

# CHAPTER 8 Comments Received on the Draft EIR and Responses

## 8.1 INTRODUCTION

This section includes public comments received on the Draft EIR for the proposed SGCP Program level EIR. The Draft EIR was submitted to the Governor's Office of Planning and Research State Clearinghouse and circulated for a 60-day public review period from January 11, 2018 through March 12, 2018. During that time, the document was reviewed by various state and local agencies, as well as by interested individuals and organizations. A letter was received from the Governor's Office of Planning and Research indicating that the State Clearinghouse submitted the Draft EIR to selected state agencies for review. All comments received by the City have been fully addressed in written responses. The public review comments and corresponding responses are provided in Appendix L.

This Final EIR includes the following items as required in Section 15132 of the State CEQA Guidelines

- The Draft EIR or a revision of the draft;
- Comments and recommendations received on the Draft EIR;
- List of persons and agencies commenting on the Draft EIR;
- Responses of the lead agency to significant environmental points raised in the review; and
- Any additional information considered pertinent by the lead agency.

## 8.2 REVISIONS TO THE DRAFT EIR

The Final EIR includes minor text and graphical clarifications to the Draft EIR as a result of the comments received during the public review period. Material added or deleted to the Draft EIR and technical reports are identified in tracking mode in the Final EIR (~~strikeout~~ for deletion/underline for insertion), so that the original and revised text may be compared.

The clarifications to the EIR do not result in any new significant environmental impacts, an increase in the severity of previously identified project impacts, or new feasible project alternatives or mitigation measures that are considerably different from others previously analyzed. Therefore, these clarifications do not trigger recirculation of the EIR, per Section 15088.5 of the CEQA Guidelines.

## 8.3 DRAFT EIR COMMENTS AND RESPONSES

Comments received on the Draft EIR for the SGCP were reviewed to determine whether there is substantial disagreement about the potential significance of impacts. Any issues raised concerning potentially significant impacts were addressed and clarified. The City received 62 written comments listed in Table 8-1 below and 10 verbal comments during the Joint Planning Commission and Transportation and Parking Commission Public Hearing on March 7, 2018.

All comments received on the Draft EIR have been coded to facilitate identification and tracking. Individual comments and the responses to them were assigned corresponding numbers consisting of two parts. Reference to the comment letters identify first the commenter, and second, the comment number.

Where comments have been duplicated within a single letter, the reader is referred to the appropriate response(s) number rather than having a comment repeated and providing a duplicate answer. Responses to the comment letter immediately follow the respective letter.

<b>Table 8-1 Comment Letters Received During the Draft Program EIR Comment Period</b>		
<i>Letter No.</i>	<i>Commenter</i>	<i>Date</i>
1	California Governor's Office of Planning and Research, State Clearinghouse (SCH)	March 13, 2018
2	South Coast Air Quality Management District (SCAQMD)	February 15, 2018
3	Aida Hakobyan	March 11, 2018
4	Alice Ziesing	March 9, 2018
5	Anahit Safaryan	March 9, 2018
6	Andrew Allison	March 8, 2018
7	Ara Kassabian	March 4, 2018
8	Aram Amiryan	March 12, 2018
9	Artak Dovlatyan	March 9, 2018
10	Avetis Keshishian	March 9, 2018
11	Barbara Magel Ayars	March 7, 2018
12	Bill Redmann	March 12, 2018
13	Brian Watters	March 12, 2018
14	Cathy Hrenda	March 6, 2018
15	Cheryl Frees-Yvega	March 12, 2018
16	Christopher Welch	March 8, 2018
17	Ed Aivazian	February 9, 2018
18	Eliz Hekimyan	January 30, 2018
19	Emma Amiryan	March 11, 2018
20	Eva Gabor	March 12, 2018
21	Evan Grant	March 9, 2018
22	Francesca Smith	March 12, 2018
23	Gabor Family	March 12, 2018
24	Gayane Soghatyan	March 9, 2018
25	Gloria Boyer	March 11, 2018
26	Grant Michals	March 12, 2018
27	JM Amussen	February 28, 2018
28	Joanne Hedge	March 12, 2018
29	Jon	March 4, 2018
30	Karo Kalpakyan	February 27, 2018
31	Kay Hosteller	March 12, 2018
32	Krystof Litomisky	March 11, 2018
33	Laura Flores	March 5, 2018
34	Lili Amiryan	March 11, 2018
35	Liz Barillas	March 9, 2018
36	Lusine Soghatyan	March 9, 2018
37	Mariam Dongelyan	March 6, 2018

**Table 8-1 Comment Letters Received During the Draft Program EIR Comment Period**

<i>Letter No.</i>	<i>Commenter</i>	<i>Date</i>
38	Mary Baldwin	March 12, 2018
39	Matt Dixon	March 8, 2018
40	Michael Sheehan	January 25, 2018 March 4, 2018
41	Mickie Boldt	February 28, 2018
42	Navasart & Maral Kazazian	March 8, 2018
43	Patty Silversher	March 9, 2018
44	Philip Boyajian	March 5, 2018
45	Ray & Georgia Wall	March 6, 2018
46	Raymond & Knarik Rumaya	March 12, 2018
47	Richard & Carol Lee	March 12, 2018
48	Rob Montgomery	March 12, 2018
49	Rondi Werner	March 11, 2018
50	Russell Lombard	February 6, 2018
51	Scott Peer	March 8, 2018
52	Stephen Meek	March 1, 2018
53	Steve Colton	February 28, 2018
54	Susan Molik	February 8, 2018
55	Thomas Hendricks	March 12, 2018
56	Tina Centrone	February 6, 2018
57	Todd McClintock	March 7, 2018
58	Tony Barrios	February 8, 2018
59	Toros Soghatyan	March 12, 2018
60	Violet Coker	March 12, 2018
61	Wendy Fonarow	March 12, 2018
62	Xochitl	March 12, 2018
63	Catherine Jurca	March 12, 2018
	Oral Comments from Planning Commission	March 7, 2018

### 8.3.1 Topical Responses

A number of comments received on the Draft EIR tended to focus on several main issues and topics associated with the proposed project and CEQA-related process and analysis. Because of this, it is more efficient to provide Topical Responses that provide contexts to these concerns and which respond to comments. The main issues warranting Topical Responses are provided below and include the following:

<i>Topics</i>	<i>Topical Response No.</i>
Purpose of Program EIR, Program v Project EIR, Comments and Responses	1
Population & Housing	2
Transportation, Traffic & Parking	3
Aesthetics	4
Recreation - Parks and Open Space	5

### 8.3.1.1 Topical Response No. 1: Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses

A number of comments received on the Draft EIR raise an issue of what purpose and level of analysis is required for the proposed SGCP Program EIR and how that purpose and level of analysis is different from project-level environmental analysis. Further, this Topical Response explains the framework for the responses to comments.

The basic purpose of the Environmental Quality Act is to inform government decision makers and the public about the potential significant environmental effects of proposed projects. (CEQA Guidelines §15002(a)(1)). The purpose of this EIR is to assess the environmental effects of implementation of the proposed SGCP and related actions to implement the Plan, including adoption of zoning ordinances and consistency amendments to the Circulation Element and Land Use Element of the General Plan. Collectively, the adoption of the SGCP, the zoning ordinances, and amendments to the Circulation and Land Use Element are referred to in the EIR as the “proposed project” or the “proposed Plan” or “SGCP”.

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined by what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. (CEQA Guidelines §15204(a)).

The test for determining whether to prepare an EIR is whether a fair argument can be made based on substantial evidence that the project may have a significant effect on the environment. (*Quail Botanical Gardens Found. Inc. v City of Encinitas* (1994) 29 CA4th 1597, 1602). If a project may cause a significant effect on the environment, the lead agency must prepare an EIR. (CEQA Guidelines §15064(a)(1), (f)(1)). Here, the Initial Study prepared for the proposed SGCP determined that the SGCP would create significant impacts on the environment, some of which could be mitigated while others could not and are considered significant and unavoidable. A lead agency may approve a project with significant environmental effects that will not be avoided or substantially lessened through mitigation if it adopts a statement of overriding considerations that finds that the project’s overriding benefits outweigh its environmental harm, including a statement that there are “larger, more general reasons for approving the project, such as the need to create jobs, providing housing, generate taxes, and the like.” (*Concerned Citizens of S. Cent. L.A. v Los Angeles Unified Sch. Dist.* (1994) 24 CA4th 826, 847; (CEQA Guidelines §15043)).

#### Program vs. Project Level Environmental Review

Program EIRs are prepared for a series of actions that can be characterized as one large project and are related geographically, as local parts in the chain of contemplated actions, are related in connection with issuance or rules, regulations, plans or other general criteria to govern the conduct of a continuing

program; or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. (CEQA Guidelines §15168(a); See Practice Under the California Environmental Quality Act, 2nd Ed., CEB, S. Kostka and M. Zischke, March 2017 Update, §10.13 “CEB”).

A Program EIR is distinct from a project-level EIR prepared for a specific project which must examine site-specific considerations in detail. (*Town of Atherton v California High-Speed Rail Auth.* (2014) 288 CA4th 314, 355). Program EIRs, such as the EIR for the SGCP, may be used for considering broad programmatic issues at the early stage of planning which allows the lead agency, in this case the City of Glendale, to undertake a more comprehensive evaluation of significant effects, including cumulative effects, than it could in a series of individual project-level EIRs (CEQA Guidelines §15168(1)-(2)). It also allows the lead agency to consider a broad range of policy alternatives and develop program-wide mitigation measures at an early stage before the specific components of the program are proposed for approval. (CEQA Guidelines §15168(b)(4); CEB, §10.19).

### Comments and Responses to Comments

The purpose of review and comment on draft EIRs includes sharing expertise, disclosing agency analyses, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counter proposals. (CEQA Guidelines §15200). The purpose of the comment process is to bring out information that will produce a better document, not to set up “a series of hoops for the lead agency to jump through.” (*City of Irvine v County of Orange* (2015) 238 CA4th 526,549). Comments on a draft EIR should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment, and ways in which the project’s significant effects might be avoided or mitigated, especially through specific alternatives or mitigation measures. (CEQA Guidelines §15204(a)).

Commenters should explain the basis for their comments, and submit supporting data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts. (CEQA Guidelines §15204(c)). EIR adequacy is determined based on what is “reasonably feasible” taking into account the magnitude and geographic scope of the project and severity of environmental impacts. (CEQA Guidelines §15204(a)). This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section. (CEQA Guidelines §15204(e)). Comments by reviewing agencies must limit their substantive comments to project activities that are within their area of expertise or that are required to be carried out or approved by the reviewing agency, and they must be supported by specific documentation. (CEQA Guidelines §§15204(d); 15086(c)). The lead agency must evaluate comments on a draft EIR that were received during the review period and must include written responses to comments in the final EIR. (CEQA Guidelines §15088(a)).

CEQA does not require that the lead agency respond to every comment submitted to it. Comments that do not raise a significant environmental question need no response. (*Citizens for E. Shore Parks v State Lands Comm’n* (2011) 202 CA4th 549). Further, comments that repeat those already considered or comments that are clearly irrelevant need no response. (*Environmental Protection Inf. Ctr. v Dept. of Forestry & Fire Protection* (2008) 44 C4th 459, 483, 487)(CEB, § 16.7). In the Final EIR for the SGCP, repeated or identical comments refer back to the original set of comments received.

#### 8.3.1.2 Topical Response No. 2: Population and Housing

Comments were submitted regarding the population/density and housing impacts of the proposed project. Most all of the comments about population and housing issues concerned the negative effects of

population and density increases on the community. Specific responses to individual comments are provided on a comment-by-comment basis; however, this topical response is designed to serve as a response to the larger issues related to population and housing raised by the comments.

With respect to housing needs, the City is within the planning jurisdiction of the Southern California Association of Governments (“SCAG”), which is the nation’s largest metropolitan planning organization, representing six counties, 191 cities, and approximately 19 million residents. SCAG growth forecasts estimate that there will be 81,100 dwelling units in the City by 2040. The predicted increase of dwelling units over the period 2012 to 2040 is 12 percent. The proposed SGCP area currently accounts for nearly half the dwelling units within the City. As indicated in Section 4.12.1 of the Draft EIR, the City estimates 37,903 dwelling units within the proposed SGCP area in 2015. The City projects 40,490 dwelling units within the proposed SGCP area by 2040, a growth rate of approximately 6.8 percent over that time. SCAG’s 2014 Regional Housing Needs Assessment (“RHNA”), which covers the planning period from January 1, 2014 to June 30, 2021, identifies that over the planning period, an additional 2,017 dwelling units are needed within the City. Population and housing impacts of the proposed project were analyzed by comparing the anticipated population growth due to development of the proposed project to SCAG projections for the City and region.

The SGCP Draft EIR analyzed whether the proposed project would displace substantial numbers of existing housing and/or people, necessitating the construction of replacement housing elsewhere, and concluded that the impact would be less than significant. The SGCP Draft EIR also analyzed whether the proposed project would induce substantial population growth in an area, either directly or indirectly, and concluded that it would and that no mitigation is available. Therefore, the SGCP Draft EIR concluded that this is a significant and unavoidable impact. Although implementation of the proposed project is not a direct development project, full build-out under the SGCP allows for an increase of up to 10,337 new dwelling units. An increase of 10,337 dwelling units would result in a population increase of about 27,910 people within the SGCP area. The growth associated with the proposed SGCP exceeds the projected growth for the entire City under SCAG’s projections. The proposed project would include an amendment to the Glendale General Plan, among other documents, to adopt the proposed SGCP and allow for the increase in population and dwelling units to be consistent with all local planning documents within the City. The impact associated with induced population growth is partly reduced due to the City’s role in approving discretionary projects.

In addition, the proposed project in combination with cumulative projects would result in population growth beyond what is accounted for in 2040 SCAG projections, and, therefore, the project’s contribution to direct and indirect population and density increases would be cumulatively considerable. Thus, because it cannot be mitigated below a level of significance, the impact is considered significant and unavoidable. Accordingly, because a significant and unavoidable impact from implementation of the proposed project is substantial population growth, any secondary effects, whether positive or negative, resulting from that population increase could also be significant and unavoidable.

### **8.3.1.3 Topical Response No. 3: Transportation, Traffic, and Parking**

A number of comments received on the Draft EIR focus explicitly or implicitly on the Plan’s effects to transportation, traffic, and parking. The City determined that it would be appropriate, and would facilitate public review, to provide a topical response to address these comments and provide the necessary context for considering the issues raised.

## Traffic

A project's effects on traffic are considered effects on the environment, and must be studied in an EIR. (See *Rominger v. County of Colusa* (2014) 229 Cal.App.4th 690, 713). The Draft EIR set several thresholds for determining the significance of effects on traffic, including any effects that would conflict with plans and policies governing service standards or effects resulting in inadequate emergency access. (Draft EIR § 4.15.3).

Several commenters are concerned that the SGCP would increase traffic and cause inadequate access for emergency services. However, separate from impacts on public services due to higher demand, the Draft EIR found that the SGCP would not significantly impact emergency services access due to traffic. (EIR § 4.15.3).

Other commenters have expressed skepticism that bike lanes would reduce or mitigate any increased traffic caused by denser development, and believe that bicycling within the SGCP area is generally unsafe or impractical. However, the SGCP does not rely on bicycle lanes to reduce any significant traffic impact. The SGCP was “developed to align with” applicable plans and does not introduce new bike lane development inconsistent with existing adopted plans, such as the Glendale Bicycle Master Plan (2012) and Glendale Safe and Healthy Street Plan (2011) (EIR § Impact 4.15-3, Impact 4.15-4). The Draft EIR concludes that the SGCP would not “conflict” with these other adopted plans. The Draft EIR acknowledges that there would be significant and unavoidable impacts to traffic, and does not rely on adding bicycle lanes or additional bike ridership as a mitigation measure. (EIR § Impact 4.15-5, MM 4.15-1–4.15-5).

The EIR does note that the mitigation of significant impacts to the Chevy Chase Drive and Colorado Street intersection would be possible, but is currently infeasible because the Glendale Bicycle Master Plan calls for a reconfiguration of lanes that would be incompatible with mitigation efforts for automobile traffic. (EIR § 4.15-3).

All comments indicating that the SGCP will have significant and unavoidable impacts on traffic have been noted. It is the City Council's role to determine if there are sufficient overriding considerations such that it will approve the SGCP and certify the Final EIR for the SGCP even though there are significant and unavoidable traffic impacts. (Pub. Resources Code, § 21081, subs. (a)(3), (b); 14 CCR 15091, subd. (a)(3); See *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 160, 183).

## Transportation

Several commenters have noted that it is unlikely that new residents would use public transportation, such as buses or Metrolink trains, and that the SGCP does not require additional public transportation to be built before allowing new development. The Draft EIR, as noted above, finds that traffic impacts would be “significant and unavoidable.” (EIR § 4.15.3). None of the mitigation measures proposed rely on adding new public transportation options, nor do they assume higher levels of public transportation utilization. (EIR § 4.15.3).

## Parking

Commenters have expressed concerns about the effects of the SGCP on parking; however, parking is not considered a separate environmental impact category under CEQA and effects on parking are not, by definition considered, “significant impacts on the environment.” Accordingly, the SGCP Draft EIR does not address any effects the Plan may have on parking adequacy or impacts per se, because the plan uses

Transit-Oriented District (“TOD”) principles, and because much of the development will be “in fill” and “reuse” of existing sites with existing uses. See Public Resources Code §21099(b)(3) which states that the “adequacy of parking for a project shall not support a finding of significance pursuant to this section;” and Public Resources Code §21099(d)(1) which specifies that parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant effects on the environment.

The SGCP “defines a vision and establishes standards and strategies for the long-term physical development and enhancement of South Glendale using the principles of a TOD. (EIR § 1.0). Pursuant to California Public Resources Code section 21099 subdivision (c), which governs TOD projects, “[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”

### 8.3.1.4 Topical Response No. 4: Aesthetics

A number of comments received on the Draft EIR focus explicitly or implicitly on the SGCP’s effects on aesthetics. The City has determined it would be appropriate, and would facilitate public review, to provide a topical response to address these comments and provide the necessary context for considering the issues raised in the comments.

“Under CEQA, it is the state's policy inter alia to ‘[t]ake all action necessary to provide the people of this state with ... enjoyment of aesthetic, natural, scenic, and historic environmental qualities.’” (*Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 936-937). Therefore, “aesthetic issues ‘are properly studied in an EIR to assess the impacts of a project.’” (Id., at p. 937).

Appendix G to the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.) recommends that the lead agency consider the following questions:

“... Would the project:

“a) Have a substantial adverse effect on a scenic vista?

“b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

“c) Substantially degrade the existing visual character or quality of the site and its surroundings?

“d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?”

(Cal. Code Regs., tit. 14, §15387).

Notably, impacts on “community character” are properly studied under CEQA only to the extent they involve aesthetics, such as impacts on public and private views, “tunneling” or “canyoning” effects of proposed buildings, or even the aesthetic merits of an unadorned aluminum water tank cover. (*Preserve Pomay v. City of Pomay* (2016) 245 Cal.App.4th 560, 577). Courts have held, however, that impacts affecting residents’ “psyche,” or “social impacts,” such as their “sense of well-being, pleasure, contentment, and values that come from living” in a certain community are not subject to CEQA analysis. (Id. at pp. 557–581).



With the proposed project, commenters are concerned about the negative effects on views and “community character” that would be caused by high-rise development within the SGCP area. The Draft EIR does consider the effects of additional high-rise buildings in the SGCP area, and concludes that their effects on the aesthetics of the area are “significant and unavoidable” and that “the overall increased development intensity and height would alter the existing character of South Glendale.” (EIR § Impact 4.1-3). The Draft EIR also recognizes that implementation of the SGCP will cause additional shading, which is another “significant and unavoidable” effect on aesthetics. (EIR § Impact 4.1-4). No mitigation measures have been identified that would decrease these impacts to a less than significant level on a program level; however, it should be noted that as individual projects are implemented under the SGCP it is possible that shade and shadow, as well as other aesthetic impacts, have the potential to be reduced through design. As discussed above, only “community character” impacts properly addressed under CEQA are aesthetics.

Some commenters writing in support of the SGCP argue that the negative effects on aesthetics are overstated in the Draft EIR, noting that city skylines are their own type of valuable view resources, and that in hot, sunny climates like Glendale, shade is a positive, not a negative. Regarding views, the Draft EIR evaluates effects on the “existing visual character” of the project site (EIR § Impact 4.1-3), which necessarily does not include any hypothetical new buildings that would add to the Glendale skyline. The Draft EIR does note that “the architectural design guidelines required for the new developments, the use of design elements, and the use of landscape features would improve the aesthetic character of the proposed SGCP area.” (EIR § Impact 4.1-3.) Therefore, the Draft EIR analyzes only the effect on existing views, but acknowledges the potential benefit of high-quality design in new buildings.

Regarding shade, the Draft EIR finds only that new, taller development would affect “shadow-sensitive uses.” (EIR § Impact 4.1-4). The potential benefits of additional shade would not offset or mitigate negative effects on “shadow-sensitive uses,” such as residences, school playgrounds, and parks.

### **8.3.1.5 Topical Response No. 5: Recreation – Open Space and Parks**

Comments were submitted regarding recreational impacts of the proposed SGCP. Most of the comments expressed concern about whether the Plan includes adequate provisions for park/recreation space, and whether the SGCP will contribute to a City-wide park deficiency. Specific responses to those comments are provided on a comment-by-comment basis; however, this topical response is designed to serve as a response to the larger issues related to recreation impacts raised by the comments.

The Draft EIR analyzed the potential environmental effects on recreation from its implementation of the Plan. Data for this analysis were taken from the Glendale General Plan Recreation Element, the Community Facilities Element, the Open Space and Conservation Element, the Glendale Downtown Specific Plan (DSP), and the Community Services and Parks List of Facilities.

The Recreation Element divides the City into 11 Recreation Planning Areas, and measures citywide consistency with parkland standards of 1 acre per 1,000 persons for neighborhood parks and 5 acres per 1,000 persons for community parks. As the Recreation Element makes clear, these parkland standards are aspirational goals for the City, and are not applied to development projects on an individual basis. None of the Goals, Objectives, or Policies of the Recreation Element requires that individual development projects meet these standards. The Recreation Element does not require that new residential development comply with these standards, acknowledging that “strict adherence to these standards would dictate that the City not permit anymore [sic] housing units in areas with a deficiency of park land,” and that “following this argument to its logical conclusion, based on existing neighborhood

park supply, it would be difficult to permit any additional residential development.” This language recognizes the problems faced by the City. However, because the SGCP is a program level document, the SGCP’s policy level consistency with the Recreational Element was analyzed in the Draft EIR.

The Draft EIR analyzed whether the increase in population associated with future development under the proposed SGCP would result in the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. The Draft EIR also analyzed whether the SGCP would include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. The Draft EIR concluded that the Plan would result in significant and unavoidable impacts associated with existing neighborhood and regional parks or other recreational facilities and the construction or expansion of such recreational facilities, because the Plan is not consistent with park planning standards in the Glendale General Plan Recreation Element.

The Draft EIR concluded that future population increases would result in additional demand for park and recreational areas and possibly create the need for the construction or expansion of such areas. As part of the adopted DSP, the City commenced exploration of a potential park project located over the SR-134 freeway known as Space 134, which is an approximate 25-acre liner “cap park.” The SGCP also anticipates further study of the feasibility of future Space 134 that could potentially increase park space within the Plan area. While Space 134 would not fully alleviate the City’s existing parkland deficit, Space 134 has the potential to increase total parkland. In addition, when completed, the Glendale Narrows Riverwalk would provide a total of approximately 2.6 acres of trails for bicyclists and pedestrians that will include parks, rest areas, river overlooks, an equestrian facility, interpretive signage, a public art project, and potentially a bridge connecting Glendale Narrows Riverwalk to Griffith Park and/or North Atwater.

Future subdivisions within the proposed SGCP area will be required to comply with the Quimby Act which requires that 6 acres of land for each 1,000 residents be devoted to local park and recreational purposes. This could be met through land dedication or payment of park fees, or a combination of both. Individual projects that are approved after Plan implementation can fully mitigate their project-level recreation impacts through required payment of the City’s Public Use Facilities Development Impact Fees for Parks and Libraries impacts (Glendale Municipal Code Chapter 4.10). Assessment of a fee is an appropriate form of mitigation, when it is linked to a specific mitigation program. (*Anderson First Coalition v City of Anderson* (2005) 130 CA4th 1173).

## 8.3.2 Responses to Comments Received

This section contains responses to comments on the Draft EIR that were received during the public comment period. Consistent with Section 15088 of the CEQA Guidelines, comments that raise significant environmental issues are provided with responses. Comments that are outside of the scope of CEQA review (i.e., where a comment does not raise an environmental issue, or where it expresses the subjective opinion of the commenter) will be forwarded for consideration to the decision-makers as part of the project approval process. All comments will be considered by the City when making a decision on the project.

June 2018

COMMENTS

RESPONSES



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

Letter 1 State Clearinghouse (SCH)

Response 1.1

The letter from the State Clearinghouse acknowledges that the Draft EIR was submitted to the state agencies indicated in its attached checklist for review, that no letters were received from those state agencies, and that the lead agency has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA.

March 13, 2018

Erik Krause  
City of Glendale  
633 E. Broadway, Room 103  
Glendale, CA 91206

Subject: South Glendale Community Plan EIR  
SCH#: 2016091026

Dear Erik Krause:

1.1 The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on March 12, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

**COMMENTS**

**RESPONSES**

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2016091026  
**Project Title** South Glendale Community Plan EIR  
**Lead Agency** Glendale, City of

**Type** EIR Draft EIR  
**Description** Note: Review Per Lead

The proposed South Glendale Community Plan, the second of four community plans proposed for the city of Glendale, includes four components: adoption of the proposed SGCP, amendments to the general plan land use element text and LU map, and circulation element to reflect the SGCP, an amendment of the boundaries of the downtown specific plan, and amendments to the zoning ordinance and zoning map to apply zoning consistent with the proposed SGCP. The proposed SGCP builds on and amends the existing Glendale GP to provide a vision and policies of how future development in South Glendale should develop over time.

**Lead Agency Contact**

**Name** Erik Krause  
**Agency** City of Glendale  
**Phone** 818-548-2115 **Fax**  
**email**  
**Address** 633 E. Broadway, Room 103  
**City** Glendale **State** CA **Zip** 91206

**Project Location**

**County** Los Angeles  
**City** Glendale  
**Region**  
**Lat / Long** 34° 8' 31" N / 118° 15' 18" W  
**Cross Streets** Glendale  
**Parcel No.** various  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** I-5, SR 2, 134  
**Airports**  
**Railways** UPRR  
**Waterways** LA River, Verdugo Wash  
**Schools** Var  
**Land Use** Multiple

**Project Issues** Air Quality; Archaeologic-Historic; Biological Resources; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Landuse; Cumulative Effects; Aesthetic/Visual; Drainage/Absorption; Economics/Jobs; Forest Land/Fire Hazard; Minerals; Growth Inducing; Other Issues; Vegetation; Wetland/Riparian

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Cal Fire; Department of Parks and Recreation; Caltrans, District 7; Office of Emergency Services, California; Department of Housing and Community Development; Air Resources Board, Transportation Projects; State Water Resources Control Board, Division of Drinking Water; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

**Date Received** 01/11/2018 **Start of Review** 01/11/2018 **End of Review** 03/12/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

COMMENTS

RESPONSES



SENT VIA E-MAIL AND USPS:  
[sgcp@glendaleca.gov](mailto:sgcp@glendaleca.gov)  
 Erik Krause, Deputy Director of Planning  
 City of Glendale  
 633 E. Broadway, Room 103  
 Glendale, CA 91206-4386

February 15, 2018

**Draft Environmental Impact Report (Draft EIR) for the Proposed South Glendale Community Plan**

**Letter 2 South Coast Air Quality Management District (SCAQMD)**

**Response 2.1**

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.

**Response 2.2**

The comment is a general response regarding the air quality analysis contained in Chapter 4.2 of the Draft EIR.

**Response 2.3**

The comment is a general response regarding SCAQMD's adoption of the 2016 Air Quality Management Plan (AQMP) that establishes the most significant air quality challenge facing the South Coast Air Basin (SCAB) specifically as it relates to NOx emissions.

- 2.1 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 EIR.  
SCAQMD Staff's Summary of Project Description  
 The Lead Agency proposes to develop a comprehensive set of incentives, standards, and requirements to provide a vision and policies to guide future development over time on 4.6 square miles (Proposed Project). Projected build-out residential and non-residential development would include a net increase of 10,377 dwelling units and 3,766 square feet for non-residential uses. The Proposed Project is generally bounded by State Route 134 to the north, State Route 2 to the east, Forest Lawn Memorial Park to the south, and the San Fernando Road Corridor to the west. The Proposed Project is expected to be developed over a period of 24 years between 2016 and 2040 at an annual growth rate of 1.01 percent<sup>1</sup>.
- 2.2 SCAQMD Staff's Air Quality Analysis  
 In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational air quality emissions and compared those emissions to SCAQMD's regional air quality CEQA significance thresholds. Although the Proposed Project is anticipated to be developed over 24 years, the Proposed Project was modeled to begin in 2018 because future years are anticipated to have lower emission factors for construction equipment<sup>2</sup>. Based on the analysis, the Lead Agency found that the Proposed Project's mitigated construction emissions would be less than SCAQMD's regional CEQA significance thresholds, except NOx emissions, and that the Proposed Project's mitigated operational emissions would exceed SCAQMD's regional CEQA significance thresholds, except SOx emissions.
- 2.3 SCAQMD's 2016 Air Quality Management Plan  
 On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)<sup>3</sup>, which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

<sup>1</sup> Draft EIR, Section 4.2: Air Quality, Page 4.2-11.  
<sup>2</sup> *Ibid.*  
<sup>3</sup> South Coast Air Quality Management District, March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

COMMENTS

RESPONSES

Erik Krause

February 15, 2018

2.4 General Comments  
 SCAQMD staff has reviewed the Air Quality Analysis in the Draft EIR and has comments on the methodology. Please see the attachment for more information. Additionally, as described in the 2016 AQMP, to achieve NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. The Proposed Project plays an important role in contributing to NOx emissions. Therefore, SCAQMD staff has comments on existing air quality mitigation measures and recommends additional mitigation measures to further reduce NOx emissions as well as ROG, PM10, and PM2.5 emissions. Finally, the attachment includes recommendations to include a discussion on SCAQMD Rule 403(e).

2.5 Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions regarding the enclosed comments.

Sincerely,  
  
 Lijin Sun, J.D.  
 Program Supervisor, CEQA IGR  
 Planning, Rule Development & Area Sources

Attachment  
 LS  
 LAC180116-04  
 Control Number

Response 2.4

The comment is a general response to the air quality analysis contained in Chapter 4.2 of the Draft EIR emphasizing SCAQMD's request for additional mitigation measures to further reduce NOx emissions as well as ROG, PM10, and PM2.5 emissions. Please refer to responses to comments 2.6 to 2.14 below for a response to future requested actions recommended by SCAQMD.

Response 2.5

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. Furthermore, all responses to comments from the SCAQMD comply with CEQA Guidelines Section 15088(c).

**COMMENTS**

**RESPONSES**

ATTACHMENT

Air Quality Analysis – Interim Milestone Years

2.6 1. The Draft EIR included only two Air Quality analysis years for modeling: 2018<sup>4</sup> and 2040 (buildout year). By 2040, the Proposed Project is assumed to be fully built based on the projections. Although the Proposed Project may not be at peak capacity in earlier years, it is possible that due to higher emission rates of vehicles, trucks, and equipment in earlier years, peak daily emissions may occur in 2018 and beyond. The overall emission rates of vehicles, trucks, and equipment are generally higher in earlier years as more stringent emission standards and technologies have not been fully implemented and fleets have not fully turned over. Therefore, SCAQMD staff recommends that the Lead Agency include interim milestone years (i.e., year 2020, year 2025, year 2030, and year 2035) in the Air Quality Analysis to ensure the peak daily emissions are identified and adequately disclosed in the Final EIR. The interim milestone years will also assist in the demonstration of progress overtime from implementing air quality-related mitigation measures and policies included in the Draft EIR.

Air Quality Analysis – Phase Construction Activities

2.7 2. Based on a review of the Mitigation Measure (MM) 4.2-1, SCAQMD staff found that one of the air quality policies for the Proposed Project is to phase construction activities (Policy AQ-1(d))<sup>5</sup> over a development period of 24 years. However, the Proposed Project's construction emissions were modeled and disclosed for year 2018 only in the Draft EIR<sup>6</sup>. Construction impacts after year 2018 may not have been accounted for determining the level of significance. Since phase construction activities over years are reasonably foreseeable (Policy AQ-1(d)), to represent a worst-case construction impact scenario, SCAQMD staff recommends that the Lead Agency model all of the Proposed Project's construction activities in a single year and disclose the maximum construction emissions from criteria pollutants in the Final EIR. Alternatively, the Lead Agency should use its best efforts to find out construction activities by year and quantify associated emissions to be included in the Final EIR.

Air Quality Analysis – Overlapping Construction and Operational Impacts

2.8 3. When specific development is reasonably foreseeable as a result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated.

Based on a review of the Air Quality Analysis, SCAQMD staff found that the Lead Agency did not analyze a scenario where construction activities overlap with operational activities. Since implementation of the Proposed Project is expected to occur over a period of 24 years from 2016 to 2040, an overlapping construction and operation scenario is reasonably foreseeable, unless the Proposed Project includes requirement(s) that will prohibit overlapping construction and operational activities. To properly analyze a worst-case impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared, SCAQMD staff recommends that the Lead Agency identify the overlapping years, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA

<sup>4</sup> Draft EIR, Section 4.2: Air Quality, Page 4.2-11.

<sup>5</sup> Draft EIR, Section 2.8: Summary of Environmental Impacts and Mitigation Measures, Page 2-10.

<sup>6</sup> Draft EIR, Section 4.2: Air Quality, Table 4.2-6, Page 4.2-15.

**Response 2.6**

The air quality impact analyses completed for the proposed project was conducted following the methodology and guidelines in SCAQMD's CEQA Air Quality Handbook and SCQAMD's established regional thresholds of significance for air pollutants. As noted by the commenter and stated on page 4.2-11 of the Draft EIR, specific construction phasing and intensity is unknown. Further, based on the anticipated SGCP gradual buildout rate of about 1.0 percent, emissions from individual development construction may not exceed applicable SCAQMD daily thresholds, depending on the specific project size and construction phasing/schedule. However, these details are not available at this program-level analysis and, therefore, a worst-case construction day, where multiple construction activities could occur at one time was evaluated. Furthermore, as discussed in the Topical Response No. 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses, individual environmental analysis would be conducted at the project level as individual projects are submitted for review. At which time, interim milestone years would be evaluated that demonstrate progress overtime as a result of more stringent emissions standards.

**Response 2.7**

The Draft EIR was prepared as a Program EIR and evaluates impacts associated with land use policies and not with a specific development project. Policy AQ-1 included in MM 4.2-1 addresses phasing as it relates to future development projects implemented under the proposed SGCP. This policy would require conditions of approval for construction projects near receptors that would generate substantial levels of mass emissions that may require implementation of emission reduction strategies. Policy AQ-1(d) is a suggested emission reduction strategy that could be applied to future individual development projects implemented under the SGCP. It is not meant to apply to the phasing of the assumed buildout under the Plan but rather to the phasing of future development overtime so that not all air quality impacts of construction would occur at the same time as a way to mitigate for such potential impacts.

**Response 2.8**

Please refer to Topical Response No 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses. The EIR was performed as a Program level EIR and evaluates potential development that could occur if the proposed land use policies are adopted by City Council. Future development projects would be required to perform their own environmental review that would analyze the potential project-specific impacts, as well as cumulative air quality impacts at the time the development is proposed. It is not reasonably foreseeable that all the anticipated development of the Plan would occur at the same time. The mitigation measure suggested by SCAQMD (refer to response 2.12 below) has been added to the Mitigation Monitoring and Report Program prepared for the SGCP.

COMMENTS

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2.8 cont. *operational* thresholds of significance to determine the level of significance in the Final EIR. In the event that the Lead Agency, after revising the Air Quality Analysis, finds that the Proposed Project's air quality impacts would be significant, mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4. For more information on suggested potential mitigation measures as guidance to the Lead Agency, please see Comment No. 7 below and visit SCAQMD's CEQA Air Quality Handbook website<sup>7</sup>.

**Air Quality Analysis – Localized Significance Thresholds Analysis**

2.9 4. Based on the information in the environmental settings and a review of aerial maps, SCAQMD staff found that the Proposed Project is potentially surrounded by sensitive receptors. Therefore, SCAQMD staff recommends that the Lead Agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the SCAQMD website. In the event that the Lead Agency finds, after its analyses, that the Proposed Project would exceed SCAQMD's localized air quality CEQA significance thresholds<sup>8</sup>, mitigation measures are required.

**Additional Consideration for Existing Mitigation Measure (MM) 4.2-1**

2.10 5. As part of MM 4.2-1 for the Proposed Project, the Lead Agency is committed to four air quality policies to reduce construction related emissions associated with future development projects implemented under the Proposed Project. One of the air quality policies (Policy AQ-1(b)) "requires construction contractors to use off-road equipment that meets CARB's most recent certification for off-road diesel engines or Best Available Control Technology (BACT)."<sup>9</sup> Consistent with Policy AQ-1(b), SCAQMD staff recommends that the Lead Agency require construction contractors to use Tier 4 construction equipment. Detailed consideration is italicized as follows:

*All off-road diesel-powered construction equipment shall meet or exceed Tier 4 off-road emissions standards. A copy of the fleet's tier compliance documentation, and CARB or SCAQMD operating permit shall be provided to the Lead Agency at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the Lead Agency must demonstrate through future study with written findings supported by substantial evidence before using other technologies/strategies. Alternative strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously.*

**Additional Consideration for Existing MM 4.2-3**

2.11 6. As part of MM 4.2-3 for the Proposed Project, the Lead Agency is committed to two air quality policies (Policy HRA-1 and Policy HRA-2) to exposure of new sensitive receptors to pollution sources associated with future development projects implemented under the Proposed Project. Policy HRA-2 requires, among others, high efficiency filters<sup>10</sup>. SCAQMD staff recommends that the Lead Agency consider limits to high efficiency filters and ensure that these filters are enforceable throughout the lifetime of the Proposed Project if they are used. Detailed consideration is italicized as follows:

<sup>7</sup> South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

<sup>8</sup> South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

<sup>9</sup> Draft EIR, Section 2.8: Summary of Environmental Impacts and Mitigation Measures. Page 2-10.

<sup>10</sup> *Ibid.* Page 2-12.

**Response 2.9**

As indicated in response to comment 2.8 above, the Draft EIR was prepared as a Program level EIR and any future development proposed under the Plan will be required to evaluate localized air quality impacts consistent with SCAQMD's guidance documents. In addition, new development within the SGCP area would be required to adhere to MM 4.2-1 of the Draft EIR that includes policies for minimizing air quality impacts to the maximum extent possible.

**Response 2.10**

The following mitigation measure MM 4.2-1, Policy AQ-1 (b) has been modified as follows:

**MM 4.2-1**

*The following policies shall be incorporated into the SGCP to reduce construction related emissions associated with future development projects implemented under the proposed SGCP.*

■ **Policy AQ-1:** *Require conditions of approval for construction projects near sensitive receptors and/or that would generate substantial levels of mass emission to implement emissions reduction strategies such as:*

- (a) *Install PM or other exhaust reducing filters on generators;*
- (b) *~~Require construction contractors to use off road equipment that meets CARB's most recent certification for off road diesel engines or Best Available Control Technology (BACT)~~ All off-road diesel-powered construction equipment shall meet or exceed Tier 4 off-road emissions standards. A copy of the fleet's tier compliance documentation, and CARB or SCAQMD operating permit shall be provided to the Lead Agency at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the Lead Agency must demonstrate through future study with written findings supported by substantial evidence before using other technologies/strategies. Alternative strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the proposed project, and/or limiting the number of individual construction project phases occurring simultaneously;*
- (c) *Use of electric-powered construction equipment;*
- (d) *Phase construction activities;*
- (e) *Provide grid or renewable electricity in place of generators;*
- (f) *Use alternative fuel such as high performance renewable diesel for construction equipment and vehicles;*



COMMENTS

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- (g) *Ensure that construction equipment is maintained and tuned according to manufacturer specifications; and/or*
- (h) *Require construction contractors to provide clear signage that posts the California Code of Regulations, Title 13, section 2449 (d) (3) and 2485 requirement to reduce idling time to 5 minutes or less at construction sites.*

**Response 2.11**

Based on comments received by SCAQMD, mitigation measure MM 4.2-3 and specifically Policy HRA-2 has been modified as indicated below due to the potential infeasibility of such measures as filtration units.

**MM 4.2-3**

*The following policies shall be incorporated into the SGCP to reduce exposure of new sensitive receptors to pollution sources associated with future development projects implemented under the proposed SGCP.*

- **Policy HRA-2:** *At the time of discretionary approval of new sensitive land uses proposed in close proximity to existing TAC sources, the City shall require development projects to implement applicable best management practices, as necessary and feasible, that will reduce exposure to TACs and PM<sub>2.5</sub>. ~~Available measures include, but are not limited to, barriers (e.g., vegetation, concrete walls) between the source and the receptor, high efficiency filtration with mechanical ventilation, and portable air filters. Specific reduction measures will be evaluated and determined depending on proposed land uses, proximity to TAC sources, and feasibility.~~*

COMMENTS

RESPONSES

2.11  
 cont.

Limits to High Efficiency or Enhanced Filtration Units

SCAQMD staff recommends that the Lead Agency consider the limitations of the high efficiency or enhanced filtration units. For example, in a study that SCAQMD conducted to investigate filters<sup>11</sup>, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the analysis in the Draft EIR does not account for the times when the residents have their windows or doors open or are in common space areas of the project. In addition, these filters have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of any filtration units should therefore be evaluated in more detail prior to assuming that they will sufficiently alleviate near roadway exposures to DPM emissions. The evaluation should be included as a mandatory requirement as part of Policy HRA-2 or as a new HRA policy in the Final EIR.

Enforceability of High Efficiency or Enhanced Filtration Units

In the event that high efficiency or enhanced filtration units are used, and to ensure that they are enforceable throughout the lifetime of the Proposed Project as well as effective in reducing exposures to DPM emissions, SCAQMD staff recommends that the Lead Agency provide additional details on future operational and maintenance implementation and monitoring of filters in the Final EIR. At a minimum, the Final EIR should provide detailed information about the responsible implementing and enforcement agency (or entity); recommended schedules for replacing the high efficiency or enhanced filtration units; ongoing monitoring schedules; ongoing cost sharing strategies, if any, for replacing the high efficiency or enhanced filtration units; disclosure on increased energy costs for running the HVAC system to prospective residents; criteria for assessing progress in installing and replacing the enhanced filtration units; and process for evaluating the effectiveness of the enhanced filtration units. Enforceability should be made a mandatory requirement as part of Policy HRA-2 or as a new HRA policy in the Final EIR.

Additional Recommended Mitigation Measures

7. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final EIR to further reduce emissions, particularly from ROG, NOx, and particulate matter. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website.

2.12

- a) Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction and operation, and if the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum.
- b) Require that 240-Volt electrical outlets or Level 2 chargers be installed in parking lots that would enable charging of NEVs and/or battery powered vehicles.

<sup>11</sup> This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see also 2012 Peer Review Journal article by South Coast Air Quality Management District: <http://d7.iqair.com/sites/default/files/pdf/Pollidon-et-al-2012.pdf>.

Response 2.12

The following policies have been added to mitigation measure MM 4.2-2:

**MM 4.2-2**

*The following policies shall be incorporated into the SGCP to reduce operational emissions from ROG, NOx, and particulate matter associated with future development projects implemented under the proposed SGCP.*

- **Policy AQ-13:** *Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction and operation. If 2010 model year or newer diesel haul trucks are not feasible, the development projects under the plan shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum.*
- **Policy AQ-14:** *Require that 240-Volt electrical outlets or Level 2 chargers be installed in parking lots that would enable charging of NEVs and/or battery powered vehicles. Development projects under the Proposed Plan shall be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in.*
- **Policy AQ-15:** *Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.*
- **Policy AQ-16:** *Limit parking supply and unbundle parking costs.*
- **Policy AQ-17:** *Maximize the planting of trees in landscaping and parking lots.*
- **Policy AQ-18:** *Use light colored paving and roofing materials.*
- **Policy AQ-19:** *Install light colored “cool” roofs and cool pavements.*
- **Policy AQ-20:** *Require use of electric or alternatively fueled sweepers with HEPA filters.*
- **Policy AQ-21:** *Require use of electric lawn mowers and leaf blowers.*
- **Policy AQ-22:** *Utilize only Energy Star heating, cooling, and lighting devices, and appliances.*
- **Policy AQ-23:** *Use of water-based or low VOC cleaning products.*

The California and City of Glendale Building and Safety Codes requires that all new development be equipped to install vehicle charging stations when such infrastructure becomes available. As a result, the City is already implementing this suggestion.

COMMENTS

RESPONSES

2.12  
cont.

Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx and ROG impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require the Proposed Project be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in.

- c) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
- d) Limit parking supply and unbundle parking costs.
- e) Maximize the planting of trees in landscaping and parking lots.
- f) Use light colored paving and roofing materials.
- g) Install light colored “cool” roofs and cool pavements.
- h) Require use of electric or alternatively fueled sweepers with HEPA filters.
- i) Require use of electric lawn mowers and leaf blowers.
- j) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- k) Use of water-based or low VOC cleaning products.

To further reduce particulate matter from the Proposed Project, SCAQMD staff recommends that the Lead Agency include the following mitigation measures in the Final EIR.

2.13

- a) Suspend all soil disturbance activities when winds exceed 25 mph as instantaneous gusts or when visible plumes emanate from the site and stabilize all disturbed areas.
- b) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- c) Sweep all streets at least once a day using SCAQMD Rule 1186, 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).
- d) Apply water three times daily, or non-toxic soil stabilizers according to manufacturers’ specifications, to all unpaved parking or staging areas, unpaved road surfaces, or to areas where soil is disturbed.

2.14

**Compliance with SCAQMD Rule 403(e) – Large Operations**

8. The Lead Agency included a discussion on general compliance with SCAQMD Rule 403 in the Draft EIR. Based on the project description, the Proposed Project is a large operation of approximately 4.6 square miles or approximately 3,000 acres (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast

**Response 2.13**

To further reduce particulate matter from future development under the proposed project, the following emission reductions strategies have been added to Policy AQ-1 of MM 4.2-1:

- (i) *Suspend all soil disturbance activities when winds exceed 25 mph as instantaneous gusts or when visible plumes emanate from the site and stabilize all disturbed areas.*
- (j) *Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.*
- (k) *Sweep all streets at least once a day using SCAQMD Rule 1186, 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).*
- (l) *Apply water three times daily, or non-toxic soil stabilizers according to manufacturers’ specifications, to all unpaved parking or staging areas, unpaved road surfaces, or to areas where soil is disturbed.*

**Response 2.14**

As stated in the Draft EIR, individual development projects would be required to adhere to SCAQMD Rule 403. The commenter incorrectly states that the project is a large operation of 4.6 square miles. The EIR is a Program level EIR prepared to evaluate land use policies and does not solely propose a 4.6 square mile development. Should the City Council adopt the land use policies, then any future development proposal within the SGCP area would be required to conduct project level analysis that could tier off the Program EIR for the SGCP.

The following statement has been added to the Final EIR in the unlikely event that any future development proposed within the SGCP area be considered under SCAQMD’s definition of Large Operation.

*Any future proposed development plan within the SGCP meeting SCAQMD definition of Large Operation (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) will be required to adhere to Rule 403 (e) – Additional Requirements for Large Operations, which includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class.*

**COMMENTS**

**RESPONSES**

2.14  
cont.

Air Basin. The Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations<sup>12</sup>, which includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class<sup>13</sup>. Therefore, SCAQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with SCAQMD Rule 403(e) in the Final EIR. Compliance with SCAQMD Rule 403(e) will further reduce particulate matter from the Proposed Project.

<sup>12</sup> South Coast Air Quality Management District Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

<sup>13</sup> South Coast Air Quality Management District Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at [dustcontrol@aqmd.gov](mailto:dustcontrol@aqmd.gov).

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Sunday, March 11, 2018 10:39 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

Dear Council Members,

- I object to the South Glendale Community Plan (SGCP) since:
  - 3.1 a) contrary to SGCP’s claims, it is NOT the vision of our community – unless our community is suicidal; it is rather the vision of developers who are the only ones to benefit and whose greedy mega developments have already ruined our community within/bordering the Downtown Specific Plan area;
  - 3.2 b) it suggests an unacceptable, unjustifiable and, most importantly, an unsustainable upzoning of high density areas into mixed use zones, adding new zones for transit areas, as well as changes within the present zoning requirements (e.g., removal of setbacks in R1250) to allow for more height of buildings and more density of population, which have proved to be a DISASTER for the Glendale community within/bordering the DSP area already;
  - 3.3 c) it is premised on the fictions that people who are close to bus routes and transit areas will necessarily use buses and people who live close or at the mixed-use buildings (to be built) with first level retail stores will necessarily find employment in the retail stores, thereby promoting walkability, revitalization and employment in Glendale, whereas these are just practically unrealistic, logically flawed and statistically unsupported speculations; and finally
  - 3.4 d) the Environmental Impact Report (EIR) prepared for the proposed SGCP, with its SEVEN (7) SIGNIFICANT and UNAVOIDABLE adverse ENVIRONMENTAL IMPACTS is PROOF that the new developments and the associated dramatic growth in density of the population expected under the SCGP will irreversibly and permanently affect both the QUALITY OF LIFE and the SAFETY of Glendale residents.

Therefore, the only comment to the EIR is: SGCP IS UNACCEPTABLE AND SHOULD BE DISCARDED.

Moreover, I propose to create a new SGCP with the objective to FIX the environmental impacts caused by or anticipated from the recent DSP area (part of South Glendale) developments and approved projects by: a) DOWNZONING areas in South Glendale to disallow any future mega developments; b) creating

**Letter 3 Aida Hakobyan**

**Response 3.1**

This comment expresses opinions concerning the proposed SGCP, but it does not raise a significant environmental issue for which a response is required. The comment will be included with the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 3.2**

Please see Section 4.12-2 “Population and Housing” and refer to Topical Response No. 2 Population and Housing. Implementation of the proposed project would induce substantial population growth in an area, either directly or indirectly. No feasible mitigation measures are identified. With respect to the increase in zoning and density, please refer to Section 4.1-3. Implementation of the proposed project would substantially degrade the existing visual character or quality of the site and its surroundings. There is no feasible mitigation measure identified to reduce this impact.

**Response 3.3**

Please see Section 4.15 “Traffic and Transportation,” specifically Impact 4.15-3, and also refer to Topical Response No. 3 Transportation, Traffic and Parking. Implementation of the proposed project will not conflict with adopted polices, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

**Response 3.4**

Please refer to response to comment 3.1 above and see Chapter 5 “Other CEQA Considerations” of the SGCP which provides background for developing the Plan. See also Topical Response No. 5 Recreation - Parks and Open Space.

**COMMENTS**

**RESPONSES**

3.4 cont. | MORE OPEN SPACE AND MORE PARKS to counterbalance the shortage created by the constructed or already approved mega developments.

3.5 | South Glendale community is already on LIFE SUPPORT, in view of the recent aggressive and unreasonable mega developments within/bordering DSP area, which resulted in more traffic, less parking, less open and green space, and higher rents. The adoption of the SGCP will just TURN OFF THE LIFE SUPPORT for Glendale community; PLEASE, DON'T DO IT!

\*\*\*\*\*

3.6 | The EIR (environmental impact report) of the SGCP openly identifies SEVEN (7) environmental impacts that will be UNAVOIDABLE and SIGNIFICANT and will NOT have any mitigation measures:

1) Aesthetics: per EIR, the current visual character and quality of the site and its surroundings, "would be substantially degraded"; "the proposed projects would result in new sources of increased shade."

Historically, the character of our jewel City of Glendale has been its quiet streets, its cozy low-rise buildings, with plenty of views of mountains, blue sky, and green space. Glendale has been intended to be a suburb to Los Angeles; not to become Los Angeles.

3.6 | The proposed SGCP, with upzoning, addition of new transit zones, changes within the current zone requirements, and even the innocent looking density bonuses so generously awarded to all Developers, would be contrary to the community character and historic designation of the City of Glendale and will significantly impact the QUALITY OF LIFE of its residents.

South Glendale, which encompassed the Downtown Specific Plan, has already been impacted by the unreasonable approvals of numerous mega development projects within DSP and at times bleeding outside the DSP), where developers constructed high-rise buildings, with inconsistent and aesthetically unappealing designs (blue, yellow, orange, and red painted walls), with parking variances (allowing for less parking spaces than required by the code) and density bonuses (allowing for more people and more units than allowed by the code). Further, the mega developments have also eliminated so much of open green space required for our visual and mental relief, made our streets impassable due to traffic congestion, and created lots of shades to the adjacent units. SGCP should now focus on creating more open space and more parks, rather than continue the same development trend which has proved to be a disaster already.

**Response 3.5**

Please refer to response to comment 3.1 above.

**Response 3.6**

As evaluated in Section 4.1.3 of the Draft EIR, the City cannot avoid potential impacts on visual character or quality from changes in building height and increased shade from implementation of the proposed SGCP, and there are no feasible mitigation measures that would reduce the impacts to a less than significant level. City Council has the approval authority for the proposed project and will consider all information in the Final EIR and related documents before making a decision on the project.

The remainder of the comment represents an opinion that will be included in the Final EIR and made available for consideration by City Council before making a decision on the project.

**COMMENTS**

**RESPONSES**

3.6  
cont. | Moreover, the aesthetics and quiet low-rise residential character of South Glendale community is not only important for the preservation of the character per se or for the historic designation of Glendale as a suburban place, but also imperative and absolutely necessary for the mental health and the associated physical health of the Glendale community (healthy soul, healthy body). The recent years' mega developments in DSP zone, encompassed by the South Glendale (with their traffic congestion, noise, etc.) have only added to the stress of Glendale residents and deprived them of the green and/or open spaces to relieve that stress.

| Therefore, the environmental impact to the aesthetics and character of Glendale, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city officials (Planning Commission or City Council).

3.7 | 2) Air quality: Per EIR, the implementation of the proposed project would:  
a) "conflict with or obstruct implementation of the applicable air quality plan";  
b) "violate an air quality standard or contribute substantially to an existing or projected air quality violation"; c) "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)";  
d) "expose sensitive receptors to substantial pollutant concentrations."

| Indisputably, the above quotations from the EIR itself make it apparent that the SGCP will dramatically affect the QUALITY OF LIFE of Glendale residents from the perspective of air quality. Air has no boundaries; air pollutants will affect the entire Glendale community. Air quality is important for both our physical and mental health and it cannot be compromised.

| Therefore, the environmental impact to the air quality, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

3.8 | 3) Greenhouse Gas Emissions: The proposed project a) "would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment"; b) "would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses."

**Response 3.7**

As evaluated in Section 4.2.3 of the Draft EIR, the City cannot completely avoid or mitigate potential impacts on air quality from implementation of the SGCP. The identified impacts of the Plan include conflicts with existing air quality plans, potentially significant contributions to the existing adverse air quality conditions in the South Coast Air Basin, resulting in a cumulatively considerable net increase of criteria pollutants for which the SGCP area is in nonattainment. Implementation of the SGCP has the potential to expose sensitive receptors to increased operational-related levels of toxic air contaminants. There are no feasible mitigation measures that would reduce the identified air quality impacts to a less than significant level. City Council has the approval authority for the proposed project and will consider all information in the Final EIR and related documents before making a decision on the project.

The remainder of the comment represents an opinion that will be included in the Final EIR for consideration by the decision makers.

**Response 3.8**

As evaluated in Section 4.6.3 of the Draft EIR, the City cannot avoid potentially significant direct and indirect greenhouse gas emission impacts from project implementation. These impacts will result from construction and operation activities that result from implementation of the adopted Plan, and because SGCP conflicts with existing applicable plans, policies or regulations to reduce greenhouse gas emissions. The SGCP Draft EIR did not identify any feasible mitigation measures that would reduce the Plan's impacts on greenhouse gas emissions to a less than significant level. The City Council has the approval authority for the proposed project and this comment will be included in the Final EIR for consideration along with related documents before making a decision on the project.

The remainder of the comment is the commenter's opinion that will be included in the Final EIR for consideration by City Council before making a decision on the project.

**COMMENTS**

**RESPONSES**

**3.8 cont.** It is undeniable that the adverse effects of greenhouse gas emission and the associated air pollution will dramatically affect the quality of life and the physical and mental health of the entire Glendale community, since there are no air boundaries and since South Glendale – due to its vast array of retail stores and recreational facilities – is the most visited by all Glendale residents.

Therefore, the environmental impact to the greenhouse gas emissions, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

4) Population and Housing: Per EIR, the “implementation of the proposed project would induce substantial population growth in an area, either directly or indirectly.”

It is indisputable that most of South Glendale presently does not have and geographically cannot provide the adequate road infrastructure to accommodate such a substantial population growth. The streets in Glendale, especially outside the DSP area, are mostly one-lane in each direction, with the so much needed street parking on both sides of the streets. Allowing an increase in the population, where there are no adequate road and parking infrastructure, is unacceptable for both the current and future residents of Glendale.

**3.9** Moreover, the recent mega developments in Glendale, while recommended, lauded, and even approved by city staff, have proved to be a disaster for Glendale residents in view of the increased traffic, impassable streets, elimination of street parking for public, and allowing developers to provide less parking spaces than required by the code. South Glendale community has greatly suffered already; now is the time to stop the mega developments in South Glendale and to evenly distribute population growth in the entire Glendale.

As for housing, it is undisputed that all the developers who have implemented or are implementing projects within/bordering the DSP area have demolished (or plan to demolish) the presently affordable rental buildings, have constructed mega buildings with smaller units and double rents, have pushed the rents in Glendale up, and – despite providing a few units of affordable housing – have actually created and furthered the housing crisis in South Glendale. Plus, most of the recent mega developments in the DSP area are not fully occupied till present due to the unaffordable rents.

There is simply no sound justification to further the population increase and housing crisis.

**Response 3.9**

As evaluated in Section 4.12.3 of the Draft EIR, implementation of the proposed SGCP will result in potentially significant impact on housing and population growth (which is beyond the allowable growth under the existing Glendale General Plan). See also Topical Response No. 2 Population and Housing. The Draft EIR did not identify any feasible mitigation measures that would reduce the Plan’s impact on population and housing growth to a less than significant level. This comment will be included the Final EIR for consideration by the City Council prior to making a decision on the project.

The remainder of the comment represents the commenter’s opinion that will be included in Final EIR for consideration by City Council before making a decision on the project.



COMMENTS

RESPONSES

3.9  
cont. | Therefore, the environmental impact to the population and housing, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

5) Public Services: Per EIR, the implementation of the proposed project would: a) "increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand"; b) would increase the demand of police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. Moreover, per EIR, Glendale is already far below the required response time for public services (e.g. fire protection).

The mentioned environmental impacts of increased need for fire protection and police protection stem from the anticipated dramatic increase of population and the associated likelihood of fire and crimes/accidents/fatalities based on the SGCP. Most importantly, per EIR, there cannot be any mitigation to this impact.

3.10 | EIR is clear that South Glendale community, upon the proposed SGCP, will suffer from poor response times of public services (fire protection, police); this environmental impact actually threatens not just the quality of life, but the SAFETY of Glendale community.

It should be noted that, even if the currently understaffed fire protection and police services extend their staff and structures to accommodate the expected population growth under SGCP – which EIR openly declares non feasible and impossible – the current inadequate road infrastructure (narrow one-lane each direction in most South Glendale) and the traffic increase anticipated by the SGCP will nonetheless further slow the response time for public services and will therefore make South Glendale unsafe to live in.

Therefore, the environmental impact to the public services, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

3.11 | 6) Recreation: Implementation of the proposed project would: a) "increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated"; b) "require the construction of new recreational facilities or the expansion of existing recreational facilities that could have an adverse physical effect on the environment."

**Response 3.10**

As evaluated in Section 4.13.3 of the Draft EIR, implementation of the proposed SGCP will result in significant and unavoidable impacts from the increased need for police and fire protection services that result in the addition of new or expansion of existing public service facilities in order to maintain service ratio maintenance, response times or other performance objectives. As the project is implemented over time, it is likely that police and fire protection facilities will need to be added or expanded in order to maintain existing levels of service. When such facilities will be needed depends on the rate at which the SGCP is implemented on a project-level basis. There are no feasible mitigation measures that would reduce the impacts to a less than significant level. See also Topical Response No. 2 Population and Housing.

The remainder of the comment represents the commenter’s opinion that will be included in the Final EIR for the City Council’s consideration before making a decision on the project.

**Response 3.11**

Recreation impacts were analyzed in Section 4.14 of the Draft EIR. Although development impact fees are imposed on individual new development as a condition of the issuance of a building permit or subdivision tract map for a development project and payment of such fees is considered full mitigation of recreation impacts for an individual project, overall environmental impacts on parkland and park facilities from implementation of the proposed project is expected to be significant and unavoidable, and there are no feasible mitigation measures that would reduce the impacts to a less than significant level. See Topical Response No. 5 Recreation – Parks and Open Space.

The remainder of the comment represents an opinion that will be included in the Final EIR for City Council consideration before making a decision on the project.

**COMMENTS**

**RESPONSES**

3.11  
cont.

It is undisputed that recreation is a vital component and need for a healthy community; it is imperative to create more recreational facilities and parks and it is disastrous to further the lack of those, as anticipated by the SGCP based on the EIR finding.

First, ironically, the fact is: there are presently only a few recreation facilities in South Glendale, and those are all already overcrowded and lacking the adequate parking or open space. For example, the YMCA's visitors do not have adequate parking and presently utilize the adjacent streets of Kenwood or Louise and the presently available parking lots nearby. But, per City Council's decision, the adjacent public parking on Louise will soon cease to provide parking since a new development of "Louise Hotel" has been approved for the site. And the GUSD parking lot, which specifically provides additional parking for YMCA after school hours, may cease to provide parking because of a proposed mega development on that site waiting for final approval by the City Council. This is just one example, but it can be equally applied to all presently available recreation facilities. Not to mention, the parking at the Americana – another major recreational place – is unaffordable for most of Glendale residents.

Second, it is no secret that there are only a few parks in South Glendale; one of the only big parks on Brand and Colorado will soon become home for another approved development.

Third, all the parks and recreational facilities that have been created or planned recently are located far outside of South Glendale, in the mountains, which are not accessible for the most vulnerable group of our society - our children, elder people, or people who cannot afford to get to those destinations (due to lack of cars, lack of funds, or incapacity to drive).

The proposed SGCP, per EIR, not only does not resolve the problem with the current shortage of parks and recreational facilities, but actually unacceptably furthers the problem.

Therefore, the environmental impact to the recreation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

3.12

7) Transportation: Per EIR, the implementation of the proposed project "would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways."

**Response 3.12**

See Topical Response No. 3 Transportation, Traffic and Parking. The City acknowledges the importance of the road network and its impact on the daily lives and perceptions of communities throughout the SGCP area. As evaluated in Section 4.15.3 of the Draft EIR, implementation of the proposed SGCP on transportation and traffic is considered significant and unavoidable even with the application of mitigation measures. As part of the Congestion Management Program (CMP) analysis that was performed for the proposed project (Appendix F of this Draft EIR), four freeway locations near the SGCP area were found to be impacted under 2040 SGCP conditions (refer to Table 4.15-8 in the Draft EIR). Mitigation to reduce these impacts would require widening these freeway facilities; however, the area is currently fully built-out and any expansion measure is considered infeasible. As such, the impacts are considered significant and unavoidable. Likewise, implementation of certain mitigation measures as described in Section 4.15.3 would reduce the impacts of the proposed project at five associated intersections, but there are no feasible mitigation measures that would reduce the impacts to the remaining 22 intersections listed in Table 4.15-9 to a less than significant level.

The remainder of the comment represents the commenter's which will be included in the Final EIR and made available for consideration by City Council before making a decision on the project.

**COMMENTS**

**RESPONSES**

**3.12 cont.** It is undisputed that the road infrastructure in Glendale is insufficient and has not been historically designated/intended to accommodate the dramatic increase of population anticipated by the proposed SGCP. The end result of the dramatic increase of population and the associated dramatic and unsustainable impact on transportation will be traffic congestion, traffic noise, more traffic accidents and fatalities, more pedestrian fatalities, etc. This will undeniably deteriorate the quality of life of all Glendale residents.

Moreover, the recent DSP area developments are just proof of how congested and impassable our roads have become; this problem with transportation should be fixed and not furthered more. Suggesting more bus routes will not resolve the problem, as confirmed by EIR. Plus, there is no guaranty and no common sense to assume that creating more bus lines will make people take buses, or providing bicycle lanes will make people risk their lives and use bicycles in the already congested and crowded streets of Glendale.

Therefore, the environmental impact to transportation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

**3.13** To summarize, the EIR's identified seven environmental impacts will adversely and permanently affect both the quality of life and the safety of Glendale community; those cannot and should not be overridden or overlooked by any decision making city official.

Therefore, the proposed SGCP is UNACCEPTABLE for the South Glendale community and SHOULD BE DISCARDED.

Regards,  
Aida Hakobyan  
Glendale, CA 91206

**Response 3.13**

This comment provides a conclusion to the comment letter. The City acknowledges the commenter's opposition to the proposed SGCP. As discussed in response to comment 3.1 above, this comment letter will be included in the Final EIR for the City Council's consideration prior to making a decision on whether or not to approve the Project.

COMMENTS

RESPONSES

**From:** Alice Ziesing [mailto:shezing@everyactioncustom.com]  
**Sent:** Friday, March 09, 2018 7:35 PM  
**To:** Krause, Erik EKrause@Glendaleca.gov  
**Subject:** Support for Proposed South Glendale Community Plan

Dear Deputy Director of Community Development Erik Krause,

I am writing to you to in support for the proposed project analyzed in the South Glendale Community Plan DEIR. I urge the city to proceed with the proposed project, and not the no build or either of the reduced density alternatives.

My 28 yr old son and many others need housing stock if they are to become homeowners committed to CA economic success like we were.

4.1 The greater Los Angeles region is facing a severe housing shortage. This project will help create much needed housing in a walkable, mixed-use neighborhood with good transit and plans for future transit expansion. By helping to create new housing in a desirable neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

I also urge you to consider potential positive impacts of the project in the FEIR:

4.2 4.1.3 Visual Character - new buildings can improve the aesthetics of the city, especially where new mixed-use development replaces auto-oriented development.

4.3 4.1.4 Shade - in a warm, sunny climate like Glendale, more shade is often an amenity. On hot summer days, pedestrians in downtown Glendale frequently seek shade to cool off.

4.4 4.2.1 Air Quality & 4.6.1 Greenhouse Gas Emissions - allowing more development in a central location like South Glendale reduces the demand for greenfield development on the urban fringe, reducing driving and GHG emissions. Additional development in dense, walkable areas like South Glendale also makes it more likely that current residents will be able to walk, bike, or take transit to meet their daily needs instead of driving. State policy such as SB 375 has recognized the climate benefits of infill development.

Letter 4 Alice Ziesing

Response 4.1

This comment is in support of the proposed SGCP (proposed project) and does not raise a significant environmental issue for which a response is required. This comment will be in the documents for review and consideration by City Council.

Response 4.2

The City acknowledges and appreciates this comment. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

Response 4.3

Please refer to response to comment 4.2 above.

Response 4.4

Please refer to response to comment 4.2 above.

**COMMENTS**

**RESPONSES**

4.5 | 4.12.2 Population and Housing - an increase in housing and population can be positive, as denser cities reduce environmental impacts per capita and promote greater diversity and economic development.

4.6 | Height Restrictions - the city should not reduce height limits to below what they are today. Lower height limits reduce the amount of housing that can be built, which reduces the likelihood of development until prices rise, making housing less affordable. Eliminating the reductions in maximum height should not require any further analysis under the EIR, since it would not be a change from present conditions.

4.7 | Thank you for the opportunity to comment on the South Glendale Community Plan DEIR. Again, I encourage the city to proceed with the proposed project analyzed in the DEIR.

Personally sent by Alice Ziesing using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization dedicated to advocating for more housing.

Sincerely,  
Alice Ziesing  
La Crescenta, CA 91214  
shezing@aol.com

**Response 4.5**

Please refer to response to comment 4.2 above.

**Response 4.6**

Please refer to response to comment 4.2 above.

**Response 4.7**

This comment provides a conclusion to the comment letter. The City appreciates the support expressed by the commenter.

COMMENTS

RESPONSES

**From:** website@mail@glendaleca.gov [mailto:website@mail@glendaleca.gov]  
**Sent:** Friday, March 09, 2018 4:43 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 5 Anahit Safaryan**

**Response 5.1**

This comment provides an introduction to the author of the comment letter. The comment does not raise a significant environmental issue for which a response is required. For more analysis regarding responses to comments, see Topical Response No. 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses.

**Response 5.2**

This comment does not raise a significant environmental issue for which a response is required. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project. For more analysis regarding responses to comments, see Topical Response No. 5 Recreation – Parks and Open Space.

- 5.1 I am a resident of South Glendale and my family owns the property where I live. I am disabled and suffer from various medical issues.  
  
One reason of why my family and I live in our neighborhood is because while we cannot afford a single house with our own yard and green spaces, our neighborhood provides plenty of sun exposure, green space, and open space.  
  
Currently, there is a GUSD apartments project proposed right in front of our building which will eliminate the green and open space in front of our apartment and will put us in shade. I already lack vitamin D and I know that sun and daylight is the best source for it. Sun and daylight are also important for people with rheumatoid problems. And finally, sun and daylight eliminates or helps reduce stress and depression.  
  
GUSD apartments project is an example of the mega developments and mixed use developments that South Glendale is facing. Those mixed use and mega developments only hurt us - Glendale residents - because they put our neighboring apartment complexes and houses in shade and deprive us from sunlight so much needed for our health; they overcrowd our streets and make those unsafe for walking because the more cars are outside the likelihood of a car accident or pedestrian fatality is higher; through added disproportional and unsustainable density of population, they prolong the already slow response times for public services (fire protection and police) making our community unsafe to live, to walk, to sleep; they add to our existing diseases or aggravate our medical conditions by causing lack of sunlight, lack of green space, impact to air quality and air pollution.
- 5.2 Unfortunately, the new SGCP does not provide any open space or park or recreational facility but only tends to aggravate the existing health issues of the Glendale community, including myself. Moreover, the SGCP hypocritically states that it will look to create more parking lots, whereas it also suggests eliminating all surface parking structures and building mega complexes and mixed use buildings instead. Developments in the DSP area, with parking and density variances and astronomical rents, proved already that mixed use buildings and mega apartment complexes will not serve any community needs and will only damage our community.

**COMMENTS**

**RESPONSES**

5.3 Please, help keep Glendale a safe and healthy place to live in.  
The latest developments in DSP area have threatened our quality of life and our safety already. It is the time to create and develop a new SGCP to counterbalance those problems of DPS developments and to reroute the density of Glendale to less densely populated areas outside of SGCP.

Thank you.  
Anahit Safaryan  
Glendale, CA

**Response 5.3**

This comment provides a conclusion to the comment letter. Please refer to response to comment 5.2 above.

**COMMENTS**

**RESPONSES**

**From:** website@mail@glendaleca.gov [mailto:website@mail@glendaleca.gov]  
**Sent:** Thursday, March 08, 2018 5:00 AM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 6 Andrew Allison**

**Response 6.1**

The impacts suggested by the comment are addressed in Section 4.16 (Utilities and Service Systems), not Section 4.13. Additionally, all future development under the proposed SGCP would be required to comply with all federal, State, and local statutes and regulations related to solid waste handling, transport, and disposal during construction and long-term operation. Assessment of adequate waste collection services would also be required to ensure that sufficient waste provision is accounted for with future growth within the proposed SGCP area.

**Response 6.2**

Please refer to response to comment 6.1 above.

6.1 I am writing to express great concern that the South Glendale Community Plan (SGCP) Program Draft Environmental Impact Report (EIR), has not fully addressed all impacts of increased numbers of resident in South Glendale as a result of proposed new development projects.

In South Glendale, there is a general concern over the impact of medium- and high-density residential development, and the capacity of City Services to keep up with neighborhood needs and address the resulting issues associated with such development. Specifically, there is a concern with the large amount of abandoned furniture and bulky item trash that accumulates on the sidewalks in front of multi-family residential locations, which in some instances remains for weeks at a time. Further, as furniture blight is left for a long time, additional trash gets tossed in these areas, including fast-food waste and cigarettes. This has been personally observed by me as especially problematic along East Chevy Chase Drive and along East Palmer Avenue, from South Glendale Avenue to South Adams Street, as well as the intersecting streets along this stretch. On numerous occasions I have observed discarded furniture piled in front of the "Adams Square" signage monument on Chevy Chase, which is intended as a "welcome" to our small commercial district. These problems also exist in other areas of South Glendale. None of these concerns have been addressed in Section 4.13 "Public Services" of the EIR. I would invite the EIR authors or anyone in the City Community Development Department to walk with me (or on your own) along this stretch of Chevy Chase, and see firsthand what we in the neighborhood experience on a daily basis.

6.2 As new development such as the proposed building are planned and density continues to increase, this problem will grow into an even larger issue. Furniture blight, construction waste, and bulky trash items left on sidewalks are eyesores in the neighborhood, and give the appearance of a run-down area where residents don't care about neat, clean, and safe streets and sidewalks. One solution would be to hold building owners responsible for the large-item trash left in front of their buildings, and to enforce City regulations for disposing of such in a timely manner.



**COMMENTS**

**RESPONSES**

6.2  
cont. | Providing adequate City Services to the general community of South Glendale must be a consideration in any accommodation for future growth. I am unable to support any plan for new medium- and high-density residential development until I see the City making progress with these issues.

6.3 | In addition to the concern about street garbage, the increased traffic in this area is potentially dangerous to the many pedestrians and students who walk along the sidewalks in the vicinity of the proposed development. The traffic violation of cars making right turns without stopping at stop signs or red lights in our area is widespread.

| Thanks for considering my concerns, and the concerns of all South Glendale residents.

Andrew Allison  
drew\_allison@yahoo.com

**Response 6.3**

The City acknowledges the importance of the road network and its impact on the daily lives and perceptions of communities. Regarding traffic and parking concerns, please see Topical Response No. 3 Transportation, Traffic and Parking.

COMMENTS

RESPONSES

**From:** website@mail@glendaleca.gov [mailto:website@mail@glendaleca.gov]  
**Sent:** Sunday, March 04, 2018 7:18 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 7 Ara Kassabian**

**Response 7.1**

7.1 The SGCP EIR summary section shows that the SGCP would negatively impact almost every single aspect of life in South Glendale. In addition to the negative findings listed there, it is also clear that the SGCP would negatively affect the availability of affordable housing in the city, and this at a time when affordable housing is hard to come by already.

As a resident of Adams Hill, given all the above, I strongly oppose the SGCP. Furthermore, it would be unconscionable, in my opinion, for the City Council to move forward with this plan.

The commenter is correct in that adoption of the SGCP would result in significant and unavoidable impacts to areas of Aesthetics, Air Quality, Greenhouse Gas Emissions, Population and Housing, Public Services, Recreation and Traffic and Transportation.

Although the distribution of housing types are not issues that require analysis under CEQA, the SGCP includes a provision of affordable housing for all income levels through its policies (1.1 through 1.9, 2.2 through 2.04, 4.2, 4.4, 4.10, 5.1, 6.1, and 6.2) listed in the Glendale General Plan, Housing Element and referenced in Section 4.12.2 of the Draft EIR. In addition to the Housing Element and associated policies, the Glendale Long Range Planning Public Input Findings (2006) identified “retention, new development, and rehabilitation of affordable housing” as its highest priority within the housing topic area.

Furthermore, as indicated in Chapter 2, Section 2.3 of the Draft EIR, the vision of the plan calls for an “affordable housing overlay zone” located along the multi-family blocks parallel to the Broadway, Central Avenue, and Colorado Street transit corridors that would provide opportunities for affordable and inclusionary housing.

Regards,  
Ara Kassabian  
a\_kassabian@hotmail.com

COMMENTS

RESPONSES

From: websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
Sent: Monday, March 12, 2018 3:22 AM  
To: Krause, Erik <EKrause@Glendaleca.gov>  
Subject: City of Glendale, CA: SGCP EIR Comments

Letter 8 Aram Amiryman

Response 8.1-8.13

This comment letter is the same as an earlier comment letter (Letter No. 3). Refer to responses to comments 3.1 through 3.13.

Dear Council Members,

- 8.1 I object to the South Glendale Community Plan (SGCP) since:
    - a) contrary to SGCP's claims, it is NOT the vision of our community – unless our community is suicidal; it is rather the vision of developers who are the only ones to benefit and whose greedy mega developments have already ruined our community within/bordering the Downtown Specific Plan area;
    - 8.2 b) it suggests an unacceptable, unjustifiable and, most importantly, an unsustainable upzoning of high density areas into mixed use zones, adding new zones for transit areas, as well as changes within the present zoning requirements (e.g., removal of setbacks in R1250) to allow for more height of buildings and more density of population, which have proved to be a DISASTER for the Glendale community within/bordering the DSP area already;
    - 8.3 c) it is premised on the fictions that people who are close to bus routes and transit areas will necessarily use buses and people who live close or at the mixed-use buildings (to be built) with first level retail stores will necessarily find employment in the retail stores, thereby promoting walkability, revitalization and employment in Glendale, whereas these are just practically unrealistic, logically flawed and statistically unsupported speculations; and finally
    - 8.4 d) the Environmental Impact Report (EIR) prepared for the proposed SGCP, with its SEVEN (7) SIGNIFICANT and UNAVOIDABLE adverse ENVIRONMENTAL IMPACTS is PROOF that the new developments and the associated dramatic growth in density of the population expected under the SCGP will irreversibly and permanently affect both the QUALITY OF LIFE and the SAFETY of Glendale residents.
- Therefore, the only comment to the EIR is: SGCP IS UNACCEPTABLE AND SHOULD BE DISCARDED.
- Moreover, I propose to create a new SGCP with the objective to FIX the environmental impacts caused by or anticipated from the recent DSP area (part of South Glendale) developments and approved projects by: a) DOWNZONING areas in South Glendale to disallow any future mega developments; b) creating

COMMENTS

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8.4 cont. MORE OPEN SPACE AND MORE PARKS to counterbalance the shortage created by the constructed or already approved mega developments.

8.5 South Glendale community is already on LIFE SUPPORT, in view of the recent aggressive and unreasonable mega developments within/bordering DSP area, which resulted in more traffic, less parking, less open and green space, and higher rents. The adoption of the SGCP will just TURN OFF THE LIFE SUPPORT for Glendale community; PLEASE, DON'T DO IT!

\*\*\*\*\*

8.6 The EIR (environmental impact report) of the SGCP openly identifies SEVEN (7) environmental impacts that will be UNAVOIDABLE and SIGNIFICANT and will NOT have any mitigation measures:

1) Aesthetics: per EIR, the current visual character and quality of the site and its surroundings, "would be substantially degraded"; "the proposed projects would result in new sources of increased shade."

Historically, the character of our jewel City of Glendale has been its quiet streets, its cozy low-rise buildings, with plenty of views of mountains, blue sky, and green space. Glendale has been intended to be a suburb to Los Angeles; not to become Los Angeles.

8.6 The proposed SGCP, with upzoning, addition of new transit zones, changes within the current zone requirements, and even the innocent looking density bonuses so generously awarded to all Developers, would be contrary to the community character and historic designation of the City of Glendale and will significantly impact the QUALITY OF LIFE of its residents.

South Glendale, which encompassed the Downtown Specific Plan, has already been impacted by the unreasonable approvals of numerous mega development projects within DSP and at times bleeding outside the DSP), where developers constructed high-rise buildings, with inconsistent and aesthetically unappealing designs (blue, yellow, orange, and red painted walls), with parking variances (allowing for less parking spaces than required by the code) and density bonuses (allowing for more people and more units than allowed by the code). Further, the mega developments have also eliminated so much of open green space required for our visual and mental relief, made our streets impassable due to traffic congestion, and created lots of shades to the adjacent units. SGCP should now focus on creating more open space and more parks, rather than continue the same development trend which has proved to be a disaster already.

COMMENTS

RESPONSES

8.6  
cont. | Moreover, the aesthetics and quiet low-rise residential character of South Glendale community is not only important for the preservation of the character per se or for the historic designation of Glendale as a suburban place, but also imperative and absolutely necessary for the mental health and the associated physical health of the Glendale community (healthy soul, healthy body). The recent years' mega developments in DSP zone, encompassed by the South Glendale (with their traffic congestion, noise, etc.) have only added to the stress of Glendale residents and deprived them of the green and/or open spaces to relieve that stress.

Therefore, the environmental impact to the aesthetics and character of Glendale, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city officials (Planning Commission or City Council).

8.7 | 2) Air quality: Per EIR, the implementation of the proposed project would:  
a) "conflict with or obstruct implementation of the applicable air quality plan";  
b) "violate an air quality standard or contribute substantially to an existing or projected air quality violation"; c) "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)";  
d) "expose sensitive receptors to substantial pollutant concentrations."

Indisputably, the above quotations from the EIR itself make it apparent that the SGCP will dramatically affect the QUALITY OF LIFE of Glendale residents from the perspective of air quality. Air has no boundaries; air pollutants will affect the entire Glendale community. Air quality is important for both our physical and mental health and it cannot be compromised.

Therefore, the environmental impact to the air quality, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

8.8 | 3) Greenhouse Gas Emissions: The proposed project a) "would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment"; b) "would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses."

**COMMENTS**

**RESPONSES**

**8.8 cont.** It is undeniable that the adverse effects of greenhouse gas emission and the associated air pollution will dramatically affect the quality of life and the physical and mental health of the entire Glendale community, since there are no air boundaries and since South Glendale – due to its vast array of retail stores and recreational facilities – is the most visited by all Glendale residents.

Therefore, the environmental impact to the greenhouse gas emissions, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

4) Population and Housing: Per EIR, the “implementation of the proposed project would induce substantial population growth in an area, either directly or indirectly.”

It is indisputable that most of South Glendale presently does not have and geographically cannot provide the adequate road infrastructure to accommodate such a substantial population growth. The streets in Glendale, especially outside the DSP area, are mostly one-lane in each direction, with the so much needed street parking on both sides of the streets. Allowing an increase in the population, where there are no adequate road and parking infrastructure, is unacceptable for both the current and future residents of Glendale.

**8.9** Moreover, the recent mega developments in Glendale, while recommended, lauded, and even approved by city staff, have proved to be a disaster for Glendale residents in view of the increased traffic, impassable streets, elimination of street parking for public, and allowing developers to provide less parking spaces than required by the code. South Glendale community has greatly suffered already; now is the time to stop the mega developments in South Glendale and to evenly distribute population growth in the entire Glendale.

As for housing, it is undisputed that all the developers who have implemented or are implementing projects within/bordering the DSP area have demolished (or plan to demolish) the presently affordable rental buildings, have constructed mega buildings with smaller units and double rents, have pushed the rents in Glendale up, and – despite providing a few units of affordable housing – have actually created and furthered the housing crisis in South Glendale. Plus, most of the recent mega developments in the DSP area are not fully occupied till present due to the unaffordable rents.

There is simply no sound justification to further the population increase and housing crisis.

COMMENTS

RESPONSES

8.9  
cont. | Therefore, the environmental impact to the population and housing, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

5) Public Services: Per EIR, the implementation of the proposed project would: a) "increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand"; b) would increase the demand of police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. Moreover, per EIR, Glendale is already far below the required response time for public services (e.g. fire protection).

The mentioned environmental impacts of increased need for fire protection and police protection stem from the anticipated dramatic increase of population and the associated likelihood of fire and crimes/accidents/fatalities based on the SGCP. Most importantly, per EIR, there cannot be any mitigation to this impact.

8.10 | EIR is clear that South Glendale community, upon the proposed SGCP, will suffer from poor response times of public services (fire protection, police); this environmental impact actually threatens not just the quality of life, but the SAFETY of Glendale community.

It should be noted that, even if the currently understaffed fire protection and police services extend their staff and structures to accommodate the expected population growth under SGCP – which EIR openly declares non feasible and impossible – the current inadequate road infrastructure (narrow one-lane each direction in most South Glendale) and the traffic increase anticipated by the SGCP will nonetheless further slow the response time for public services and will therefore make South Glendale unsafe to live in.

Therefore, the environmental impact to the public services, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

8.11 | 6) Recreation: Implementation of the proposed project would: a) "increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated"; b) "require the construction of new recreational facilities or the expansion of existing recreational facilities that could have an adverse physical effect on the environment."

COMMENTS

RESPONSES

8.11  
cont.

It is undisputed that recreation is a vital component and need for a healthy community; it is imperative to create more recreational facilities and parks and it is disastrous to further the lack of those, as anticipated by the SGCP based on the EIR finding.

First, ironically, the fact is: there are presently only a few recreation facilities in South Glendale, and those are all already overcrowded and lacking the adequate parking or open space. For example, the YMCA’s visitors do not have adequate parking and presently utilize the adjacent streets of Kenwood or Louise and the presently available parking lots nearby. But, per City Council’s decision, the adjacent public parking on Louise will soon cease to provide parking since a new development of “Louise Hotel” has been approved for the site. And the GUSD parking lot, which specifically provides additional parking for YMCA after school hours, may cease to provide parking because of a proposed mega development on that site waiting for final approval by the City Council. This is just one example, but it can be equally applied to all presently available recreation facilities. Not to mention, the parking at the Americana – another major recreational place – is unaffordable for most of Glendale residents.

Second, it is no secret that there are only a few parks in South Glendale; one of the only big parks on Brand and Colorado will soon become home for another approved development.

Third, all the parks and recreational facilities that have been created or planned recently are located far outside of South Glendale, in the mountains, which are not accessible for the most vulnerable group of our society - our children, elder people, or people who cannot afford to get to those destinations (due to lack of cars, lack of funds, or incapacity to drive).

The proposed SGCP, per EIR, not only does not resolve the problem with the current shortage of parks and recreational facilities, but actually unacceptably furthers the problem.

Therefore, the environmental impact to the recreation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

8.12

7) Transportation: Per EIR, the implementation of the proposed project “would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.”



COMMENTS

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8.12 cont. It is undisputed that the road infrastructure in Glendale is insufficient and has not been historically designated/intended to accommodate the dramatic increase of population anticipated by the proposed SGCP. The end result of the dramatic increase of population and the associated dramatic and unsustainable impact on transportation will be traffic congestion, traffic noise, more traffic accidents and fatalities, more pedestrian fatalities, etc. This will undeniably deteriorate the quality of life of all Glendale residents.

Moreover, the recent DSP area developments are just proof of how congested and impassable our roads have become; this problem with transportation should be fixed and not furthered more. Suggesting more bus routes will not resolve the problem, as confirmed by EIR. Plus, there is no guaranty and no common sense to assume that creating more bus lines will make people take buses, or providing bicycle lanes will make people risk their lives and use bicycles in the already congested and crowded streets of Glendale.

Therefore, the environmental impact to transportation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

8.13 To summarize, the EIR's identified seven environmental impacts will adversely and permanently affect both the quality of life and the safety of Glendale community; those cannot and should not be overridden or overlooked by any decision making city official.

Therefore, the proposed SGCP is UNACCEPTABLE for the South Glendale community and SHOULD BE DISCARDED.

Regards,  
Aram Amiryan  
Glendale, CA 91206

COMMENTS

RESPONSES

**From:** Artak Dovlatyan [mailto:artak@specializedrealty.com]  
**Sent:** Friday, March 09, 2018 10:10 AM  
**To:** Stotler, Laura <LStotler@Glendaleca.gov>  
**Cc:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** Comments on the South Glendale Community Plan and the DEIR

Laura,

9.1 I would like to request that the boundary area of East Colorado Gateway to include south street side of Colorado Street from Griswold to Fischer. These properties have lot depths and size that can accommodate larger developments and are similar to the other side of Colorado & Griswold which are already included. Please see the attached map depicting the subject area.  
Please have the impacts on this change be included in the final EIR.

Best Regards,  
Artak Dovlatyan



Letter 9 Artak Dovlatyan

Response 9.1

The area discussed by the commenter is proposed to be included in the East Colorado neighborhood in Chapter 4 of the SGCP. Zoning in this neighborhood is proposed to go from C3 to MX2 as a “Mixed-Use Low” corridor. The existing density in this area varies from 19 dwelling units per acre (du/ac) to 35 du/ac with a maximum height of 50 feet. Proposed density would allow up to 43 du/ac and maximum height of 50 feet. The change in zone from C3 to MX2 would allow for a true mixed-use zone rather than a commercial zone with residential allowed under R-1250 multi-family zoning standards. The requested East Colorado Gateway neighborhood is currently zoned CR and proposed to be rezoned to MX3 designated as “Mixed-Use High” corridor in the SGCP and would allow for a density up to 50 du/ac with a maximum height of 60 feet. Both the proposed designation are similar to the existing designation.

This comment will be forwarded to the City Council for consideration before making a decision on the project.

**COMMENTS**

**RESPONSES**

**From:** Avo Keshishian [mailto:palladioclub@yahoo.com]  
**Sent:** Friday, March 09, 2018 1:01 PM  
**To:** Stotler, Laura <LStotler@Glendaleca.gov>; Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** 311 S Adams street

Hi Laura,

**10.1** Please include as part of the boundary area of East Colorado 311 S Adams Street, the PPD that was recently passed. Please see the attached map showing the property.

Please have the impacts on this change be included in the final EIR.

Thank you  
Avetis Keshishian

**Letter 10 Avetis Keshishian**

**Response 10.1**

This comment is in reference to a recent Zoning Map Amendment on this site adopted by City Council on May 17, 2017. The SGCP amends the General Plan Land Use Map to reflect this change.



COMMENTS

RESPONSES

**From:** Barbara Magel Ayars [mailto:peep126@outlook.com]  
**Sent:** Wednesday, March 07, 2018 4:19 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** Comment- South Glendale Community Plan

**Letter 11 Barbara Magel Ayars**

**Response 11.1**

The City acknowledges and appreciates this comment; however, the City's process in preparing the SGCP is well documented and has included extensive public involvement, including community planning and sponsor groups. The Draft EIR was subjected to a 60-day public review period as mandated by State CEQA Guidelines Section 15105 and was made available for public review and comment on the City's website and at the City of Glendale Planning Division and Glendale Central Library. Additionally, the public hearing for the Draft EIR was published in the local newspaper.

**Response 11.2**

This comment does not raise a significant environmental issue for which a response is required as the Sate CEQA Guidelines no longer require an analysis of parking impacts. With the exception of the Transit-Oriented Development (TOD) plan included as part of the SGCP, there are no policy recommendations to change the parking standards. The TOD, however, does include a policy, should the City Council adopt the Plan that states the following:

*Policy 3.7.1: Expand the parking policies implemented in the Downtown Specific Plan (DSP) to the proposed Transit-Oriented Development (TOD) zones. Recently adopted parking code revisions, accomplished through the DSP, should be extended to the new TOD zones. Strategies include reducing minimum parking requirements, allowing tandem and stacked parking, requiring secure bicycle parking, implementing complementary transportation demand management strategies (TDM), seeking shared parking opportunities, exempting change-of-use for properties under 5,000 square feet, and instituting a parking in-lieu fee policy. Parking requirements for industrial uses within Tropicco should also be reduced, including those outside the TOD zones.*

Further, Chapter 4 of the SGCP establishes a parking management plan to discourage retail and commercial patrons and employees from parking in adjacent residential neighborhoods.

**Response 11.3**

This comment does not raise a significant environmental issue for which a response is required. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

11.1 Once again the City of Glendale has failed in its statutorily required obligation to provide notice to all potentially impacted property owners of the comment period and public meeting for the development plan proposed for South Glendale. We own a condominium on that block and have received NO NOTICE of either the comment period or the public meeting from the City. Despite that failing, we are providing our comments in opposition to the plan. The idea that a five story building of the size proposed- in that location- could be anything but a bad idea is ludicrous.

11.2 South Glendale is already a densely developed area of smaller rental/condo buildings and single family homes. Parking is almost impossible to find along any of the streets. I understand that the City assumes people in this new development will use public transportation like buses and therefore not have as great an impact on local traffic or parking. That is entirely unrealistic and the City is well aware of that of course. People will drive- the buses are neither as frequent or dependable as in other parts of the county and simply so not provide a viable alternative to private car use. To base a decision on an assumption that buses will be used is insupportable.

11.3 A building of the size proposed will make South Glendale an unpleasantly overcrowded area as opposed to the pleasant treed area that currently exists. The only people in favor of this type of development in the area are those who anticipate profiting from it. The people who actually live there are almost uniformly opposed. You should not allow profit to overwhelm that day to day interests of Glendale residents in general. Your obligation as public employees and elected officials is to serve your constituency- not one property developer looking for a quick buck.

**COMMENTS**

**RESPONSES**

**From:** Bill Redmann [mailto:billredmann@gmail.com]  
**Sent:** Monday, March 12, 2018 1:29 AM  
**To:** SGCP@glendaleca.gov  
**Subject:** Comments on SGCP DEIR, Appendix F

Dear Mr. Kassakhian,

After examining the Draft Environmental Impact Report (DEIR) for the Draft South Glendale Community Plan, in particular Appendix F: Transportation Analysis Report, I have some comments that I would like to be considered:

Overview

The detailed level of service (LOS) analysis studies 50 representative intersections across the Plan area. The analysis includes a report of existing conditions (from 2016) and four other scenarios:

- 1) No Project (2040)
- 2) Alternative 1 (2040)
- 3) Alternative 2 (2040)
- 4) Preferred Project (2040)

12.1

Comment 01 (Regarding apparent proposal for overdevelopment):

In the overview of the project area, the analysis states "Glendale is a fully developed City", yet the overall plan includes more development, which implies Glendale will becoming an OVERDEVELOPED City. The plan expects to increase the burden on the extant street network and interface to the regional highway system. The Overview points out that the "South Glendale Community Plan Area...contains the highest concentrations of housing and commercial uses of the City, as well as several key commercial corridors that serve as attractors for both local and regional residents." Yet the presence of such "attractors" can be mooted by traffic conditions that prevent convenient access. Note that while the demand for access to ones workplace is significantly inelastic, the demand for access to commercial and retail facilities by clients and customer is not. This seems to threaten the vitality of Glendale's businesses. In the conclusion of the Traffic Analysis, the Preferred Project traffic analysis shows 22 Significant and Unavoidable impacts to arterial intersections and 4 Significant and Unavoidable impacts to the regional freeway system.

**Letter 12 Bill Redmann**

**Response 12.1**

The statement describing Glendale as a "fully developed" City implies that the City has a robust transportation network and limited vacant land for new development to occur. This statement was not intended to suggest that the City has no more capacity for additional development. The commenter's opinion that increased congestion could threaten the vitality of Glendale's businesses is noted and will be included in the Final EIR for consideration by City Council before making a decision on the project.

**COMMENTS**

**RESPONSES**

12.2 | Comment 02 (Regarding bicycle & pedestrian plan in all future scenarios)

All the scenarios (except the 2016 Existing data) include the Bicycle Master Plan and Pedestrian Master Plan, and all of the scenarios result in a significantly worse and unavoidable outcome in comparison to the 2016 Existing analysis. Why would we not conclude that the Bicycle and Pedestrian Master Plans are contributing, if not causing, the "significant and unavoidable" impacts cited? Why was no 2040 scenario run that DID NOT INCLUDE the changes listed for the Bicycle Master Plan and Pedestrian Master Plan?

**Response 12.2**

The purpose of the transportation study, included as Appendix F in the Draft EIR, was to evaluate the traffic impacts that could occur as a direct result of the SGCP. The analysis included the land use growth related to the changes in zoning and network changes, including automobile, transit, bicycle and pedestrian networks, which are anticipated to occur by year 2040. These changes were reviewed and confirmed in consultation with City staff and thus form the basis of the CEQA analysis.

12.3 | Comment 03 (Regarding lack of pedestrian counts in intersection data collection)

The data collection performed for the 50 studied intersections seems to have counted vehicles in each of the various directions and turning right, left, or going through. However, I did not notice any pedestrian counts. Pedestrians and their distributed arrivals impact LOS because they trigger a cross-walk cycle to occur that wouldn't occur had the pedestrian not shown up, increasing delay at the intersection. If pedestrian counts are missing from the collected data, how would the analysis accurately represent the impact of increased cross-walk cycles as the (uncounted) pedestrian presence (presumably) increases? Will the reported degradation of LOS will be more severe than has been modeled if pedestrian traffic increases?

**Response 12.3**

The City calculates intersection Level of Service (LOS) using the Intersection Capacity Utilization (ICU) Method\*. ICU is a planning methodology as opposed to an operations methodology and as such does not incorporate the effect of signal timing. In addition, the ICU methodology does not model the effect of pedestrians on an intersection's capacity. Therefore, this information was not collected. In order to model the effect of pedestrians on the LOS of an intersection, a delay-based methodology, such as the Highway Capacity Manual (HCM), would need to be used. This method requires the input of signal timing information to ascertain LOS. The two methodologies are very different and the LOS results cannot be compared directly due to the fundamental differences in the underlying calculations and the metrics that are generated from each.

12.4 | Comment 04 (Regarding the fraction of bicycle traffic that behaves as pedestrian traffic)

What fraction of bicycle traffic behaves as pedestrian traffic (i.e., where a bike rider is on a sidewalk and presses a cross-walk button to trigger a cycle)?

\*The ICU methodology estimates LOS by calculating an intersection's total utilized capacity throughout the entire peak hour. This volume-capacity ratio is summed from the most congested movements but represents an average for the entire intersection. The calculations do not specifically consider downstream congestion or ramp metering, signal timing or phasing, turn pocket lengths, or decreased saturation flow rates for all individual movements. The ICU methodology may also under report volume-capacity ratios and LOS at intersections with one highly congested movement.

12.5 | Comment 05 (Regarding effects of increased bicycle traffic on ICU model)

In the Intersection Capacity Utilizations (ICU) methodology, modeled factors include delay times for traffic to start moving and to clear the intersection. What adjustments factors are included for bicycle traffic that may start more slowly or clear the intersection more slowly? If such factors are not included, does this mean the LOS will be more severe than has been modeled if bicycle traffic increases? Are bicycle-shared lanes individually identified in the

**Response 12.4**

The study does not contain any information or data on the number of cyclists that are riding on the sidewalk and behaving like a pedestrian at a signalized crosswalk. This information is not required by the City's methodology when assessing LOS at an intersection.

**Response 12.5**

The City's method for calculating intersection LOS does not include the effect of bicycles on an intersections capacity. No adjustments were made to intersection capacity for slow moving bicycle traffic, as these are not considered significant enough to affect LOS.

**COMMENTS**

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12.6 Comment 06 (Regarding which aspects of bicycle & pedestrian plan are incorporated)

Page 30 of Appendix F enumerates the list of projects that are included in all of the scenarios. Some of them, particularly certain road diets, are easy to confirm have been included in the model: Studied intersections are diagrammed as having a certain number of lanes turning left, going through, or turning right, and I can confirm these with Google Maps and/or Google StreetView. In the future scenario, studied intersections show reduced numbers of lanes, consistent with some of the road diets listed (e.g., GlenOaks Blvd and Pacific Pedestrian plan curb extensions at studied intersection #1). Are all of these projects included in the future models? For example, the Doran Street Traffic Calming project doesn't alter any of the studied intersections' lane counts. However, in summing the flows southbound leaving intersection #9 and comparing to southbound entering intersection #15, there isn't much change in their difference, where the difference would likely be caused by traffic turning in either direction along Doran. Were the projects that did not directly alter the studied intersections included in the traffic model?

**Response 12.6**

All of the projects listed in Appendix F were included in the traffic forecasting models. For projects that did not directly affect an intersection's capacity, alternate adjustments consistent with the project description were included. For example, the Doran Street Traffic Calming project was implemented by reducing the free flow speed on Doran Street within the project limits.

**Response 12.7**

Please refer to Topical Response No. 5 Recreation – Parks and Open Space.

**Response 12.8**

The traffic model assumed a modal shift from automobiles to transit near the proposed transit stations. The model did not include any assumptions about whether park-and-ride stations would be constructed or available.

**Response 12.9**

Under the proposed project analyzed in the Program EIR prepared for the SGCP, any changes to the zoning in the Plan area would be contingent on public transit coming first.

12.7 Comment 07 (Regarding no change in park allocation)

It has long been noted that Glendale overall, and South Glendale in particular, are underserved by open space such as parks. According to Table 9 on page 29 of Appendix F, there is going to be no additional park space added through 2040, according to these plans. Thus, all of the future plans are proposing to FURTHER underserve the residents of South Glendale in this regard. Why was the addition of open space/parks not included in the South Glendale plan and what would be the expected impact on traffic in the model?

12.8 Comment 08 (Regarding Proposed Project support for proposed rail lines)

On page 28 of Appendix F, the Propose Project cites development around future transit stations. Are such transit stations included in the traffic model? In particular, are they represented as a land use type? Such transit stations might become a destination (e.g., "park & ride") or just a neighborhood parking burden (where ridership parks, but not in a purpose-designated parking facility).

12.9 Comment 09 (Regarding Proposed Project support for proposed rail lines)

Does the Proposed Project anticipate making development conditional on the opening of the proposed rail line extensions? In this way, we wouldn't suffer increased density for a transit system that doesn't materialize when expected. Rail lines and subways and the like are known for running late as projects, sometimes multiple decades late, if not being cancelled altogether. If the alleged

**COMMENTS**

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12.9 cont. benefit of high density development is based upon such specific transit lines, then let those transit lines exist first (or at least get to some degree of substantial progress), before any high density development exploiting that resource is undertaken.

12.10 Comment 10 (Regarding single grade 'F', not F(0), F(1), etc.: p10)

The LA County Metro CMP 2010 (cited on page 10 of Appendix F) provides a table in its section A.6 Intersection Level of Service Calculations (on its page A.3), translating Volume/Capacity ratios (V/C) into LOS letter grades 'A'-'E', but above that, a V/C from >1.00 to 1.25 is 'F(0)', from >1.23 to 1.35 is 'F(1)', and so on, thereby continuing the tiers of increasing. According to the CMP, "Levels of service must be assigned based on overall intersection V/C ratios as shown below" i.e., F(0), F(1), etc. However, in the present study, only the simple grade 'F' is used, which understates the degree to which an intersection is compromised in some circumstances in the report (e.g., Study Intersection #44, San Fernando Rd. & Los Felix, where the 2016 Existing AM LOS is "C" (ICU=0.754) and PM LOS is "E" (ICU=0.906), but in the Proposed Project 2040, the AM LOS, reported as "F" should be "F(0)" (ICU=1.179) and the PM LOS, reported as "F" should be "F(1)" (ICU=1.325, which is 3/4 of the way to F(2)!). Here, the use of "F" hides a two-tier jump (from E->F(1)) as a single letter grade difference (E->F). This is particularly concerning as this intersection is near a major hospital, meaning that congestion at this intersection can compromise access to emergency medical services. (Note: The "F(0)" reporting style \*is\* used in the Appendix F in conjunction with Freeway Level of Service reporting.)

12.11 Comment 11 (Regarding modern transportation modes not accounted for: Ride Sharing)

The Draft Transportation Analysis Report seems to have little consideration or analysis devoted to emerging transportation modes, e.g., ride sharing services such as Uber & Lyft, and fledgling self-driving vehicle technologies. There seems to be no consideration given for how to make popular destinations more friendly to such services, anticipating that suitable ride spotting and pickup locations would be appropriate, even though these could become a dominant mode of travel. Present-day anecdotes report that public transit takes from 2-4 times longer than a personal vehicle for an LA-area commute. There are extreme cases both good (e.g., live/work near stops along the same transit line) and bad (e.g., point-to-point where extraordinary routing is needed, making for a four-hour traversal of the county).

**Response 12.10**

The Los Angeles Metro Congestion Management Program (CMP) methodology uses freeway LOS grades F(0), F(1), F(2), F(3) for locations that are operating at different volume-capacity ratios above 1.0. The intersection methodology used by the City assesses LOS based on a similar scale but does not require intersections operating at LOS F (v/c of 1.0 or greater) to be graded as F(0), F(1), F(2), etc.

**Response 12.11**

The traffic analysis considers ride-sharing services to the extent that those trips are already occurring today. These trips are included in the existing traffic counts and incorporated into the analysis. The future year analysis does not incorporate any additional volumes for privately operated Transportation Network Companies (TNCs), such as Uber and Lyft, as information regarding their travel behavior and operations is not readily available. Planning for individual pick-up and drop-off locations is also not considered in the Transportation Analysis Report.



**COMMENTS**

**RESPONSES**

12.12 Comment 12 (Regarding modern transportation modes not accounted for: Electric Vehicles)  
The Draft Transportation Analysis Report seems to have little consideration or analysis devoted to electric vehicles, and in particular, electric vehicle charging infrastructure. New developments are required to allocate a certain number of parking spaces for various purposes (handicapped, employee parking, etc.), but what is the consideration being given for electric vehicle (EV) charging, both at home and at work? EV charging is substantially slower than refueling a gasoline/diesel vehicle. And EV "fast charging", while it exists, is less energy efficient than a slower paced charging. Are any aspects of electric vehicles being promoted (or inhibited) by the plan?

12.13 Comment 13 (Regarding air quality)  
Has the increased commute times due to congestion from increasing LOS been factored into any air quality estimates under each of the plans? Per Appendix F, Table 5, there are over 1/2 million vehicle trips taken to, from, or within Glendale each weekday. How much extra delay is each trip going to encounter on average, and how much fuel does that represent being burned by idling engines?

12.14 Comment 14 (Regarding the road diet on Glenoaks)  
Figure 4 of Appendix F (p19) shows 18% of trips from Glendale having a destination northeastward to Burbank and beyond. Glenoaks Blvd is classified as a "Major Arterial" and carries a non-trivial portion of this traffic. What is the effect of the Glenoaks Blvd road diets on increasing this commute time and redistributing the traffic elsewhere (and at that, to where?).

12.15 Comment 15 (Regarding the road diet on Los Feliz)  
Figure 4 of Appendix F (p19) shows XX% of trips from Glendale having a destination west-by-southwest toward Los Angeles and the I-5. Los Feliz Road is classified as a "Major Arterial" and carries a non-trivial portion of this traffic. What is the effect of the Los Feliz Road road diet on increases this commute time and redistributing the traffic elsewhere (and, at that, to where?)

12.16 Comment 16 (Regarding the road diet on Chevy Chase Drive)  
Chevy Chase Drive is classified as a "Minor Arterial" that carries a significant amount of traffic. The intersection at Chevy Chase and Glendale is configured in both the Existing 2016 and all the 2040 scenarios as having two through eastbound lanes. However, this contradicts the assertion on page 30 of

**Response 12.12**

EV charging stations are not currently required as part of the zoning codes. However, pursuant to State and local building codes, all new developments within the City are required to provide the necessary infrastructure to allow for the installation of future EV charging stations.

**Response 12.13**

As stated in Section 4.2.3 of the Draft EIR, operational emissions of criteria air pollutants and precursors were evaluated in accordance with SCAQMD's CEQA Air Quality Handbook (SCAQMD 1993). Emissions estimates included long-term operational emissions of ozone precursors (i.e., NO<sub>x</sub> and VOC) associated with mobile-sources (i.e., trip generation) and stationary sources (e.g., area wide and energy consumption). Annual trip generation rate and vehicle miles traveled (VMT) were based on information in the Transportation Analysis Report (Appendix F). Construction and operational emissions of criteria air pollutants and precursors were calculated using CalEEMod, as recommended by SCAQMD.

As shown in Table 4.2-7 of Section 4.2.3, operation-related activities would result in mass emissions of VOC, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and CO that exceed the SCAQMD-recommended thresholds of significance. Thus, VOC, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and CO emissions generated under full buildout of the proposed SGCP may result in adverse air quality impacts to existing surrounding land uses and may contribute to the existing adverse air quality condition in the SCAB. This would be a potentially significant impact. Implementation of mitigation measures MM 4.2-1 and MM 4.2-2 would reduce this impact, but not to a less than significant level.

**Response 12.14**

The Glenoaks Boulevard road diet was included in the travel model and reflects the redistribution of traffic to parallel other facilities within the vicinity of the lane reduction. Therefore, the LOS calculations reflect the decrease in available vehicle capacity. The analysis does not consider or evaluate the impact of the road diet on travel commute times: this is not required for the EIR analysis.

**Response 12.15**

See response to comment 12.14 above.

**Response 12.16**

The lane reductions occur east of the intersection at Glendale/Chevy Chase, such that two eastbound through lanes are available at the intersection.

**COMMENTS**

**RESPONSES**

12.16 cont. Appendix F regarding a road diet of one-lane closed in each direction along Chevy Chase between Glendale and Acacia.

Comment 16 (Regarding "decrease vehicle trip generation")  
On page 32 of Appendix F, the 3rd paragraph discusses the factors by which diversity and density "decrease vehicle trip generation". I presume there is a specific, technical definition for "vehicle trip generation", however it is not given. I'm thinking that if a small community of 100 people generate some number X of vehicle trips per day, they have a "vehicle trip generation RATE" of X/100. According to the figure given, if that same community is increased by one individual (1% density increase), the new "vehicle trip generation RATE" will be  $(0.9996 * X/100)$ ? Where the 0.9996 is  $1 - 0.04\%$ . However, the number of trips generated is  $101 * (0.9996 * X/100)$ , which is very close to  $(X+1)/100$ . That is, the higher population of a higher density community generates MORE trips than a smaller population at a lower density, but the "vehicle trip generation RATE" is smaller. If I'm wrong on that, please explain!

12.17  
Comment 17 (Regarding trip reduction strategy)  
On page 34, Table 11 summarizes the trip reduction programs and expected efficacy. About 80% of the trip reductions come from manipulating the parking supply (limiting the parking supply, increasing the price of parking, etc. - and one should add to this list, stepping up enforcement of parking meter use). Note that manipulation of parking supply is more than 7x as effective as the "transit system" group (in all cases, using the high end of the range given for the expected Reduction column). Consider, however, that parking as it relates to downtown is for people going to work (employees) and clients and customers coming to businesses. Is this something that we want to curtail? While employees can sometimes be considered to have an inelastic demand for the trip - i.e., they'll do anything it takes to get to their job, it's not always true: In a tight labor market, making the commute more difficult means your employee takes a different job that isn't so inconvenient. Businesses won't appreciate making it harder for their clients and customers to access them.

12.18  
Apologies for my only having time to analyze Appendix F.

I look forward to your reply regarding these comments.

Sincerely,  
Bill Redmann

**Response 12.17**

Vehicle trip generation describes the rate at which vehicle trips are generated for a specific quantity of land use (i.e., residential dwelling units or thousand square feet of retail). The commenter is correct that increases in land use generate more vehicle trips and also that the overall trip rate will be lower when the benefits of increased diversity and density are incorporated.

**Response 12.18**

The trip reduction strategies incorporated into the traffic model and analysis are consistent with the goals and policies for each of the subareas described in the SGCP. The commenter's opinion regarding parking supply is noted and will be included in the Final EIR for consideration by City Council before making a decision on the project.

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Monday, March 12, 2018 10:34 AM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 13 Brian Watters**

**Response 13.1-13.13**

This comment letter is the same as an earlier comment letter (Letter No. 3). Refer to responses to comments 3.1 through 3.13.

- 13.1 I object to the South Glendale Community Plan (SGCP) since:
  - a) contrary to SGCP's claims, it is NOT the vision of our community – unless our community is suicidal; it is rather the vision of developers who are the only ones to benefit and whose greedy mega developments have already ruined our community within/bordering the Downtown Specific Plan area;
  - 13.2 b) it suggests an unacceptable, unjustifiable and, most importantly, an unsustainable upzoning of high density areas into mixed use zones, adding new zones for transit areas, as well as changes within the present zoning requirements (e.g., removal of setbacks in R1250) to allow for more height of buildings and more density of population, which have proved to be a DISASTER for the Glendale community within/bordering the DSP area already;
  - 13.3 c) it is premised on the fictions that people who are close to bus routes and transit areas will necessarily use buses and people who live close or at the mixed-use buildings (to be built) with first level retail stores will necessarily find employment in the retail stores, thereby promoting walkability, revitalization and employment in Glendale, whereas these are just practically unrealistic, logically flawed and statistically unsupported speculations; and finally
  - d) the Environmental Impact Report (EIR) prepared for the proposed SGCP, with its SEVEN (7) SIGNIFICANT and UNAVOIDABLE adverse ENVIRONMENTAL IMPACTS is PROOF that the new developments and the associated dramatic growth in density of the population expected under the SCGP will irreversibly and permanently affect both the QUALITY OF LIFE and the SAFETY of Glendale residents.
- 13.4 Therefore, the only comment to the EIR is: SGCP is unacceptable and should be discarded.  
  
Moreover, I propose to create a new SGCP with the objective to FIX the environmental impacts caused by or anticipated from the recent DSP area (part of South Glendale) developments and approved projects by: a) DOWNZONING areas in South Glendale to disallow any future mega developments; b) creating

**COMMENTS**

**RESPONSES**

13.4 cont. | MORE OPEN SPACE AND MORE PARKS to counterbalance the shortage created by the constructed or already approved mega developments.

13.5 | South Glendale community is already on LIFE SUPPORT, in view of the recent aggressive and unreasonable mega developments within/bordering DSP area, which resulted in more traffic, less parking, less open and green space, and higher rents. The adoption of the SGCP will just TURN OFF THE LIFE SUPPORT for Glendale community; PLEASE, DON'T DO IT!

\*\*\*\*\*

13.6 | The EIR (environmental impact report) of the SGCP openly identifies SEVEN (7) environmental impacts that will be UNAVOIDABLE and SIGNIFICANT and will NOT have any mitigation measures:

1) Aesthetics – per EIR, the current visual character and quality of the site and its surroundings, “would be substantially degraded”; “the proposed projects would result in new sources of increased shade.”

Historically, the character of our jewel City of Glendale has been its quiet streets, its cozy low-rise buildings, with plenty of views of mountains, blue sky, and green space. Glendale has been intended to be a suburb to Los Angeles; not to become Los Angeles.

13.6 | The proposed SGCP, with upzoning, addition of new transit zones, changes within the current zone requirements, and even the innocent looking density bonuses so generously awarded to all Developers, would be contrary to the community character and historic designation of the City of Glendale and will significantly impact the QUALITY OF LIFE of its residents.

South Glendale, which encompassed the Downtown Specific Plan, has already been impacted by the unreasonable approvals of numerous mega development projects within DSP and at times bleeding outside the DSP), where developers constructed high-rise buildings, with inconsistent and aesthetically unappealing designs (blue, yellow, orange, and red painted walls), with parking variances (allowing for less parking spaces than required by the code) and density bonuses (allowing for more people and more units than allowed by the code). Further, the mega developments have also eliminated so much of open green space required for our visual and mental relief, made our streets impassable due to traffic congestion, and created lots of shades to the adjacent units. SGCP should now focus on creating more open space and more parks, rather than continue the same development trend which has proved to be a disaster already.

**COMMENTS**

**RESPONSES**

13.6  
cont. | Moreover, the aesthetics and quiet low-rise residential character of South Glendale community is not only important for the preservation of the character per se or for the historic designation of Glendale as a suburban place, but also imperative and absolutely necessary for the mental health and the associated physical health of the Glendale community (healthy soul, healthy body). The recent years' mega developments in DSP zone, encompassed by the South Glendale (with their traffic congestion, noise, etc.) have only added to the stress of Glendale residents and deprived them of the green and/or open spaces to relieve that stress.

Therefore, the environmental impact to the aesthetics and character of Glendale, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city officials (Planning Commission or City Council).

13.7 | 2) Air quality: Per EIR, the implementation of the proposed project would:  
a) "conflict with or obstruct implementation of the applicable air quality plan";  
b) "violate an air quality standard or contribute substantially to an existing or projected air quality violation"; c) "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)";  
d) "expose sensitive receptors to substantial pollutant concentrations."

Indisputably, the above quotations from the EIR itself make it apparent that the SGCP will dramatically affect the QUALITY OF LIFE of Glendale residents from the perspective of air quality. Air has no boundaries; air pollutants will affect the entire Glendale community. Air quality is important for both our physical and mental health and it cannot be compromised.

Therefore, the environmental impact to the air quality, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

13.8 | 3) Greenhouse Gas Emissions: The proposed project a) "would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment"; b) "would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses."

**COMMENTS**

**RESPONSES**

13.8  
cont. It is undeniable that the adverse effects of greenhouse gas emission and the associated air pollution will dramatically affect the quality of life and the physical and mental health of the entire Glendale community, since there are no air boundaries and since South Glendale – due to its vast array of retail stores and recreational facilities – is the most visited by all Glendale residents.

Therefore, the environmental impact to the greenhouse gas emissions, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

4) Population and Housing: Per EIR, the “implementation of the proposed project would induce substantial population growth in an area, either directly or indirectly.”

It is indisputable that most of South Glendale presently does not have and geographically cannot provide the adequate road infrastructure to accommodate such a substantial population growth. The streets in Glendale, especially outside the DSP area, are mostly one-lane in each direction, with the so much needed street parking on both sides of the streets. Allowing an increase in the population, where there are no adequate road and parking infrastructure, is unacceptable for both the current and future residents of Glendale.

13.9 Moreover, the recent mega developments in Glendale, while recommended, lauded, and even approved by city staff, have proved to be a disaster for Glendale residents in view of the increased traffic, impassable streets, elimination of street parking for public, and allowing developers to provide less parking spaces than required by the code. South Glendale community has greatly suffered already; now is the time to stop the mega developments in South Glendale and to evenly distribute population growth in the entire Glendale.

As for housing, it is undisputed that all the developers who have implemented or are implementing projects within/bordering the DSP area have demolished (or plan to demolish) the presently affordable rental buildings, have constructed mega buildings with smaller units and double rents, have pushed the rents in Glendale up, and – despite providing a few units of affordable housing – have actually created and furthered the housing crisis in South Glendale. Plus, most of the recent mega developments in the DSP area are not fully occupied till present due to the unaffordable rents.

There is simply no sound justification to further the population increase and housing crisis.

COMMENTS

RESPONSES

13.9  
cont. | Therefore, the environmental impact to the population and housing, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

5) Public Services: Per EIR, the implementation of the proposed project would:  
a) "increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand"; b) would increase the demand of police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. Moreover, per EIR, Glendale is already far below the required response time for public services (e.g. fire protection).

The mentioned environmental impacts of increased need for fire protection and police protection stem from the anticipated dramatic increase of population and the associated likelihood of fire and crimes/accidents/fatalities based on the SGCP. Most importantly, per EIR, there cannot be any mitigation to this impact.

13.10 | EIR is clear that South Glendale community, upon the proposed SGCP, will suffer from poor response times of public services (fire protection, police); this environmental impact actually threatens not just the quality of life, but the SAFETY of Glendale community.

It should be noted that, even if the currently understaffed fire protection and police services extend their staff and structures to accommodate the expected population growth under SGCP – which EIR openly declares non feasible and impossible – the current inadequate road infrastructure (narrow one-lane each direction in most South Glendale) and the traffic increase anticipated by the SGCP will nonetheless further slow the response time for public services and will therefore make South Glendale unsafe to live in.

Therefore, the environmental impact to the public services, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

13.11 | 6) Recreation: Implementation of the proposed project would: a) "increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated"; b) "require the construction of new recreational facilities or the expansion of existing recreational facilities that could have an adverse physical effect on the environment."

**COMMENTS**

**RESPONSES**

13.11  
cont.

It is undisputed that recreation is a vital component and need for a healthy community; it is imperative to create more recreational facilities and parks and it is disastrous to further the lack of those, as anticipated by the SGCP based on the EIR finding.

First, ironically, the fact is: there are presently only a few recreation facilities in South Glendale, and those are all already overcrowded and lacking the adequate parking or open space. For example, the YMCA’s visitors do not have adequate parking and presently utilize the adjacent streets of Kenwood or Louise and the presently available parking lots nearby. But, per City Council’s decision, the adjacent public parking on Louise will soon cease to provide parking since a new development of “Louise Hotel” has been approved for the site. And the GUSD parking lot, which specifically provides additional parking for YMCA after school hours, may cease to provide parking because of a proposed mega development on that site waiting for final approval by the City Council. This is just one example, but it can be equally applied to all presently available recreation facilities. Not to mention, the parking to Americana – another major recreational place – is unaffordable for most of Glendale residents.

Second, it is no secret that there are only a few parks in South Glendale; one of the only big parks on Brand and Colorado will soon become home for another approved development.

Third, all the parks and recreational facilities that have been created or planned recently are located far outside of South Glendale, in the mountains, which are not accessible for the most vulnerable group of our society - our children, elder people, or people who cannot afford to get to those destinations (due to lack of cars, lack of funds, or incapacity to drive).

The proposed SGCP, per EIR, not only does not resolve the problem with the current shortage of parks and recreational facilities, but actually unacceptably furthers the problem.

Therefore, the environmental impact to the recreation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

13.12

7) Transportation: Per EIR, the implementation of the proposed project “would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.”



**COMMENTS**

**RESPONSES**

13.12 cont. It is undisputed that the road infrastructure in Glendale is insufficient and has not been historically designated/intended to accommodate the dramatic increase of population anticipated by the proposed SGCP. The end result of the dramatic increase of population and the associated dramatic and unsustainable impact on transportation will be traffic congestion, traffic noise, more traffic accidents and fatalities, more pedestrian fatalities, etc. This will undeniably deteriorate the quality of life of all Glendale residents.

Moreover, the recent DSP area developments are just proof of how congested and impassable our roads have become; this problem with transportation should be fixed and not furthered more. Suggesting more bus routes will not resolve the problem, as confirmed by EIR. Plus, there is no guaranty and no common sense to assume that creating more bus lines will make people take buses, or providing bicycle lanes will make people risk their lives and use bicycles in the already congested and crowded streets of Glendale.

Therefore, the environmental impact to transportation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

13.13 To summarize, the EIR's identified seven environmental impacts will adversely and permanently affect both the quality and the safety of Glendale community; those cannot and should not be overridden or overlooked by any decision making city official. Therefore, the proposed SGCP is unacceptable for the South Glendale community and should be discarded.

Brian Watters  
briancwatters@gmail.com

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Tuesday, March 06, 2018 5:50 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 14 Cathy Hrenda**

**Response 14.1**

14.1 I urge you to accept the No Project alternative because the EIR has identified that Emergency Services (GFD and GPD) in the SGCP area are currently not within standards and will be adversely effected by continued development with no mitigation. GPD is already below recommended staffing levels and GFD response times are currently below agency standards. Both of these bell-weather criteria will further deteriorate with increased development. A plan to increase Emergency Services for South Glendale needs to be implemented before increasing development.

Police and Fire Service is discussed in Section 4.13 of the Draft EIR. Impacts from the need to add or expand existing public service facilities due to increased calls for service, service ratio maintenance, response times or other performance objectives due to project implementation are considered significant and unavoidable. Facilities will be added or expanded to the extent and when project implementation makes such facilities necessary to maintain existing levels of service. When that will happen depends on the rate at which the SGCP is implemented on a project-level basis. As evaluated in Section 4.13.3 of the Draft EIR, the City cannot avoid potential impacts on police and fire protection services from implementation of the proposed SGCP. Adding police and fire personnel to maintain service ratios has the potential to create a significant impact from the provision of new or physically altered facilities and the construction of which could cause significant environmental impacts to accommodate the increased service demand. While it is the City's policy to maintain adequate service ratios for police and fire personnel, and it is probable that new development will contribute its fair share of property taxes and other revenues to pay for added services and contribute to the addition of new facilities, because this future contribution cannot be guaranteed to meet the need, this impact is treated as significant and unavoidable.

14.2 New recreational spaces must also be developed in South Glendale before increasing development. The Glendale General Plan Recreation Element establishes a standard of 6 acres of recreational land per 1000 persons. With a current population of 102,338 and recreational land at 23.19 acres we have a deficit of 590 acres. The proposed plan increases the South Glendale population to 130,248 without an increase in recreational land. This means the deficit will increase to 758 acres. In other words, more people will be stressing our already overused parks and there is no proposal for mitigation of this lack of park land.

**Response 14.2**

As stated in Section 4.14.3 of the Draft EIR, although implementation of the proposed SGCP would result in a reduced deficiency in recreational land available to the residents of South Glendale, the area would remain in noncompliance with the 6 acres of recreational land per 1,000 residents under the No Project Alternative. There are no feasible mitigation measures that would reduce the impacts on recreation to a less than significant level from a program level. It should be noted however, development impact fees are imposed on new development as a condition of the issuance of a building permit or subdivision tract map for project development, and payment of such fees is considered full mitigation of recreation impacts for an individual project. Nonetheless, overall, environmental impacts on parkland and park facilities from implementation of the project are expected to be significant and unavoidable.

Cathy Hrenda  
smEEK3@charter.net

**COMMENTS**

**RESPONSES**

**From:** website@glendaleca.gov [mailto:website@glendaleca.gov]  
**Sent:** Monday, March 12, 2018 3:47 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 15 Cheryl Frees-Yvega**

**Response 15.1**

15.1 [ A quick note about the SGCP – the RCPOA (Royal Canyon Property Owners Association) stands by the consensus at the GHCC March meeting that the impacts of the proposed project are significant and greater mitigation is required.

This comment is conclusive in nature and does not raise a significant environmental issue for which a response is required. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

Thank you,

Cheryl L Frees-Yvega,  
President, RCPOA  
cheryl.frees@gmail.com

COMMENTS

RESPONSES

From: websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
Sent: Thursday, March 08, 2018 7:28 PM  
To: Krause, Erik <EKrause@Glendaleca.gov>  
Subject: City of Glendale, CA: SGCP EIR Comments

Letter 16 Christopher Welch

Response 16.1

The City concurs with the comment and Figure 2-1 will be modified accordingly. The area in Roads End that is presently designated "low density" in the existing General Plan and zoned R1R should have been proposed for re-designation as "Single Family Hillside Residential" in the SGCP. The single-family hillside neighborhood in Roads End is similar to the areas in Adams Hill which are also zoned R1R and are proposed to be re-designated "Single Family Hillside Residential." No change is proposed in Roads End for the area presently designated "Moderate Density Residential" and zoned R3050.

Response 16.2

The City concurs with the comment that Roads End is currently designated Low Density Residential and Moderate Density Residential. Table 4.9-1 will be edited to remove Roads End from the Medium Density Residential category and add it to the Moderate Density Residential one. Also, Table 4.9-2 will be edited to add Roads End to locations for the R1R (Restricted Residential) Zone.

Response 16.3

The City concurs with the comment and has edited the following text under the Glendale Beeline section as follows:

The Glendale Beeline operates nine fixed routes within the proposed SGCP area, as shown in Table 4.15-5.

Response 16.4

The City has edited the respective text within the Draft EIR accordingly.

Response 16.5

The City appreciates the support expressed by the commenter. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

- 16.1 I have the following notes regarding what I believe to be errors in the report which should be corrected:  
Figure 2-1 shows my neighborhood of Roads End as "low density" in the proposed plan versus Single Family Hillside. The Roads End neighborhood, excepting a small portion of Mission near Glendale Ave is currently zoned as R1R, the same as the rest of Adams Hill, and is besides generally hillside in nature. Certainly my own home is on a steep slope, as are all the homes abutting mine.
- 16.2 Table 4.9-2 shows Roads End within the multi-family zones on the table. As noted above, only a small section of the neighborhood is R3050, the vast majority is R1R.
- 16.3 Page 4.15-12 -- This section (as well as the attached Fehr + Peers study) reference the Glendale Beeline as having "101 routes" -- this is a gross overstatement and I believe is simply a typographical error. The Beeline has only 10 routes.
- 16.4 I strongly demand the erroneous items be corrected; to not correct them would be a gross injustice and could be misconstrued by future readers of the report.
- 16.5 That said, and assuming that the corrections are adopted, I have no opposition to this proposed plan -- in fact I support it. The reality is that the entire Southern California region will grow naturally and even today is badly in need of additional stocks of housing. In all of Glendale, only the proposed Tropic Urban Center is a true Transit Oriented neighborhood. Downtown Glendale -- where almost all housing has been developed is -- in my opinion -- a relative transit desert. Yes, there is one Rapid bus line connecting between Hollywood and Pasadena, and a couple of local Metro lines and the Beeline -- but that is a very limited selection of transit options within walking distance. As such, downtown is likely to be badly overrun with more and more cars, creating significant local impacts.

**COMMENTS**

**RESPONSES**

**16.5 cont.** Tropic on the other hand is a virtual transit heaven. While there is no Metro Rail service, there is very good Metrolink service from the GTC, with 30 daily round trips between Glendale and Union Station, as well as connections to Burbank Airport. During the morning peak hours between 6:54 and 9:58 am there are a total of 11 trips to downtown LA in 3 hours -- an average headway of about 16 minutes between trains!

Furthermore, a round trip monthly Metrolink Pass between Glendale and Downtown LA costs only \$70. This is cheaper than a Metro EZ Pass by \$40 -- while delivering the equivalent value to the EZ Pass as well as Metrolink service. I personally use the Metrolink service daily for my commute into downtown LA.

In addition to the Metrolink service, the intersection of Los Feliz and San Fernando is the nexus of two Metro Rapid lines, connecting this intersection with Downtown LA, Hollywood, Burbank/Sylmar and Pasadena. Beyond these Rapid services there are no fewer than 5 other Metro local services and multiple Beeline routes.

This area will greatly benefit by policies such as the elimination of minimum parking standard (possibly even imposing MAXIMUM parking standards) and significantly increasing the density in the area. Mixed use should be encouraged along the major streets like San Fernando, Central and Los Feliz and design requirements should attempt to create a welcoming street for walking, sidewalk cafes and a genuine urban feeling. The Glendale Planning Department and Design Review committees should be ashamed of having allowed that horrible CVS development to have been built at such an important gateway to the City. It is an absolute horror of a development, with surface parking lots and an entrance on the corner of Los Feliz that is a joke -- because CVS keeps it locked permanently.

If the Tropic Urban District, as well as the upzoning and allowance of mixed use development on Central are done well, and designed to encourage "Complete Streets" as we should be doing for this city as a matter of law, then we can look forward to a welcoming urban district supported by restaurants attracted to the throngs of walking residents that we should be attempting to attract. I look forward to that in the coming decades, and will continue to be an advocate for "good" development, and not a continuation of development for the sake of cars, and cars alone.

Christopher Welch  
cwelch91205@att.net

COMMENTS

RESPONSES

February 9, 2018

Laura Stotler AICP

Principal Planner

Community Development , Planning and Neighborhood Services

633 E. Broadway, Room 103

Glendale, CA 91206

RE: 1500 South Glendale Ave., Glendale, CA 91205

Dear Laura.

As the City is preparing to finalize the long awaited South Glendale Specific Plan, I would like to once again express our interest in developing the above property, consisting of 28,892 SF with a mixed use project, finally replacing the old buildings with a quality modern structure.

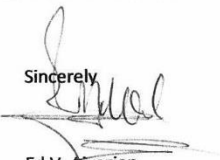
As you are aware, the property has split zoning. The frontage on Glendale Avenue has C3I and the rear of the lot has R1R. I am requesting that the entire site be zoned C3 and designated for mixed use low land uses. Alternately, please consider putting a PPD overlay zone on the property.

17.1

The first floor of the project shall consist mainly of retail & related uses, while the upper floors shall be developed with residential units, complying with the guidelines & the standards of the City of Glendale.

I would greatly appreciate it if you could keep the above in mind , while you and your colleagues are finalizing the South Glendale Specific Plan.

Any guidance, suggestions or comments will also be greatly appreciated.

Sincerely  


Ed V. Aivazian

Property Owner's Representative

T: (818) 355-5985

E: edaivazian@yahoo.com

Letter 17 Ed Aivazian

Response 17.1

A PPD overlay zone cannot be include in the SGCP, since it requires the approval of precise plan of design. As a result, this overlay zone could occur without first having a design for a specific proposal. Furthermore, request for a PPD overlay must go before the Design Review Board for a recommendation prior to be considered by the Planning Commission and then City Council.

This comment does not raise a significant environmental issue for which a response is required. The comment will be included in the Final EIR and made available for consideration by City Council before making a decision on the project.

**COMMENTS**

**RESPONSES**

**From:** website@mail@glendaleca.gov [mailto:website@mail@glendaleca.gov]  
**Sent:** Tuesday, January 30, 2018 9:40 AM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

Dear City of Glendale,

18.1 I wanted to comment on the EIR. As a resident of S. Glendale, I am happy to see the changes you are proposing. We definitely need some updates to this side of the city, especially with our streets and electric lines. I am looking forward to more affordable housing too. Some of these landlords think they can raise rent because the newly developed buildings are much higher.

18.2 But I wanted to ask why there is not a more robust plan for planting trees. As you see, N. Glendale has lots of trees, and this helps them stay cool during the hot months. Our main streets in S. Glendale can be difficult to walk through in the summer because it's too hot.

Will you look into incorporating more trees in this plan?

Thank you.  
Eliz Hekimyan  
eloskids@aol.com

**Letter 18 Eliz Hekimyan**

**Response 18.1**

This comment is introductory in nature and does not raise a significant environmental issue for which a response is required. The City appreciates the support expressed by the commenter.

**Response 18.2**

The City acknowledges and appreciates this comment. As stated in Section 4.1.2 of the Draft EIR, the SGCP provides Comprehensive Design Guidelines, including direction on landscaping features such as the planting of mature trees, for all new development within the SGCP area.

This comment will be included in the Final EIR for review and consideration by City Council.

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Sunday, March 11, 2018 10:33 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 19 Emma Amiryan**

**Response 19.1-19.13**

This comment letter is the same as an earlier comment letter (Letter No. 3). Refer to responses to comments 3.1 through 3.13.

- 19.1 I object to the South Glendale Community Plan (SGCP) since:
  - a) contrary to SGCP's claims, it is NOT the vision of our community – unless our community is suicidal; it is rather the vision of developers who are the only ones to benefit and whose greedy mega developments have already ruined our community within/bordering the Downtown Specific Plan area;
  - 19.2 b) it suggests an unacceptable, unjustifiable and, most importantly, an unsustainable upzoning of high density areas into mixed use zones, adding new zones for transit areas, as well as changes within the present zoning requirements (e.g., removal of setbacks in R1250) to allow for more height of buildings and more density of population, which have proved to be a DISASTER for the Glendale community within/bordering the DSP area already;
  - 19.3 c) it is premised on the fictions that people who are close to bus routes and transit areas will necessarily use buses and people who live close or at the mixed-use buildings (to be built) with first level retail stores will necessarily find employment in the retail stores, thereby promoting walkability, revitalization and employment in Glendale, whereas these are just practically unrealistic, logically flawed and statistically unsupported speculations; and finally
  - d) the Environmental Impact Report (EIR) prepared for the proposed SGCP, with its SEVEN (7) SIGNIFICANT and UNAVOIDABLE adverse ENVIRONMENTAL IMPACTS is PROOF that the new developments and the associated dramatic growth in density of the population expected under the SCGP will irreversibly and permanently affect both the QUALITY OF LIFE and the SAFETY of Glendale residents.
- 19.4 Therefore, the only comment to the EIR is: SGCP IS UNACCEPTABLE AND SHOULD BE DISCARDED.  
  
Moreover, I propose to create a new SGCP with the objective to FIX the environmental impacts caused by or anticipated from the recent DSP area (part of South Glendale) developments and approved projects by: a) DOWNZONING areas in South Glendale to disallow any future mega developments; b) creating



**COMMENTS**

**RESPONSES**

19.4 cont. MORE OPEN SPACE AND MORE PARKS to counterbalance the shortage created by the constructed or already approved mega developments.

19.5 South Glendale community is already on LIFE SUPPORT, in view of the recent aggressive and unreasonable mega developments within/bordering DSP area, which resulted in more traffic, less parking, less open and green space, and higher rents. The adoption of the SGCP will just TURN OFF THE LIFE SUPPORT for Glendale community; PLEASE, DON'T DO IT!

\*\*\*\*\*

19.6 The EIR (environmental impact report) of the SGCP openly identifies SEVEN (7) environmental impacts that will be UNAVOIDABLE and SIGNIFICANT and will NOT have any mitigation measures:

1) Aesthetics: per EIR, the current visual character and quality of the site and its surroundings, "would be substantially degraded"; "the proposed projects would result in new sources of increased shade."

Historically, the character of our jewel City of Glendale has been its quiet streets, its cozy low-rise buildings, with plenty of views of mountains, blue sky, and green space. Glendale has been intended to be a suburb to Los Angeles; not to become Los Angeles.

19.6 The proposed SGCP, with upzoning, addition of new transit zones, changes within the current zone requirements, and even the innocent looking density bonuses so generously awarded to all Developers, would be contrary to the community character and historic designation of the City of Glendale and will significantly impact the QUALITY OF LIFE of its residents.

South Glendale, which encompassed the Downtown Specific Plan, has already been impacted by the unreasonable approvals of numerous mega development projects within DSP and at times bleeding outside the DSP), where developers constructed high-rise buildings, with inconsistent and aesthetically unappealing designs (blue, yellow, orange, and red painted walls), with parking variances (allowing for less parking spaces than required by the code) and density bonuses (allowing for more people and more units than allowed by the code). Further, the mega developments have also eliminated so much of open green space required for our visual and mental relief, made our streets impassable due to traffic congestion, and created lots of shades to the adjacent units. SGCP should now focus on creating more open space and more parks, rather than continue the same development trend which has proved to be a disaster already.

**COMMENTS**

**RESPONSES**

19.6  
cont. | Moreover, the aesthetics and quiet low-rise residential character of South Glendale community is not only important for the preservation of the character per se or for the historic designation of Glendale as a suburban place, but also imperative and absolutely necessary for the mental health and the associated physical health of the Glendale community (healthy soul, healthy body). The recent years' mega developments in DSP zone, encompassed by the South Glendale (with their traffic congestion, noise, etc.) have only added to the stress of Glendale residents and deprived them of the green and/or open spaces to relieve that stress.

Therefore, the environmental impact to the aesthetics and character of Glendale, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city officials (Planning Commission or City Council).

19.7 | 2) Air quality: Per EIR, the implementation of the proposed project would:  
a) "conflict with or obstruct implementation of the applicable air quality plan";  
b) "violate an air quality standard or contribute substantially to an existing or projected air quality violation"; c) "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)";  
d) "expose sensitive receptors to substantial pollutant concentrations."

Indisputably, the above quotations from the EIR itself make it apparent that the SGCP will dramatically affect the QUALITY OF LIFE of Glendale residents from the perspective of air quality. Air has no boundaries; air pollutants will affect the entire Glendale community. Air quality is important for both our physical and mental health and it cannot be compromised.

Therefore, the environmental impact to the air quality, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

19.8 | 3) Greenhouse Gas Emissions: The proposed project a) "would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment"; b) "would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses."

**COMMENTS**

**RESPONSES**

**19.8 cont.** It is undeniable that the adverse effects of greenhouse gas emission and the associated air pollution will dramatically affect the quality of life and the physical and mental health of the entire Glendale community, since there are no air boundaries and since South Glendale – due to its vast array of retail stores and recreational facilities – is the most visited by all Glendale residents.

Therefore, the environmental impact to the greenhouse gas emissions, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

**19.9** 4) Population and Housing: Per EIR, the “implementation of the proposed project would induce substantial population growth in an area, either directly or indirectly.”

It is indisputable that most of South Glendale presently does not have and geographically cannot provide the adequate road infrastructure to accommodate such a substantial population growth. The streets in Glendale, especially outside the DSP area, are mostly one-lane in each direction, with the so much needed street parking on both sides of the streets. Allowing an increase in the population, where there are no adequate road and parking infrastructure, is unacceptable for both the current and future residents of Glendale.

Moreover, the recent mega developments in Glendale, while recommended, lauded, and even approved by city staff, have proved to be a disaster for Glendale residents in view of the increased traffic, impassable streets, elimination of street parking for public, and allowing developers to provide less parking spaces than required by the code. South Glendale community has greatly suffered already; now is the time to stop the mega developments in South Glendale and to evenly distribute population growth in the entire Glendale.

As for housing, it is undisputed that all the developers who have implemented or are implementing projects within/bordering the DSP area have demolished (or plan to demolish) the presently affordable rental buildings, have constructed mega buildings with smaller units and double rents, have pushed the rents in Glendale up, and – despite providing a few units of affordable housing – have actually created and furthered the housing crisis in South Glendale. Plus, most of the recent mega developments in the DSP area are not fully occupied till present due to the unaffordable rents.

There is simply no sound justification to further the population increase and housing crisis.

**COMMENTS**

**RESPONSES**

19.9  
cont. | Therefore, the environmental impact to the population and housing, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

5) Public Services: Per EIR, the implementation of the proposed project would: a) "increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand"; b) would increase the demand of police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. Moreover, per EIR, Glendale is already far below the required response time for public services (e.g. fire protection).

The mentioned environmental impacts of increased need for fire protection and police protection stem from the anticipated dramatic increase of population and the associated likelihood of fire and crimes/accidents/fatalities based on the SGCP. Most importantly, per EIR, there cannot be any mitigation to this impact.

19.10 | EIR is clear that South Glendale community, upon the proposed SGCP, will suffer from poor response times of public services (fire protection, police); this environmental impact actually threatens not just the quality of life, but the SAFETY of Glendale community.

It should be noted that, even if the currently understaffed fire protection and police services extend their staff and structures to accommodate the expected population growth under SGCP – which EIR openly declares non feasible and impossible – the current inadequate road infrastructure (narrow one-lane each direction in most South Glendale) and the traffic increase anticipated by the SGCP will nonetheless further slow the response time for public services and will therefore make South Glendale unsafe to live in.

Therefore, the environmental impact to the public services, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

19.11 | 6) Recreation: Implementation of the proposed project would: a) "increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated"; b) "require the construction of new recreational facilities or the expansion of existing recreational facilities that could have an adverse physical effect on the environment."

**COMMENTS**

**RESPONSES**

19.11 cont. It is undisputed that recreation is a vital component and need for a healthy community; it is imperative to create more recreational facilities and parks and it is disastrous to further the lack of those, as anticipated by the SGCP based on the EIR finding.

First, ironically, the fact is: there are presently only a few recreation facilities in South Glendale, and those are all already overcrowded and lacking the adequate parking or open space. For example, the YMCA's visitors do not have adequate parking and presently utilize the adjacent streets of Kenwood or Louise and the presently available parking lots nearby. But, per City Council's decision, the adjacent public parking on Louise will soon cease to provide parking since a new development of "Louise Hotel" has been approved for the site. And the GUSD parking lot, which specifically provides additional parking for YMCA after school hours, may cease to provide parking because of a proposed mega development on that site waiting for final approval by the City Council. This is just one example, but it can be equally applied to all presently available recreation facilities. Not to mention, the parking at the Americana – another major recreational place – is unaffordable for most of Glendale residents.

Second, it is no secret that there are only a few parks in South Glendale; one of the only big parks on Brand and Colorado will soon become home for another approved development.

Third, all the parks and recreational facilities that have been created or planned recently are located far outside of South Glendale, in the mountains, which are not accessible for the most vulnerable group of our society - our children, elder people, or people who cannot afford to get to those destinations (due to lack of cars, lack of funds, or incapacity to drive).

The proposed SGCP, per EIR, not only does not resolve the problem with the current shortage of parks and recreational facilities, but actually unacceptably furthers the problem.

Therefore, the environmental impact to the recreation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

19.12 7) Transportation: Per EIR, the implementation of the proposed project "would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways."

**COMMENTS**

**RESPONSES**

19.12 cont. It is undisputed that the road infrastructure in Glendale is insufficient and has not been historically designated/intended to accommodate the dramatic increase of population anticipated by the proposed SGCP. The end result of the dramatic increase of population and the associated dramatic and unsustainable impact on transportation will be traffic congestion, traffic noise, more traffic accidents and fatalities, more pedestrian fatalities, etc. This will undeniably deteriorate the quality of life of all Glendale residents.

Moreover, the recent DSP area developments are just proof of how congested and impassable our roads have become; this problem with transportation should be fixed and not furthered more. Suggesting more bus routes will not resolve the problem, as confirmed by EIR. Plus, there is no guaranty and no common sense to assume that creating more bus lines will make people take buses, or providing bicycle lanes will make people risk their lives and use bicycles in the already congested and crowded streets of Glendale.

Therefore, the environmental impact to transportation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

19.13 To summarize, the EIR's identified seven environmental impacts will adversely and permanently affect both the quality of life and the safety of Glendale community; those cannot and should not be overridden or overlooked by any decision making city official.

Therefore, the proposed SGCP is UNACCEPTABLE for the South Glendale community and SHOULD BE DISCARDED.

Regards,  
Emma Amiryan  
Glendale, CA 91206

COMMENTS

RESPONSES

From: websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
Sent: Monday, March 12, 2018 12:40 PM  
To: Krause, Erik <EKrause@Glendaleca.gov>  
Subject: City of Glendale, CA: SGCP EIR Comments

20.1 We object to this new boundary plan, and the Carmel mega apartment complex. Please do Not expand the boundaries northeast. Leave north of Wilson and east of Maryland out of the expansion boundary.

20.2 We represent 6 properties and close to 90 affected residents.  
There is not enough existing street parking for the current residents living on Louise, Kenwood and Jackson.

20.3 The additional traffic is already too congested in the area as a result of the YMCA, shopping center, and other recently built apartment complexes on Kenwood and Maryland, and soon to add the many projects in the existing planning on the 100 block North Louise, ie a hotel that is too large and sadly disgraces the city's integrity of the two historical landmarks adjacent to it, and other projects planned in the immediate area already.

20.4 The vacancy rate of the multi unit newer existing buildings in the area should be considered. Also, if any new buildings are proposed in this zone, there should not be a mega complex of more than 2 stories, and no more than 3 stories Maximum including the roof (no high peaks),ie; Not 4 stories plus an additional sunroof with a pool, etc., and a demand for 2 car parking for Every unit no matter the size, and spaces for maintenance and employees to park in addition.

Every older residential building in the area is only a maximum of 3 stories and any mega complexes in this area would create more population density issues. People would like to enjoy their existing mountain views, sunrise, moonrise, sunsets, trees, etc. Additionally, flooding the area with more rental units will add to a more transient atmosphere as they frequently move.

20.5 To note, the visual aesthetics and colors of the buildings need to help keep Glendale's integrity. We are becoming known as "Legoland" with ugly block buildings and awfully bright colors are adversely changing the landscape of our once so beautiful city. Where are the city's strict guidelines for keeping Glendale's heritage with unique architecture and an approved color scheme and building sizes? And, just because a mega unit apartment building is pretty, does not make it the right decision for the area's planned usage.

Letter 20 Eva Gabor

Response 20.1

The City appreciates this comment and notes that this comment letter will be part of the Final EIR; therefore, the commenter's opposition to the expansion of the proposed SGCP boundary to the northeast is documented and this information will be made available to City Council.

Response 20.2

This comment provides an introduction to the author of the comment letter. The City appreciates this comment but does not raise a significant environmental issue for which a response is required as the Sate CEQA Guidelines no longer require an analysis of parking impacts. With the exception of the Transit-Oriented Development (TOD) plan included as part of the SGCP, there are no policy recommendations to change the parking standards. The TOD; however, does include a policy, should the City Council adopt the Plan that states the following:

*Policy 3.7.1: Expand the parking policies implemented in the Downtown Specific Plan (DSP) to the proposed Transit-Oriented Development (TOD) zones. Recently adopted parking code revisions, accomplished through the DSP, should be extended to the new TOD zones. Strategies include reducing minimum parking requirements, allowing tandem and stacked parking, requiring secure bicycle parking, implementing complementary transportation demand management strategies (IDM), seeking shared parking opportunities, exempting change-of-use for properties under 5,000 square feet, and instituting a parking in-lieu fee policy. Parking requirements for industrial uses within Tropicco should also be reduced, including those outside the TOD zones.*

Further, Chapter 4 of the SGCP establishes a parking management plan to discouraging retail and commercial patrons and employees from parking in adjacent residential neighborhoods.

Response 20.3

See Topical Response No. 3 Transportation, Traffic and Parking.

Response 20.4

This comment does not raise a significant environmental issue for which a response is required. As stated in Section 4.1.3 of the Draft EIR, the existing condition with regard to scenic vistas (e.g., mountain views) within the SGCP area is already impaired, and implementation of the proposed SGCP would not result in new impacts associated with the impairment of views surrounding scenic vistas. Furthermore, each future project implemented under the proposed SGCP would be subject to separate environmental review once development plans are submitted to the Permit Services Center.

**COMMENTS**

**RESPONSES**

20.6

Please respect our Jewel City. There is already a plan in place for multi unit and high rise buildings elsewhere. Please do not compromise just because deep pockets want to dictate their way and offer a few low income unit's for the city. The best interests of the property owners and the hundreds of residents affected need to be the priority. You were elected to represent the best interests of the existing residence of Glendale. This is a serious decision that once allowed, will make room for more future inappropriate encroachments in the areas already in disapproval, and will create only more hardships on the affected owners and residents. Again, just because the developer promises to include a few low income housing units, should not dictate nor allow permission to pass a development proposal.

Thank you for your attention to this matter that is an important decision that will dramatically change several hundred local resident's lives unfairly, as well as the thousands of people that live and work and drive in the area daily.

Again, there is already a specified boundary planned years ago that has already been shamefully ignored. Please respect that prior existing plan, and create more strict aesthetic guidelines for keeping the beauty and integrity of our beloved Jewel City in mind. Your vote to change the boundary lines will Adversely affect thousands of residents now and in the next generations to come.

Sincerely,  
E. Gabor, et al  
power1properties1@gmail.com

**Response 20.5**

This comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project. As stated in Section 4.1.2 of the Draft EIR, the SGCP provides Comprehensive Design Guidelines, including direction on building color and architectural concept, for all new development within the SGCP area.

**Response 20.6**

This comment provides concluding statements based on the more specific comments discussed above; therefore, no new issues are raised in which a response is required.

The information in this comment will be in the documents for review and consideration by City Council.



COMMENTS

RESPONSES

**From:** Evan Grant [mailto:epgrant.esq@everyactioncustom.com]  
**Sent:** Friday, March 09, 2018 1:33 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** Support for Proposed South Glendale Community Plan

**Letter 21 Evan Grant**

**Response 21.1-21.7**

This comment letter is the same as an earlier comment letter (Letter No. 4). Refer to responses to comments No. 4.1 through 4.7.

Dear Deputy Director of Community Development Erik Krause,

- 21.1 I am writing to you to in support for the proposed project analyzed in the South Glendale Community Plan DEIR. I urge the city to proceed with the proposed project, and not the no build or either of the reduced density alternatives.
- 21.1 The greater Los Angeles region is facing a severe housing shortage. This project will help create much needed housing in a walkable, mixed-use neighborhood with good transit and plans for future transit expansion. By helping to create new housing in a desirable neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.
- 21.2 I also urge you to consider potential positive impacts of the project in the FEIR:  
4.1.3 Visual Character - new buildings can improve the aesthetics of the city, especially where new mixed-use development replaces auto-oriented development.
- 21.3 4.1.4 Shade - in a warm, sunny climate like Glendale, more shade is often an amenity. On hot summer days, pedestrians in downtown Glendale frequently seek shade to cool off.
- 21.4 4.2.1 Air Quality & 4.6.1 Greenhouse Gas Emissions - allowing more development in a central location like South Glendale reduces the demand for greenfield development on the urban fringe, reducing driving and GHG emissions. Additional development in dense, walkable areas like South Glendale also makes it more likely that current residents will be able to walk, bike, or take transit to meet their daily needs instead of driving. State policy such as SB 375 has recognized the climate benefits of infill development.
- 21.5 4.12.2 Population and Housing - an increase in housing and population can be positive, as denser cities reduce environmental impacts per capita and promote greater diversity and economic development.

**COMMENTS**

**RESPONSES**

21.6 | Height Restrictions - the city should not reduce height limits to below what they are today. Lower height limits reduce the amount of housing that can be built, which reduces the likelihood of development until prices rise, making housing less affordable. Eliminating the reductions in maximum height should not require any further analysis under the EIR, since it would not be a change from present conditions.

21.7 | Thank you for the opportunity to comment on the South Glendale Community Plan DEIR. Again, I encourage the city to proceed with the proposed project analyzed in the DEIR.

Personally sent by Evan Grant using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization dedicated to advocating for more housing.

Sincerely,  
Evan Grant  
epgrant.esq@GMAIL.COM

COMMENTS

RESPONSES

March 12, 2018

Mr. Erik Krause, Deputy Director of Planning,  
Glendale City Hall  
633 E Broadway, Room 103  
Glendale CA 91206-4386  
via e-mail to sgcp@glendaleca.gov

RE: South Glendale Community Plan (SGCP) Program Draft Environmental  
Impact Report, Cultural Resources section

Dear Mr. Krause:

We sincerely appreciate being part of this process and the opportunity to comment of this important document. The following comments are focused solely on the Cultural Resources section of the South Glendale Community Plan (SGCP) Program Draft Environmental Impact Report (DEIR).

Cultural Resources (4.4)

22.1 The introduction does not define “cultural resources.” “Cultural resources” normally includes archaeological, Native American, traditional, and built environment resources, including but not necessarily limited to buildings, structures, objects, districts, and sites. Qualified cultural resources professionals, consulting with their peers, Native Americans, subject matter experts, or review authorities as necessary, conduct studies of cultural resources that may possess significance and that could be impacted by the series of actions reviewed in the SGCP. One element cultural resources do not include is paleontological resources. Please revise the subsection to define cultural resources and remove the paleontology section.

22.2 Paleontology, exclusive of the study of fossil humans, is a natural science closely associated with geology and biology. In geologically diverse California, vertebrate, invertebrate, and plant fossils are usually found in sedimentary and metasedimentary deposits. Paleontology should rightly be evaluated in a separate section, prepared by and peer reviewed for the City by qualified paleontologists. Kindly delete references to Geologic Hazards technical report prepared by Earth Consultants International for the Glendale General Plan, and the California Division of Mines and Geology.

Letter 22 Francesca Smith

Response 22.1

The following definition of a cultural resource has been added to the Final EIR (See page 4.4-4), although the same definition is included on pages 4.4-17 and 4.4-18 of the Draft EIR:

15064.5. DETERMINING THE SIGNIFICANCE OF IMPACTS TO ARCHAEOLOGICAL AND HISTORICAL RESOURCES

- (a) For purposes of this section, the term “historical resources” shall include the following:
  - (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).
  - (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
  - (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:
    - (A) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
    - (B) Is associated with the lives of persons important in our past;

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

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

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

As discussed in response 22.2 below, paleontological resources are included as a threshold in the cultural resources section of the checklist in Appendix G of the State CEQA Guidelines and therefore are appropriately discussed in Section 4.4 of the Draft EIR.

**Response 22.2**

Paleontological resources are included in the Cultural Resources Section of the Draft EIR pursuant with the CEQA thresholds contained in the checklist in Appendix G of the State CEQA Guidelines. Beginning on page 4.4-19 of the Draft EIR, paleontological resources were evaluated under Impact 4.4-3. The reference to the geotechnical study is appropriate in that the types of soils are an important factor in identifying the possibility for paleontological resources to exist in the project area.

**COMMENTS**

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- 22.3** Environmental Setting - Prehistoric Setting (4.4.1)

The purpose of this subsection is to demonstrate familiarity with the area being studied and to provide context for any archaeological resources identified. Part of its intent is to demonstrate that preparers have conducted research on the area in question and understand its environment, ethnography, prehistory and history. The problem is, the single paragraph provided is not adequate.

Is an archaeological survey of any type associated with this document? If not, please provide a justification for not including at the very minimum, a records search and a sensitivity study of the SGCP area prepared by professionals qualified in that field. It should also provide a timeline of the history of archaeological investigations in the area, with particular reference to studies that have taken place in the study area, or concerning prehistoric sites similar to those which should have been identified in the focused project archaeological study.
- 22.4** Historic Setting- Glendale – Historical Development Overview

In the “Historic Setting” and “Glendale – Historical Development Overview” section, not one footnote, endnote or citation for the historic context narrative is provided. The described history of Glendale is detailed until the 1930s but inexplicably skips a half century ahead to the 1980s and ends. Please provide a more complete framework for the development of the community that includes and describes events and development patterns that occurred after 1930.
- 22.5** Definition of a Historic Resource

Bewilderingly, the “Definition of a Historic Resource” subsection does not offer a definition of the term, “historic resource.” Likewise it does not contain definitions of the phrases “historic property” or “historical resource,” but nonetheless merges those very specific terms-of-art as the combined phrase “historic resources” with no definition, and does not so much as provide the criteria for local landmark designation in that introductory subsection. The following sections are predicated on readers understanding what these words mean. The definition of a historic resource section is not adequate and should be revised to provide a clear definition of the phrase, which is used throughout the document.
- 22.6** The unclear, incomplete chronology of regulations and legislation does not provide the expected framework for the non-professionals, including the public and decision-makers, to understand what the intended purpose is for the subsection. I recommend the subsection be revised to define applicable related laws and ordinances, and to define terms that may not be understandable to the average reader. Our recommendations include providing an explanation of

**Response 22.3**

The commenter’s criticism of the Environmental Setting (Section 4.4.1) as a “single paragraph” mischaracterizes the actual Environmental Setting section in the Draft EIR which spans multiple pages. (See Section 4.4.1, pages 4.4.1- 4.4.7). The Environmental Setting includes a discussion of the Prehistoric Setting, Historic Setting, Glendale – Historical Development Overview, Definition of a Historic Resource, Historic Resources within the Proposed SGCP Area, Table 4.4-1 Designated Historic Properties in the Proposed SGCP Area, Archaeological Resources, and Paleontological Resources. The length of the Prehistoric Setting description does not mean its coverage is inadequate to disclose that human pre-historical settlements and or activities exist in southern Glendale. The Final EIR will also include the 2000 Compass Rose Report: Archaeological Resources Management Plan for the City of Glendale (the “Report”). This Report indicates that the South Glendale area is identified as either high or high-moderate sensitivity zones for archaeological resources and includes the standard caveat that any issues will be resolved on a project specific basis. Specifically, MM 4.4-3, 4.4-4, 4.4-7 and 4.4-8 in the Draft EIR incorporate the Compass Rose Report’s recommendation that archeologists be retained to monitor projects during any ground-disturbing activities.

**Response 22.4**

A full history of the historical development of South Glendale is included in the South Glendale Historic Context, which is Appendix A.1 of the SGCP. The historic context has been added to the Final EIR as Appendix “J” and footnote references have been added into the Glendale - Historical Development Overview in the Final EIR as well. Historic Resources Group prepared a 374-page South Glendale Historic Resources Survey for the Draft EIR, attached as Appendix G to the Draft EIR, which was referenced throughout the Environmental Setting section.

**Response 22.5**

Please refer to response to comment 22.1 above. A complete regulatory framework is provided in the Final EIR beginning on page 4.4-9 that includes national, State and local regulations for evaluation of cultural resource impacts that include historical, archaeological, paleontological, and tribal resources along with human remains.

**Response 22.6**

Please refer to response to comment 22.5 above.

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**22.6 cont.** CEQA as it relates to historical resources, as well as a parallel discussion of local ordinances that relate to historic preservation and cultural resources.

**22.7** The quoted description from CEQA Guidelines that outlines how historical resources need not be previously identified to be historically significant includes no explanation, introduction, or follow-up. The declaration that historical resources may not be previously recognized does not provide the public and decision makers with any clear understanding of the criteria for eligibility or requirements for integrity for listing in the National, California or local registers.

We strongly recommend the subsection be revised to clearly include definitions and to qualify and explain the quote.

Historic Resources within Proposed SGCP Area

In the “Historic Resources within Proposed SGCP Area” section, properties that have been determined eligible for the National Register are not listed or described. The two properties described below were each evaluated in the attending survey as 5S3, or “Appears to be individually eligible for local listing or designation through survey evaluation,” ignoring previous evaluations and more importantly determinations of eligibility that impart higher levels of historic significance:

- **22.8** Bekins Moving & Storage Warehouse at 929 S. Brand Bl. was determined eligible for the National Register as a district contributor in 1984 (California Office of Historic Preservation, Directory of Properties in the Historic Property Date File for Los Angeles County.” April 5, 2012: 152). It is incorrectly described as “CRHR” or only listed in the California Register, in Table 4.4.1.
- The Burns-Davis Building at 201 E. Broadway was previously found eligible for listing the National and California Registers in a City-adopted survey (California Office of Historic Preservation, Directory of Properties in the Historic Property Date File for Los Angeles County.” April 5, 2012: 137).

Unless a property has been significantly altered in the time since the survey was completed, or information that refutes the justification has been uncovered since the finding or determination of eligibility was made, that earlier evaluation takes precedence, particularly in the case of a National Register determination of eligibility. Identification of these errors are the result of random spot-checking, but point to the survey clearly needing more thorough peer-review and quality assurance checks before the Final EIR is adopted.

**Response 22.7**

Please refer to response to Comment 22.1 above for the complete definition, which will be added to Section 4.4.1 in the Final EIR.

**Response 22.8**

The “Historic Resources within SGCP Area” section correctly includes information about the survey, including properties eligible for the Glendale Register, California Register, and the National Register. The respondent may disagree with the status codes applied by the survey, but a 5 code offers the same protections under both CEQA and local law that a 3 code offers and therefore, the code references do not alter the project’s potential impacts on historical resources.

Corrections to Table 4.4-1 have been made in the Final EIR to indicate the correct eligibility for Bekins Moving & Storage Warehouse and the inclusion of the Burns-Davis Building.

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- 22.9 In Table 4.4-1, "Designated Historic properties in the Proposed SCGP Area" the entry for Cottage Grove Historic District should be revised to "locally designated historic district."
- 22.10 California Register Status Codes  
No definitions for California Register Status Codes are mentioned or provided, yet those numerical codes are discussed throughout the document. To the average, non-professional reader, without any understanding of such definitions, those sections and discussions are meaningless. We recommend this important omission be corrected in the final environmental document.
- 22.11 Historic Districts  
"Potential historic districts" are described, but no definition for that excessively qualified phrase is provided. Are each of the properties identified in the survey as individually significant merely potentially significant? Either the "potential historic districts" are historic districts in the professional opinion of the surveyor or they are not. Calling them "potential," is an evasive qualification for a professional survey.
- 22.12 When the City adopts this document (and hence these survey findings), these historic districts would be considered presumptive "historical resources" for the purposes of CEQA, not "potential" historic districts. Delete all references to "potential historic districts" as well as "potential historic resources." The ambiguity of the word "potential," while intentional, obviates the very reasons for performing the survey, which is to identify the properties and districts that the city considers historically significant. That determination is the purview of the lead agency under CEQA. Part of the purpose of hiring professional consultants is for them to make findings for the city- not maybes or "could be" choices. When such surveys are performed, they must identify districts- even though the survey does not actually designate districts or separate properties directly.
- 22.13 The sentence "This potential district emphasizes homes in architectural styles of the early 20th century, and includes styles that are no longer practiced today (HRG 2017)" is vague, confusing and provides no justification for its ostensible significance. With the rest of the Cultural Resources section, it should be revised to make a declaration that substantiates the survey finding. Otherwise a different sentence borrowed from the survey that provides facts or useful information should be used in its place.

**Response 22.9**

The Commenter is correct regarding the identification of the Cottage Grove Historic District; Table 4.4-1 in the Final EIR has been corrected to identify the area as a "locally designated historic district."

**Response 22.10**

The South Glendale Historic Resource Survey Appendix G of the Draft EIR contains definitions for all Historic Resource Status Codes (See pages 15-16).

**Response 22.11**

The phrase "potential historic district" is used in the Draft EIR to indicate those districts identified by the South Glendale Historic Resource Survey as eligible for designation as a local historic district.

**Response 22.12**

Please refer to response to comment 22.11 above.

**Response 22.13**

The Draft EIR is referencing the description of the potential district found in the South Glendale Historic Resource Survey in the "Potential Garfield/Windsor District" as discussion on page 32 of the survey.

The following sentence found on page 4.4-7 of the Draft EIR under the heading "*Potential Garfield/Windsor District*" has been modified as shown below:

*"This potential district emphasizes homes in architectural styles of the early 20th century, and includes styles that are no longer practiced today (HRG 2017)."*

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**22.14** Archaeological Resources  
 Review of the section entitled “Archaeological Resources,” reveals that no archaeological survey, records search or sensitivity study was prepared for the SGCP or its DEIR.

**22.15**  
 The subsection does not explain what a “unique archaeological resource” is or when an archaeological resource is a historical resource for the purposes of CEQA. Please add that information to the FEIR or explain why this information would is not be applicable.

**22.16**  
 This subsection is awkwardly vague, does not provide substantiation for its assertions and makes unsupported claims based on an otherwise unidentified document, “Glendale, 2005” that is more than a decade out-of-date. The contention that “hard surface development over archaeological resources may preserve them for future studies” is only one of numerous ways to appropriately deal with archaeological resources under CEQA. The California Public Resources Code states in Section 21083.2. (b) “Archeological Resources,” (b) and (c):

(b) Examples of that [preservation in place] treatment, ...may include, but are not limited to, any of the following:

- (1) Planning construction to avoid archaeological sites.
- (2) Deeding archaeological sites into permanent conservation easements.
- (3) Capping or covering archaeological sites with a layer of soil before building on the sites.
- (4) Planning parks, greenspace, or other open space to incorporate archaeological sites.

(c) To the extent that unique archaeological resources are not preserved in place or not left in an undisturbed state, mitigation measures shall be required...

Development directly over archaeological resources or “capping” them is only one of several ways to mitigate CEQA impacts and can destroy delicate artifacts if not undertaken properly. We strongly urge Glendale to properly consider treatment of archaeological resources in ways other than capping, rather than recommending one of many alternatives in the DEIR as described above.

**Response 22.14**

As indicated in responses to comments 22.2 and 22.3, the presence of archeological resources is based on soil types and information contained in the Open Space and Conservation Element. Furthermore, as directed by the Open Space and Conservation Element and mitigation measures MM 4.4-3, MM 4.3-5, and MM 4.4-8 in the Draft EIR, a more comprehensive analysis of impacts associated with archeological resources will be conducted at the project level when detailed plans are submitted for planning entitlements.

**Response 22.15**

The term “unique archaeological resource” appears in mitigation measures MM 4.4-3, MM 4.4-4, and MM 4.4-8. The word “unique archaeological resource” is taken from Public Resources Code §21083.2(a), as referenced in MM 4.4-4. Public Resource Code 21083.2(g) defines “unique archaeological resources as “...archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

**Response 22.16**

Please refer to response to comment 22.14 above. A complete list of references used in the analysis for this section of the Final EIR is provided on page 4.4-26. “Glendale 2005” is a reference to the Glendale Open Space and Conservation Element which directs future development to conduct its own review of impacts to archeological resources; the same is required by mitigation measures MM 4.4-3, MM 4.4-4, and MM 4.4-8. Based on the mitigation measures included in the Draft EIR, the appropriate method for dealing with archeological resources will be determined by a qualified archeologist.



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- 22.17 Regulatory Framework (4.4.2)  
The regulatory framework section notably fails to provide a clear outline or background for decision makers and the public. It notably fails to connect the described federal regulations, state legislation and local ordinances to the proposed SGCP, it does not describe how the described regulations, legislation or ordinances apply to the SGCP or its proposed actions.  
For instance, how is the Advisory Council on Historic Preservation in any way linked to the SGCP? Are properties listed in or determined eligible for the National Register considered historical recourses for the purposes of CEQA? How do *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* apply to CEQA review, the SCGP or to projects in Glendale? Is application of the State Historical Building Code mandatory or can cities use it whenever they want to? To what properties would it apply?  
Without any demonstrable connection between the federal, state and local regulations, laws and ordinances this section is useless to any reviewers who are not historic preservation professionals. Merely providing a litany of those regulations, laws and ordinances does nothing to provide the nexus readers will be seeking to understand how they directly relate to the proposed series of actions.
- 22.18 If the National Historic Landmarks (NHL) program was developed in 1982, properties were designated as NHLs in California for more than thirty prior years. It was established in 36 Code of Federal Regulations Part 65 and that information should be included. Are any extant or eligible National Historic Landmarks in Glendale? Would they be treated any differently in the SGCP area than other historic properties? How does the NHL program apply to this document? Please correct the incorrect assertion that there are fewer than 2,500 such designated properties (<https://www.nps.gov/nhl/>).
- 22.19 Downtown Specific Plan (DSP)  
This subsection notably fails to mention that the DSP and its survey were adopted by the city. Many findings in the SCGP historic survey “overrode” the adopted findings in the previous survey when those properties were not demonstrated to have been substantially altered since that survey was adopted. The SGCP survey is no more rigorous than the methodology in the adopted survey and moreover has not, to date, been adopted. We strongly recommend that the DSP adopted survey findings take precedence over the reconnaissance survey prepared for this document unless a property has been substantially

**Response 22.17**

The comment makes stylistic suggestions and asks that the EIR provide in depth explanations of how all the various regulatory frameworks are applicable to the CEQA analysis. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. (CEQA Guidelines Section 15204(a)). The Draft EIR identifies the applicable regulatory frameworks for the analysis and discusses compliance with those frameworks that are applicable to the project as required by CEQA.

**Response 22.18**

There are no National Historic Landmarks in the project area; if there were they would have been identified. The last sentence under the subheading *National Historic Landmarks* on page 4.4-10 of the EIR has been revised as shown below:

“Today, ~~fewer than just~~ over 2,500 historic places bear this distinction.”

**Response 22.19**

The South Glendale Survey determinations do not always agree with those in the Downtown Specific Plan (DSP) survey, but all of the properties where there is a discrepancy are still, at a minimum, locally eligible so there are no adverse impacts due to these discrepancies. This comment will be included in the Final EIR and made available for consideration by City Council before making a decision on the project.

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22.19 cont. altered or new information has been uncovered that justifies a change in the property’s historic status. If this recommendation is not followed, provide a concise, defensible reason for this SGCP “hybrid reconnaissance and intensive survey” (Jay Platt in City Council Meeting March 13, 2018) somehow taking governance over a city-adopted survey. Unless a resource listed in a survey has been demolished, lost substantial integrity, or there is a preponderance of evidence indicating that it is not eligible for listing, the lead agency should consider properties identified as significant in the previous survey (Status Codes 1-5) to be presumptively eligible for the California Register.

22.20 DSP Policy 4.1.3 regarding Historic Preservation, Rehabilitation and Adaptive Reuse is incorrectly quoted and the change is problematic. Policy 4.1.3 recommends:  
  
“Reuse and rehabilitate the existing buildings of architectural merit that reflect the spirit and historic significance of Glendale’s past and ensure that these buildings will have their place in the expressed design guidelines for new development” (page 4.2). The SGCP DEIR adds a new sentence: “The historic resource must meet the Secretary of the Interior’s Standards and be placed on the GRHR prior to or concurrent with design approval.” Because the *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* do not contain criteria for designation but rather guidelines for several given treatments, the mistaken addition does not make sense. Please revise that misquote and Policy 4.4.4 to correctly reference the actual text in the adopted document. If those sections are not revised as requested, provide clear justification for the described differences between the adopted document and the language cited in the SGCP PEIR and explain how a property would “meet the Secretary of the Interior’s Standards.”

22.21 Thresholds of Significance  
  
We note that the document does not provide a description of a “significant effect” as defined in CEQA.

California Public Resources Code asserts that a “significant effect on the environment means a substantial, or potentially adverse change in any of the physical conditions within the area affected by the project... including objects of historic or aesthetic significance” (PRC 21068 and CEQA Guidelines Section 15382). Adverse change is defined as “Physical demolition, destruction, relocation or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be impaired.”

Response 22.20

The respondent is correct and no change to Policy 4.1.3 of the DSP is proposed as part of the proposed project. The Final EIR will reflect the correct language of DSP Policy 4.1.3 as follows:

**Policy 4.1.3 Historic Preservation, Rehabilitation and Adaptive Reuse:** Reuse and rehabilitate the existing buildings of architectural merit that reflect the spirit and historic significance of Glendale’s past and ensure that these buildings will have their place in the expressed design guidelines for new development. ~~The historic resource must meet the Secretary of the Interior’s Standards and be placed on the GRHR prior to or concurrent with design approval.~~

Response 22.21

As suggested by the commenter, the following text from California Code of Regulations Section 15064.5 has been added to Impact 4.4-2 of the Final EIR.

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

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

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22.21  
cont.

In the California Code of Regulations, Section 15064.5 "Determining the Significance of Impacts to Archaeological and Historical Resources," it clearly states:

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

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

(3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

(3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

(4) A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.

(5) When a project will affect state-owned historical resources, as described in Public Resources Code Section 5024, and the lead agency is a state agency, the lead agency shall consult with the State Historic Preservation Officer as provided in Public Resources Code Section 5024.5. Consultation should be coordinated in a timely fashion with the preparation of environmental documents.

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22.21 cont. (4) A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.

It is strongly recommended that the bulleted, paraphrased CEQA Guidelines sections be replaced with clear text from the California Code of Regulations, Section 15064.5 as cited above.

22.22 We remind the city that impacts can be direct, indirect or cumulative in nature. None of those nuances or differences in impact types is addressed in the DEIR and we recommend they be added for clarity.

Inadequacy of Proposed Built Environment Mitigation Measures

22.23 In the DEIR cultural resources are cited as subject to substantial adverse change by implementation of the proposed series of actions. However, the proposed mitigation measures would not and moreover are not clearly demonstrated in the document to avoid, minimize, rectify, reduce, eliminate or compensate for the expected significant impacts. CEQA requires that a lead agency consider proposed projects, evaluate their expected environmental impacts and, if significant impacts are identified, to describe feasible mitigation measures that would reduce those impacts.

22.24 We note that actions consistent with *The Secretary of Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Restoring & Reconstructing Historic Buildings* can be accepted as mitigation. We strongly caution the city and decision makers that moving a historical resource to an appropriate receiver site may or may not mitigate an effect to less than significant.

22.25 Documentation of historical resources by narrative, drawings, or photos will not necessarily mitigate demolition/destruction to a less-than-significant level. (CEQA Guidelines Section 15126.4(b)(2).) Mitigation Measure MM4.4-1 is misleading: creation of publicly available information that will identify whether or not a property has been identified as a historical resource would not avoid, minimize, rectify, reduce or eliminate, or compensate for the loss of a historic property. Most nearby cities have had this tool available for decades, including Los Angeles and Pasadena. The fact that Glendale has been delayed in making this important information available, particularly in-house when processing permits, while it is admittedly a significant oversight, does not make providing that transparent information to the public a mitigation measure. While we absolutely

**Response 22.22**

As required by CEQA, both direct and indirect impacts are discussed for each of the CEQA thresholds included in the Draft EIR. Cumulative impacts are included in Section 4.4.4 of the Draft EIR.

**Response 22.23**

The purpose of a mitigation measure is to minimize the environmental impacts and mitigation can take various forms. (CEQA Guidelines §15126.4(a)(1)). Pursuant to CEQA Guidelines §15370, "Mitigation" includes:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

The mitigation measures for cultural resources (MM 4.4-1 through 4.4-8) will reduce potential impacts on cultural resources to below a level of significance, because thorough project-level review is required during the implementation of the SGCP. Such mitigation is legally adequate. Mitigation measures may be incorporated into plans, such as general plans, specific plans or community plans, that provide a legal or policy framework for later projects or approval; such is the case here. (CEQA Guidelines §15126.4(a)(2); See *Napa Citizens for Honest Gov't v Napa County Bd. of Supervisors* (2001) 91 CA4th 342, 358; *Twain Harte Homeowners Ass'n v county of Tuolumne* (1982) 138 CA3d 664, 690. The mitigation measures adopted in a plan can describe performance criteria for a project-specific mitigation and provide for further refinement of the mitigation measures when later activities are proposed. For example, the Court in *Rio Vista Farm Bureau Ctr. v County of Solano* (1992) upheld the county's adoption of a hazardous waste management plan and certification of an EIR where the plan identified sites that were potentially suitable for hazardous waste facilities but did not select or recommend particular sites. The County incorporated mitigation measures as policies in the plan so that later approvals would have to be consistent with the policies. The court agreed that the plan's siting criteria and other mitigation "policies" were consistent with the general nature of the plan and that the mitigation measures could not be specifically formulated without a proposal for

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a specific facility, and the plan included a firm commitment to a future mitigation of significant impacts.

Here, like in the *Rio Vista Farm Bureau* case, the proposed mitigation measures are being imposed on a plan and policy level with a firm commitment to ensure that specific projects identify significant impacts on historic resources and mitigate them.

To that end, MM 4.4-1 is being clarified in the Final EIR so that it is clear that:

*MM 4.4-1: All properties listed on the NR/CR/GR and properties identified with status codes 1 through 5 in a survey or individual resource assessment will require further analysis under CEQA prior to the approval of any entitlements or issuance of permits.*

**Response 22.24**

This comment will be included in the Final EIR and made available for consideration by City Council before making a decision on the project. The mitigation measures require individual project level review to assure that significant impacts on historic resources from implementation of the SGCP do not occur.

**Response 22.25**

Mitigation measure MM 4.4.1 has been clarified in the Final EIR as shown in response to comment 22.23 above.

**COMMENTS**

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- 22.25 cont. support the information being made publicly available as well as in-house when processing permits, but it would not be a mitigation measure and should not be considered one. Please correct the proposed built environment mitigation measures to meet the requirements in CEQA.
- 22.26 We gently remind the city that an environmental protection feature must be credible as a true component of the project plan or design, rather than a mitigating action that is separate from the proposed series of actions themselves, and it must be responsive to impacts. The concepts described in MM4.4-1 and MM4.4-2 are separate from the series of actions being considered and neither is responsive to the expected impacts to historical resources.
- 22.27 Part of the purpose of a programmatic EIR is to provide more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action. This document does not provide clear consideration of future effects and recommends activities such as future surveys (MM4.4-2) as mitigation measures. Future study as described in this mitigation measure is normally considered inadequate under CEQA (see ICF "CEQA Basics Office of Historic Preservation: Is the Project's Impact Significant under CEQA??" at [http://ohp.parks.ca.gov/pages/1054/files/CEQA%20for%20OHP\\_061815.pdf](http://ohp.parks.ca.gov/pages/1054/files/CEQA%20for%20OHP_061815.pdf) ).
- 22.28 While an up-to-date historical resources survey is a crucial element of a well-developed Certified Local Government Program, it is not, and should not substitute for a mitigation measure. Implementation of a future survey in four years would not avoid, minimize, rectify, reduce or eliminate, or compensate for the loss of a historic property and may well constitute deferred mitigation if that performance of that task is not clearly prescribed in this document.
- 22.29 Likewise implementation of the publicly available database or a future survey would not mitigate the impacts of the demolition, significant alteration of, or some instances of relocation of historical resources. Unfortunately, each of those described community benefits, while desperately needed, would not make them rise to the level of mitigation. Those impacts to historical resources caused by the expected series of actions would remain significant.
- 22.30 Problems with Archaeological Resources Mitigation Measures  
MM 4.4-3 specifies  
The City shall require that archaeological and tribal monitors be retained during ground disturbing activities that can disturb previously undisturbed soils that may have the potential to impact archaeological and tribal cultural resources qualifying as historical resources or unique archaeological resources, as determined by a qualified archaeologist (following Standard of

**Response 22.26**

See responses to comments 22.23, 22.24, and 22.25 above. The SGCP is a policy document; it does not propose specific development but describes an envelope of development that could occur should the SGCP be adopted. As stated in mitigation measures MM 4.4-1 and MM 4.4-2, individual development projects implemented under the SGCP will be required to undergo project-level CEQA review.

**Response 22.27**

Please refer to Topical Response No. 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses, and response to comment 22.23 above.

**Response 22.28**

Please refer to response to comment 22.23 above.

**Response 22.29**

Please refer to response to comment 22.23 above.

**Response 22.30**

California state law does not identify any qualifications to practice archaeology in the state, however, to address this gap, in March 2013, the Society for California Archaeology (SCA) adopted a set of professional qualifications for the position of Principal Investigator for archaeological projects. The purpose of these professional qualifications is to improve the quality and public benefit of archaeology by setting forth the education and experience required for individuals to practice professional archaeology as a Principal Investigator in California. MM 4.4-3 requires that any retained archaeologist have such qualifications.

Further, the City of Glendale is not required to have archaeologists or tribal monitors "on staff". MM 4.4-3 requires that qualified archaeologists *be retained during ground disturbing activities that can disturb previously undisturbed soils...*" The requirement is clear and what "triggers" the measure is equally clear: retain the expert when previously undisturbed soils are disturbed. The fact that most projects do not have monitors does not mean the mitigation will not be triggered in the future. The City has a sensitivity study, the 2000 Compass Rose Report. See response to comment 22.3 above.

**COMMENTS**

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22.30  
cont.

Interior Qualifications [sic]) and local Native American tribal monitors in consultation with the City. Historically built environments have not been subject to CEQA guidelines and could possess unknown cultural resources previously undiscovered. Additionally, current construction practices often require foundations to be set at a depth below that historically used for seismic stability. This new practice can result in previously undisturbed soils that contain archaeological deposits. Native American monitors shall be retained for projects that have a high potential to impact unknown and sensitive tribal cultural resources, as determined by the City in coordination with the qualified archaeologist.

Neither archaeological nor tribal monitors are defined in this section or elsewhere in the document. We remind the lead agency that the City of Glendale currently has no archaeologists on staff who are qualified under the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Code of Federal Regulations, 36 CFR Part 61) to appropriately judge what has "a high potential to impact unknown and sensitive tribal cultural resources, as determined by the City in coordination with the qualified archaeologist" and whether or not such monitors would be necessary. It is highly unlikely that every project would require such monitoring; few projects are currently required to evaluate archaeological sensitivity in any way in Glendale. We do not understand what would trigger the "mitigation measure," which is standard practice when archaeological sensitivity is predicted. Because the city has no overall archaeological sensitivity study, this "mitigation measure" would likely result in unnecessary monitoring (the necessity of which would be determined by the persons who would be paid to do the task) rather than the protection of archaeological resources.

22.31

Mitigation measures must include performance standards that describe how mitigation will be refined and how it would be effective. None of those required elements is presented. Simply monitoring impacts doesn't avoid or reduce them: if monitoring is required, that action must be part of a larger mitigation measure describing what would be done to reduce impacts if resources are encountered (ICF "CEQA Basics Office of Historic Preservation "Why Isn't Monitoring Alone Adequate Mitigation?" at [http://ohp.parks.ca.gov/pages/1054/files/CEQA%20for%20OHP\\_061815.pdf](http://ohp.parks.ca.gov/pages/1054/files/CEQA%20for%20OHP_061815.pdf) ).

**Response 22.31**

Please refer to response to comment 22.23 above. Mitigation performance is achieved through adoption of a Mitigation, Monitoring & Reporting Program in the Final EIR as required by CEQA. See CEQA Guidelines § 15126.4(a), which governs mitigation generally and requires that an EIR describe the monitoring and reporting program. Neither the CEQA Guidelines nor the Public Resources Code requires the mitigation and monitoring program be set forth in the Draft EIR. (See Public Resources Code §21081.6).

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- 22.32** | Similarly, Mitigation Measure 4.4-4: asserts that

To prevent impacts to cultural resources, the City shall evaluate the likelihood of the project site to contain archaeologist resources [sic] to ensure future projects that require ground disturbance are subject to a Phase I cultural resource inventory on a project-specific basis prior to approval of project plans. The study shall be conducted by a qualified archaeologist following the Secretary of Interior Standards.

The proposed mitigation measure makes little sense and includes no provisions that would “prevent impacts” as described it merely requires surveys under unclear circumstances. CEQA review includes two basics steps: first to identify what is historically or culturally significant (which is not mitigation) and secondly, to establish what can be done to preserve those historic or culturally significant resources. Identification of what is there is not mitigation- it merely documents what is extant.
- 22.33** | We again remind the City of Glendale that no qualified archaeologists are on staff (see above) and moreover assert that there is no such thing as “archaeologist resources” in CEQA, the Native American Heritage Commission’s Archaeological Terms Glossary or anywhere else. The iterated requirement to conduct Phase I cultural resources inventories in certain undefined instances is meaningless without a definition of exactly when those would be required, what those reports would entail, and more importantly without the existence of staff qualified to review at least a baseline archaeological survey that would identify areas of sensitivity where such surveys would be warranted. The described measure is not mitigation as proposed, but should rightly be part of the City’s Local CEQA Guidelines. CEQA training asserts that an analysis that relies solely on database search (which is what a Phase I survey is), to conclude that a project would not have an impact is normally inadequate. Few such studies have been conducted in the past in Glendale.
- 22.34** | To continue this course of discussion, would consequential information be removed? Where would it be curated? How, then would this mitigation measure would “prevent impacts” as described? Conducting studies is not equivalent to mitigation and does not in any way ensure the prevention of impacts. The California Office of Historic Preservation notes “Avoidance and preservation in place are the preferable forms of mitigation for archeological sites. When avoidance is infeasible, a data recovery plan should be prepared which adequately provides for recovering scientifically consequential information from the site. Studies and reports resulting from excavations must be deposited with the California Historical Resources Regional Information Center. Merely discovering or recovering artifacts and storing them does not mitigate impacts

**Response 22.32**

Please refer to response to comment 22.23 above.

**Response 22.33**

Please refer to response to comment 22.30 above. MM 4.4-4 does not “merely” document what is extant – MM 4.4-4 requires preservation in place as the preferred method and avoidance via project redesign, and exploration of additional treatment measures as additional methods. CEQA Guidelines Section 15126.4 (b)(3) establishes a clear priority for preservation in place over data recovery or other mitigation measures: preservation in place “is the preferred manner of mitigating impacts to archaeological sites...”

**Response 22.34**

Please refer to responses to comments 22.31 and 22.33 above. Because Native American sensitivity and archaeological sensitivity are two different sensitivities, MM 4.4-3, 4.4-4, 4.4-7, and 4.4-8 all require the presence of both a qualified archaeologist and a tribal monitor.



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22.34 cont. below a level of significance” (Calif OHP “How Can Substantial Adverse Change be Avoided or Mitigated?” at [http://ohp.parks.ca.gov/?page\\_id=21727](http://ohp.parks.ca.gov/?page_id=21727))

22.35 Those surveys or “Phase I studies” are further described in MM 4.4-4: “The [Phase I?] study shall be conducted by a qualified archaeologist following the Secretary of Interior Standards [sic]. The City shall consult with the local Native American representatives for future development projects.” We caution the lead agency to consider the following: known Native American sensitivity does not necessarily equate to archaeological sensitivity and all Native Americans are not qualified archaeologists. Whether or not Native Americans believe a project should be monitored should be carefully considered by qualified archaeologists who would not be performing monitoring and thus would not have conflicts of interest when making that professional judgment.

22.36 MM 4.4-4 continues to state  
Any cultural resources inventory shall include a cultural resources records search to be conducted at the South Central Coastal Information Center; scoping with the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey by the qualified archaeologist, (when appropriate); and formal recordation of all identified archaeological resources and significance evaluation of such resources presented in a technical report. The report shall also include full documentation of outreach to the Native American community. The Phase I survey shall be conducted prior to any CEQA review of development projects.

Records searches are the first step in performing these studies, but that only demonstrates whether other studies have previously been performed by archaeologists who submitted their final reports to the local information center. It does not establish whether resources are necessarily present or not.

22.37 The Native American Heritage Commission (NAHC) does not normally participate in “scoping” as that is not its stated mission. The NAHC generally performs sacred lands searches, and those are limited to areas that have previously been studied. Sacred lands are known places of special religious or social significance to Native Americans, and known graves and cemeteries of Native Americans on private lands in California. That Commission is charged with the duty of preserving and ensuring accessibility of sacred sites and burials, the disposition of Native American human remains and burial items, maintaining an inventory of Native American sacred sites on public lands and review current administrative and statutory protections related to those sacred sites.

Response 22.35

Please refer to response to comment 22.24 above. The preparers agree with the comment concerning the difference between records searches (Phase I) and on-site investigations; that is the reason why the qualified archaeologist and tribal monitor are required to be retained and on-site “during ground disturbing activity that can disturb previously undisturbed soil that may have the potential to impact archaeological and tribal cultural resources....” See MM 4.4-3.

Response 22.36

Please refer to response to comment 22.35 above.

Response 22.37

To scope means to “investigate or assess”. These are appropriate activities for the NAHC to undertake for purposes of determining whether a site may have cultural resources.

**COMMENTS**

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22.38 To remind the lead agency: "Avoidance and preservation in place are the preferable forms of mitigation for archeological sites. [Conducting an archaeological survey is does not constitute mitigation. Appropriate disposition of significant finds may mitigate the impacts.] When avoidance is infeasible, a data recovery plan should be prepared which adequately provides for recovering scientifically consequential information from the site. Studies and reports resulting from excavations must be deposited with the California Historical Resources Regional Information Center. Merely discovering or recovering artifacts and storing them does not mitigate impacts below a level of significance" (Calif Office of Historic preservation "How Can Substantial Adverse Change be Avoided or Mitigated?" at [http://ohp.parks.ca.gov/?page\\_id=21727](http://ohp.parks.ca.gov/?page_id=21727)).

22.39 Disclosure of Significant Impacts  
We note that findings required under CEQA Section 21081 have not been properly made that would necessitate identifying whether significant impacts would be reduced to less-than-significant levels and if so, would clearly describe how they would be reduced. CEQA requires the disclosure of potential significant impacts of a proposed action before it can be approved.

22.40 The document states under Impact 4.4-1 "Implementation of the proposed project would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. This is considered a potentially significant impact. However, implementation of mitigation would reduce this impact to a less than significant level."

Mitigation measures should be reasonably obvious, such as a compensatory action or special impact-reducing actions in response to significant impacts. The state CEQA Guidelines require "an essential nexus (i.e. connection) between the mitigation measure and a legitimate governmental interest" (CEQA Guidelines Title 14, Chapter 3, Section 15126.4 (a)(4)(A) ). In addition, "The measures must be 'roughly proportional' to the impacts on the project" (CEQA Guidelines, Title 14, Chapter 3, Section 15126.4 (a)(4)(B)).

Mitigation of significant impacts must lessen or eliminate the physical impact that the project will have on the historical resource. Otherwise the impact remains. This can be accomplished through redesign of a project to eliminate objectionable or damaging aspects of the project (e.g., retaining rather than removing a character-defining feature, reducing the size or massing of a proposed addition, or relocating a structure outside the boundaries of an archeological site) or changing the project to avoid impacting the historical resource. The purpose of environmental documents is to provide local agencies and the general public with detailed information on the potentially significant

**Response 22.38**

Please refer to responses to comments 22.33 and 22.35 above.

**Response 22.39**

Please refer to Topical Response No. 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses. Pursuant to California Public Resources Code §21081, "Pursuant to the policy stated in Sections 21002 and 21002.1, no public agency shall approve or carry out a project for which an environmental impact report *has been certified* which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

(a) The public agency makes one or more of the following findings with respect to each significant effect:

(1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.

(2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

(3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report."

(b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment."

The "findings" will be drafted for City Council's consideration prior to certification of the Final EIR and project approval as required by California Public Resources Code §21081.

**Response 22.40**

Please refer to response to comment 22.23 above. See also Topical Response No. 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses. The commenter has cited to what is commonly known as the "Nollan/Dolan" proportionality and nexus requirements for exactions and mitigation measures, but has not provided any substantial evidence to support why the proposed mitigation measures do not comply with the requirements

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- 22.40 cont. environmental effects that a proposed project is likely to have, to list ways that the significant environmental effects may be minimized and to analyze alternatives to the project.  
Based on the expected impacts: demolition, substantial alteration of, or significant impacts to the setting of historical resources in the Specific Plan Area, none of the proposed mitigation measures would serve to reduce impacts to less-than-significant levels. None of the described impacts, including demolition, substantial alteration, or significant impacts to the setting of historical resources in the specific plan area would be mitigated by creation of a publicly-available computer database to identify historic properties (MM 4.4-1) or preparation of the historical resources survey that is actually a baseline component of the environmental clearance document (MM 4.4.2). Updating that survey in 2022 (MM 4.4-2) while essential to the City's planning future may constitute "deferred mitigation." CEQA Guidelines forbid the use of deferred mitigation to reduce impacts.
- 22.41 What would be allowable would be the identification of Plan Level Impacts and development of a Menu of Options for Unavoidable Impacts. Unavoidable loss of a public benefit necessitates mitigation to reduce, lessen, avoid or compensate for those impacts.
- 22.42 Another essential problem with the identified mitigation measures is that there is no connection to the impacts or proportional balance to the proposed measures. Mitigation measures should be special actions needed to limit the degree and magnitude of expected project impacts or compensate for those impacts. They must directly addresses the loss of historical resources. Such mitigation measures should be useful and readily accessible to the public, and it should both engage and mitigate (or lessen) the loss of the historic property.
- 22.43 None of the two proposed built environment mitigation measures would serve those purposes. Further, the measures each must be analyzed for effectiveness in reducing the expected impacts and a mitigation monitoring or reporting plan would need to be adopted. The CEQA document must analyze the expected impacts, identify the relevant threshold of significance, address whether the threshold would be exceeded and why, and describe how "environmental protection feature" (e.g. DSP Policies) and mitigation measures would, based on substantial evidence, reduce or maintain the expected effect at a less-than-significant level. A mitigation measure's impact-reducing influence can only be considered after a clear, initial conclusion that describes the proposed project's significant or potentially significant effect on the environment. Regardless, the relevant environmental impact must be evaluated and disclosed.

set forth in the U.S. Supreme Court's *Nollan v. California Coastal Comm'n*, 483 U.S. 825 (1987) and *Dolan v. City of Tigard*, 512 U.S. 374 cases. Instead the commenter makes conclusory statements without supporting facts that the mitigation measures will not work.

**Response 22.41**

Please refer to Topical Response No. 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses, and response to comment 22.23 above.

**Response 22.42**

Please refer to response to comments 22.41 above.

**Response 22.43**

Please refer to response to comments 22.41 above.

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22.43  
cont. Including environmental protection features in the project description or DSP does not relieve the lead agency of the obligation to adequately analyze the potential significant environmental impacts of the project, even related to the issue that a protection feature is intended to address. Based on the court's decision in Lotus, it is important to discuss whether additional or other more effective, feasible measures would be available.

22.44 Cumulative Impacts (4.4.4)  
The assertion that "Development allowable under the proposed SGCP would be required to implement mitigation measures MM 4.4-1 and MM 4.4-2, which would reduce the impact to a level below significant (page 4.4-24)" defies common sense. Development projects allowable under the proposed program would have no connection to the development or implementation of those mitigation measures (a publicly available database and a future survey) and those described mitigation measures, ostensibly performed by the city would do nothing to avoid, minimize, rectify, reduce or eliminate or compensate for the loss of historical resources.

22.45 The cumulative impacts of successive projects of the same type (e.g. demolition or alteration of historical resources such that their significance would be impaired) in a concentrated area of Glendale, over time, that are not mitigated as described above would therefore be significant. The loss, over time of more than one historical resource, each cleared by the application of mitigation measures that do not compensate for the loss of the historical resources would result in the cumulative loss of multiple historical resources, which is the definition of "cumulative impacts."

22.46 No clear table information is provided to describe historical resources losses in the SGCP area in the past decade, and no information regarding known future projects is provided to allow readers to fact-check the erroneous assertion that the cumulative effects would not be considerable. Over the past decade, hundreds of Craftsman style buildings have been demolished in South Glendale or altered beyond recognition, many with no demonstrable environmental review. Each of those demolitions, considered and combined with those proposed in the future and that will be cleared by the SGCP together would constitute cumulatively considerable effects. We request that study be included in the FEIR for this Community Plan.

22.47 We assert that the proposed series of actions' contribution to the destruction and/or removal of historic resources would be cumulatively considerable, and those cumulative impacts to historical resources would be significant.

**Response 22.44**

Please refer to response to comments 22.41 above.

**Response 22.45**

The comment incorrectly presumes the recommended mitigation measures (MM 4.4-1 through 4.4-8) will not actually mitigate significant impacts on cultural resources to a less than significant level. See response to comment 22.41 above.

**Response 22.46**

The cumulative impact analysis requires the project proponent to examine the incremental effects of a project when viewed in connection with the effect of past projects, other current projects and probably future projects. (CEQA Guidelines §15064(h)(1)). This comment presumes that the recommended mitigation measures (MM 4.4-1 through 4.4-8) will not actually mitigate significant impacts on cultural resources to a less than significant level, and taken together with past projects will result in a cumulatively considerable impact. This conclusion is faulty because it incorrectly presumes the recommended mitigation measures will not mitigate the impacts of the project to a less than significant level. See response to comment 22.41 above. Impacts of a project are not cumulative considerable when there is no substantial evidence that any incremental impacts of the project are potentially significant. (*Leonoff v Monterey County Bd., of Supervisors* (1984) 150 CA3d 740, 750).

**Response 22.47**

Please refer to response to comments 22.46 above.

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We appreciate being part of this process and the opportunity to comment of this important document.

Sincerely,

*Lee Smith*

*Francesca Smith*

Lee & Francesca Smith  
Glendale, CA 91202

**COMMENTS**

**RESPONSES**

**From:** E Gabor [mailto:power1properties1@gmail.com]  
**Sent:** Monday, March 12, 2018 9:35 AM  
**To:** Krause, Erik EKrause@Glendaleca.gov  
**Subject:** GUSD / Camden Apt project

**Letter 23 Gabor Family**

**Response 23.1-23.13**

This comment letter is the same as an earlier comment letter (Letter No. 3). Refer to responses to comments 3.1 through 3.13.

- 23.1 I object to the South Glendale Community Plan (SGCP) since:
  - a) contrary to SGCP's claims, it is NOT the vision of our community – unless our community is suicidal; it is rather the vision of developers who are the only ones to benefit and whose greedy mega developments have already ruined our community within/bordering the Downtown Specific Plan area;
  - 23.2 b) it suggests an unacceptable, unjustifiable and, most importantly, an unsustainable upzoning of high density areas into mixed use zones, adding new zones for transit areas, as well as changes within the present zoning requirements (e.g., removal of setbacks in R1250) to allow for more height of buildings and more density of population, which have proved to be a DISASTER for the Glendale community within/bordering the DSP area already;
  - 23.3 c) it is premised on the fictions that people who are close to bus routes and transit areas will necessarily use buses and people who live close or at the mixed-use buildings (to be built) with first level retail stores will necessarily find employment in the retail stores, thereby promoting walkability, revitalization and employment in Glendale, whereas these are just practically unrealistic, logically flawed and statistically unsupported speculations; and finally
  - d) the Environmental Impact Report (EIR) prepared for the proposed SGCP, with its SEVEN (7) SIGNIFICANT and UNAVOIDABLE adverse ENVIRONMENTAL IMPACTS is PROOF that the new developments and the associated dramatic growth in density of the population expected under the SCGP will irreversibly and permanently affect both the QUALITY OF LIFE and the SAFETY of Glendale residents.
- 23.4 Therefore, the only comment to the EIR is: SGCP is unacceptable and should be discarded.  
  
Moreover, I propose to create a new SGCP with the objective to FIX the environmental impacts caused by or anticipated from the recent DSP area (part of South Glendale) developments and approved projects by: a) DOWNZONING areas in South Glendale to disallow any future mega developments; b) creating

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23.4 cont. | MORE OPEN SPACE AND MORE PARKS to counterbalance the shortage created by the constructed or already approved mega developments.

23.5 | South Glendale community is already on LIFE SUPPORT, in view of the recent aggressive and unreasonable mega developments within/bordering DSP area, which resulted in more traffic, less parking, less open and green space, and higher rents. The adoption of the SGCP will just TURN OFF THE LIFE SUPPORT for Glendale community; PLEASE, DON'T DO IT!

\*\*\*\*\*

23.6 | The EIR (environmental impact report) of the SGCP openly identifies SEVEN (7) environmental impacts that will be UNAVOIDABLE and SIGNIFICANT and will NOT have any mitigation measures:

1) Aesthetics – per EIR, the current visual character and quality of the site and its surroundings, “would be substantially degraded”; “the proposed projects would result in new sources of increased shade.”

Historically, the character of our jewel City of Glendale has been its quiet streets, its cozy low-rise buildings, with plenty of views of mountains, blue sky, and green space. Glendale has been intended to be a suburb to Los Angeles; not to become Los Angeles.

23.6 | The proposed SGCP, with upzoning, addition of new transit zones, changes within the current zone requirements, and even the innocent looking density bonuses so generously awarded to all Developers, would be contrary to the community character and historic designation of the City of Glendale and will significantly impact the QUALITY OF LIFE of its residents.

South Glendale, which encompassed the Downtown Specific Plan, has already been impacted by the unreasonable approvals of numerous mega development projects within DSP and at times bleeding outside the DSP), where developers constructed high-rise buildings, with inconsistent and aesthetically unappealing designs (blue, yellow, orange, and red painted walls), with parking variances (allowing for less parking spaces than required by the code) and density bonuses (allowing for more people and more units than allowed by the code). Further, the mega developments have also eliminated so much of open green space required for our visual and mental relief, made our streets impassable due to traffic congestion, and created lots of shades to the adjacent units. SGCP should now focus on creating more open space and more parks, rather than continue the same development trend which has proved to be a disaster already.

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23.6  
cont. | Moreover, the aesthetics and quiet low-rise residential character of South Glendale community is not only important for the preservation of the character per se or for the historic designation of Glendale as a suburban place, but also imperative and absolutely necessary for the mental health and the associated physical health of the Glendale community (healthy soul, healthy body). The recent years' mega developments in DSP zone, encompassed by the South Glendale (with their traffic congestion, noise, etc.) have only added to the stress of Glendale residents and deprived them of the green and/or open spaces to relieve that stress.

Therefore, the environmental impact to the aesthetics and character of Glendale, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city officials (Planning Commission or City Council).

23.7 | 2) Air quality: Per EIR, the implementation of the proposed project would:  
a) "conflict with or obstruct implementation of the applicable air quality plan";  
b) "violate an air quality standard or contribute substantially to an existing or projected air quality violation"; c) "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)";  
d) "expose sensitive receptors to substantial pollutant concentrations."

Indisputably, the above quotations from the EIR itself make it apparent that the SGCP will dramatically affect the QUALITY OF LIFE of Glendale residents from the perspective of air quality. Air has no boundaries; air pollutants will affect the entire Glendale community. Air quality is important for both our physical and mental health and it cannot be compromised.

Therefore, the environmental impact to the air quality, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

23.8 | 3) Greenhouse Gas Emissions: The proposed project a) "would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment"; b) "would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses."



**COMMENTS**

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**23.8 cont.** It is undeniable that the adverse effects of greenhouse gas emission and the associated air pollution will dramatically affect the quality of life and the physical and mental health of the entire Glendale community, since there are no air boundaries and since South Glendale – due to its vast array of retail stores and recreational facilities – is the most visited by all Glendale residents.

Therefore, the environmental impact to the greenhouse gas emissions, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

4) Population and Housing: Per EIR, the “implementation of the proposed project would induce substantial population growth in an area, either directly or indirectly.”

It is indisputable that most of South Glendale presently does not have and geographically cannot provide the adequate road infrastructure to accommodate such a substantial population growth. The streets in Glendale, especially outside the DSP area, are mostly one-lane in each direction, with the so much needed street parking on both sides of the streets. Allowing an increase in the population, where there are no adequate road and parking infrastructure, is unacceptable for both the current and future residents of Glendale.

**23.9** Moreover, the recent mega developments in Glendale, while recommended, lauded, and even approved by city staff, have proved to be a disaster for Glendale residents in view of the increased traffic, impassable streets, elimination of street parking for public, and allowing developers to provide less parking spaces than required by the code. South Glendale community has greatly suffered already; now is the time to stop the mega developments in South Glendale and to evenly distribute population growth in the entire Glendale.

As for housing, it is undisputed that all the developers who have implemented or are implementing projects within/bordering the DSP area have demolished (or plan to demolish) the presently affordable rental buildings, have constructed mega buildings with smaller units and double rents, have pushed the rents in Glendale up, and – despite providing a few units of affordable housing – have actually created and furthered the housing crisis in South Glendale. Plus, most of the recent mega developments in the DSP area are not fully occupied till present due to the unaffordable rents.

There is simply no sound justification to further the population increase and housing crisis.

COMMENTS

RESPONSES

23.9  
cont. | Therefore, the environmental impact to the population and housing, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

5) Public Services: Per EIR, the implementation of the proposed project would: a) "increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand"; b) would increase the demand of police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. Moreover, per EIR, Glendale is already far below the required response time for public services (e.g. fire protection).

The mentioned environmental impacts of increased need for fire protection and police protection stem from the anticipated dramatic increase of population and the associated likelihood of fire and crimes/accidents/fatalities based on the SGCP. Most importantly, per EIR, there cannot be any mitigation to this impact.

23.10 | EIR is clear that South Glendale community, upon the proposed SGCP, will suffer from poor response times of public services (fire protection, police); this environmental impact actually threatens not just the quality of life, but the SAFETY of Glendale community.

It should be noted that, even if the currently understaffed fire protection and police services extend their staff and structures to accommodate the expected population growth under SGCP – which EIR openly declares non feasible and impossible – the current inadequate road infrastructure (narrow one-lane each direction in most South Glendale) and the traffic increase anticipated by the SGCP will nonetheless further slow the response time for public services and will therefore make South Glendale unsafe to live in.

Therefore, the environmental impact to the public services, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

23.11 | 6) Recreation: Implementation of the proposed project would: a) "increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated"; b) "require the construction of new recreational facilities or the expansion of existing recreational facilities that could have an adverse physical effect on the environment."

**COMMENTS**

**RESPONSES**

23.11 cont. It is undisputed that recreation is a vital component and need for a healthy community; it is imperative to create more recreational facilities and parks and it is disastrous to further the lack of those, as anticipated by the SGCP based on the EIR finding.

First, ironically, the fact is: there are presently only a few recreation facilities in South Glendale, and those are all already overcrowded and lacking the adequate parking or open space. For example, the YMCA’s visitors do not have adequate parking and presently utilize the adjacent streets of Kenwood or Louise and the presently available parking lots nearby. But, per City Council’s decision, the adjacent public parking on Louise will soon cease to provide parking since a new development of “Louise Hotel” has been approved for the site. And the GUSD parking lot, which specifically provides additional parking for YMCA after school hours, may cease to provide parking because of a proposed mega development on that site waiting for final approval by the City Council. This is just one example, but it can be equally applied to all presently available recreation facilities. Not to mention, the parking to Americana – another major recreational place – is unaffordable for most of Glendale residents.

Second, it is no secret that there are only a few parks in South Glendale; one of the only big parks on Brand and Colorado will soon become home for another approved development.

Third, all the parks and recreational facilities that have been created or planned recently are located far outside of South Glendale, in the mountains, which are not accessible for the most vulnerable group of our society - our children, elder people, or people who cannot afford to get to those destinations (due to lack of cars, lack of funds, or incapacity to drive).

The proposed SGCP, per EIR, not only does not resolve the problem with the current shortage of parks and recreational facilities, but actually unacceptably furthers the problem.

Therefore, the environmental impact to the recreation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

23.12 7) Transportation: Per EIR, the implementation of the proposed project “would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.”

**COMMENTS**

**RESPONSES**

**23.12** | It is undisputed that the road infrastructure in Glendale is insufficient and has not  
**cont.** | been historically designated/intended to accommodate the dramatic increase of  
 | population anticipated by the proposed SGCP. The end result of the dramatic  
 | increase of population and the associated dramatic and unsustainable impact on  
 | transportation will be traffic congestion, traffic noise, more traffic accidents and  
 | fatalities, more pedestrian fatalities, etc. This will undeniably deteriorate the  
 | quality of life of all Glendale residents.

Moreover, the recent DSP area developments are just proof of how congested  
 and impassable our roads have become; this problem with transportation should  
 be fixed and not furthered more. Suggesting more bus routes will not resolve the  
 problem, as confirmed by EIR. Plus, there is no guaranty and no common sense  
 to assume that creating more bus lines will make people take buses, or providing  
 bicycle lanes will make people risk their lives and use bicycles in the already  
 congested and crowded streets of Glendale.

Therefore, the environmental impact to transportation, already found to be  
 significant and unavoidable by the EIR, is unacceptable and should not be  
 overridden by any decision making city official (Planning Commission or City  
 Council).

**23.13** | To summarize, the EIR's identified seven environmental impacts will adversely  
 | and permanently affect both the quality and the safety of Glendale community;  
 | those cannot and should not be overridden or overlooked by any decision making  
 | city official. Therefore, the proposed SGCP is unacceptable for the South  
 | Glendale community and should be discarded.

Sincerely,  
 The Gabor Family which own 6 adjacent properties and represent almost 90  
 affected residents.

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Friday, March 09, 2018 4:24 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 24 Gayane Soghbatyan**

**Response 24.1**

This comment provides an introduction to the author of the comment letter. As evaluated in Sections 4.13.3, 4.2.3, and 4.6.3 of the Draft EIR, respectively, the City cannot avoid potential impacts on police and fire protection services, air quality, and greenhouse gas emissions from implementation of the proposed SGCP, and there are no feasible mitigation measures that would reduce the impacts to a less than significant level. The ultimate determination of infeasibility of the proposed SGCP will be made by City Council.

**Response 24.2**

Section 4.14.1 of the Draft EIR discusses the existing green space and parks within the SGCP. The Draft EIR notes in section 4.14.1 that the SGCP would increase the use of existing facilities, which is a potentially significant impact for which there are no mitigation measures. Section 4.14.2 notes that the SGCP “strives to alleviate park and recreational deficits,” and to that end, the City is planning for the development of 25 acres of new recreation use along SR-134. See Topical Response No. 5 Recreation – Parks and Open Space.

**Response 24.3**

This comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project. Please refer to Topical Response No. 3: Transportation, Traffic and Parking.

**Response 24.4**

Please refer to response to comment 24.3 above.

- 24.1 I have disabled parents and an infant child; my family owns several properties in South Glendale, where I live. The proposed South Glendale Community Plan is unacceptable, in view of the environmental impact report, because as EIR identifies, it will be a hazard and irreversible adverse impact to the quality of life of my family.  
SGCP will be hazardous to the safety and well-being of my disabled parents or my infant child - through impacted air quality, greenhouse gas emissions, even fire and police protection services.  
Glendale will become an unsafe place to live for me and my family.
- 24.2 Our elderlies, our disabled family members and our children need more green space, more parks, and more recreational facilities. None of that is envisaged or addressed by the SGCP.
- 24.3 My family members currently hunt for parking on the streets since our building does not provide enough parking for each unit. Adding more apartment complexes - with the parking variances and higher density variances sought by developers and granted by developers - will make all the problems for my family and similarly situated people suffer in South Glendale.
- 24.4 The Draft EIR's mitigating measures will not work out because they are premised on the fiction that just adding new lanes and restriping the lanes on the intersections will eliminate traffic on the through streets. Adding bike lanes will not help the community on the narrow streets of Glendale; it will actually slow down traffic in Glendale and will jeopardize the safety of bicyclists, instead. Creating parking permit districts will only add a financial and administrative burden for the public and will not resolve the growing density and growing need for parking for the geographically small and already overcrowded area of South Glendale.

**COMMENTS**

**RESPONSES**

24.5 [ It is clear that SGCP will only serve to the benefit of Developers of mega complexes, and will bring absolutely nothing good to the community.  
The new SGCP is not a sustainable or responsible development plan and should be rejected. EIR is proof of that.

Gayane Soghatyan  
nairas2003@yahoo.com

**Response 24.5**

This comment provides a conclusion to the comment letter and does not raise a significant environmental issue for which a response is required.

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Sunday, March 11, 2018 10:57 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 25 Gloria Boyer**

**Response 25.1-25.13**

This comment letter is the same as an earlier comment letter (Letter No. 3). Refer to responses to comments 3.1 through 3.13.

Dear Council Members,

- 25.1 I object to the South Glendale Community Plan (SGCP) since:
  - a) contrary to SGCP's claims, it is NOT the vision of our community – unless our community is suicidal; it is rather the vision of developers who are the only ones to benefit and whose greedy mega developments have already ruined our community within/bordering the Downtown Specific Plan area;
  - 25.2 b) it suggests an unacceptable, unjustifiable and, most importantly, an unsustainable upzoning of high density areas into mixed use zones, adding new zones for transit areas, as well as changes within the present zoning requirements (e.g., removal of setbacks in R1250) to allow for more height of buildings and more density of population, which have proved to be a DISASTER for the Glendale community within/bordering the DSP area already;
  - 25.3 c) it is premised on the fictions that people who are close to bus routes and transit areas will necessarily use buses and people who live close or at the mixed-use buildings (to be built) with first level retail stores will necessarily find employment in the retail stores, thereby promoting walkability, revitalization and employment in Glendale, whereas these are just practically unrealistic, logically flawed and statistically unsupported speculations; and finally
  - d) the Environmental Impact Report (EIR) prepared for the proposed SGCP, with its SEVEN (7) SIGNIFICANT and UNAVOIDABLE adverse ENVIRONMENTAL IMPACTS is PROOF that the new developments and the associated dramatic growth in density of the population expected under the SCGP will irreversibly and permanently affect both the QUALITY OF LIFE and the SAFETY of Glendale residents.
- 25.4 Therefore, the only comment to the EIR is: SGCP IS UNACCEPTABLE AND SHOULD BE DISCARDED.  
  
Moreover, I propose to create a new SGCP with the objective to FIX the environmental impacts caused by or anticipated from the recent DSP area (part of South Glendale) developments and approved projects by: a) DOWNZONING areas in South Glendale to disallow any future mega developments; b) creating

**COMMENTS**

**RESPONSES**

23.4 cont. | MORE OPEN SPACE AND MORE PARKS to counterbalance the shortage created by the constructed or already approved mega developments.

23.5 | South Glendale community is already on LIFE SUPPORT, in view of the recent aggressive and unreasonable mega developments within/bordering DSP area, which resulted in more traffic, less parking, less open and green space, and higher rents. The adoption of the SGCP will just TURN OFF THE LIFE SUPPORT for Glendale community; PLEASE, DON'T DO IT!

\*\*\*\*\*

23.6 | The EIR (environmental impact report) of the SGCP openly identifies SEVEN (7) environmental impacts that will be UNAVOIDABLE and SIGNIFICANT and will NOT have any mitigation measures:

1) Aesthetics – per EIR, the current visual character and quality of the site and its surroundings, “would be substantially degraded”; “the proposed projects would result in new sources of increased shade.”

Historically, the character of our jewel City of Glendale has been its quiet streets, its cozy low-rise buildings, with plenty of views of mountains, blue sky, and green space. Glendale has been intended to be a suburb to Los Angeles; not to become Los Angeles.

23.6 | The proposed SGCP, with upzoning, addition of new transit zones, changes within the current zone requirements, and even the innocent looking density bonuses so generously awarded to all Developers, would be contrary to the community character and historic designation of the City of Glendale and will significantly impact the QUALITY OF LIFE of its residents.

South Glendale, which encompassed the Downtown Specific Plan, has already been impacted by the unreasonable approvals of numerous mega development projects within DSP and at times bleeding outside the DSP), where developers constructed high-rise buildings, with inconsistent and aesthetically unappealing designs (blue, yellow, orange, and red painted walls), with parking variances (allowing for less parking spaces than required by the code) and density bonuses (allowing for more people and more units than allowed by the code). Further, the mega developments have also eliminated so much of open green space required for our visual and mental relief, made our streets impassable due to traffic congestion, and created lots of shades to the adjacent units. SGCP should now focus on creating more open space and more parks, rather than continue the same development trend which has proved to be a disaster already.



**COMMENTS**

**RESPONSES**

**23.6 cont.** Moreover, the aesthetics and quiet low-rise residential character of South Glendale community is not only important for the preservation of the character per se or for the historic designation of Glendale as a suburban place, but also imperative and absolutely necessary for the mental health and the associated physical health of the Glendale community (healthy soul, healthy body). The recent years' mega developments in DSP zone, encompassed by the South Glendale (with their traffic congestion, noise, etc.) have only added to the stress of Glendale residents and deprived them of the green and/or open spaces to relieve that stress.

Therefore, the environmental impact to the aesthetics and character of Glendale, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city officials (Planning Commission or City Council).

**23.7** 2) Air quality: Per EIR, the implementation of the proposed project would:  
 a) "conflict with or obstruct implementation of the applicable air quality plan";  
 b) "violate an air quality standard or contribute substantially to an existing or projected air quality violation"; c) "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)";  
 d) "expose sensitive receptors to substantial pollutant concentrations."

Indisputably, the above quotations from the EIR itself make it apparent that the SGCP will dramatically affect the QUALITY OF LIFE of Glendale residents from the perspective of air quality. Air has no boundaries; air pollutants will affect the entire Glendale community. Air quality is important for both our physical and mental health and it cannot be compromised.

Therefore, the environmental impact to the air quality, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

**23.8** 3) Greenhouse Gas Emissions: The proposed project a) "would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment"; b) "would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses."

**COMMENTS**

**RESPONSES**

**23.8 cont.** It is undeniable that the adverse effects of greenhouse gas emission and the associated air pollution will dramatically affect the quality of life and the physical and mental health of the entire Glendale community, since there are no air boundaries and since South Glendale – due to its vast array of retail stores and recreational facilities – is the most visited by all Glendale residents.

Therefore, the environmental impact to the greenhouse gas emissions, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

4) Population and Housing: Per EIR, the “implementation of the proposed project would induce substantial population growth in an area, either directly or indirectly.”

It is indisputable that most of South Glendale presently does not have and geographically cannot provide the adequate road infrastructure to accommodate such a substantial population growth. The streets in Glendale, especially outside the DSP area, are mostly one-lane in each direction, with the so much needed street parking on both sides of the streets. Allowing an increase in the population, where there are no adequate road and parking infrastructure, is unacceptable for both the current and future residents of Glendale.

**23.9** Moreover, the recent mega developments in Glendale, while recommended, lauded, and even approved by city staff, have proved to be a disaster for Glendale residents in view of the increased traffic, impassable streets, elimination of street parking for public, and allowing developers to provide less parking spaces than required by the code. South Glendale community has greatly suffered already; now is the time to stop the mega developments in South Glendale and to evenly distribute population growth in the entire Glendale.

As for housing, it is undisputed that all the developers who have implemented or are implementing projects within/bordering the DSP area have demolished (or plan to demolish) the presently affordable rental buildings, have constructed mega buildings with smaller units and double rents, have pushed the rents in Glendale up, and – despite providing a few units of affordable housing – have actually created and furthered the housing crisis in South Glendale. Plus, most of the recent mega developments in the DSP area are not fully occupied till present due to the unaffordable rents.

There is simply no sound justification to further the population increase and housing crisis.

COMMENTS

RESPONSES

25.9  
cont. | Therefore, the environmental impact to the population and housing, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

5) Public Services: Per EIR, the implementation of the proposed project would: a) "increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand"; b) would increase the demand of police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. Moreover, per EIR, Glendale is already far below the required response time for public services (e.g. fire protection).

The mentioned environmental impacts of increased need for fire protection and police protection stem from the anticipated dramatic increase of population and the associated likelihood of fire and crimes/accidents/fatalities based on the SGCP. Most importantly, per EIR, there cannot be any mitigation to this impact.

25.10 | EIR is clear that South Glendale community, upon the proposed SGCP, will suffer from poor response times of public services (fire protection, police); this environmental impact actually threatens not just the quality of life, but the SAFETY of Glendale community.

It should be noted that, even if the currently understaffed fire protection and police services extend their staff and structures to accommodate the expected population growth under SGCP – which EIR openly declares non feasible and impossible – the current inadequate road infrastructure (narrow one-lane each direction in most South Glendale) and the traffic increase anticipated by the SGCP will nonetheless further slow the response time for public services and will therefore make South Glendale unsafe to live in.

Therefore, the environmental impact to the public services, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

25.11 | 6) Recreation: Implementation of the proposed project would: a) "increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated"; b) "require the construction of new recreational facilities or the expansion of existing recreational facilities that could have an adverse physical effect on the environment."

**COMMENTS**

**RESPONSES**

25.11 cont. It is undisputed that recreation is a vital component and need for a healthy community; it is imperative to create more recreational facilities and parks and it is disastrous to further the lack of those, as anticipated by the SGCP based on the EIR finding.

First, ironically, the fact is: there are presently only a few recreation facilities in South Glendale, and those are all already overcrowded and lacking the adequate parking or open space. For example, the YMCA's visitors do not have adequate parking and presently utilize the adjacent streets of Kenwood or Louise and the presently available parking lots nearby. But, per City Council's decision, the adjacent public parking on Louise will soon cease to provide parking since a new development of "Louise Hotel" has been approved for the site. And the GUSD parking lot, which specifically provides additional parking for YMCA after school hours, may cease to provide parking because of a proposed mega development on that site waiting for final approval by the City Council. This is just one example, but it can be equally applied to all presently available recreation facilities. Not to mention, the parking at the Americana – another major recreational place – is unaffordable for most of Glendale residents.

Second, it is no secret that there are only a few parks in South Glendale; one of the only big parks on Brand and Colorado will soon become home for another approved development.

Third, all the parks and recreational facilities that have been created or planned recently are located far outside of South Glendale, in the mountains, which are not accessible for the most vulnerable group of our society - our children, elder people, or people who cannot afford to get to those destinations (due to lack of cars, lack of funds, or incapacity to drive).

The proposed SGCP, per EIR, not only does not resolve the problem with the current shortage of parks and recreational facilities, but actually unacceptably furthers the problem.

Therefore, the environmental impact to the recreation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

25.12 7) Transportation: Per EIR, the implementation of the proposed project "would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways."

**COMMENTS**

**RESPONSES**

25.12  
cont. It is undisputed that the road infrastructure in Glendale is insufficient and has not been historically designated/intended to accommodate the dramatic increase of population anticipated by the proposed SGCP. The end result of the dramatic increase of population and the associated dramatic and unsustainable impact on transportation will be traffic congestion, traffic noise, more traffic accidents and fatalities, more pedestrian fatalities, etc. This will undeniably deteriorate the quality of life of all Glendale residents.

Moreover, the recent DSP area developments are just proof of how congested and impassable our roads have become; this problem with transportation should be fixed and not furthered more. Suggesting more bus routes will not resolve the problem, as confirmed by EIR. Plus, there is no guaranty and no common sense to assume that creating more bus lines will make people take buses, or providing bicycle lanes will make people risk their lives and use bicycles in the already congested and crowded streets of Glendale.

Therefore, the environmental impact to transportation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

25.13 To summarize, the EIR's identified seven environmental impacts will adversely and permanently affect both the quality of life and the safety of Glendale community; those cannot and should not be overridden or overlooked by any decision making city official.

Therefore, the proposed SGCP is UNACCEPTABLE for the South Glendale community and SHOULD BE DISCARDED.

Regards,  
Gloria Boyer  
Homeowner  
Glendale, CA 91206

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Monday, March 12, 2018 11:31 AM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

South Glendale Community Plan Staff,

- 26.1 While I am involved with many organizations, I am commenting as an individual on the SGCP.  
I am concerned by the numerous significant and unavoidable negative impacts of the project and that no identified measures will adequately mitigate the impacts.  
Parks and Open Space: I advocated for the utilization of DIF funding to procure new open space in South Glendale. The DSP has not added any significant public open space. The SGCP is not expected to add open space while increasing density. The Space 134 is a moonshot project that, while I support the exploration of the concept, will not provide any public benefit in a relative time frame to the impacts of the SGCP. A greater emphasis on the creation of meaningful open space is needed currently and needed more so prior to the implementation of the project.
- 26.2 Emergency Services and Response Times: Glendale prides itself on the exemplary service provided by our Police and Fire Departments. The expected negative impacts to response times and access will be experienced throughout Glendale as the departments will balance and prioritize resources.
- 26.3 I believe that the increased transit, potential projects such as Space 134, increased infrastructure and mitigation measures must be realized prior to implementation of any aspect of the project plan that is expected to generate significant negative impacts.

Grant Michals  
grant@michals.com

**Letter 26 Grant Michals**

**Response 26.1**

Please refer to Topical Response No. 5 Recreation – Parks and Open Space. This comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 26.2**

The City acknowledges and appreciates this comment. As evaluated in Section 4.13.3 of the Draft EIR, the City cannot avoid potential impacts on police and fire protection services from implementation of the proposed SGCP. There are no feasible mitigation measures that would reduce the impacts associated with fire or police protections services to a less than significant level. The ultimate determination of infeasibility of the proposed SGCP will be made by City Council.

**Response 26.3**

Please refer to Topical Response No. 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses. This comment provides a conclusion to the comment letter and does not raise a significant environmental issue for which a response is required.

**COMMENTS**

**RESPONSES**

**From:** website@mail@glendaleca.gov [mailto:website@mail@glendaleca.gov]  
**Sent:** Wednesday, February 28, 2018 5:39 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 27 J.M. Amussen**

**Response 27.1**

27.1 [ The number of high density and medium density projects being built into residential neighborhoods negatively impacts home ownership and quality of life. Increases in traffic, 24 hour noise, environmental pollution, as well as increased nighttime light pollution all have negative impacts on health and quality of life. Please reduce or limit further projects.

Respectfully  
JMA  
J M Amussen  
Amussen1@aol.com

The SGCP's impact on housing, population and density from implementation of the Plan is considered to be significant and unavoidable. Please refer to Topical Response No. 2 Population and Housing. Some traffic impacts are considered to be significant and unavoidable. Please refer to Topical Response No. 3 Transportation, Traffic and Parking. Noise impacts were analyzed in Section 4.11 of the Draft EIR. The analysis included a survey of the baseline ambient noise, and existing traffic, rail tariff, aircraft and stationary noise, plus existing groundborne vibration levels. The Draft EIR determined that the Plan would result in potentially significant noise impacts in excess of standards established in the General Plan or Noise Ordinance or applicable noise standards of other agencies based primarily on vehicular noise and rail noise. Mitigation Measures 4.11-1 through 4.11-5 will be adopted and implemented to reduce all significant noise impacts to a less than significant level.

Potential nighttime lighting impacts were analyzed in Section 4.1, Aesthetics, Impact 4.1-2 (Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?) of the Draft EIR. The analysis concluded that project implementation would not crease a new source of substantial light or glare that would adversely affect nighttime views.

**COMMENTS**

**RESPONSES**

**From:** Joanne Hedge [mailto:hedgegraphics@earthlink.net]  
**Sent:** Monday, March 12, 2018 2:44 PM  
**To:** Krause, Erik EKrause@Glendaleca.gov  
**Cc:** SGCP@glendaleca.gov  
**Subject:** SGCP Draft EIR - comment from Rancho

Erik Krause, Deputy Director, Planning Division  
Community Development Department  
Glendale CA 91206

28.1 This is to support the consensus at the Glendale Homeowners Coordinating Council's March meeting re the South Glendale Community Plan, and that the proposed project impacts are significant and that greater mitigation is required.  
The Glendale Rancho can empathize. It is determined to protect and preserve its zoning from commercial and residential development that would adversely impact all facets of its history, quality of life, horsekeeping, and the property values associated with its unique character.

Thank you,  
Joanne Hedge  
GLENDALE RANCHO NEIGHBORHOOD ASSOCIATION  
hedgegraphics@earthlink.net

**Letter 28 Joanne Hedge**

**Response 28.1**

This comment is conclusive in nature and does not raise a significant environmental issue for which a response is required. Please refer to Topical Response No. 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.



**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Sunday, March 04, 2018 10:21 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 29 Jon**

**Response 29.1**

The City appreciates the comment. See Topical Response No. 5 for Recreation – Parks and Open Space, No. 3 Transportation, Traffic and Parking, and No. 2 Population and Housing.

29.1 [ Less green space and an increased population will only harm out community and quality of life. The city is already packed to the brim with people and traffic is out of control. Getting across the river and into the city in the mornings has gone from a 20 min ordeal several years ago to up to an hour today, and there doesn't seem to be any plan in sight to address the situation. Why would anyone propose to add to the problem unless they had a lot to gain at the cost of the community?

Jon  
Glendale, CA 91206

**COMMENTS**

**RESPONSES**

**From:** KARO KALPAKYAN [mailto:kalpak66@gmail.com]  
**Sent:** Tuesday, February 27, 2018 9:44 PM  
**To:** SGCP@glendaleca.gov  
**Subject:** Parking in freeway

**Letter 30 Karo Kalpakyan**

**Response 30.1**

The City acknowledges and appreciates this comment. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 30.2**

Please refer to response to comment 30.1 above.

- 30.1 [ Glendale has one main entry from the freeway or exit which is Colorado boulevard That takes you to downtown Glendale we need another entrance from the 5 freeway Like Lexington so we can clean up all the arteries on the streets
- 30.2 [ Also can you guys start giving tickets people who double park their cars as it is we don't have enough parkings on the streets especially now you guys turning all the garages to units now  
We definitely need to tickets all the people who double parks

COMMENTS

RESPONSES

From: websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
Sent: Monday, March 12, 2018 5:23 PM  
To: Krause, Erik <EKrause@Glendaleca.gov>  
Subject: City of Glendale, CA: SGCP EIR Comments

Letter 31 Kay Hostetler

Response 31.1

The City concurs with this comment. As evaluated in Section 4.13.3 of the Draft EIR, the City cannot avoid potential impacts on police and fire protection services from implementation of the proposed SGCP. There are no feasible mitigation measures that would reduce the impacts associated with fire or police protections services to a less than significant level. The ultimate determination of infeasibility of the proposed SGCP will be made by City Council.

Response 31.2

Please refer to response to comment 31.1 above. In addition, even the No Project Alternative would add 2,587 new units amounting to 6,985 residents above existing conditions. Although the population under the No Project Alternative would be significantly less than the proposed SGCP population of 27,910 residents, impacts to the Glendale Police Department (GPD) would remain significant and unavoidable.

Response 31.3

This comment does not raise a significant environmental issue for which a response is required. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

Response 31.4

Please refer to response to comment 31.1 through 31.3 above.

31.1 According to the Draft EIR for the South Glendale Community Plan, the impact of thousands of residents moving to South Glendale would seriously impact our fire department's response time. Although we have a great fire department, it takes them longer to get to the site now than the NFPA's standard of 240 seconds. It takes longer for our fire department to respond when they leave the fire station and meet instant gridlock or when the trucks have to navigate narrow streets that are parked full. That describes the situation in South Glendale. Glendale outgrew its number of parking spaces years ago. According to the report development would bring a significantly larger population with more residential and commercial buildings and the impact would be significant and unavoidable. There is no feasible mitigation to reduce the impact.

31.2 According to the report our police department with 244 sworn officers is severely understaffed. They do incredible work. The Work Boots meeting that City Council held at the GPD headquarters featured the training they receive and the way they handle emergencies. As a resident here I appreciate the alerts and reports we receive by email from the GPD's media relations person. However with every resident we add to our city, we add work for the police department. The outcome of the report is that the impact of increasing our population will be significant and unavoidable. There is no feasible mitigation to reduce the impact.

31.3 The South Glendale Community Plan to increase the population by developing new projects in Glendale should be put ON HOLD. High rents and the cost of owning a home already adds more people to some residences because sharing the home or apartment is one way to keep residential costs affordable.

31.4 Our park space needs to be increased for the residents who already live in South Glendale. The amount of green space is far less than it should be. The amount of concrete covering our square miles in South Glendale is far greater than it should be. We need quality air, a peaceful environment, space, and the other markers that indicate quality of life. A physician testified at the planning commission meeting on March 7. She said density of population affects our physical health and mental health. I agree. One of our transportation commissioners at the same meeting said we need more parking for our businesses and for our residents and their visitors. The choice for the City of Glendale should be NO PROJECT in South Glendale. Transportation and the hours of bus service need to be increased first.

Kay Hostetler  
kayhostetler76@gmail.com

**COMMENTS**

**RESPONSES**

**From:** Krystof Litomisky [mailto:krystof.litomisky@everyactioncustom.com]  
**Sent:** Sunday, March 11, 2018 6:45 PM  
**To:** SGCP@glendaleca.gov  
**Subject:** Support for Proposed South Glendale Community Plan

Dear Glendale Planning Department,

I am writing to you to in support for the proposed project analyzed in the South Glendale Community Plan DEIR. I urge the city to proceed with the proposed project, and not the no build or either of the reduced density alternatives.

32.1 The greater Los Angeles region is facing a severe housing shortage. This project will help create much needed housing in a walkable, mixed-use neighborhood with good transit and plans for future transit expansion. By helping to create new housing in a desirable neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

32.2 I also urge you to consider potential positive impacts of the project in the FEIR:  
4.1.3 Visual Character - new buildings can improve the aesthetics of the city, especially where new mixed-use development replaces auto-oriented development.

32.3 4.1.4 Shade - in a warm, sunny climate like Glendale, more shade is often an amenity. On hot summer days, pedestrians in downtown Glendale frequently seek shade to cool off.

32.4 4.2.1 Air Quality & 4.6.1 Greenhouse Gas Emissions - allowing more development in a central location like South Glendale reduces the demand for greenfield development on the urban fringe, reducing driving and GHG emissions. Additional development in dense, walkable areas like South Glendale also makes it more likely that current residents will be able to walk, bike, or take transit to meet their daily needs instead of driving. State policy such as SB 375 has recognized the climate benefits of infill development.

32.5 4.12.2 Population and Housing - an increase in housing and population can be positive, as denser cities reduce environmental impacts per capita and promote greater diversity and economic development.

**Letter 32 Krystof Litomisky**

**Response 32.1**

This comment letter is the same as an earlier comment letter (Letter No. 4). Refer to responses to comments 4.1 through 4.7.

**Response 32.2**

The City acknowledges and appreciates this comment. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 32.3**

Please refer to response to comment 32.2 above.

**Response 32.4**

Please refer to response to comment 32.2 above.

**Response 32.5**

Please refer to response to comment 32.2 above.

**COMMENTS**

**RESPONSES**

32.6 | Height Restrictions - the city should not reduce height limits to below what they are today. Lower height limits reduce the amount of housing that can be built, which reduces the likelihood of development until prices rise, making housing less affordable. Eliminating the reductions in maximum height should not require any further analysis under the EIR, since it would not be a change from present conditions.

32.7 | Thank you for the opportunity to comment on the South Glendale Community Plan DEIR. Again, I encourage the city to proceed with the proposed project analyzed in the DEIR.

Personally sent by Krystof Litomisky using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization dedicated to advocating for more housing.

Sincerely,  
Krystof Litomisky  
La Crescenta, CA 91214  
krystof.litomisky@gmail.com

**Response 32.6**

Please refer to response to comment 32.2 above.

**Response 32.7**

This comment provides a conclusion to the comment letter. The City appreciates the support expressed by the commenter.

COMMENTS

RESPONSES

From: websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
Sent: Monday, March 05, 2018 12:53 PM  
To: Krause, Erik <EKrause@Glendaleca.gov>  
Subject: City of Glendale, CA: SGCP EIR Comments

Letter 33 Laura Flores

Response 33.1

This comment expresses opposition to the adoption of the SGCP, the implementation of which would allow for additional housing development. Housing and Population impacts were analyzed in the Draft EIR (Section 4.12). The Draft EIR concludes that the SGCP would induce substantial population growth on both a program level and a cumulative level that would result in a significant and unavoidable impact on population. See Topical Response No. 2 Population and Housing.

Response 33.2

Impacts on public services such as police, fire and schools were evaluated in Section 4.13.3 of the Draft EIR.

Whether or not the proposed project will impact police services depends on whether the implementation of the SGCP would result in substantial adverse environmental impacts from provision of new or physically altered governmental facilities, or the need for a new facility the construction of which could cause significant environmental impacts in order to maintain acceptable levels of service ratios, response times or performance objectives. The Draft EIR determined that an increase in population will increase demand for police services that could create a significant and unavoidable impact resulting from the construction of new police facilities. The same is true with respect to fire protection services.

Implementation of the proposed SGCP would increase the number of students attending Glendale Unified School District (GUSD) schools within the proposed SGCP area; however, payment of development impact fees has been deemed to provide full and complete school facilities mitigation. Therefore, the proposed project would reduce the potential impacts on schools to a less than significant level.

Response 33.3

Transportation and Traffic impacts were analyzed in Section 4.15.3 of the Draft EIR. There are numerous mitigation measures that will reduce many impacts to below a level of significance (MM 4.15-1 – 4.15-11), but the City cannot avoid all potentially significant impacts even after the implementation of mitigation measures on certain intersections within the SGCP area under the proposed SGCP. There are no feasible mitigation measures that would reduce the impacts associated with these intersections to a less than significant level. Please refer to Topical Response No. 3 Transportation, Traffic and Parking.

33.1 While it is understandable that the city of Glendale needs to update its plan for South Glendale in order to accommodate future population growth and transportation needs, I cannot support the current plan and ask the Glendale City Council and Planning Department to revise the current plan to decrease the number of mid to high density projects outlined here.

33.2 Under the Summary of Environmental Impacts and Mitigation Measures listed in the Main Summary, I am greatly concerned with the findings that the proposed plan will cause significant population growth and therefore significant increase in the need for critical public services such as police, fire and public schools with no plan to mitigate the higher demand.

33.3 In addition, the Summary states that traffic problems will increase with no plan to mitigate this impact while conflicting with county traffic standards.

33.4 I am also concerned about the noise, air pollution the projects would create while "diminishing the existing character and quality" of our community.

33.5 My fear is that this plan will exacerbate our city's existing problems with higher density, demand for public services and increased traffic, thus further diminishing the overall quality of life in our city.

I am a Glendale native and would support moderate, controlled growth, but this plan goes too far and makes no accommodations for the negative impacts that it would bring to our city. I ask the Glendale City Council to reject this plan and ask that it be revised.

Laura Flores  
lauramflores@sbcglobal.net

**COMMENTS**

**RESPONSES**

**Response 33.4**

This comment notes concern regarding noise and air quality, but does not identify a specific environmental impact issue for which a response is required. Both noise and air quality impacts were extensively analyzed in the Draft EIR (See Section 4.2 – Air Quality; Section 4.11 – Noise).

**Response 33.5**

This concluding paragraph represents the commenter’s opinion that will be included in the Final EIR and made available for consideration by City Council before making a decision on the project.

COMMENTS

RESPONSES

**From:** Lily Amiryman [mailto:lamiryan@yahoo.com]  
**Sent:** Sunday, March 11, 2018 1:52 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>; Stotler, Laura <LStotler@Glendaleca.gov>; Gharpetian, Vartan <VGharpetian@Glendaleca.gov>; Devine, Paula <PDevine@Glendaleca.gov>; Najarian, Ara <ANajarian@Glendaleca.gov>; Sinanyan, Zareh <ZSinanyan@Glendaleca.gov>; Agajanian, Vrej <VAgajanian@Glendaleca.gov>; Beers, Yasmin K <YBeers@Glendaleca.gov>; Manoukian, Rafi <RManoukian@Glendaleca.gov>; Kassakhian, Ardashes AKassakhian@Glendaleca.gov  
**Subject:** Comments to Environmental Impact Report (EIR) and objections to South Glendale Community Plan (SGCP)

Dear Council Members,

- 34.1 I object to the South Glendale Community Plan (SGCP) since:
  - a) contrary to SGCP's claims, it is NOT the vision of our community – unless our community is suicidal; it is rather the vision of developers who are the only ones to benefit and whose greedy mega developments have already ruined our community within/bordering the Downtown Specific Plan area;
  - 34.2 b) it suggests an unacceptable, unjustifiable and, most importantly, an unsustainable upzoning of high density areas into mixed use zones, adding new zones for transit areas, as well as changes within the present zoning requirements (e.g., removal of setbacks in R1250) to allow for more height of buildings and more density of population, which have proved to be a DISASTER for the Glendale community within/bordering the DSP area already;
  - 34.3 c) it is premised on the fictions that people who are close to bus routes and transit areas will necessarily use buses and people who live close or at the mixed-use buildings (to be built) with first level retail stores will necessarily find employment in the retail stores, thereby promoting walkability, revitalization and employment in Glendale, whereas these are just practically unrealistic, logically flawed and statistically unsupported speculations; and finally
  - 34.4 d) the Environmental Impact Report (EIR) prepared for the proposed SGCP, with its SEVEN (7) SIGNIFICANT and UNAVOIDABLE adverse ENVIRONMENTAL IMPACTS is PROOF that the new developments and the associated dramatic growth in density of the population expected under the SCGP will irreversibly and permanently affect both the QUALITY OF LIFE and the SAFETY of Glendale residents.
- Therefore, the only comment to the EIR is: SGCP IS UNACCEPTABLE AND SHOULD BE DISCARDED.

Letter 34 Lili Amiryman

Response 34.1-34.13

This comment letter is the same as an earlier comment letter (Letter No. 3). Refer to responses to comments 3.1 through 3.13.



COMMENTS

RESPONSES

34.4  
cont. | Moreover, I propose to create a new SGCP with the objective to FIX the environmental impacts caused by or anticipated from the recent DSP area (part of South Glendale) developments and approved projects by: a) DOWNZONING areas in South Glendale to disallow any future mega developments; b) creating MORE OPEN SPACE AND MORE PARKS to counterbalance the shortage created by the constructed or already approved mega developments.

34.5 | South Glendale community is already on LIFE SUPPORT, in view of the recent aggressive and unreasonable mega developments within/bordering DSP area, which resulted in more traffic, less parking, less open and green space, and higher rents. The adoption of the SGCP will just TURN OFF THE LIFE SUPPORT for Glendale community; PLEASE, DON'T DO IT!

\*\*\*\*\*

| The EIR (environmental impact report) of the SGCP openly identifies SEVEN (7) environmental impacts that will be UNAVOIDABLE and SIGNIFICANT and will NOT have any mitigation measures:

1) Aesthetics: per EIR, the current visual character and quality of the site and its surroundings, "would be substantially degraded"; "the proposed projects would result in new sources of increased shade."

Historically, the character of our jewel City of Glendale has been its quiet streets, its cozy low-rise buildings, with plenty of views of mountains, blue sky, and green space. Glendale has been intended to be a suburb to Los Angeles; not to become Los Angeles.

34.6 | The proposed SGCP, with upzoning, addition of new transit zones, changes within the current zone requirements, and even the innocent looking density bonuses so generously awarded to all Developers, would be contrary to the community character and historic designation of the City of Glendale and will significantly impact the QUALITY OF LIFE of its residents.

South Glendale, which encompassed the Downtown Specific Plan, has already been impacted by the unreasonable approvals of numerous mega development projects within DSP and at times bleeding outside the DSP), where developers constructed high-rise buildings, with inconsistent and aesthetically unappealing designs (blue, yellow, orange, and red painted walls), with parking variances (allowing for less parking spaces than required by the code) and density bonuses (allowing for more people and more units than allowed by the code). Further, the mega developments have also eliminated so much of open green space required for our visual and mental relief, made our streets impassable due to traffic congestion, and created lots of shades to the adjacent units. SGCP should now

**COMMENTS**

**RESPONSES**

34.6 cont. focus on creating more open space and more parks, rather than continue the same development trend which has proved to be a disaster already.

Moreover, the aesthetics and quiet low-rise residential character of South Glendale community is not only important for the preservation of the character per se or for the historic designation of Glendale as a suburban place, but also imperative and absolutely necessary for the mental health and the associated physical health of the Glendale community (healthy soul, healthy body). The recent years' mega developments in DSP zone, encompassed by the South Glendale (with their traffic congestion, noise, etc.) have only added to the stress of Glendale residents and deprived them of the green and/or open spaces to relieve that stress.

Therefore, the environmental impact to the aesthetics and character of Glendale, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city officials (Planning Commission or City Council).

34.7 2) Air quality: Per EIR, the implementation of the proposed project would: a) "conflict with or obstruct implementation of the applicable air quality plan"; b) "violate an air quality standard or contribute substantially to an existing or projected air quality violation"; c) "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)"; d) "expose sensitive receptors to substantial pollutant concentrations."

Indisputably, the above quotations from the EIR itself make it apparent that the SGCP will dramatically affect the QUALITY OF LIFE of Glendale residents from the perspective of air quality. Air has no boundaries; air pollutants will affect the entire Glendale community. Air quality is important for both our physical and mental health and it cannot be compromised.

Therefore, the environmental impact to the air quality, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

34.8 3) Greenhouse Gas Emissions: The proposed project a) "would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment"; b) "would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses."

COMMENTS

RESPONSES

34.8 cont. It is undeniable that the adverse effects of greenhouse gas emission and the associated air pollution will dramatically affect the quality of life and the physical and mental health of the entire Glendale community, since there are no air boundaries and since South Glendale – due to its vast array of retail stores and recreational facilities – is the most visited by all Glendale residents.

Therefore, the environmental impact to the greenhouse gas emissions, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

4) Population and Housing: Per EIR, the “implementation of the proposed project would induce substantial population growth in an area, either directly or indirectly.”

It is indisputable that most of South Glendale presently does not have and geographically cannot provide the adequate road infrastructure to accommodate such a substantial population growth. The streets in Glendale, especially outside the DSP area, are mostly one-lane in each direction, with the so much needed street parking on both sides of the streets. Allowing an increase in the population, where there are no adequate road and parking infrastructure, is unacceptable for both the current and future residents of Glendale.

34.9 Moreover, the recent mega developments in Glendale, while recommended, lauded, and even approved by city staff, have proved to be a disaster for Glendale residents in view of the increased traffic, impassable streets, elimination of street parking for public, and allowing developers to provide less parking spaces than required by the code. South Glendale community has greatly suffered already; now is the time to stop the mega developments in South Glendale and to evenly distribute population growth in the entire Glendale.

As for housing, it is undisputed that all the developers who have implemented or are implementing projects within/bordering the DSP area have demolished (or plan to demolish) the presently affordable rental buildings, have constructed mega buildings with smaller units and double rents, have pushed the rents in Glendale up, and – despite providing a few units of affordable housing – have actually created and furthered the housing crisis in South Glendale. Plus, most of the recent mega developments in the DSP area are not fully occupied till present due to the unaffordable rents.

There is simply no sound justification to further the population increase and housing crisis.

COMMENTS

RESPONSES

34.9  
cont. | Therefore, the environmental impact to the population and housing, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

5) Public Services: Per EIR, the implementation of the proposed project would: a) "increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand"; b) would increase the demand of police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. Moreover, per EIR, Glendale is already far below the required response time for public services (e.g. fire protection).

The mentioned environmental impacts of increased need for fire protection and police protection stem from the anticipated dramatic increase of population and the associated likelihood of fire and crimes/accidents/fatalities based on the SGCP. Most importantly, per EIR, there cannot be any mitigation to this impact.

34.10 | EIR is clear that South Glendale community, upon the proposed SGCP, will suffer from poor response times of public services (fire protection, police); this environmental impact actually threatens not just the quality of life, but the SAFETY of Glendale community.

It should be noted that, even if the currently understaffed fire protection and police services extend their staff and structures to accommodate the expected population growth under SGCP – which EIR openly declares non feasible and impossible – the current inadequate road infrastructure (narrow one-lane each direction in most South Glendale) and the traffic increase anticipated by the SGCP will nonetheless further slow the response time for public services and will therefore make South Glendale unsafe to live in.

Therefore, the environmental impact to the public services, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

34.11 | 6) Recreation: Implementation of the proposed project would: a) "increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated"; b) "require the construction of new recreational facilities or the expansion of existing recreational facilities that could have an adverse physical effect on the environment."

COMMENTS

RESPONSES

34.11 cont. It is undisputed that recreation is a vital component and need for a healthy community; it is imperative to create more recreational facilities and parks and it is disastrous to further the lack of those, as anticipated by the SGCP based on the EIR finding.

First, ironically, the fact is: there are presently only a few recreation facilities in South Glendale, and those are all already overcrowded and lacking the adequate parking or open space. For example, the YMCA's visitors do not have adequate parking and presently utilize the adjacent streets of Kenwood or Louise and the presently available parking lots nearby. But, per City Council's decision, the adjacent public parking on Louise will soon cease to provide parking since a new development of "Louise Hotel" has been approved for the site. And the GUSD parking lot, which specifically provides additional parking for YMCA after school hours, may cease to provide parking because of a proposed mega development on that site waiting for final approval by the City Council. This is just one example, but it can be equally applied to all presently available recreation facilities. Not to mention, the parking at the Americana – another major recreational place – is unaffordable for most of Glendale residents.

Second, it is no secret that there are only a few parks in South Glendale; one of the only big parks on Brand and Colorado will soon become home for another approved development.

Third, all the parks and recreational facilities that have been created or planned recently are located far outside of South Glendale, in the mountains, which are not accessible for the most vulnerable group of our society - our children, elder people, or people who cannot afford to get to those destinations (due to lack of cars, lack of funds, or incapacity to drive).

The proposed SGCP, per EIR, not only does not resolve the problem with the current shortage of parks and recreational facilities, but actually unacceptably furthers the problem.

Therefore, the environmental impact to the recreation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

34.12 7) Transportation: Per EIR, the implementation of the proposed project "would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways."

**COMMENTS**

**RESPONSES**

**34.12**  
cont. | It is undisputed that the road infrastructure in Glendale is insufficient and has not been historically designated/intended to accommodate the dramatic increase of population anticipated by the proposed SGCP. The end result of the dramatic increase of population and the associated dramatic and unsustainable impact on transportation will be traffic congestion, traffic noise, more traffic accidents and fatalities, more pedestrian fatalities, etc. This will undeniably deteriorate the quality of life of all Glendale residents.

Moreover, the recent DSP area developments are just proof of how congested and impassable our roads have become; this problem with transportation should be fixed and not furthered more. Suggesting more bus routes will not resolve the problem, as confirmed by EIR. Plus, there is no guaranty and no common sense to assume that creating more bus lines will make people take buses, or providing bicycle lanes will make people risk their lives and use bicycles in the already congested and crowded streets of Glendale.

Therefore, the environmental impact to transportation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

**34.13** | To summarize, the EIR's identified seven environmental impacts will adversely and permanently affect both the quality of life and the safety of Glendale community; those cannot and should not be overridden or overlooked by any decision making city official.

Therefore, the proposed SGCP is UNACCEPTABLE for the South Glendale community and SHOULD BE DISCARDED.

Regards,  
Lili Amiryam  
Glendale, CA 91206

**COMMENTS**

**RESPONSES**

**From:** Liz Barillas [mailto:trunkschan90@everyactioncustom.com]  
**Sent:** Friday, March 09, 2018 8:20 PM  
**To:** Krause, Erik EKrause@Glendaleca.gov  
**Subject:** Support for Proposed South Glendale Community Plan

Dear Deputy Director of Community Development Erik Krause,

- 35.1 I am writing to you to in support for the proposed project analyzed in the South Glendale Community Plan DEIR. I urge the city to proceed with the proposed project, and not the no build or either of the reduced density alternatives.  
The greater Los Angeles region is facing a severe housing shortage. This project will help create much needed housing in a walkable, mixed-use neighborhood with good transit and plans for future transit expansion. By helping to create new housing in a desirable neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.
- 35.2 I also urge you to consider potential positive impacts of the project in the FEIR:  
4.1.3 Visual Character - new buildings can improve the aesthetics of the city, especially where new mixed-use development replaces auto-oriented development.
- 35.3 4.1.4 Shade - in a warm, sunny climate like Glendale, more shade is often an amenity. On hot summer days, pedestrians in downtown Glendale frequently seek shade to cool off.
- 35.4 4.2.1 Air Quality & 4.6.1 Greenhouse Gas Emissions - allowing more development in a central location like South Glendale reduces the demand for greenfield development on the urban fringe, reducing driving and GHG emissions. Additional development in dense, walkable areas like South Glendale also makes it more likely that current residents will be able to walk, bike, or take transit to meet their daily needs instead of driving. State policy such as SB 375 has recognized the climate benefits of infill development.
- 35.5 4.12.2 Population and Housing - an increase in housing and population can be positive, as denser cities reduce environmental impacts per capita and promote greater diversity and economic development.

**Letter 35 Liz Barillas**

**Response 35.1**

This comment letter is the same as an earlier comment letter (Letter No. 4). Refer to responses to comments 4.1 through 4.7.

**Response 35.2**

The City acknowledges and appreciates this comment. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project. For additional analysis regarding aesthetics, please see Topical Response No. 4 Aesthetics.

**Response 35.3**

Please refer to response to comment 35.2 above. For additional analysis regarding aesthetics, please see Topical Response No. 4 Aesthetics.

**Response 35.4**

Please refer to response to comment 35.2 above.

**Response 35.5**

Please refer to response to comment 35.2 above. For additional analysis, please see Topical Response No. 2 Population and Housing.

**COMMENTS**

**RESPONSES**

35.6 | Height Restrictions - the city should not reduce height limits to below what they are today. Lower height limits reduce the amount of housing that can be built, which reduces the likelihood of development until prices rise, making housing less affordable. Eliminating the reductions in maximum height should not require any further analysis under the EIR, since it would not be a change from present conditions.

35.7 | Thank you for the opportunity to comment on the South Glendale Community Plan DEIR. Again, I encourage the city to proceed with the proposed project analyzed in the DEIR.

Sincerely,  
Liz Barillas  
trunkschan90@yahoo.com

**Response 35.6**

Please refer to response to comment 35.2 above.

**Response 35.7**

Please refer to response to comment 35.2 above.



**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Friday, March 09, 2018 4:07 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 36 Lusine Soghatyan**

**Response 36.1**

This comment letter will be part of the Final EIR; therefore, the commenter’s opposition to the proposed SGCP is documented and this information will be made available to City Council.

In regard to the first bullet, the environmental impacts associated with Alternative 1, the No Project Alternative, are evaluated in Section 6.4.1 of the Draft EIR.

**Response 36.2**

As discussed in response to comment 36.1, Alternative 1 is identified as the No Project Alternative in Sections 6.3 and evaluated in 6.4 of the Draft EIR. The City concurs with the statement that impacts under Alternative 1 will have the same adverse environmental impacts as the proposed project with the exception of the following resources: conflict with or obstruct implementation of applicable air quality plans and conflict with any applicable land use plan, policy, or regulation.

The City appreciates this comment. The ultimate determination of infeasibility of the proposed SGCP will be made by City Council.

**Response 36.3**

This comment represents an opinion and does not raise a significant environmental issue for which a response is required.

**Response 36.4**

Regarding traffic and parking concerns, please see Topical Response No. 3 Transportation, Traffic and Parking.

- 36.1 In view of the EIR and the identified 7 environmental impacts that will not be feasible to mitigate even with Alternative 1 - i.e. no Project, I completely oppose the draft South Glendale Community Plan because:
  - a) draft SGCP does not address the identified environmental impacts that Glendale faces even with Alternative 1.
  - b) it is very confusing and unclear if "No Project" is "Alternative 1." The public hearing did not make it clear either and further made a confusion on it. So the No Project - i.e. Alternative 1 - was mentioned to also have the same adverse environmental impacts - and even if to a less degree - those would still not be lessened to a point of less than significant and unavoidable.
- 36.2 Therefore, if No Project - i.e. the continuation of the status quo - has the environmental adverse impacts - then a proper South Glendale Community Plan should try to mitigate those impacts - i.e. issue a MORATORIUM (stop any development in Glendale temporarily) and CREATE MORE OPEN SPACE AND PARKS AND PARKING, to preclude the growth of the density of population expected before 2040 and to address the traffic congestion and parking shortage problems.
- 36.3 c) it is unreasonable why the changes in zoning regulations (less parking requirements, elimination of setbacks in R1250) are suggested and there is no other explanation to it than to benefit developers and to hurt the community even further. It is unacceptable.
- 36.4 d) bike lanes as a plan is unacceptable in Glendale because those are non-feasible. Even if the bike lanes are established on a couple of streets (e.g. Central), those are overcrowded streets, the lanes are already narrow, those will take away from either the width of the lanes or from the street parking and will further aggravate traffic and parking problems, will slow traffic, will be unsafe for the bicyclists themselves, and will be just for the benefit of a very few people who either can't afford to drive a car or ride a bike for recreational purposes only. It is fiction that the addition of bike lanes will make people use bikes rather than their cars to work or to grocery stores...

**COMMENTS**

**RESPONSES**

**36.4 cont.** So the benefits of the bike lanes, if any, will be greatly outweighed by the adverse impacts to the community and even for the bicyclists themselves.

**36.5** c) part of the mitigating measures on transportation are mentioned as restriping the lane turns - but this only mitigates - if so - the intersection traffic; this does not mitigate the traffic on the through streets. As mentioned by the specialists commissioners of the transportation and parking commission, Glendale, having a triangular layout, does not have the parallel and perfectly lined streets as our adjacent cities, e.g. Pasadena, etc. Therefore, the mitigating measures for transportation, including restriping or bike lanes, which might have worked elsewhere, will not work out in Glendale and will not be a mitigating measure for transportation impact.

d) based on the plan, even in Alternative 1 - and it is unclear if it is a No Project or different from it - "transform"-ing is defined as utilization of surface parking lots and infills, whereas AFTERWARDS after a year, it is planned to create parking lots in multifamily area BEYOND 1 year.

Thus, first, the plan seems to contradict itself - first, it allows and even suggests to eliminate the parking lots and then tends to seek for room for it after the elimination.

**36.6** Second, based on the community experience, "infill site" is a very broad definition and unfortunately it is not specified as to what is an infill site. Thus, for example, the GUSD lot on the corner of Wilson and Jackson was identified as an "infill site" in the Mitigating Negative Declaration for the GUSD Apartments Project - even though it has several decent functioning buildings built in 1970 or afterwards, while most of the buildings in South Glendale predate that. So based on the broad definition of "infill sites" - this becomes a caveat and a benefit for many developers to start developing any area AND to avoid creating an EIR for it (since an exemption from EIR is provided for "infill sites"). Thus, "infill development" is a very suspicious and problematic designation; it should not be allowed unless infill is narrowly defined and specified in detail.

e) SGCP is based on the fiction that the creation of more transit lines and transit oriented areas people will necessarily use buses and not take their cars. This is statistically unverified and unjustified.

**36.7** Plus, if there is a grant for transit-oriented development and for metro study, we should not jump into using the grant, but should use the funds to create transit and then see if people use buses more. I personally doubt it and I am sure I am right. I have used buses 10 years ago when I had no car, and I will never go back to using buses for work or even grocery shopping.

**Response 36.5**

Please refer to response to comment 36.3 above.

**Response 36.6**

Infill is development in an urbanized area and may include development on vacant lands, redevelopment of sites that were previously developed, or revitalization of sites through reinvestment, such as reusing or renovating buildings and facades, street improvements or "grey field" development. The key to infill development is efficient utilization of land resources; more compact patterns of land use and development; reinvestment in areas targeted for growth and that have existing infrastructure; and more efficient delivery of quality public services.

The Glendale Unified School District (GUSD) site at the corner of Wilson and Jackson is an infill site. This Program level EIR does not address the GUSD Apartments Project which is subject to its own project-level, environmental review.

**Response 36.7**

Regarding traffic and parking concerns, please see Topical Response No. 3 Transportation, Traffic and Parking.

**COMMENTS**

**RESPONSES**

36.8 f) SGCP is also based on the fiction that if we create more businesses in Glendale through mixed-use developments, it will mitigate traffic and will promote economic and employment in Glendale. However, first, those mixed use developments always ask for and get approvals for parking variances, height and FAR variances, and then establish excessively high rents for the community deepening the housing crisis and the traffic/parking crisis. On top of that, there is no guarantee that there will be any benefit at all to the community - no guarantee that the businesses will employ Glendale residents necessarily.

**Response 36.8**

Please refer to response to comment 36.7 above regarding traffic and parking. The Draft EIR does not consider economic impacts, such as local hire requirements for businesses.

36.9 g) SGCP also suggests creating parking permit districts as a mitigating measure for parking - however, it will not cure the parking problem. Even if parking permits are issued, there is just not enough parking space to accommodate that kind of density we have at the moment - let alone to accommodate the expected increase in density under even the Alternative 1.

**Response 36.9**

The City acknowledges and appreciates this comment. This comment will be in the documents for review and consideration by City Council. Please refer to response to comment 36.7 above regarding parking.

36.10 h) DEIR and the SGCP had no adequate public outreach and no adequate notice because the public outreach was confined to posting a link on the city website and posting a flyer on City Hall's wall. This is not enough. It assumes every resident in South Glendale necessarily checks the city website or visits the city hall at least once a month. This is wrong. There was no adequate notice to the public compared to the magnitude of the proposed SGCP and its impacts.

**Response 36.10**

The City acknowledges and appreciates this comment; however, the City's process in preparing the SGCP is well documented and has included extensive public involvement, including community planning and sponsor groups. The Draft EIR was subjected to a 60-day public review period as mandated by State CEQA Guidelines Section 15105 and was made available for public review and comment on the City's website and at the City of Glendale Planning Division and Glendale Central Library. Additionally, the public hearing for the Draft EIR was published in the local newspaper.

36.11 i) finally, the EIR mentions that public services (fire protection and police) are already understaffed and have longer response time than required by the code. Adding more density to South Glendale area will make our community unsafe. Even if some room is found to expand the facilities of fire protection and police - and bring in more staff to respond to calls - the impassable and overcrowded streets and narrow lanes and the non-perfectly lined streets in Glendale will not allow the passage of the public services cars on time. This directly threatens the safety of the population.

**Response 36.11**

As evaluated in Sections 4.13.3 of the Draft EIR, the City cannot avoid potential impacts on police and fire protection services from implementation of the proposed SGCP, and there are no feasible mitigation measures that would reduce the impacts to a less than significant level. The ultimate determination of infeasibility of the proposed SGCP will be made by City Council. Regarding the effect of traffic on public services, see Topical Response No 3. Transportation, Traffic and Parking.

Therefore, I suggest:

36.12 1) extend the time for public comment period on the EIR and to make sure public outreach includes more than just posting a notice on the city's website or a flyer on the city hall's wall.

**Response 36.12**

This comment provides concluding statements based on the more specific comments discussed above; therefore, no new issues are raised in which a response is required for comments 36.12 through 36.17.

36.13 2) eliminate the confusion with Alternative 1 and NO Project - it turns out those are not the same in the SGCP and in the EIR... This has to be clarified for the public to understand.

**Response 36.13**

Please refer to response to comment 36.12 above.

**COMMENTS**

**RESPONSES**

36.14 3) reconsider the mitigating measures suggested - those are not proper mitigating measures and will not do much difference: adding bike lanes, restriping the streets, parking permit districts, etc. The answer to mitigation of the environmental impacts is to decrease and to proportionally allocate density in Glendale. South Glendale, due to DSP developments, has already been densely populated; no more apartment complexes should be built here, especially that the new apartment complexes did not improve the affordable housing issue but only aggravated the housing crisis based on the astronomically high rents.

**Response 36.14**

Please refer to response to comment 36.12 above.

36.15 4) if No Project is Alternative 1 and will still create the same 7 unavoidable and significant impacts, then the SGCP should come up with a plan to mitigate those - not leave things unchanged with Alternative 1/No Project or further aggravate the impacts with Alternatives 2 and 3 (or Alternative 1, in case it is different from No Project).

**Response 36.15**

Please refer to response to comment 36.12 above.

36.16 5) not allow the elimination of surface parking lots in Glendale any more (for any apartment or mixed use development). Glendale already suffers from parking shortage. There is no point to allow the elimination of the existing ones, if any, and then try to look for rooms to create parking lots in future.

**Response 36.16**

Please refer to response to comment 36.12 above.

36.17 6) issue a MORATORIUM on the developments in South Glendale, re-evaluate the DSP developments' impact, create the SGCP plan that addresses the adverse impacts of DSP developments, and focus on creating parks, recreation facilities in South Glendale rather than in the mountains which are not accessible to the most needy and vulnerable groups for community: kids, elderlies, the disabled, etc.

**Response 36.17**

Please refer to response to comment 36.12 above.

Thank you.  
Lusine Soghatyan

COMMENTS

RESPONSES

**From:** Mariam Berberyan [mailto:mber1983@gmail.com]  
**Sent:** Tuesday, March 06, 2018 2:52 PM  
**To:** Krause, Erik EKrause@Glendaleca.gov  
**Subject:**

**Letter 37 Mariam Dongelyan**

**Response 37.1-37.5**

This comment letter is the same as an earlier comment letter (Letter No. 3). Refer to responses to comments 3.1 through 3.5.

- 37.1 I object to the South Glendale Community Plan (SGCP) since:
    - a) contrary to SGCP's claims, it is NOT the vision of our community – unless our community is suicidal; it is rather the vision of developers who are the only ones to benefit and whose greedy mega developments have already ruined our community within/bordering the Downtown Specific Plan area;
    - b) it suggests an unacceptable, unjustifiable and, most importantly, an unsustainable upzoning of high density areas into mixed use zones, adding new zones for transit areas, as well as changes within the present zoning requirements (e.g., removal of setbacks in R1250) to allow for more height of buildings and more density of population, which have proved to be a DISASTER for the Glendale community within/bordering the DSP area already;
    - c) it is premised on the fictions that people who are close to bus routes and transit areas will necessarily use buses and people who live close or at the mixed-use buildings (to be built) with first level retail stores will necessarily find employment in the retail stores, thereby promoting walkability, revitalization and employment in Glendale, whereas these are just practically unrealistic, logically flawed and statistically unsupported speculations; and finally
    - d) the Environmental Impact Report (EIR) prepared for the proposed SGCP, with its SEVEN (7) SIGNIFICANT and UNAVOIDABLE adverse ENVIRONMENTAL IMPACTS is PROOF that the new developments and the associated dramatic growth in density of the population expected under the SCGP will irreversibly and permanently affect both the QUALITY OF LIFE and the SAFETY of Glendale residents.
- Therefore, the only comment to the EIR is: SGCP is unacceptable and should be discarded.

**COMMENTS**

**RESPONSES**

37.4  
cont. | Moreover, I propose to create a new SGCP with the objective to FIX the environmental impacts caused by or anticipated from the recent DSP area (part of South Glendale) developments and approved projects by: a) DOWNZONING areas in South Glendale to disallow any future mega developments; b) creating MORE OPEN SPACE AND MORE PARKS to counterbalance the shortage created by the constructed or already approved mega developments.

37.5 | South Glendale community is already on LIFE SUPPORT, in view of the recent aggressive and unreasonable mega developments within/bordering DSP area, which resulted in more traffic, less parking, less open and green space, and higher rents. The adoption of the SGCP will just TURN OFF THE LIFE SUPPORT for Glendale community; PLEASE, DON'T DO IT!

Mariam Dongelyan

**COMMENTS**

**RESPONSES**

**From:** website@mail@glendaleca.gov [mailto:website@mail@glendaleca.gov]  
**Sent:** Monday, March 12, 2018 5:00 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 38 Mary Baldwin**

**Response 38.1**

38.1 I find the South Glendale Community Plan to be catastrophic to the noise levels of this area. the study admits that many current levels of noise will be will be far beyond acceptable levels. I oppose this current plan. We suffer from too much traffic and freeway noise already.

Thank you.  
Mary Baldwin  
baldwin-m@sbcglobal.net

Noise impacts are addressed in Chapter 4.11 of the Draft EIR. Table 4.11-6 shows Future Vehicle Traffic Noise CNEL Contour Distances for the SGCP Area. As a result of the proposed project, existing and proposed residential use areas would, in cases of residences close to the freeways and major roadways, exceed the General Plan Noise Element “conditionally acceptable” thresholds for residential land uses (70 dBA CNEL) under both existing and future conditions. Implementation of mitigation measures MM 4.11-1, MM 4.11-2, and MM 4.11-3 would reduce potential impacts to sensitive receptors to less than significant. Implementation of mitigation measure MM 4.11-4 would reduce potential impacts associated with excessive groundborne vibration or groundborne noise levels to less than significant. Implementation of mitigation measure MM 4.11-5 would reduce temporary or periodic potential impacts to ambient noise levels within the proposed SGCP area to less than significant.

COMMENTS

RESPONSES

Abundant Housing LA

March 8, 2018

Erik Krause  
Deputy Director of Community Development  
City of Glendale  
633 E Broadway, Room 103  
Glendale, CA 91206

Deputy Director Krause,

Thank you for the opportunity to comment on the South Glendale Community Plan Draft EIR.

39.1

The City of Glendale has seen tremendous success in growth and development of the downtown area since the adoption of the Downtown Specific Plan (DSP). The popularity and strong performance of downtown Glendale, especially compared to other nearby cities, is a testament to the wisdom and foresight of the Planning Department in adopting the DSP. Thanks to the construction of new mixed-use buildings downtown, Glendale is a leader in southern California in helping meet the region's housing needs and showing how cities can accommodate new residents and businesses in a positive way.

I am pleased to see that the South Glendale Community Plan is a continuation of those previous successes, and supports new housing and mixed-use development near transit nodes and corridors. However, I think the plan may overestimate the potential negative impacts of new construction and underestimate the benefits. I offer the following comments on the Draft EIR and on the Appendix I Planning Documents:

Comments on South Glendale Community Plan DEIR Impacts

**Aesthetics**

39.2

- 4.1.3: it is wrong to assume that the proposed project would substantially degrade the existing visual character of the area. Many of the most iconic vistas around the world are of cities and urban skylines, including downtown LA against the dramatic backdrop of Hollywood or the San Gabriel Mountains. Glendale has a history of quality design review and it is very likely that new development would improve the aesthetics of the city, especially where it replaces auto-oriented development and poor pedestrian amenities with walkable mixed-use development. Glendale has several historic buildings of this size that are quite attractive, such as the Glendale Flats building at Glendale & Broadway, and the Security Trust and Savings Bank building at Brand & Broadway. Many attractive new buildings have been constructed on Central Ave and Orange St under the DSP.

39.3

- 4.1.4: while it is beyond doubt that the proposed project would increase the amount of shade, this is not a negative feature in a place like Glendale. Last year, the area recorded 66 days over 90 degrees (more than 1 in 6 days) and 14 days over 100 degrees. As a resident of South Glendale, when walking around on hot days I frequently notice people seeking out what shade is

Letter 39 Matt Dixon

Response 39.1

This comment is introductory in nature and expresses the commenter's opinion about development in the Downtown Specific Plan (DSP), but it does not raise a significant environmental issue for which a response is required.

Response 39.2

The comment represents the commenter's opinion that will be included in the Final EIR and provided to the City Council for consideration before making a decision on the project. For additional analysis regarding aesthetics, please see Topical Response No. 4 Aesthetics.

Response 39.3

Please refer to response to comment 39.2 above.



**COMMENTS**

**RESPONSES**

39.3 cont. available. According to research conducted by UCLA, climate change is expected to increase the average temperature in Glendale by almost 4 degrees by mid-century<sup>1</sup>, so shade provided by buildings will be a benefit.

**Air Quality**

39.4 • 4.2.1 thru 4.2.3: while it is not normally considered in analysis, it should be noted that dense, transit-accessible, infill development in already built-up areas is far superior for regional air quality than new development on the fringe. Walkability, transit, and short commutes help reduce air quality impacts. If the proposed project is not built, it is likely that some people will instead move to more distant locations, where they will be less likely to take transit and likely to drive more and longer distances. This contributes to regional congestion on freeways and arterials.

**Greenhouse Gas Emissions**

39.5 • 4.6.1: while additional development in South Glendale may increase greenhouse gas (GHG) emissions locally due to construction and new residents, it may allow some current residents to reduce GHG emissions by bringing amenities closer to them. Allowing more development in a central location like Glendale reduces pressure for greenfield development at the urban fringe, reducing GHG impacts of development. State policy has recognized the benefit of denser development through SB 375. In addition, allowing more people to live in states with progressive climate policies like California reduces out-migration to states where per capita GHG emissions are much higher, such as Texas<sup>2</sup>. Since it does not matter to climate change at all where GHG emissions occur, a large reduction in emissions elsewhere in exchange for a slight increase in emissions in California is a net positive for climate.

**Population and Housing**

39.6 • 4.12.2: while it is undeniable that more development will lead to an increase in housing and population, this should be considered a positive impact. Denser cities reduce environmental impacts per capita and promote greater diversity and economic development, which are positive impacts.

**Public Services**

39.7 • 4.13.3: while it may seem logical to expect that an increase in development will increase the demand for fire protection services, there are good reasons to expect this will not be the case. There have been significant advances in building construction, fire codes, and electrical codes in recent decades that make new buildings less likely to catch fire and more able to control the

**Response 39.4**

Please refer to response to comment 39.2 above.

**Response 39.5**

Please refer to response to comment 39.2 above.

**Response 39.6**

Please refer to response to comment 39.2 above. See also Topical Response No. 2 Population and Housing.

**Response 39.7**

Please refer to response to comment 39.2 above. See also Response 3.10 in Comment Letter No. 3.

<sup>1</sup> <http://newsroom.ucla.edu/releases/climate-change-in-la-235493>

<sup>2</sup> Per capita emissions in Texas are three times as high as in California. See <https://public.tableau.com/profile/bhurlev#!/vizhome/StateCO2Emissions2014Data/TotalStateCO2Emissions2014data>

**COMMENTS**

**RESPONSES**

39.7  
cont.

spread of fire. For example, new residential construction in California is fully sprinklered, which greatly reduces the frequency and severity of residential fires.

**Response 39.8**

Please refer to response to comment 39.7 above.

39.8

- 4.13.4: likewise, while it may seem logical to expect that an increase in development will increase the demand for police protection services, this may also prove to be untrue. By increasing foot traffic and “eyes on the street”, the proposed project may have a positive impact on police resources. Crime flourishes where there is no one to see the misdeed, not where there are many eyes watching.

**Response 39.9**

Please refer to response to comment 39.2 above. See also Topical Response No. 2 Population and Housing and Topical Response No. 3 Transportation, Traffic and Parking.

**Transportation and Traffic**

39.9

- 4.15.5: the traffic impacts of development are often hard to predict because reducing development in one location may increase development elsewhere, in a place where residents are more auto-dependent. For example, if a reduction in construction in Glendale results in more people commuting to Glendale from Santa Clarita or the Antelope Valley, that may have a larger impact on regional traffic than new local development. Many cities with famously bad traffic, such as Atlanta, are much less dense than the LA region. Also, the state is moving away from traffic-count based environmental assessment to use of vehicle miles traveled as a metric. Allowing more people to live in a job-rich, centrally located city like Glendale is likely to reduce VMT in the region.

**Response 39.10**

Please refer to response to comment 39.2 above. See also Topical Response No. 4 Aesthetics.

**Response 39.11**

Please refer to response to comment 39.2 above. See also Topical Response No. 4 Aesthetics.

**Comments on Implementation of the South Glendale Community Plan**

**Height Restrictions**

39.10

- In general, the city should not reduce height limits to below what they are today. Lower height limits reduce the amount of housing that can be built, which reduces the likelihood of development until prices rise, making housing less affordable. Eliminating the reductions in maximum height should not require any further analysis under the EIR, since it would not be a change from present conditions.

39.11

- Corridors: the city should not reduce the height limit in the IMU, IMUR, & SFMU zones. Two explicit goals of the mixed-use high corridor designation are “a creative skyline” and “24 hour activity”. Reducing the height limit will result in less skyline creativity and boxier buildings, as architects are forced to fit the floor-area ratio needed to make a project profitable into a smaller volume of space. The decrease of height from 75’ to 50’ in the IMUR zone in mixed-use low corridors will greatly reduce the potential for development.

**COMMENTS**

**RESPONSES**

Comments on Appendix I – Planning Documents

- 39.12 • 4A.2a Tropicco TOD: the goal of creating a mixed-use neighborhood around the Glendale Station is fantastic, and the city should be commended for making this plan. I suggest the following improvements:
  - o The city should not reduce the height limit in the Tropicco TOD area. 6 stories/90' is an appropriate limit for a TOD node. The vision for Tropicco calls for transformation into a transit-oriented mixed-use district, and varied massing of buildings, both of which will be promoted by 90' height. Lower heights will result in less development and boxier, less varied, architecture. In order to promote development of a transit-oriented mixed-use district, height limits should not be reduced.
  - o The possibility for some larger (10-15 story) residential buildings should be allowed to help create more architectural and residential variety. The proposed maximum height for hospital uses should also apply to residential buildings.
  - o Redevelopment of the parking lot at Glendale Station should be a goal of the plan. This is about 4 acres of space and at the proposed density could accommodate about 400 families. If it is desired to preserve parking for train riders, this could be provided as part of the development, with the developer recouping costs by charging for parking. In a dense TOD district, parking should not be free, especially on high-value land adjacent to the transit station.
- 39.13 • 4A.3a Pacific Ave Gateway: the goal of creating a center near the 134 and Pacific is also great, and will help calm traffic entering and exiting the freeway. I hope the future West Glendale plan will extend the center north of the freeway towards Glenoaks, and suggest the following improvements:
  - o Consider allowing 6-story height where facing Pacific Ave and the 134.
- 39.14 • 4A.3b Pacific Edison Center: the city should not reduce maximum allowed heights in this area. Maintain 75'/6 stories maximum.
- 39.15 • 4A.4a Adams Square, 4A.4b Columbus School: for many properties that already have one-story commercial structures, it may not be financially feasible to redevelop it for only 3 story height. The maximum height should be 4 stories. If there is a desire to break up building massing, it might be practical have a portion of a project be 4 stories and the remainder 1 story.
- 39.16 • 4B.1a East Broadway, 4B.1b East Colorado Gateway, 4B.1c South Central: the plan to make corridors such as Broadway, Colorado, and Central gateways to downtown Glendale is great planning, and the city should be commended for it. In order to encourage this development, I suggest the following improvements:

**Response 39.12**

Please refer to response to comment 39.2 above.

**Response 39.13**

Please refer to response to comment 39.2 above.

**Response 39.14**

Please refer to response to comment 39.2 above.

**Response 39.15**

Please refer to response to comment 39.2 above.

**Response 39.16**

Please refer to response to comment 39.2 above.

**COMMENTS**

**RESPONSES**

39.16  
cont.

- o Consider allowing 75’/6 stories of height facing Broadway, with a stepdown to adjacent R-zoned properties at the edges of the zone if desired.
- o Consider allowing a height transfer to help create a varied skyline. For example, if a site is already developed with a 2-story building and a parking lot, allowing an 8-story building to be developed on the parking lot would not increase overall mass, and would create more architectural variability.

**Response 39.17**

Please refer to response to comment 39.2 above.

**Response 39.18**

Please refer to response to comment 39.2 above.

39.17

- 4B.1d West Broadway: since West Broadway currently has a zoning designation of SFMU, the plan should be changed so that it does not reduce density or height. There is already an attractive 5-story building under construction at Pacific and Broadway, replacing an auto-oriented one-story box store that had an enormous parking lot. I suggest the city apply one of the TOD designations to West Broadway, which will make a wonderful corridor connecting the Pacific Edison center to downtown Glendale. Since the current permitted height is already 60’, there is no impact to applying this designation.

**Response 39.19**

Please refer to response to comment 39.2 above.

**Response 39.20**

Please refer to response to comment 39.2 above.

39.18

- 4B.1e West Colorado: like West Broadway, this corridor is already zoned SFMU and will be a great connection between the Pacific Edison center. Apply one of the TOD designations. Since the current permitted height is already 60’, there is no impact to applying this designation.

**Response 39.21**

Please refer to response to comment 39.2 above.

39.19

- 4B.1f East Colorado: in order to make East Colorado a great gateway to downtown all the way to Eagle Rock, consider applying the MX-3 designation, along with suggested improvements to East Broadway corridor.

**Response 39.22**

Please refer to response to comment 39.2 above.

39.20

- 4B.1g South Glendale: due to the proximity to Glendale Station, consider applying the MX-3 designation.

**Response 39.23**

Please refer to response to comment 39.2 above.

39.21

- 4B.2a South Glendale: there has been little development here in recent years under the C3-I zoning designation, which allows 3-story height.
  - o In order to encourage development, apply the MX-2 designation.
  - o Allow height transfer to help encourage development. For example, if a site is already developed with a 1-story building and a parking lot, allowing a 4-story building to be developed on the parking lot would not increase overall mass, and would create more architectural variability.

39.22

- 4B.2b Verdugo Rd: if a Metro station is constructed at Verdugo & Chevy Chase, it would make sense to allow more density to capitalize on that investment. Consider applying the MX-3 designation in that case.

39.23

- 4B.3a North Glendale: current development on this portion of Glendale Ave is auto-oriented. I frequently walk to this area and suggest the following improvements:
  - o Apply the MX-2 or MX-3 designation.

**COMMENTS**

**RESPONSES**

39.23  
cont.

- o Since most parcels are already developed, allow denser development on parking lots in exchange for maintaining existing structures. For example, the Vons Plaza, Ralphs Plaza, and Whole Foods site all feature large 1-2 story commercial structures and large parking lots. The parking lots on these sites could be developed to 6-story height while replacing existing parking underground and not impacting any adjacent properties.

**Response 39.24**

Please refer to response to comment 39.2 above.

**Response 39.25**

Please refer to response to comment 39.2 above.

**Response 39.26**

Please refer to response to comment 39.2 above.

39.24

- 4B.5a Brand Blvd of Cars: it is understood that revenues generated by the Brand Boulevard of Cars are a critical source of income to the city, and planning in this area must be coordinated with the dealerships and accessory uses. Changes to this area are probably correctly beyond the scope of current planning efforts. However, in the longer term, the city should consider the following:
  - o Young people have been waiting longer to get their drivers licenses and are less likely to own cars.
  - o There is increased demand for living in walkable mixed-use areas, and avoiding the costs of car ownership.
  - o Future changes in transportation, such as ride-sharing, may reduce the amount of car ownership.
  - o With the addition of higher quality transit between Glendale Station and downtown Glendale on Brand Blvd, the corridor will be a natural place for more development.
  - o Dealers and property owners may prove amenable to plans that increase their flexibility for a greater mix of land uses.

39.25

- 4C.1b Diamond: the city should consider adding the Diamond area to the Tropic TOD zone. This entire area is less than half a mile from the Metrolink station, and with future improved rail service, is a natural location for denser mixed-use development. Provisions could be made for historic preservation of a few of the finest examples of Craftsman architecture, but preserving every remaining Craftsman is not a reasonable or practical goal for a city in a region with a growing economy and severe housing shortage.

39.26

- 5.3.6 Small Lot Subdivision Ordinance: the plan correctly notes that downzoning and parking requirements in South Glendale have reduced investment in the neighborhoods. This also allows landlords to charge higher rents for older housing stock and prices young people out of home ownership, since current owners can charge high prices for old houses and the costs cannot be spread across several new units. However, the plan is almost silent on what can be done to address these challenges.
  - o At the least, the city should move forward with plans for a small lot subdivision ordinance. I suggest the ordinance allow small lot subdivisions in any multifamily zone with a minimum lot size of 1,200 SF. This will allow the development of small starter homes that are more affordable to young people.

COMMENTS

RESPONSES

39.26  
cont.

o I live in an apartment building developed at approximately the equivalent of R3 density in the City of Los Angeles (800 SF per unit) and the building next to me is developed at approximately the equivalent of R4 density in the City of Los Angeles (400 SF per unit). New development on my street now only allows 3 units per lot (2250 SF per unit), so unsurprisingly, the result is larger, more expensive units. I do not think there is anything wrong with my home, nor do I think there is anything wrong with my neighbors' homes. I do not think it was a mistake to allow our buildings to be constructed and for us to be able to afford to live in South Glendale. In the longer term, the city should consider restoring previously allowed density to South Glendale neighborhoods to make housing more affordable and make the city more accessible to more people.

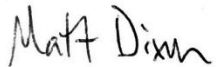
39.27

• It is understood that the EIR has been completed based on a certain number of new housing units, new trip generation, and so on. In order to implement the suggestions of this comment letter without requiring additional analysis, the Programmatic EIR could require a future supplemental analysis when the city approaches the number of new units contemplated under the present analysis. This would allow greater flexibility for planning and development, creating more opportunity in the city, and not depend on the redevelopment of a small number of specific parcels to meet the city's housing needs. This approach has recently been adopted for continued housing growth under the DSP.

Response 39.27

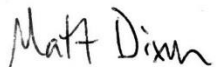
This concluding paragraph does not raise a significant environmental issue for which a response is required. This comment will be included in the Final EIR for consideration by the decision makers.

Best Regards,



Matt Dixon  
620 W Wilson Ave, Unit H  
Glendale 91203

Commenting as a resident of South Glendale and on behalf of the Abundant Housing LA Steering Committee:



Matt Dixon  
620 W Wilson Ave, Unit H  
Glendale 91203



Mark Vallianatos  
3591 Canada St  
Los Angeles 90065



Brent Gaisford  
3236 Hutchison Ave  
Los Angeles 90034

**COMMENTS**

**RESPONSES**



Leonora Yetter  
1013 16<sup>th</sup> St, Unit 102  
Santa Monica 90403



Mark Edwards  
1174 N Curson Ave, #8  
West Hollywood 90046

Gabe Rose



Chelsea Byers

COMMENTS

RESPONSES

From: M [mailto:directortv41@yahoo.com]  
Sent: Thursday, January 25, 2018 7:03 PM  
To: MyGlendale <MyGlendale@Glendaleca.gov>; SGCP@glendaleca.gov  
Subject: Re: South Glendale Community Plan

Letter 40 Michael Sheehan

Response 40.1

Hello.

The Central Park Block Project, which includes the proposed development of the Armenian American Museum, is undergoing separate project level environmental analysis. The comment will be included in the Final EIR for consideration by City Council.

The City will include the commenter's opposition to the development of more housing that may be implemented under the proposed project. This comment letter will be included in the Final EIR and made available for consideration by City Council before making a decision on the project.

Thank you for this information. Because Central Park is the last truly open green space near downtown, will the City hold Open Forums and/or Town Hall meetings to discuss alternate sites for the proposed museum and the plans to revamp the parking around the Library? This seems a terrible idea to me and to many of my neighbors here in South Glendale. The recent 'meetings' were simply a promotion for the proposed changes. Council woman Paula Devine says, "It's a done deal?"

40.1 It is very important that all citizens have a say regardless of the City Council's vetting this idea.

Please announce more than one opportunity to have a say, as the folks in north Glendale did, sending the museum project to this totally wrong cite.

Please come up with alternative sites such as the National Guard Armory, The Elks' Club, The movie theater on Maryland, Cerritos Park.. (ten times the size of Central Park), the Nestle Building.. the restaurant for sale at Brand and Glenoaks? Others have mentioned the Sears Building.

Save Central Park.. please..

Thank you,  
Michael Sheehan  
Adams Hill 1986



**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Sunday, March 04, 2018 9:48 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

40.1  
cont.

The current number of huge apartment complexes already rising to make canyons of the streets of Glendale.. Central Blvd.. .. Los Feliz Avenue.. especially.. and the wanton proposed destruction of green space, specifically Central Park for a museum is deplorable. It's awful! That museum will be better located elsewhere.

I want to voice strong opposition to the encouragement of more housing that eliminates the quiet comforts of our single family neighborhoods to the benefit of deep pockets developers who have little concern for the quality of life. It's all about money. The huge project for the GUSD space is, literally, a bastardization of space.

Do we want these rich speculators to own all of Glendale? I do not.

Please stop the rising tide of over populating our city.

Though the incident of the destruction of 1420 Valley View Road is north of the 134, it is exactly what greedy developers do knowing that all they get is a slap on the wrist and then, go on to ruin our city. Please, do not let this happen anymore. Do not allow greed to overcome our peaceful and comfortable human habitat.

Thank you.  
Michael Sheehan  
Adams Hill Neighborhood Association  
directortv41@yahoo.com

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Wednesday, February 28, 2018 10:27 AM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 41 Mickie Boldt**

**Response 41.1**

This comment provides an introduction to the author of the comment letter. The City acknowledges and appreciates this comment but does not raise a significant environmental issue for which a response is required.

41.1

I am very concerned about the planned SGCP expansion. I have lived in Glendale for thirty years and loved the "small town" feel, that was also keeping up with new shopping areas and the convenience of neighborhood grocery stores (as well as the variety of them).

However, I don't understand the amount of apartment/condo construction that has been occurring. I am not opposed to new citizenry, but I am opposed to the fact that rents in the city are out of control. I am a senior citizen taking care of my elderly mother. We are sharing a SINGLE (no bedroom) apartment and paying \$1,025/month. Our management company has been very fair with rent increases, however, I don't know how long that will last with the competition they might face with all of the new construction. Also, the apartment complex I live in is a group of small bungalow type apartments. Since I have the single, I do not get a garage or parking space and have to park on the street. Street parking is at a premium. Many times I have had to park more than a block away. There are three churches within a block of my place and only one has a parking lot. On Sundays, I can't even leave my place, for fear of not finding a place to park when I get home!

My son is renting a single that is smaller than mine and his building was bought recently. His rent went from \$1,050/month to \$1325/month which is more than a 25% increase. This is insane!

We love Glendale and don't want to move. Please consider your citizens. MANY of us do not have a lot of money and can't afford these new places that charge two to three times what I am paying for the same type of residence.

Sincerely,  
Mickie L Boldt  
mickieboldt@yahoo.com

COMMENTS

RESPONSES

3/08/2018

Ms. Laura Stotler, AICP  
Community Development  
Planning & Neighborhood Services  
633 E. Broadway, Rom 103  
Glendale, CA 91206-4308

**Letter 42 Navasart & Maral Kazazian**

**Response 42.1**

This comment letter does not raise a CEQA environmental impact issue, but is instead a request to include certain properties within the boundaries of the proposed SGCP project. The comment will be included in the Final EIR for consideration by City Council.

Dear Ms. Stotler,

42.1

We have properties developed with commercial uses which front on Chevy Chase Dr.; 120 E. Chevy Chase Dr. and 204 E. Chevy Chase Dr.

For many years these two properties were zoned commercial and in 1986 they were changed to residential. Since the change we have to come in and file for new variance to retain our commercial uses.

Please redraw the boundary of South Glendale Avenue north of Palmer Planning Area to include my two properties, as part of this planning area that will allow us to operate our business in accordance to the way it was in 1984 when we purchased them.

We are asking for a return of commercial zoning for our properties.

Best regards,



Navasart and Maral Kazazian  
204 E. Chevy Chase Dr.  
Glendale, CA 91205

Cell – (323) 202 5228  
maralkazaz@yahoo.com

COMMENTS

RESPONSES

**From:** Patty Silversher [mailto:psilversher@gmail.com]  
**Sent:** Friday, March 09, 2018 11:57 AM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>; Stotler, Laura LStotler@Glendaleca.gov  
**Subject:**

Dear Erik and Laura,

43.1 As the Neighborhood Watch Chairman of the Adams Hill Neighborhood Association, I am responsible for organizing our disaster preparedness and crime prevention programs and events. The EIR states that impacts to fire protection services would be "significant and unavoidable." The report also points out that South Glendale currently falls short of the National Fire Protection Agency's 4-minute response time standard by more than one minute. As Adams Hill is in a high fire hazard area, any reduction of fire services beyond our already deficient level is alarming and unacceptable.

43.2 The impacts to the Glendale Police Department's services would also be intolerable under the proposed project. The GPD is already overburdened by being staffed at 1.2 officers per 1,000 people – far below the standard ratio of 2 per 1000. Increasing our population by another 27,000 people would further endanger the lives and properties of our residents not just in South Glendale but throughout the City.

43.3 The EIR's findings concerning police and fire services also conflict with Glendale's Safety Element policy to reduce loss of life and property by ensuring sufficient fire services and disaster preparedness.

43.4 We urge you to reject the South Glendale Community Plan as proposed and order that a new plan be developed that will not endanger the lives and property of Glendale's population.

Thank you,  
Patty Silversher  
Glendale, CA 91205

**Letter 43 Patty Silversher**

**Response 43.1**

This comment provides an introduction to the author of the comment letter. As evaluated in Section 4.13.3 of the Draft EIR, the City cannot avoid potential impacts on police and fire protection services from implementation of the proposed SGCP, and there are no feasible mitigation measures that would reduce the impacts to a less than significant level. The ultimate determination of infeasibility of the proposed SGCP will be made by City Council, and City Council policy will determine if and to what extent new or expanded public services will be provided in response to increase service demands within the community

**Response 43.2**

Please refer to response to comment 43.1 above.

**Response 43.3**

As stated above under response to comment 43.1, the ultimate determination of infeasibility of the proposed SGCP will be made by City Council.

**Response 43.4**

The City acknowledges the commenter's opposition to the SGCP. The comment will be included in the Final EIR and made available for consideration by City Council before making a decision on the project.

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Monday, March 05, 2018 2:59 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 44 Philip Boyajian**

**Response 44.1**

See Topical Response No. 3 Transportation, Traffic and Parking.

See Topical Response No. 2 Population and Housing.

The City acknowledges the commenter’s opposition to the proposed SGCP. This comment letter will be part of the Final EIR and made available for consideration by City Council before making a decision on the project..

44.1

South Glendale is already being suffocated by traffic. We can't find parking on most streets even with the current population density.

Environmental impact must be taken into a real consideration. Not because land is available for development or re-developmental that we should proceed with it.

Growth must be defined by how many people that an area can it sustain.

People need basic services, from water, electricity and sewer systems. If honest planners read their own reports then they should with clear conscience stop from implementing the project. It seems that these reports are written only as an insurance policy against litigation; To state later that it was presented it to the public.

City officials are elected or hired full time to look after the best interests of the community; That's whom they're supposed to serve. If the public has to fight every issue then why do we have public officials?

I completely object to the plan!

philip.boyajian@me.com

**COMMENTS**

**RESPONSES**

**From:** Georgia Wall [mailto:georgia.wall@roadrunner.com]  
**Sent:** Tuesday, March 06, 2018 3:13 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** Environmental Impact Report (EIR)  
**Importance:** High

**Letter 45 Ray & Georgia Wall**

**Response 45.1**

The City acknowledges the commenter’s opposition to the proposed SGCP. This comment letter will be part of the Final EIR and made available for consideration by City Council before making a decision on the project.

45.1 As 40- year owners of property in Glendale, we find the proposed SGCP is unacceptable for the South Glendale community and should be discarded.

Ray and Georgia Wall

COMMENTS

RESPONSES

**From:** Raymond Rumaya [mailto:rrumaya@csline.com]  
**Sent:** Monday, March 12, 2018 12:15 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>; Stotler, Laura <LStotler@Glendaleca.gov>; Gharpetian, Vartan <VGharpetian@Glendaleca.gov>; Devine, Paula <PDevine@Glendaleca.gov>; Najarian, Ara <ANajarian@Glendaleca.gov>; Sinanyan, Zareh <ZSinanyan@Glendaleca.gov>; Agajanian, Vrej <VAgajanian@Glendaleca.gov>; Beers, Yasmin K <YBeers@Glendaleca.gov>; Manoukian, Rafi <RManoukian@Glendaleca.gov>; Kassakhian, Ardashes AKassakhian@Glendaleca.gov  
**Subject:** South Glendale Community Plan

**Letter 46 Raymond & Knarik Rumaya**

**Response 46.1-46.13**

This comment letter is the same as an earlier comment letter (Letter No. 3). Refer to responses to comments 3.1 through 3.13.

Dear council members,

I object to the South Glendale Community Plan (SGCP) since:

46.1

a) contrary to SGCP's claims, it is NOT the vision of our community – unless our community is suicidal; it is rather the vision of developers who are the only ones to benefit and whose greedy mega developments have already ruined our community within/bordering the Downtown Specific Plan area;

46.2

b) it suggests an unacceptable, unjustifiable and, most importantly, an unsustainable upzoning of high density areas into mixed use zones, adding new zones for transit areas, as well as changes within the present zoning requirements (e.g., removal of setbacks in R1250) to allow for more height of buildings and more density of population, which have proved to be a DISASTER for the Glendale community within/bordering the DSP area already;

46.3

c) it is premised on the fictions that people who are close to bus routes and transit areas will necessarily use buses and people who live close or at the mixed-use buildings (to be built) with first level retail stores will necessarily find employment in the retail stores, thereby promoting walkability, revitalization and employment in Glendale, whereas these are just practically unrealistic, logically flawed and statistically unsupported speculations; and finally

46.4

d) the Environmental Impact Report (EIR) prepared for the proposed SGCP, with its SEVEN (7) SIGNIFICANT and UNAVOIDABLE adverse ENVIRONMENTAL IMPACTS is PROOF that the new developments and the associated dramatic growth in density of the population expected under the SCGP will irreversibly and permanently affect both the QUALITY OF LIFE and the SAFETY of Glendale residents.

Therefore, the only comment to the EIR is: SGCP is unacceptable and should be discarded.

**COMMENTS**

**RESPONSES**

46.4  
cont. | Moreover, I propose to create a new SGCP with the objective to FIX the environmental impacts caused by or anticipated from the recent DSP area (part of South Glendale) developments and approved projects by: a) DOWNZONING areas in South Glendale to disallow any future mega developments; b) creating MORE OPEN SPACE AND MORE PARKS to counterbalance the shortage created by the constructed or already approved mega developments.

46.5 | South Glendale community is already on LIFE SUPPORT, in view of the recent aggressive and unreasonable mega developments within/bordering DSP area, which resulted in more traffic, less parking, less open and green space, and higher rents. The adoption of the SGCP will just TURN OFF THE LIFE SUPPORT for Glendale community; PLEASE, DON'T DO IT!

\*\*\*\*\*

| The EIR (environmental impact report) of the SGCP openly identifies SEVEN (7) environmental impacts that will be UNAVOIDABLE and SIGNIFICANT and will NOT have any mitigation measures:

1) Aesthetics – per EIR, the current visual character and quality of the site and its surroundings, “would be substantially degraded”; “the proposed projects would result in new sources of increased shade.”

Historically, the character of our jewel City of Glendale has been its quiet streets, its cozy low-rise buildings, with plenty of views of mountains, blue sky, and green space. Glendale has been intended to be a suburb to Los Angeles; not to become Los Angeles.

46.6 | The proposed SGCP, with upzoning, addition of new transit zones, changes within the current zone requirements, and even the innocent looking density bonuses so generously awarded to all Developers, would be contrary to the community character and historic designation of the City of Glendale and will significantly impact the QUALITY OF LIFE of its residents.

South Glendale, which encompassed the Downtown Specific Plan, has already been impacted by the unreasonable approvals of numerous mega development projects within DSP and at times bleeding outside the DSP), where developers constructed high-rise buildings, with inconsistent and aesthetically unappealing designs (blue, yellow, orange, and red painted walls), with parking variances (allowing for less parking spaces than required by the code) and density bonuses (allowing for more people and more units than allowed by the code). Further, the mega developments have also eliminated so much of open green space required for our visual and mental relief, made our streets impassable due to traffic congestion, and created lots of shades to the adjacent units. SGCP should now



**COMMENTS**

**RESPONSES**

46.6 cont. focus on creating more open space and more parks, rather than continue the same development trend which has proved to be a disaster already.

Moreover, the aesthetics and quiet low-rise residential character of South Glendale community is not only important for the preservation of the character per se or for the historic designation of Glendale as a suburban place, but also imperative and absolutely necessary for the mental health and the associated physical health of the Glendale community (healthy soul, healthy body). The recent years' mega developments in DSP zone, encompassed by the South Glendale (with their traffic congestion, noise, etc.) have only added to the stress of Glendale residents and deprived them of the green and/or open spaces to relieve that stress.

Therefore, the environmental impact to the aesthetics and character of Glendale, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city officials (Planning Commission or City Council).

46.7 2) Air quality: Per EIR, the implementation of the proposed project would:  
a) "conflict with or obstruct implementation of the applicable air quality plan";  
b) "violate an air quality standard or contribute substantially to an existing or projected air quality violation"; c) "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)";  
d) "expose sensitive receptors to substantial pollutant concentrations."

Indisputably, the above quotations from the EIR itself make it apparent that the SGCP will dramatically affect the QUALITY OF LIFE of Glendale residents from the perspective of air quality. Air has no boundaries; air pollutants will affect the entire Glendale community. Air quality is important for both our physical and mental health and it cannot be compromised.

Therefore, the environmental impact to the air quality, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

46.8 3) Greenhouse Gas Emissions: The proposed project a) "would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment"; b) "would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses."

COMMENTS

RESPONSES

46.8 cont. It is undeniable that the adverse effects of greenhouse gas emission and the associated air pollution will dramatically affect the quality of life and the physical and mental health of the entire Glendale community, since there are no air boundaries and since South Glendale – due to its vast array of retail stores and recreational facilities – is the most visited by all Glendale residents.

Therefore, the environmental impact to the greenhouse gas emissions, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

4) Population and Housing: Per EIR, the “implementation of the proposed project would induce substantial population growth in an area, either directly or indirectly.”

It is indisputable that most of South Glendale presently does not have and geographically cannot provide the adequate road infrastructure to accommodate such a substantial population growth. The streets in Glendale, especially outside the DSP area, are mostly one-lane in each direction, with the so much needed street parking on both sides of the streets. Allowing an increase in the population, where there are no adequate road and parking infrastructure, is unacceptable for both the current and future residents of Glendale.

46.9 Moreover, the recent mega developments in Glendale, while recommended, lauded, and even approved by city staff, have proved to be a disaster for Glendale residents in view of the increased traffic, impassable streets, elimination of street parking for public, and allowing developers to provide less parking spaces than required by the code. South Glendale community has greatly suffered already; now is the time to stop the mega developments in South Glendale and to evenly distribute population growth in the entire Glendale.

As for housing, it is undisputed that all the developers who have implemented or are implementing projects within/bordering the DSP area have demolished (or plan to demolish) the presently affordable rental buildings, have constructed mega buildings with smaller units and double rents, have pushed the rents in Glendale up, and – despite providing a few units of affordable housing – have actually created and furthered the housing crisis in South Glendale. Plus, most of the recent mega developments in the DSP area are not fully occupied till present due to the unaffordable rents.

There is simply no sound justification to further the population increase and housing crisis.

COMMENTS

RESPONSES

46.9  
cont. Therefore, the environmental impact to the population and housing, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

5) Public Services: Per EIR, the implementation of the proposed project would: a) "increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand"; b) would increase the demand of police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. Moreover, per EIR, Glendale is already far below the required response time for public services (e.g. fire protection).

The mentioned environmental impacts of increased need for fire protection and police protection stem from the anticipated dramatic increase of population and the associated likelihood of fire and crimes/accidents/fatalities based on the SGCP. Most importantly, per EIR, there cannot be any mitigation to this impact.

46.10 EIR is clear that South Glendale community, upon the proposed SGCP, will suffer from poor response times of public services (fire protection, police); this environmental impact actually threatens not just the quality of life, but the SAFETY of Glendale community.

It should be noted that, even if the currently understaffed fire protection and police services extend their staff and structures to accommodate the expected population growth under SGCP – which EIR openly declares non feasible and impossible – the current inadequate road infrastructure (narrow one-lane each direction in most South Glendale) and the traffic increase anticipated by the SGCP will nonetheless further slow the response time for public services and will therefore make South Glendale unsafe to live in.

Therefore, the environmental impact to the public services, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

46.11 6) Recreation: Implementation of the proposed project would: a) "increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated"; b) "require the construction of new recreational facilities or the expansion of existing recreational facilities that could have an adverse physical effect on the environment."

COMMENTS

RESPONSES

46.11 cont. It is undisputed that recreation is a vital component and need for a healthy community; it is imperative to create more recreational facilities and parks and it is disastrous to further the lack of those, as anticipated by the SGCP based on the EIR finding.

First, ironically, the fact is: there are presently only a few recreation facilities in South Glendale, and those are all already overcrowded and lacking the adequate parking or open space. For example, the YMCA’s visitors do not have adequate parking and presently utilize the adjacent streets of Kenwood or Louise and the presently available parking lots nearby. But, per City Council’s decision, the adjacent public parking on Louise will soon cease to provide parking since a new development of “Louise Hotel” has been approved for the site. And the GUSD parking lot, which specifically provides additional parking for YMCA after school hours, may cease to provide parking because of a proposed mega development on that site waiting for final approval by the City Council. This is just one example, but it can be equally applied to all presently available recreation facilities. Not to mention, the parking to Americana – another major recreational place – is unaffordable for most of Glendale residents.

Second, it is no secret that there are only a few parks in South Glendale; one of the only big parks on Brand and Colorado will soon become home for another approved development.

Third, all the parks and recreational facilities that have been created or planned recently are located far outside of South Glendale, in the mountains, which are not accessible for the most vulnerable group of our society - our children, elder people, or people who cannot afford to get to those destinations (due to lack of cars, lack of funds, or incapacity to drive).

The proposed SGCP, per EIR, not only does not resolve the problem with the current shortage of parks and recreational facilities, but actually unacceptably furthers the problem.

Therefore, the environmental impact to the recreation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

46.12 7) Transportation: Per EIR, the implementation of the proposed project “would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.”

**COMMENTS**

**RESPONSES**

**46.12** | It is undisputed that the road infrastructure in Glendale is insufficient and has not  
**cont.** | been historically designated/intended to accommodate the dramatic increase of  
 | population anticipated by the proposed SGCP. The end result of the dramatic  
 | increase of population and the associated dramatic and unsustainable impact on  
 | transportation will be traffic congestion, traffic noise, more traffic accidents and  
 | fatalities, more pedestrian fatalities, etc. This will undeniably deteriorate the  
 | quality of life of all Glendale residents.

Moreover, the recent DSP area developments are just proof of how congested  
 and impassable our roads have become; this problem with transportation should  
 be fixed and not furthered more. Suggesting more bus routes will not resolve the  
 problem, as confirmed by EIR. Plus, there is no guaranty and no common sense  
 to assume that creating more bus lines will make people take buses, or providing  
 bicycle lanes will make people risk their lives and use bicycles in the already  
 congested and crowded streets of Glendale.

Therefore, the environmental impact to transportation, already found to be  
 significant and unavoidable by the EIR, is unacceptable and should not be  
 overridden by any decision making city official (Planning Commission or City  
 Council).

**46.13** | To summarize, the EIR's identified seven environmental impacts will adversely  
 | and permanently affect both the quality and the safety of Glendale community;  
 | those cannot and should not be overridden or overlooked by any decision making  
 | city official. Therefore, the proposed SGCP is unacceptable for the South  
 | Glendale community and should be discarded.

Raymond & Knarik Rumaya  
 Glendale, CA 91206

**COMMENTS**

**RESPONSES**

**From:** Richard and Carol [mailto:rc.lee@charter.net]  
**Sent:** Monday, March 12, 2018 10:20 AM  
**To:** SGCP@glendaleca.gov; Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** SGCP Draft EIR Comment Period ends Monday

**Letter 47 Richard & Carol Lee**

**Response 47.1**

47.1 [ We agree with the consensus at the Glendale Homeowners Coordinating Council March meeting that the impacts of the proposed project are significant and greater mitigation is required.

The City acknowledges the commenter’s opposition to the proposed SGCP. Please see Topical Response No. 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses. This comment letter will be part of the Final EIR and made available for consideration by City Council before making a decision on the project.

Richard & Carol Lee

**COMMENTS**

**RESPONSES**

**From:** website@glendaleca.gov [mailto:website@glendaleca.gov]  
**Sent:** Monday, March 12, 2018 4:56 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

RE: SGCP Draft EIR Comment

48.1 I agree with the consensus at the GHCC March meeting that the impacts of the proposed project are significant and greater mitigation is required.

Rob Montgomery, President  
Whiting Woods Property Owners, Inc.  
rpm@omegaonline.com

**Letter 48 Rob Montgomery**

**Response 48.1**

The City acknowledges the commenter’s opposition to the proposed SGCP. Please see Topical Response No. 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses. This comment letter will be part of the Final EIR and made available for consideration by City Council before making a decision on the project.

COMMENTS

RESPONSES

From: websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
Sent: Sunday, March 11, 2018 10:35 PM  
To: Krause, Erik <EKrause@Glendaleca.gov>  
Subject: City of Glendale, CA: SGCP EIR Comments

Letter 49 Rondi Werner

Response 49.1

This comment provides an introduction to the author of the comment letter. This comment generally addresses concerns with density, traffic and parking. See Topical Response No. 3 Transportation, Traffic and parking and Topical Response No. 2 and Population and Housing.

Response 49.2

The SGCP is a policy document to address future growth to 2040, including accommodating growth in public transit opportunities. As noted in the Draft EIR on page 4.15-12, which begins discussion of the existing public transit network that serves south Glendale, many areas in South Glendale, particularly the Tropic area, are in proximity to high-quality transportation. The purpose of the SGCP and the Tropic Study Plan it implements (Appendix C, page ii) is to provide policies and standards that encourage and sustain high quality, neighborhood appropriate transit-oriented development in Tropic. Metrolink is a commuter rail system and is an integral link in the regional transportation network serving Glendale. The Larry Zarian Transportation Center serves the Metrolink Antelope Valley and Ventura lines, Amtrak passenger rail, and is planned for future high-speed rail, which serves Glendale residents and travelers going to and from Glendale (see page 14.15-14). The Metro and Department of Transportation routes are set out in Table 4.15-6. As noted on page 14.15-14 in the Draft EIR, Metrolink provides a connection to Burbank Airport and to Los Angeles Union Station, which connects to various Metrolink lines, Amtrak, and other regional connections. The Larry Zarian Transportation Center also serves as a bus hub for Glendale’s Beeline, which provides bus service throughout Glendale (see page 14.15-12, Table 4.15-5 Glendale Beeline Bus Routes). The Draft EIR has not identified freight trains as a transit resource.

Response 49.3

The analysis of whether the proposed SGCP is consistent with each applicable policy from the Glendale General Plan, including the Housing Element, is included in Table 4.9-4 of the Draft EIR. As stated in Section 4.9.3, the proposed project includes consistency amendments to the Glendale General Plan, such that the proposed SGCP would be consistent with the goals, policies, and objectives of the Glendale General Plan; these include amendments to the Circulation Element, Housing Element, and to the Land Use Element. The SGCP implements the General Plan Elements, including the Recreation Element and the Open Space and Conservation Element (see Table 4.9-4; see pages 4.9-27, 4.9-28 and 4.9-29 in the Draft EIR). The SGCP does not replace the Recreation Element or the Open Space and Conservation Element. See Topical Response No. 2 Population and Housing.

- 49.1 I am writing on behalf of the Adams Hill Neighborhood Association, which is the only neighborhood association in the SGCP area and represents over 3,000 households.  
According to the EIR, South Glendale has “little undeveloped land” and is already housing more than half the population of Glendale. Therefore it is not surprising that an aggressive plan to add 27,000 more residents would cause significant and unavoidable harm– not only to those who live and work in South Glendale, but throughout the City.  
The City’s rampant overdevelopment has disproportionately impacted South Glendale. We had hoped that the SGCP would alleviate this burden rather than accelerate it.  
When former City Manager Scott Ochoa presented the preliminary SGCP to Adams Hill Neighborhood Association members on September 23, 2013, attendees expressed concern over density, traffic and parking in South Glendale. We were assured that our residents would not be relegated to a lower standard of living compared to the vision of the North Glendale Community Plan, which promotes development in commercial areas rather than residential.
- 49.2 It is inappropriate for the SGCP to suggest using Transit Oriented Development as a development tool in the absence of high quality, convenient, integrated public transit in our area. It is also misleading to refer to freight trains and limited service Metrolink as a transit resource when they primarily travel through the outskirts of Glendale, not to/from/within our City.
- 49.3 The many “significant and unavoidable” negative impacts inherent in the SGCP contradict the General Plan’s Housing Element policies that require the City to:
  1. Guide and plan for resources to accommodate future housing need to prevent overcrowding and over-utilization of existing community resources.
  2. Identify neighborhoods to facilitate community planning that maintains or improves their character and quality.



**COMMENTS**

**RESPONSES**

49.3 cont. 3. Implement the recommendations of the Open Space and Conservation Element and the Recreation Element of the General Plan to ensure an adequate amount of public open space and developed parkland for the needs of new and existing residential development.

49.4 As the EIR points out, South Glendale already suffers inequitable police coverage, fire response, open space, parks, and recreational opportunities. We should be looking at ways to mitigate the damage already done rather than promoting further overdevelopment that would exacerbate existing impacts and further the inequities in our area.

49.5 The EIR mentions that Affordable Housing was identified a high priority category in the Long Range Community Plan surveys. The EIR failed to highlight that in one survey Traffic ranked higher than Affordable Housing -- and in all other studies it was a close second and would far outweigh Affordable Housing if Traffic and Parking were combined as one logical category. The SGCP would exacerbate traffic and parking impacts to intolerable levels and conflict with City and County congestion management programs.

49.6 We were surprised that the Roads End area of Adams Hill was singled out for high-density development. We are one unified, connected single-family hillside community and we object to Roads End receiving disparate zoning treatment.

49.7 As the EIR indicates numerous "significant and unavoidable" consequences that threaten the health, safety, and quality of life of Glendale's residents, we urge City Council to direct staff to reject the SGCP as proposed. Staff should instead create a vision for South Glendale that focuses on enhancing the lives of its residents through the creation of open space, development of parkland, and promotion of renewable energy.

We appreciate the effort that Community Development staff has put into the SGCP, but we are alarmed by the extensive impacts revealed in the EIR. We look forward to working with Council and Staff to address the inequitable zoning standards that has reduced the quality of life for South Glendale residents.

Best regards,  
Rondi Werner, CSI, CCCA  
President, Adams Hill Neighborhood Association

**Response 49.4**

Impacts to public services are addressed in Chapter 4.13 and Impact 4.13-3 states that "implementation of the proposed project would increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. As no feasible mitigation is available, impacts for fire protection services would be significant and unavoidable." Impact 4.13-4 states that "implementation of the proposed project would increase the demand for police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. As no feasible mitigation is available, impacts for police protection services would be significant and unavoidable." In Chapter 4.14, Recreation, Impacts 4.14-1 and 4.14-2 both note that implementation of the proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated and that accommodation of the project would "require the construction or expansion of recreational facilities that may have an adverse physical effect upon the environment" which is considered a potentially significant impact with no feasible mitigation available to reduce these impacts to a less than significant level. Therefore, these impacts would remain significant and unavoidable.

**Response 49.5**

The Draft EIR (page 4.12-9) states "in addition to the Housing Element and associated policies, the Glendale Long Range Planning Public Input Findings (2006) identified "retention, new development, and rehabilitation of affordable housing" as its highest priority within the housing topic area. Increasing population growth and new residential development within the City has thus been a priority for a considerable amount of time." The point of this statement is that affordable residential housing has been a priority for the City for many years. Whether a ranking for affordable housing or traffic was higher or lower on a study done in 2006 makes no difference in assessing physical environmental impacts. Parking is not considered an environmental impact for review under CEQA.

Also see Topical Response No. 3 Transportation, Traffic and Parking.

**Response 49.6**

No change is proposed in Roads End for the area presently designated "Moderate Density Residential" and zoned R3050. The single-family hillside neighborhood in Roads End is similar to the areas in Adams Hill, which are designated "Low Density Residential" and proposed to be re-designated "Single Family Hillside Residential." These areas in the Adams Hill neighborhood are presently zoned R1R Zone. The City agrees with a previous commenter (see Responses 16.1 and 16.2 in Letter No. 16) that the area in Roads End that is presently designated "Low Density Residential" in the General Plan and zoned R1R Zone should be proposed for re-designation as "Single Family Hillside Residential" in the SGCP. Figure 2-1 will be modified accordingly.

**COMMENTS**

**RESPONSES**

**Response 49.7**

This comment provides concluding statements based on the more specific comments discussed above; therefore, no new issues are raised in which a response is required.

The information in this comment will be in the documents for review and consideration by City Council.

COMMENTS

RESPONSES

**From:** russusroute6@aol.com [mailto:russusroute6@aol.com]  
**Sent:** Tuesday, February 06, 2018 2:54 PM  
**To:** SGCP@glendaleca.gov  
**Cc:** usroute6npsd@gmail.com  
**Subject:** South Glendale Community Plan - San Fernando Rd.



Letter 50 Russell Lombard

Response 50.1

This comment provides an introduction to the author of the comment letter. The comment provides background information and does not raise a significant environmental issue for which a response is required.

Response 50.2

This comment does not raise any environment issues with regard to the SGCP Draft EIR. This comment letter will be part of the Final EIR and will be made available to City Council before making a decision on the project.

50.1

Hello from the U.S. Route 6 Tourist Association:  
  
FYI: San Fernando Rd., located along the westerly boundary of the project is also the alignment for Historic U.S. Route 6. The historic Highway is the longest, oldest and highest of the old roads. It transverses our Nation from the waterfront in Long Beach, CA, through 14 states to Provincetown, Massachusetts which is located at the tip of Cape Cod. A distance of 3,652 miles. The high point being 11,990 feet as it goes over Loveland Pass, Colorado.

50.2

We would like you to include in the project the placement of Historic U.S. 6 Route signs which we can provide. The County of Los Angeles, a founding member of our Association has installed our signs along the historic alignment; Sierra Highway, etc. The City of Lancaster has recently installed four additional signs within their city limits. Our signs are also located in the City of Santa Clarita. California - U.S. Route 6 Tourist Association

California Assembly Concurrent Resolution No. 26—Relative to Historic U.S. Highway Route 6. > CA- ACR No. 26

Who would be our primary contact person with the City of Glendale?

Feel free to ask questions.  
Look forward to hearing from you.

Best Regards, Russ L.  
Russell J. Lombard, President / CEO  
National - U.S. Route 6 Tourist Association

CC: Roger C. Bratt, Director of Program Development - National Association

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Thursday, March 08, 2018 2:54 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 51 Scott Peer**

**Response 51.1**

In accordance with State CEQA Guidelines Section 15121(a), the purposes of an EIR is to serve as an informational document that:

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

The Draft EIR for the SGCP has been prepared as a Program EIR pursuant to State CEQA Guidelines Section 15168. A Program EIR may be prepared on a series of actions that can be characterized as one large project. According to State CEQA Guidelines Section 15168(c), subsequent activities in the program must be examined in light of the Program EIR to determine whether additional environmental documentation must be prepared. If a later activity would have effects that were not examined in the Program EIR, an initial study would need to be prepared followed by a Negative Declaration or an EIR. Such subsequent environmental documentation would be “tiered” from the Program EIR. As discussed in State CEQA Guidelines Section 15152, tiering refers to coverage of general matters and environmental effects in an EIR prepared for a policy, plan, program, or ordinance followed by narrower or site-specific environmental clearance documents that incorporate, by reference, the discussion in any prior EIR and which concentrate on the environmental effects that are (a) capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior EIR. However, if any subsequent activities would not result in new environmental effects or the need for new mitigation measures, the subsequent activity could rely on the environmental analysis provided in this EIR for the SGCP, and minimal additional environmental documentation would be required.

**Response 51.2**

The City acknowledges the commenter’s preference on the mitigation proposed to reduce or offset operational greenhouse gas emissions as it relates to energy use. As stated in Section 4.6.3 under MM4.6-1, Policy GHG-2: Specific GHG reduction requirements for individual development applications shall be determined at the time of discretionary approval and in accordance with all applicable (e.g., City, SCAQMD) and State GHG emission targets. Furthermore, Policy GHG-3 addresses this comment by discouraging auto-dependent sprawl and dependence on the private automobile; promoting water conservation and recycling; promoting development that is compact, mixed use, pedestrian friendly, and transit oriented; promoting energy-efficient building design and site planning; improving the jobs/housing ratio in each community; and other methods of reducing emissions.

51.1 I would like to see a South Glendale Community Plan that does not have such severe impacts on the environment, specifically pollutants, including greenhouse gasses. The EIR claims impacts are unavoidable in the end, which shows a lack of imagination. If that is the case, then the plan should be scrapped; if we cannot build without destroying the environment then we should not build. Some cities are going carbon-free, they should be the cities that do the building.

51.2 Reducing vehicular pollution while adding residents will certainly be a challenge. However, the mitigation for greenhouse gasses produced for electricity could be to explicitly require all new buildings under the plan to include solar panels, and they could also be required to purchase off-site offsets for any shortcoming (for example from solar farms in Mojave). The new buildings should also be required to have the solar panels connected via micro-grids, so that when a major blackout occurs due to an earthquake the buildings will still have some power.

It is not only our right, but our duty as well, to ensure that new buildings are not polluters like old ones used to be.

Scott Peer  
scottgpeer@gmail.com

COMMENTS

RESPONSES

From: websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
Sent: Thursday, March 01, 2018 2:48 PM  
To: Krause, Erik <EKrause@Glendaleca.gov>  
Subject: City of Glendale, CA: SGCP EIR Comments

Letter 52 Stephen Meek

Response 52.1

52.1 Comments to the EIR

I have reviewed the summary and feel the city should adopt the mitigation's proposed in the EIR.

- Require construction equipment to mitigate air pollution by using electric equipment or adding filtering to reduce TAC/PM from exhausts
- Applicants have City selected Geologist, Paleontologist and Archaeologist on site or on call
- Applicants should be required to meet Glendale's Greener Glendale Plans and Climate Action Plan
- Applicants must mitigate airborne dust
- Applicants must spend 2% of the budget for Art on site or contribute 3% to the city Arts & Culture
- Setbacks for construction should increase to create pedestrian walkways with trees and other flora to attract pedestrians
- Reduce noise pollution whenever/wherever possible during & following construction
- City needs to determine if new Police and Fire Department stations are needed within this area and determine where these should be located prior to any construction.
- Park space must be provided for the increased population
- City to determine in advance the increased water needs for projects and make preparations.

Stephen Meek  
smEEK3@charter.net

The commenter requests the project proponents include mitigation and conditions on the SGCP. Please refer to Topical Response No. 1 Purpose of a Program EIR, Program vs. Project Level EIRs and Standards for Comments and Responses concerning the purpose of an EIR to disclose environmental impacts from the project and adopt feasible mitigation measures that reduce or avoid significant environmental impacts to a level of less than significant. Where feasible, mitigation measures have been recommended for adoption to reduce significant environmental effects.

One of those mitigation measures, MM 4.2-1 (a)-(h), in Section 4.2 Air Quality includes, among the other requirements that PM filtering or other exhaust reducing filters be installed on generators and requires the use of electric-powered construction equipment.

In Section 4.4 Cultural Resources of the Draft EIR, mitigation measures are being recommended to require archeologists and tribal monitors be retained (MM 4.4-3), and that a paleontologist be retained to evaluate projects that require ground disturbance (MM 4.4-4). Since the Draft EIR did not identify any significant project impacts with respect to geology and soils, there are no mitigation measures that would necessitate having a geologist "on site or on call."

Section 4.6 of the Draft EIR analyzes the proposed project's impact on greenhouse gas emissions (GHG) and examines the project's compliance with regulatory standards and policies from the federal, State, county and local levels, including the Greener Glendale Plan. A discussion of the project's compliance with the Greener Glendale Plan commences on page 4.6-12 through 4.6-16.

With respect to the compliance with a Climate Action Plan, Section 4.6.4 of the Draft EIR states; "[w]hile the City previously adopted the Greener Glendale Plan as its citywide sustainability plan, it is not yet a qualified Climate Action Plan, as it lacks future GHG reduction targets against which future development projects may be analyzed. Without a qualified plan outlining a clear path towards achieving GHG reduction targets, it cannot be determined whether or not all future development would be consistent with City or State plans adopted for the purpose of reducing GHG emissions. This impact would remain significant and unavoidable."

With respect to airborne dust, Regulation IV, Rule 403 (Fugitive Dust) requires developers or contractors to implement Best Available Control Measures for all sources, and all forms of visible PM are prohibited from crossing any property line; see Section 4.2, page 4.2-8 in the Draft EIR.

Regarding the comment on Arts & Culture, the Glendale Municipal Code Section 30.37.060 requires:

**COMMENTS**

**RESPONSES**

A. In-lieu fee payment. As an alternative to the urban art plan requirements of this chapter, the applicant may pay an amount equivalent to one (1) percent of the value of the project, as determined by the building official, into the urban art fund.

B. Urban art fund. The city shall deposit in-lieu art fees into a separate account set aside for the urban **art** fund in a manner to avoid any commingling of the fees with other city revenues and funds, except for temporary investments, and shall expend the fees solely for the purpose for which they were collected. (Ord. 5721, § 6, [12-14-2010](#))”

An increase in the percentage dedicated to urban art fund would require a municipal code amendment.

Enhanced sidewalks and urban landscaping and street trees are design and policy issues that will be implemented on an individual project-level basis. The SGCP policies recommend many enhancements with respect to sidewalks and street trees, such as, for example, in the Main Street/Neighborhood Commercial Corridor—“Main Street/Neighborhood Commercial Corridors have low-scale community and neighborhood-serving retail and offices with pedestrian-scale detailing. *Transportation and Complete Streets features include enhanced pedestrian crossings, bike facilities, traffic calming and safety features, sidewalks, street trees, pedestrian-scale lighting, and street furniture.*”

Section 4.11 of the Draft EIR analyzes the project’s impacts from noise and recommends mitigation measures, MM 4.11-1 through MM 4.11-5, to reduce noise impacts to below a level of significance.

Police and fire service is discussed in Section 4.13 of the Draft EIR. Impacts from the need to add or expand existing public service facilities due to increased calls for service, service ratio maintenance, response times or other performance objectives due to project implementation are considered significant and unavoidable. Facilities will be added or expanded to the extent and when project implementation makes such facilities necessary to maintain existing levels of service. When that will happen depends on the rate at which the SGCP is implemented on a project-level basis.

Recreation was analyzed in Section 4.14 of the Draft EIR. Although development impact fees are imposed on new development as a condition of the issuance of a building permit or subdivision tract map for a development project and payment of such fees is considered full mitigation of recreation impacts for an individual project, overall environmental impacts on parkland and park facilities from implementation of the project is expected to be significant and unavoidable.

The City has determined in advance the increased water needs for projects and is constantly making preparations. Water Supply, Storage and Distribution was analyzed in Section 4.16.1 of the Draft EIR. Project impacts on water supply on a project-level and cumulative basis was determined to be less than significant.

**COMMENTS**

**RESPONSES**

**From:** stevecolton@charter.net [mailto:stevecolton@charter.net]  
**Sent:** Wednesday, February 28, 2018 1:51 PM  
**To:** SGCP@glendaleca.gov  
**Subject:** SGCP

**Letter 53 Steve Colton**

**Response 53.1**

53.1 [ As a 38 year resident I am oppose to the changes the SGCP makes to our city. The downtown Specific Plan as executed has destroyed the civil atmosphere that Glendale has been known for. This is a horrific example of where the SGCP is taking us.

The City acknowledges the commenter’s opposition to the proposed SGCP. This comment letter will be part of the Final EIR and will be made available to City Council before making a decision on the project.

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Thursday, February 08, 2018 10:29 AM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 54 Susan Molik**

**Response 54.1**

This comment is conclusive in nature and does not raise a significant environmental issue for which a response is required, as it is outside of the scope of the SGCP Draft EIR. The comment will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

It is nice to see 2 or 3 areas of our city moving towards community input planning!

Yet, in the GLENDALE RANCHO area..... we have none! and we are one of the most historic communities.... having combined entertainment industry, residential / horse ownership properties, apartments & commercial... ALL of which border our adjacent neighbors here and in BURBANK.

54.1

So with that in mind, we will be mobilizing in 2018 to prepare our plan for protecting and preserving our quality of life and property values in our EQUESTRIAN sector of Glendale. We ask City services & staff to become responsive to our "border" issues and enforce the existing municipal codes, & remain diligent to the particular neighborhood problems in our environment which is being impacted by encroaching businesses, increasing traffic, noise, pollution, and oversized developments.

Susan Molik  
Moliks@msn.com



**COMMENTS**

**RESPONSES**

**From:** website@glendaleca.gov [mailto:website@glendaleca.gov]  
**Sent:** Monday, March 12, 2018 5:55 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 55 Thomas Hendricks**

**Response 55.1**

The City appreciates the comment. See Topical Responses No. 2 Population and Housing. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 55.2**

Please refer to response to comment 55.1 above. Additionally, the City acknowledges that the City cannot avoid potential impacts on police and fire protection services from implementation of the proposed SGCP, and there are no feasible mitigation measures that would reduce the impacts to a less than significant level; see Section 4.13.3 of the Draft EIR. The ultimate determination of infeasibility of the proposed SGCP will be made by City Council.

**Response 55.3**

Please refer to response to comment 55.1 above.

- 55.1 Clearly the best option for Glendale is "No Plan".  
Glendale has already built too much high density housing on North Central Ave.  
Building more high density housing in South Glendale on the speculation of what additional transportation LA Metro may or may not do is simply bad planning to put cash into the hands of developers.
- 55.2 The draft EIR, itself, says there is no feasible way to avoid degrading police, fire, and recreation capabilities.  
WHY IN THE WORLD WOULD WANT TO DEGRADE THE LEVEL OF COMMUNITY SUPPORT?
- 55.3 Additional multiple story residential development would reduce the property values of existing home owners and is would be further erosion of the Glendale character that makes Glendale a desirable place to live.

Thomas Hendricks  
tommot@pacbell.net

COMMENTS

RESPONSES

**From:** websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
**Sent:** Tuesday, February 06, 2018 11:27 AM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 56 Tina Centrone**

Hello,

**Response 56.1**

The comment does not raise a significant environmental issue stemming from a significant environmental impact from the proposed project for which a response is required. See Topical Response No. 3 Transportation, Traffic and Parking. The comment will be included in the Final EIR and made available for consideration by City Council before making a decision on the project.

56.1

I live in an apartment complex on Elk Avenue. This street is adjacent to Colorado Blvd so needless to say is a very busy area south of Glendale. My street is extremely crowded with a lot of apartments complexes who don't provide enough parking structures for the tenants therefore the street gets very crowded with people looking for parking spaces. It is very difficult to find parking after work hours of 8 to 5. People are literally parking in the middle of the whole block saving the parking spaces for their own families which is very inconsiderate. Other people use a lot of space and do not to allow others to park and waste the space. It would be very useful if the parking in the street would be controlled by putting brackets to indicate where a car must park and give parking tickets to those who don't obey the parking guidelines. The city of Glendale has way too many apartments, condos and too many people in very little space. It's very hard to live in a very crowded city. Stop building too many live in apartment units. It's too much, too much. Please help with the street parking situation.

Tina Centrone  
tkbcentrone@sbcglobal.net

COMMENTS

RESPONSES

**From:** Todd McClintock [mailto:todd2289@gmail.com]  
**Sent:** Wednesday, March 07, 2018 10:10 AM  
**To:** Krause, Erik EKrause@Glendaleca.gov  
**Cc:** Stotler, Laura <LStotler@Glendaleca.gov>; Gharpetian, Vartan <VGharpetian@Glendaleca.gov>; Devine, Paula <PDevine@Glendaleca.gov>; Najarian, Ara <ANajarian@Glendaleca.gov>; Sinanyan, Zareh <ZSinanyan@Glendaleca.gov>; Agajanian, Vrej <VAgajanian@Glendaleca.gov>; Beers, Yasmin K <YBeers@Glendaleca.gov>; Manoukian, Rafi <RManoukian@Glendaleca.gov>; Kassakhian, Ardashes AKassakhian@Glendaleca.gov  
**Subject:** Objection to the South Glendale Community Plan - Todd McClintock

**Letter 57 Todd McClintock**

**Response 57.1-57.13**

This comment letter is the same as an earlier comment letter (Letter No. 3). Refer to responses to comments 3.1 through 3.13.

- 57.1 I object to the South Glendale Community Plan (SGCP) since:
  - a) contrary to SGCP’s claims, it is NOT the vision of our community – unless our community is suicidal; it is rather the vision of developers who are the only ones to benefit and whose greedy mega developments have already ruined our community within/bordering the Downtown Specific Plan area;
  - 57.2 b) it suggests an unacceptable, unjustifiable and, most importantly, an unsustainable upzoning of high density areas into mixed use zones, adding new zones for transit areas, as well as changes within the present zoning requirements (e.g., removal of setbacks in R1250) to allow for more height of buildings and more density of population, which have proved to be a DISASTER for the Glendale community within/bordering the DSP area already;
  - 57.3 c) it is premised on the fictions that people who are close to bus routes and transit areas will necessarily use buses and people who live close or at the mixed-use buildings (to be built) with first level retail stores will necessarily find employment in the retail stores, thereby promoting walkability, revitalization and employment in Glendale, whereas these are just practically unrealistic, logically flawed and statistically unsupported speculations; and finally
  - 57.4 d) the Environmental Impact Report (EIR) prepared for the proposed SGCP, with its SEVEN (7) SIGNIFICANT and UNAVOIDABLE adverse ENVIRONMENTAL IMPACTS is PROOF that the new developments and the associated dramatic growth in density of the population expected under the SCGP will irreversibly and permanently affect both the QUALITY OF LIFE and the SAFETY of Glendale residents.

Therefore, the only comment to the EIR is: SGCP is unacceptable and should be discarded.

**COMMENTS**

**RESPONSES**

57.4  
cont. | Moreover, I propose to create a new SGCP with the objective to FIX the environmental impacts caused by or anticipated from the recent DSP area (part of South Glendale) developments and approved projects by: a) DOWNZONING areas in South Glendale to disallow any future mega developments; b) creating MORE OPEN SPACE AND MORE PARKS to counterbalance the shortage created by the constructed or already approved mega developments.

57.5 | South Glendale community is already on LIFE SUPPORT, in view of the recent aggressive and unreasonable mega developments within/bordering DSP area, which resulted in more traffic, less parking, less open and green space, and higher rents. The adoption of the SGCP will just TURN OFF THE LIFE SUPPORT for Glendale community; PLEASE, DON'T DO IT!

\*\*\*\*\*

57.6 | The EIR (environmental impact report) of the SGCP openly identifies SEVEN (7) environmental impacts that will be UNAVOIDABLE and SIGNIFICANT and will NOT have any mitigation measures:

1) Aesthetics – per EIR, the current visual character and quality of the site and its surroundings, “would be substantially degraded”; “the proposed projects would result in new sources of increased shade.”

Historically, the character of our jewel City of Glendale has been its quiet streets, its cozy low-rise buildings, with plenty of views of mountains, blue sky, and green space. Glendale has been intended to be a suburb to Los Angeles; not to become Los Angeles.

The proposed SGCP, with upzoning, addition of new transit zones, changes within the current zone requirements, and even the innocent looking density bonuses so generously awarded to all Developers, would be contrary to the community character and historic designation of the City of Glendale and will significantly impact the QUALITY OF LIFE of its residents.

South Glendale, which encompassed the Downtown Specific Plan, has already been impacted by the unreasonable approvals of numerous mega development projects within DSP and at times bleeding outside the DSP), where developers constructed high-rise buildings, with inconsistent and aesthetically unappealing designs (blue, yellow, orange, and red painted walls), with parking variances (allowing for less parking spaces than required by the code) and density bonuses (allowing for more people and more units than allowed by the code). Further, the mega developments have also eliminated so much of open green space required for our visual and mental relief, made our streets impassable due to traffic congestion, and created lots of shades to the adjacent units. SGCP should now

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57.6 cont. focus on creating more open space and more parks, rather than continue the same development trend which has proved to be a disaster already.

Moreover, the aesthetics and quiet low-rise residential character of South Glendale community is not only important for the preservation of the character per se or for the historic designation of Glendale as a suburban place, but also imperative and absolutely necessary for the mental health and the associated physical health of the Glendale community (healthy soul, healthy body). The recent years' mega developments in DSP zone, encompassed by the South Glendale (with their traffic congestion, noise, etc.) have only added to the stress of Glendale residents and deprived them of the green and/or open spaces to relieve that stress.

Therefore, the environmental impact to the aesthetics and character of Glendale, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city officials (Planning Commission or City Council).

57.7 2) Air quality: Per EIR, the implementation of the proposed project would:  
a) "conflict with or obstruct implementation of the applicable air quality plan";  
b) "violate an air quality standard or contribute substantially to an existing or projected air quality violation"; c) "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)";  
d) "expose sensitive receptors to substantial pollutant concentrations."

Indisputably, the above quotations from the EIR itself make it apparent that the SGCP will dramatically affect the QUALITY OF LIFE of Glendale residents from the perspective of air quality. Air has no boundaries; air pollutants will affect the entire Glendale community. Air quality is important for both our physical and mental health and it cannot be compromised.

Therefore, the environmental impact to the air quality, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

57.8 3) Greenhouse Gas Emissions: The proposed project a) "would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment"; b) "would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses."

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**57.8 cont.** It is undeniable that the adverse effects of greenhouse gas emission and the associated air pollution will dramatically affect the quality of life and the physical and mental health of the entire Glendale community, since there are no air boundaries and since South Glendale – due to its vast array of retail stores and recreational facilities – is the most visited by all Glendale residents.

Therefore, the environmental impact to the greenhouse gas emissions, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

4) Population and Housing: Per EIR, the “implementation of the proposed project would induce substantial population growth in an area, either directly or indirectly.”

It is indisputable that most of South Glendale presently does not have and geographically cannot provide the adequate road infrastructure to accommodate such a substantial population growth. The streets in Glendale, especially outside the DSP area, are mostly one-lane in each direction, with the so much needed street parking on both sides of the streets. Allowing an increase in the population, where there are no adequate road and parking infrastructure, is unacceptable for both the current and future residents of Glendale.

**57.9** Moreover, the recent mega developments in Glendale, while recommended, lauded, and even approved by city staff, have proved to be a disaster for Glendale residents in view of the increased traffic, impassable streets, elimination of street parking for public, and allowing developers to provide less parking spaces than required by the code. South Glendale community has greatly suffered already; now is the time to stop the mega developments in South Glendale and to evenly distribute population growth in the entire Glendale.

As for housing, it is undisputed that all the developers who have implemented or are implementing projects within/bordering the DSP area have demolished (or plan to demolish) the presently affordable rental buildings, have constructed mega buildings with smaller units and double rents, have pushed the rents in Glendale up, and – despite providing a few units of affordable housing – have actually created and furthered the housing crisis in South Glendale. Plus, most of the recent mega developments in the DSP area are not fully occupied till present due to the unaffordable rents.

There is simply no sound justification to further the population increase and housing crisis.

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57.9  
cont. Therefore, the environmental impact to the population and housing, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

5) Public Services: Per EIR, the implementation of the proposed project would: a) "increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand"; b) would increase the demand of police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. Moreover, per EIR, Glendale is already far below the required response time for public services (e.g. fire protection).

The mentioned environmental impacts of increased need for fire protection and police protection stem from the anticipated dramatic increase of population and the associated likelihood of fire and crimes/accidents/fatalities based on the SGCP. Most importantly, per EIR, there cannot be any mitigation to this impact.

57.10 EIR is clear that South Glendale community, upon the proposed SGCP, will suffer from poor response times of public services (fire protection, police); this environmental impact actually threatens not just the quality of life, but the SAFETY of Glendale community.

It should be noted that, even if the currently understaffed fire protection and police services extend their staff and structures to accommodate the expected population growth under SGCP – which EIR openly declares non feasible and impossible – the current inadequate road infrastructure (narrow one-lane each direction in most South Glendale) and the traffic increase anticipated by the SGCP will nonetheless further slow the response time for public services and will therefore make South Glendale unsafe to live in.

Therefore, the environmental impact to the public services, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

57.11 6) Recreation: Implementation of the proposed project would: a) "increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated"; b) "require the construction of new recreational facilities or the expansion of existing recreational facilities that could have an adverse physical effect on the environment."

**COMMENTS**

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57.11  
cont.

It is undisputed that recreation is a vital component and need for a healthy community; it is imperative to create more recreational facilities and parks and it is disastrous to further the lack of those, as anticipated by the SGCP based on the EIR finding.

First, ironically, the fact is: there are presently only a few recreation facilities in South Glendale, and those are all already overcrowded and lacking the adequate parking or open space. For example, the YMCA’s visitors do not have adequate parking and presently utilize the adjacent streets of Kenwood or Louise and the presently available parking lots nearby. But, per City Council’s decision, the adjacent public parking on Louise will soon cease to provide parking since a new development of “Louise Hotel” has been approved for the site. And the GUSD parking lot, which specifically provides additional parking for YMCA after school hours, may cease to provide parking because of a proposed mega development on that site waiting for final approval by the City Council. This is just one example, but it can be equally applied to all presently available recreation facilities. Not to mention, the parking to Americana – another major recreational place – is unaffordable for most of Glendale residents.

Second, it is no secret that there are only a few parks in South Glendale; one of the only big parks on Brand and Colorado will soon become home for another approved development.

Third, all the parks and recreational facilities that have been created or planned recently are located far outside of South Glendale, in the mountains, which are not accessible for the most vulnerable group of our society - our children, elder people, or people who cannot afford to get to those destinations (due to lack of cars, lack of funds, or incapacity to drive).

The proposed SGCP, per EIR, not only does not resolve the problem with the current shortage of parks and recreational facilities, but actually unacceptably furthers the problem.

Therefore, the environmental impact to the recreation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

57.12

7) Transportation: Per EIR, the implementation of the proposed project “would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.”



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57.12 cont. It is undisputed that the road infrastructure in Glendale is insufficient and has not been historically designated/intended to accommodate the dramatic increase of population anticipated by the proposed SGCP. The end result of the dramatic increase of population and the associated dramatic and unsustainable impact on transportation will be traffic congestion, traffic noise, more traffic accidents and fatalities, more pedestrian fatalities, etc. This will undeniably deteriorate the quality of life of all Glendale residents.

Moreover, the recent DSP area developments are just proof of how congested and impassable our roads have become; this problem with transportation should be fixed and not furthered more. Suggesting more bus routes will not resolve the problem, as confirmed by EIR. Plus, there is no guaranty and no common sense to assume that creating more bus lines will make people take buses, or providing bicycle lanes will make people risk their lives and use bicycles in the already congested and crowded streets of Glendale.

Therefore, the environmental impact to transportation, already found to be significant and unavoidable by the EIR, is unacceptable and should not be overridden by any decision making city official (Planning Commission or City Council).

57.13 To summarize, the EIR's identified seven environmental impacts will adversely and permanently affect both the quality and the safety of Glendale community; those cannot and should not be overridden or overlooked by any decision making city official. Therefore, the proposed SGCP is unacceptable for the South Glendale community and should be discarded.

Sincerely,  
Todd McClintock

COMMENTS

RESPONSES

**From:** Tony Barrios [mailto:tbarrios@gusd.net]  
**Sent:** Thursday, February 08, 2018 1:29 PM  
**To:** Stotler, Laura  
**Subject:** Re: Draft South Glendale Community Plan and Draft Environmental Impact Report Public Review

**Letter 58 Tony Barrios**

**Response 58.1**

The SGCP proposes to create a Civic land use designation for publicly owned properties used for public purposes within South Glendale (except for facilities that could pose a security concern if mapped -like reservoirs, water pumping stations, electric transfer stations).

The SGCP proposes to designate school properties in the General Plan Land Use Element as Civic without changing the existing zoning (such as R-2250). A Civic designation will allow flexibility to craft a new zone in the future or keep the existing zoning. An exception to this would be if there is a school-owned property along one of the corridors or centers proposed for mixed-use. If City Council adopts the mixed-use designations, those areas will be rezoned in a future year to mixed-use.

**Response 58.2**

The City appreciates this comment, which states a preference for an alternative designation on Glendale Unified School District (GUSD) properties rather than what is shown in the proposed project. The information in this comment will be in the documents for review and consideration by City Council.

58.1 I was looking at the maps and noticed that we are listed as R2250 on the Zoning Map and Institutional on the Land Use map. Can you tell me what is the difference?

58.2 I would like to see all of our properties changed to a zoning of civic or institutional.

Thank You,  
Tony Barrios, Executive Director  
Planning, Development, and Facilities Glendale Unified School District

COMMENTS

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From: websitemail@glendaleca.gov [mailto:websitemail@glendaleca.gov]  
Sent: Monday, March 12, 2018 5:28 PM  
To: Krause, Erik <EKrause@Glendaleca.gov>  
Subject: City of Glendale, CA: SGCP EIR Comments

Heading 59 Toros Soghbatyan

Response 59.1

This comment provides an introduction to the author of the comment letter. The comment does not raise a significant environmental issue for which a response is required.

In the Draft EIR, Alternative 1 is identified as the No Project Alternative in Section 6.3 and evaluated in 6.4 of the Draft EIR. The “No Project” Alternative is required by CEQA, along with an analysis of the impacts of a “No Project” Alternative. (CEQA Guidelines §15126.6(e)(1)). Analysis of the No Project Alternative allows decision makers to compare impacts of the proposed project with impacts of not implementing the proposed project and maintaining the status quo.

Response 59.2

The City acknowledges the commenter’s preference in regard to not allowing the development of more surface parking lots and it will be considered in the final determination on this project. As stated in Section 3.4 of the Draft EIR, whenever project components submit discretionary applications for site-specific approvals within the SGCP area, the City will determine how much new information will be required for the environmental review for such proposals. In preparing these analyses, the City will assess, among other things, whether any of the significant environmental impacts identified in this Program EIR have been “adequately addressed.” Thus, the new analysis for these site-specific actions will focus on impacts that cannot be “avoided or mitigated” by mitigation measures that either were adopted in connection with the proposed SGCP or were formulated based on the information in this EIR.

The analysis of whether the proposed SGCP is consistent with the applicable policy, including for parking, from the Glendale General Plan is evaluated in Section 4.9.3, Table 4.9-4 of the Draft EIR.

Response 59.3

In its simplest form, infill development refers to the development of vacant parcels within previously built areas. Public Resources Code §21061.3 defines an “Infill site” as “a site in an urbanized area that meets either of the following criteria:

- (a) The site has not been previously developed for urban uses and both of the following apply:

- 59.1 I am a South Glendale resident and I ask that the EIR not be certified because it is premature due to a number of controversies, uncertainties, and overlaps in both SGCP and EIR:
  - a) Alternative 1 in the SGCP and Alternative 1 in the EIR do not seem to correspond and create confusion: this has to be clarified.
  - 59.2 b) SGCP suggests using existing surface parking lots; but then it also suggests creating parking lots to address the parking problems. Where will you create those parking lots when everything is used up already?  
Solution: SGCP area, as part of DSP, should not allow the development of any more surface parking lot - other than for parking purposes or for the purposes of creating parks or meaningful open space.
  - 59.3 c) SGCP suggests infill housing development, but infill is not defined anywhere. The definition present in legal documents is very broad giving rise to a broad construction of the term and abuse of it, where buildings of 1970s are considered infill sites... This is wrong.  
Solution: define infill in the narrowest and most specific term possible.
  - 59.4 d) SGCP suggests creation of linear parks, which see to be just the new name for "landscaped setbacks." Parks should be meaningful places - with the sense of open green space, relatively away from traffic noise and smog, pollution. Linear "parks" on the streets are not parks!  
Solution: EIR should address the lack of parks and make designations for them rather than state that no feasible mitigation is possible.
  - 59.5 e) SGCP mentions about the elimination of R1250 setbacks; why? This is inconsistent with the prior creation of linear parks... first you eliminate - then create?

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(1) The site is immediately adjacent to parcels that are developed with qualified urban uses, or at least 75 percent of the perimeter of the site adjoins parcels that are developed with qualified urban uses, and the remaining 25 percent of the site adjoins parcels that have previously been developed for qualified urban uses.

(2) No parcel within the site has been created within the past 10 years unless the parcel was created as a result of the plan of a redevelopment agency.

(b) The site has been previously developed for qualified urban uses.

These sites are already served by public infrastructure, such as transportation, water, wastewater, and other utilities. Infill is development in an urbanized area and may include development on vacant lands, redevelopment of sites that were previously developed, or revitalization of sites through reinvestment, such as reusing or renovating buildings and facades, street improvements or “grey field” development. The key to infill development is efficient utilization of land resources; more compact patterns of land use and development; reinvestment in areas targeted for growth and that have existing infrastructure; and more efficient delivery of quality public services.

**Response 59.4**

Sections 4.14.1 and 4.14.3 of the Draft EIR address the lack of both community and neighborhood park facilities within the southern portion of Glendale. Presently, there is approximately 285 acres of developed parkland within the City, indicating a deficit of 496 acres. See Topical Response No. 5 Recreation - Parks and Open Space. The comment also includes the commenter’s opinion concerning park development that will be included in the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 59.5**

As mentioned in Section 3.3 of the Draft EIR, as part of the proposed project, some existing development regulations in the Zoning Ordinance would be modified in conjunction with the SGCP. In regard to R-1250 High Residential Zone, development regulations would be modified to eliminate “wedding cake” style setback requirements for properties with commercial frontage proposing residential units. “Wedding cake” setback requirements have consistently proven to be impractical for contemporary urban mixed-use development. This change in setback requirements affects second and higher stories of new buildings, and would not affect the creation of linear parks at ground level.

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- 59.6 f) EIR does not fully analyze any of the impacts - EIR only gives a historical overview of the impacts and definitions, as well as points out uncertainties and development trends. For example, it suggests that air quality standards are not yet set and speaks about the standards themselves. A thorough analysis is missing as to each adverse impact of SGCP; e.g., air quality, greenhouse gas emissions...

Solution: EIR is premature until air quality standards and greenhouse gas emissions standards are fully developed and until SGCP is evaluated according to those. Plus, in that case, the City objectives will hopefully change and prioritize the health and safety of Glendale residents over the economic benefits for the City (property taxes, etc.)
- 59.7 g) EIR for SGCP, for some reason, overlaps with the EIR for the pedestrian plan, while those are different things and should have separate EIRs.
- h) EIR assumes that creation of bus lines bike lanes will necessarily be a practical and working mitigating measure for air quality and greenhouse gas emissions. This speculation is far from being right and is not statistically supported in any way.

This suggests that people would be taking buses for everyday life: work, shopping. I have taken buses for several years just because I did not have a car. I will never do so in my life. I have experienced longer wait times, at times under the rain, where my family members had to come pick me up because the bus was interrupted for some reason, I would miss the bus for 1 minute and then remain on the bus stop just because it was the 7 pm bus on a Saturday or Sunday and it was the last bus... Plus, buses only take us to limited places...

I will never walk to grocery store again unless it is for just a small shopping - in case I forgot to buy something. it is definitely hard to take the bus and walk when your hands are full with heavy grocery shopping. I live next to a bus transit line but I will never use the bus unless my car is in repair and I cannot afford uber...
- 59.9 i) EIR assumes that the creation of bike lanes and multi-modal streets, people will be promoted to ride a bike and thereby reduce gas emissions and air quality impact. This is not only impossible but also non-feasible.

**Response 59.6**

The potential impacts on air quality and greenhouse gas emissions from implementation of the proposed SGCP are fully analyzed in Sections 4.2.3 and 4.6.3, respectively in the Draft EIR. The Draft EIR does note that air quality standards for Toxic Air Contaminants (TACs) have not been set because “there are hundreds of air toxics and their effects on health tend to be local rather than regional” and because carcinogenic TACs “are assumed to have no safe threshold below which health impacts would not occur.” The remainder of the comment represents an opinion that will be included in the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 59.7**

The Citywide Pedestrian Plan was included as part of the SGCP EIR, because due to the timing of the drafting of the plan and the plan’s coverage area, which includes the SGCP area, it is considered a related project under CEQA. CEQA requires the “whole of the project” be analyzed, and considering the pedestrian plan separately, when it is in fact a part of the SGCP would be considered illegal “piecemealing”.

**Response 59.8**

Section 4.2.3 of the Draft EIR states that implementation of MM 4.2-2, Policies AQ-5 through AQ-12, to encourage more walking, bicycling, and transit use among residents, workers, and visitors will help to reduce not eliminate operational emissions associated with future development projects implemented under the proposed SGCP. As evaluated in Sections 4.2.3 and 4.6.3 of the Draft EIR, the City cannot avoid potential impacts on air quality and greenhouse gas emissions from implementation of the proposed SGCP, and there are no feasible mitigation measures that would reduce the impacts s to a less than significant level. For further information, please see Topical Response No. 3 Transportation, Traffic and Parking.

The remainder of the comment represents an opinion that will be included in the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 59.9**

Please refer to response to comment 59.8 above.

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59.9 cont. First, bike lanes might be a good idea next to the beach where people take a bike for recreation and where the street lanes are wide enough to accommodate such lanes. It will be ridiculous in Glendale, where the street lanes are already EXTREMELY narrow. Exactly where the bikes lanes will be drawn? On which streets? Our streets are not cut for bike lanes. If we are not creating bike lanes on each street, then how do we imagine people will continue driving from a street with a bike lane to a street without a bike lane? Halt traffic on the other streets, or get off the bike and walk with the bike on the streets without lanes.

Plus, it is unsafe for bicyclists to ride on the street - due to the high traffic and multitude of cars.

Also, it will create a huge traffic if you let one bicyclist halt or slow traffic on a street; let alone on a major street. It is annoying for drivers and nerve-racking as well to drive behind a bicyclist...

Creation of bike lanes will necessarily be at the expense of street parking along the sides of the street: the need and use for parking (100 people hunting for it for work and school and everyday purposes) should outweigh any little need and use of bikes for recreation purposes (1 or 2).

Solution: forget about bike lanes! It is not for Glendale... it is unsafe for bicyclists and a huge nuisance for drivers.

59.10 j) During the EIR presentation at the planning commission the public hearing, the planners mentioned that SGCP will be away from residential areas; however, the SGCP and EIR suggest mixed use buildings along entire Colorado, Broadway, and other streets. Those streets are adjacent to residential areas and the issue of shading must be clearly considered for the benefit of the public living adjacent to those future developments, if any.

59.11 Also, EIR should specify the distance that SGCP developments should be at - from the residential neighborhoods. We have seen how DSP bleeds into residential zones and SGCP should be more specific and close-ended on this issue rather than leave room for a broad interpretation.

59.12 k) During the EIR presentation at the planning commission, the planners mentioned that the SGCP developments will be implemented AFTER the transit buses and routes are in place; however, SGCP does not so specify.

There should be a clear timeline set out in the SGCP as to when any development should happen.

Response 59.10

As stated in Section 4.1.3 of the Draft EIR, due to the programmatic nature of this EIR, specific project-level design plans (including building heights, positioning, and dimensions) are not available at this time, and thus a complete assessment of shade and shadow impacts of proposed development under the SGCP is not possible. In the future when specific development projects are proposed within the SGCP area, project design plans will be developed and subject to project-level CEQA review and consistency with General Plan and SGCP policies. The project-level design plans will be evaluated, as necessary, to determine the extent of potential shade and shadow impacts upon adjacent residential areas and/or uses.

Response 59.11

As stated above in response to comment 59.10, due to the programmatic nature of this EIR, specific project-level design plans (including building heights, positioning, dimensions, setback distances) are not available at this time. In the future when specific development projects are proposed within the SGCP area, project design plans will be developed and subject to project-level CEQA review. The suggestion will be included in the Final EIR for consideration by the City Council prior to making a decision on the project.

Response 59.12

In order to qualify as “Transit Priority Projects” and for “Transit Oriented Design” to be implemented, the qualifying transit needs to first exist, that is why SGCP Transit-Oriented Developments cannot be implemented until after the transit is in place. After the SGCP is adopted, market forces will dictate when or if development will be implemented; therefore, a clear implementation timeline cannot be developed. However, with respect to transit buses and routes, the City has more control over implementation, which would not occur without authorization from the City Council and review by the Transportation and Parking Commission at public meetings for which public notice will be provided.

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59.13 l) SGCP and EIR should also suggest caps or quota on the development per year, because it is very likely that the projected developments till 2040 will happen in less than 2 years. This will create a significant cumulative impact on the environment even if those impacts would otherwise have been insignificant.

**Response 59.13**

Please refer to response to comment 59.12 above. The comment will be included in the Final EIR for consideration by the City Council prior to making a decision on the project.

59.14 m) SGCP should wait and incorporate findings of DSP's re-evaluation and the suggested changes, including the possible moratorium on residential developments and entitlements (density...) With this regard, the timing of SGCP is also premature since there is all the facts that DSP, which seems as a prototype for SGCP future planned developments, was not as smooth and as problem-free as expected...

**Response 59.14**

The comment makes a suggestion concerning timing and the SGCP's relationship with the Downtown Specific Plan (DSP). The comment will be included in the Final EIR for consideration by the City Council prior to making a decision on the project.

59.15 n) EIR does not address the need for more civic space while it acknowledges that there will be shortage of public services; it does not address the need for more high schools, while it anticipates higher density of population.

**Response 59.15**

As evaluated in Section 4.13.3 of the Draft EIR, the Glendale Unified School District (GUSD) would potentially need to expand existing schools and/or provide new facilities in order to accommodate growth associated with the proposed SGCP. In accordance with SB 50, at the time of building permit issuance, development projects are required to pay established school impact fees. Funding collected under SB 50 would reduce impacts to GUSD facilities, which serve the proposed SGCP area to a less than significant level. Parks and libraries are funded through the City's Public Facilities Development Impact Fees, which serve as full mitigation for new development impact on these facilities. Project implementation will have a significant and unavoidable impact on public services, such as police and fire, in that increased calls for service and the need to maintain existing service ratios and response times will likely necessitate the construction of new or alteration of existing public service facilities (i.e., fire or police stations), the construction or alteration of which will result in significant environmental impacts.

SUMMARY: the key to resolving all problems and environmental impacts above is only in decreasing density or, at least, halting the disproportional increase of density in South Glendale.

59.16 The streets where developments are suggested even under alternative 1 - colorado and broadway are already overcrowded. You can't allow more overcrowding to happen there!

**Response 59.16**

This comment is a concluding statement based on the more specific comments discussed above; therefore, no new issues are raised in which a response is required.

No Project is the only proper alternative for the proposed SGCP.

A new SGCP should be developed and focus on fixing the problems already present in South Glendale - air quality, parking needs, etc.

The quality, health, safety of Glendale residents is at risk, per EIR - please, do not adopt the proposed SGCP. EIR is premature and unclear on a number of issues, it cannot be certified...

The City acknowledges the commenter's opposition to the proposed SGCP and this comment will be included in the Final EIR for review and consideration by City Council.

Thank you!  
Toros Soghbatyan  
nairas2003@yahoo.com

**COMMENTS**

**RESPONSES**

**From:** Violet Coker [mailto:vcoker@quadc.org]  
**Sent:** Monday, March 12, 2018 10:44 AM  
**To:** SGCP@glendaleca.gov  
**Subject:** SGCP Timeline

Hello,

60.1 | Would it be possible to get an estimated timeline for the South Glendale Community Plan approval process? We're currently monitoring mixed-use projects and would love to stay up to date on the plan.

Best,  
Violet Coker  
Public Affairs Representative  
Carpenters/Contractors Cooperation Committee

**Letter 60 Violet Coker**

**Response 60.1**

This comment is outside of the scope of the SGCP Draft EIR. However, the SGCP webpage on the City of Glendale website [www.GlendaleCA.gov] contains links to public notices and a project calendar with upcoming meetings.



**COMMENTS**

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**From:** website@glendaleca.gov [mailto:website@glendaleca.gov]  
**Sent:** Monday, March 12, 2018 12:03 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 61 Wendy Fonarow**

**Response 61.1**

The comment does not raise a significant environmental issue for which a response is required. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 61.2**

Please refer to response to comment 61.1 above.

**Response 61.3**

This concluding paragraph does not raise a significant environmental issue for which a response is required.

61.1 This plan is devastating to south Glendale and Roads End specifically. This is a family lot neighborhood with the oldest barn in the city used as a home and in pristine condition. The pattern of continuing to add density housing in South Glendale even in the few neighborhoods with middle class housing shows enormous prejudice against those living south of the 134. The north continues to be allowed to remain almost exclusively resident while high density is continuing in the south at a fever pitch. Even before the opening of the Griffin apartments access to the 5 freeway and the 2 freeway are maximum density during commute hours. Los Feliz is congested for the majority of daylight hours. Atwater Village (our sister neighborhood) would also be impacted by the addition of traffic.

61.2 However the biggest concern is of parity. South Glendale cannot continue to be the area that provides the housing for most to pay for the city up north. Incentives work for builders and not homeowners.

61.3 The environmental impact on the lives of those in South Glendale would be monumental negative. Spread developments. Stop treating south Glendale as second class citizens.

Wendy Fonarow  
Wfonarow@glendale.edu

COMMENTS

RESPONSES

**From:** Xochitl Ruiz [mailto:chemicalxr@gmail.com]  
**Sent:** Monday, March 12, 2018 1:22 PM  
**To:** Krause, Erik <EKrause@Glendaleca.gov>; Stotler, Laura <LStotler@Glendaleca.gov>; Gharpetian, Vartan <VGharpetian@Glendaleca.gov>; Devine, Paula <PDevine@Glendaleca.gov>; Najarian, Ara <ANajarian@Glendaleca.gov>; Sinanyan, Zareh <ZSinanyan@Glendaleca.gov>; Agajanian, Vrej <VAgajanian@Glendaleca.gov>; Beers, Yasmin K <YBeers@Glendaleca.gov>; Manoukian, Rafi <RManoukian@Glendaleca.gov>; Kassakhian, Ardashes AKassakhian@Glendaleca.gov  
**Subject:** South Glendale Community Plan and EIR

**Letter 62 Xochitl**

**Response 62.1-62.5**

This comment letter is the same as an earlier comment letter (Letter No. 3). Refer to responses to comments 3.1 through 3.5.

- 62.1 As a concerned resident and homeowner in this community, I object to the South Glendale Community Plan (SGCP) because:
  - a) contrary to SGCP's claims, it is NOT the vision of our community; it is rather the vision of developers who are the only ones to benefit and whose greedy mega developments have already ruined our community within/bordering the Downtown Specific Plan area;
  - 62.2 b) it suggests an unacceptable, unjustifiable and, most importantly, an unsustainable upzoning of high density areas into mixed use zones, adding new zones for transit areas, as well as changes within the present zoning requirements ( e.g., removal of setbacks in R1250) to allow for more height of buildings and more density of population, which have proved to be harmful for the Glendale community within/bordering the DSP area already;
  - 62.3 c) it is based on the false assumption that people who are close to bus routes and transit areas will use buses and people who live close or at the mixed-use buildings (to be built) with first level retail stores will necessarily find employment in the retail stores, thereby promoting walkability, revitalization and employment in Glendale, whereas these are just practically unrealistic, logically flawed and statistically unsupported speculations; and finally
  - 62.4 d) the Environmental Impact Report (EIR) prepared for the proposed SGCP, with its SEVEN (7) SIGNIFICANT and UNAVOIDABLE adverse ENVIRONMENTAL IMPACTS is PROOF that the new developments and the associated dramatic growth in density of the population expected under the SCGP will irreversibly and permanently affect both the QUALITY OF LIFE and the SAFETY of Glendale residents.

Therefore, the only comment to the EIR is: SGCP is unacceptable and should be discarded.

**COMMENTS**

**RESPONSES**

62.4  
cont. | Moreover, I ask that a new SGCP be drafted with the objective to FIX the environmental impacts caused by or anticipated from the recent DSP area (part of South Glendale) developments and approved projects by: a) DOWNZONING areas in South Glendale to disallow any future mega developments; b) creating MORE OPEN SPACE AND MORE PARKS to counterbalance the shortage created by the constructed or already approved mega developments.

| Additionally, these developments would greatly and negatively impact air quality, specifically increasing greenhouse gas emissions; population and housing; public services; transportation; recreation, and aesthetics.

62.5 | We ask you, as a concerned homeowner, and voting member of this community, to solve the problem now before any of these tactics are implemented and negatively affects the future of this community.

| Best regards,  
Xochitl

**COMMENTS**

**RESPONSES**

**From:** websitemail@glendaleca.gov  
**Sent:** Monday, March 12, 2018 12:40 PM  
**To:** Krause, Erik  
**Subject:** City of Glendale, CA: SGCP EIR Comments

**Letter 63 Catherine Jurca**

**Response 63.1**

The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project. For more analysis regarding responses to comments, please refer to Topical Response No. 5 Recreation - Open Space and Parks.

**Response 63.2**

This comment does not raise a significant environmental issue for which a response is required. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

- 63.1 4.9-40 (Land Use Planning) states that "the DSP accomplishes the following goals and principles of the GDSP": "To significantly increase the amount of public open space and developed parkland in the downtown and surrounding residential neighborhoods." And 4.9-41 states "the proposed SGCP makes further progress toward realizing the following goals of the GDSP": "To significantly increase the amount of public open space and developed parkland in the downtown and surrounding residential neighborhoods." The City's has failed to make any progress toward these goals, and the DEIR makes clear it cannot do so. Even a cursory glance at a map of South Glendale demonstrates the absolute dearth of park space and open land. Nothing guarantees that Development Impact Fees are spent where the development occurs. The DEIR's substantial adverse impact is on top of the already substantial adverse impact that downtown development has had on parks and recreation facilities. That is, the SGCP receives a failing grade on top of a failing grade. The City should not increase development until it has created adequate park space for South Glendale residents who already live here.
- 63.2 4.9-41 (Land Use Planning) Changes to DSP will "include entire properties in the DSP that are currently split between the DSP and citywide zoning, and to incorporate adjacent citywide parcels into the DSP." The DSP was passed with the promise the DSP area would not be expanded. Parcels that are currently split between zones should revert to the zoning that prevails outside the DSP.

**COMMENTS**

**RESPONSES**

63.3 4.9-41 (Land Use Planning) The DEIR repeatedly states that the City’s design review process will save us from bad design. For example, in the DSP section, the DSP purpose is to “Encourage excellence in design and quality of craftsmanship to enhance the Downtown environment.” and “Preserve and enhance the distinctive character of Glendale’s Downtown buildings, streets, and views.” The City’s failure to achieve these goals is related to the provision that the DSP bypass normal process that would otherwise require projects to go before the experts on the Planning Commission and DRB. The pipeline from staff directly to Council is insufficient, in part because of radical under-staffing since the recession, as witness the unattractive, low-quality designs and variances associated with the hotel on Louise and the new building at 222 N. Brand, next to the Alex Theater. Such buildings, both of which are immediately adjacent to National Register historic properties, represent substantial adverse impacts to the Aesthetics of South Glendale. Economic development seems increasingly to take precedence over quality design and thoughtful planning, despite excellent and committed planners on staff. The SGCP should resume normal city processes for the DSP; otherwise the substantial adverse impacts to Aesthetics will only be exacerbated.

**Response 63.3**

The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project. For more analysis regarding responses to comments, see Topical Response No. 4 Aesthetics. Furthermore, revised mitigation measure MM 4.4-1 requires that all properties listed on the National Register/California Register/Glendale Register and properties identified with status codes 1 through 5 in a survey or individual resource assessment be analyzed under CEQA prior to the approval of any entitlements or issuance of permits.

63.4 4.12-9 (Population Housing) Planning staff have indicated in public presentations that zoning changes along some transit corridors (Broadway and Colorado) would take place only after the rapid bus line is added. But here it states that the project proposes “an amendment to Zoning Ordinance and Zoning Map to apply zoning consistent with the proposed SGCP; some or all of which could be approved concurrently with the proposed SGCP at the discretion of City Council.” So it would seem that we could get transit-oriented zoning before there is actually transit, even when the only transit proposed is a bus line. What does the City of Glendale think about the allure of bus service? So little that even though there is frequent bus service between the Glendale Transportation Center up to Glenoaks the City proposes spending more than \$100 million dollars to build a streetcar along Brand. This fact indicates the city’s acknowledgement that buses do not get people out of cars and thus the SGCP’s transit-oriented development will impact parking/traffic in South Glendale even more than described in the DEIR.

**Response 63.4**

Chapter 6 of the SGCP includes the implementation schedule of the Plan. Section 6.1.4, Item 6 of the implementation schedule clearly states that residential densities would increase following expansion of local transit opportunities. The timing of this section would not occur until beyond two years from the adoption of the SGCP, should the City Council adopt the Plan as proposed.

63.5 The DEIR fails to take into account a proposed Small Lot Ordinance, which went to Council on December 11, 2012, and is included as an exhibit at the very end of the staff report for the July 19, 2016 Community Meeting on the SGCP. Staff plan to bring this forward when the SGCP is finished. It calls for a “by right” process and abolition of parking requirements for guests. The number of additional dwelling units that could be created as 2862. The Small Lot Ordinance would increase the substantial adverse impacts of the SGCP in terms of aesthetics, traffic/parking, life/safety, and park/open space but none of this is addressed.

**Response 63.5**

The commenter is incorrect; the Council did not consider a small lot ordinance at the December 11, 2012 hearing nor at any other date. Section 6.1.2 of the Plan does include, under Item 2, timing the consideration of a small lot ordinance within one year of the adoption of the SGCP; however, any changes to the zoning or subdivision ordinance would be reviewed for CEQA impacts at such time an ordinance is brought before the City Council. Any changes to density would also be evaluated at that time.

**COMMENTS**

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63.6 Mitigation Measures 4.4.-1 (Cultural Resources): Projects involving properties given a status code of 5S3 (appears eligible for the Glendale Register) will go through a separate CEQA review; demolition of 6L properties ["may warrant special consideration in planning"] will be allowed "without further environmental review." The lack of further environmental review for any property except those identified as 5S3 is currently less protection than older and potentially historic buildings in Glendale currently enjoy and thus can hardly count as mitigation for the SGCP's impacts on historic resources. Currently owners of houses, especially Craftsmans, built through the 1920s, are routinely required to produce a historic resource assessment before a demolition permit can be issued if the property retains sufficient integrity, even if it is not significant for its architecture. The assessment is focused and identifies prior owners and residents of the properties to determine if someone of significance in the history of Glendale, the state, or the nation is associated with it or if an important event in the history of the city, the state, or the nation took place there. Association with significant individuals or events would render the property eligible for the Glendale Register, the California Register, or the National Register and a historic resource under CEQA. The South Glendale Historic Resources Survey prepared by HRG did not do adequate research into prior owners and residents and events for 6L or 5S3 identified properties; thus it is not a substitute for a focused assessment that looks only at significant associations. HRG did not pay attention to the fact that streets across South Glendale were renumbered in 1919 and thus unsurprisingly were unable to find residency information for early owner/occupants. There are no permits for these buildings due to a fire at City Hall, so unless they "walk back" the actual addresses they lack crucial information about early associations. Also, City directories were unavailable (they had been sent to Ancestry for digitization) when they did their research, so another research avenue was closed to them. Unfortunately, only one DPR form is available from HRG, for the property at 361 Myrtle St, which can be compared with an independent evaluation prepared by Sapphos. HRG missed that Joseph K. Tobin was the owner of the property from 1920-1922. They date David Green's association with the property to 1925 because of a permit; he owned and occupied it beginning in 1923. They cite a 1930 directory showing he lived there in that year; they neglect to mention that he lived there with his wife Bertha. they occupied the property from 1923 until 1939; she remained there until 1953. We are not claiming that 361 Myrtle was eligible for its associations, only that HRG's research did not provide sufficient information for a case to be made one way or another. HRG did no research at all on high-integrity properties from the 1920s that they did not find to be at least 6L or 5S3 based on their architecture; without additional research into owners/residents/events the chances that the city will demolish historic resources—as it came close to doing in the case of Clifford Cole's residence at 132 N. Kenwood, which City Council found to be a historic resource after evidence of Cole's ownership/residency and significance to the community were demonstrated—are high, which would be substantial adverse impacts on the environment.

**Response 63.6**

The SGCP does not proposed any changes to current practices for evaluating properties designed as 6L. Furthermore, revised mitigation measure MM 4.4-1 requires that all properties listed on the National Register/California Register/Glendale Register and properties identified with status codes 1 through 5 in a survey or individual resource assessment be analysis under CEQA prior to the approval of any entitlements or issuance of permits.

**COMMENTS**

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1. **Maro Yacoubian** - speaking as a resident, not as Chairperson of the Transportation and Parking Commission
  - a) DEIR Section 4.13-4. Impacts to Police Services would be significant and unavoidable. No solution to provide proper police services for an increased population.
  - b) DEIR Section 4.15-5. Implementation of the proposed project would conflict with an applicable congestion management program including, but not limited to, level of service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways.
  - c) We are putting in all this development and we have it as 2040, but let us be realistic looking at the implementation plan—with all the approvals scheduled to be implemented within one or two years, everything is happening at once, it will be like an 1849 land grab for gold. I am concerned that this area will become a ghetto and too thickly populated, while not providing the levels of public services needed.
  - d) We are doing it backwards and should address the quality of life issues that currently face South Glendale. Should start implementing the measure from the Pedestrian Action Plan, but this SGCP is a disaster and it will not take until 2040 until this area of Glendale is completely bombarded with development. Bringing people into Southern Glendale does not mean that they will start taking the bus.
  
2. **Ara Kurkjian** - speaking as a resident, not as a member of the Transportation and Parking Commission
  - a) Glendale is shaped like a triangle and we do not have perfectly aligned East-West and North-South thoroughfares like Pasadena or other neighboring cities. (ex. Central, San Fernando Road, Glenoaks, Glendale Ave). Adding additional units in South Glendale will cause a transportation nightmare because our streets are not aligned.
  - b) We want to develop responsibly and don't want to give exemption to parking standards. Developers need to comply with parking requirements. Apartments should come with parking and property owner should not have the ability to have parking rented separately to residents.
  - c) Streets are congested due to lack of parking spaces or use of parking spaces, especially in South Glendale. Everyone is renting their parking spaces. This is true for both residential and non-residential businesses.

**Response 1.a**

The Draft EIR determined that impacts on Police Services would be significant and unavoidable based on a standard ratio of 2 officers per 1,000 residents (2/1,000). With the amount of development anticipated for the plan, the ratio would be 1.2/1,000. Although this standard is not currently met, the SGCP would exacerbate this deficiency. The only feasible mitigation measure would be to hire the additional officers necessary to reach a ratio of 2/1,000.

**Response 1.b**

This commenter is correct. The Draft EIR determined that impacts would be significant and unavoidable for 27 intersections at either the morning or evening peak periods. Five of the 27 intersections could be fully mitigated to less than significant leaving 22 intersections as significant and unavoidable.

**Response 1.c**

This comment does not raise a significant environmental issue for which a response is required. The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 1.d**

Please refer to response to comment 1.c above.

**Response 2.a**

Please refer to response to comment 1.c above.

**Response 2.b**

Parking is not considered an impact category under CEQA as discussed in Topical Response No. 3 Transportation, Traffic, and Parking on page 8-7 of the Final EIR. In addition, please refer to response to comment 1.c above.

**Response 2.c**

Please refer to response to comment 1.c and 2.b above.

**COMMENTS**

**RESPONSES**

- d) Not having enough off-street parking spaces impacts business. More people are losing businesses due to lack of off-street parking for customers. More development without adequate off-street parking will continue this trend-stop issuing CUPs for development with inadequate parking.
- e) Bike lanes will remove street lanes. We need to take dedications on new development in order to have adequate width for bike lanes.
- f) With regard to public transportation, buses need a carve out on the street for bus stops. If we have more people taking bicycles, they will need more time to put the bikes on buses. The buses block travel lanes now while they are stopped for people to put on bikes. Having more bus carve outs will allow traffic to pass while buses are stopped and improve traffic flow.

**3. Jennifer Barrios**

- a) Projects ask for variances for parking and these projects are massive. This is making a bad parking situation worse in South Glendale. Need to have more parking available on-street and off-street in all new developments.
- b) Need to provide more open space in new developments. New projects tear down single family homes that have front yard lawns and back yards and we lose these open areas. Stop giving variances for open space.
- c) Wants the SGCP to address alleviation of parking problems, open space and parks, not just new units.
- d) Pacific Edison and San Fernando is an area with bad traffic. There is an elementary school, library, park and other areas with children here and the traffic makes streets unsafe. Need more traffic safety in this area.

**4. Matt Dixon**

- a) Like what has happened in the Downtown because there is now something to do there. People are living there and it's walkable. Infill is better for sustainability, so we should keep doing this.

**Response 2.d**

Please refer to response to comment 1.c above.

**Response 2.e**

Please refer to response to comment 1.c above.

**Response 2.f**

Please refer to response to comment 1.c above.

**Response 3.a**

Please refer to response to comment 2.b above.

**Response 3.b**

Please refer to response to comment 1.c above.

**Response 3.c**

Please refer to response to comment 1.c above.

**Response 3.d**

Please refer to response to comment 1.c above.

**Response 4.a**

Please refer to response to comment 1.c above.



**COMMENTS**

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**5. Steven Mack**

- a) Transportation items need to be implemented prior to changing zoning and allowing more infill development.
- b) Even shade can be good in summer, so not all larger development is bad.
- c) Park space in Glendale is hard to do, but needs to be addressed. Needs to be real park space, not just a paseo, but a real green park.
- d) Police and Fire, both departments are understaffed and we are not meeting our goal for staffing and response times. We need to up staffing to accommodate the new population growth.

**6. Lorna Vartanian - President Rossmoyne-Mountain Homeowners Association**

- a) The proposed level of growth is unacceptable and inappropriate. Seven quality of life categories are identified in the DEIR (Aesthetics, Air Quality, GHG Emissions, Population and Housing, Public Services, Recreation and Transportation) that will be impacted at significant and unavoidable levels without proposed mitigation measures. We are looking at a blueprint to build without the infrastructure to support it. We are creating transit-oriented development without the appropriate transportation in place. This is confirmed by the numerous instances where the DEIR states that the anticipated impacts due to increases in vehicular traffic cannot be mitigated. For example the following three intersections on page 6, Section 4.15 operate at a level of F during peak hours and will get worse: Pacific Avenue at 134 westbound, Pacific Avenue at 134 East bound and Glendale Avenue at Monterey Road, an intersection at the entrance to the Rossmoyne-Mountain neighborhood. In addition, year 2040 project Table 4.15-9 on page 29 indicates Brand & Los Feliz was rated B during the AM peak hour and is rated F by 2040. This same intersection during the PM peak hour in 2016 was rated C and is rated F in 2040, San Fernando Road at Los Feliz was rated C in 2016 during the AM peak hour and is rated F in 2040 and the same intersection is rated E in 2016 during the PM peak hour and is rated F by 2040.

**Response 5.a**

Chapter 6 of the SGCP includes the implementation schedule of the Plan. Section 6.1.4, Item 6 of the implementation schedule clearly states that residential densities would increase following expansion of local transit opportunities. The timing of this section would not occur until beyond two years from the adoption of the SGCP, should the City Council adopt the Plan as proposed.

**Response 5.b**

Please refer to response to comment 1.c above.

**Response 5.c**

Please refer to response to comment 1.c above.

**Response 5.d**

The Draft EIR determined that impacts associated with Police and Fire would be significant and unavoidable. Please refer to response to comment 1.a and 1.c above.

**Response 6.a**

The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project. The commenter is correct in stating there will be significant impacts to traffic associated with implementation of the proposed SGCP.

**COMMENTS**

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- b) There are 22 intersections of the ones studied for which no feasible mitigations are identified. Nothing in the DEIR or the Community Plan can guarantee future transportation or funding for that transportation, from Metro or anywhere else.
  - c) There is also no timeline that manages at what pace the growth will occur and whether or not housing will be built at the same pace as transportation. In other words, all of the buildings could go up before anything is in place to mitigate our already congested streets and failing intersections. The community is already unhappy with what has happened in the soon to be expanded boundaries of the Downtown Specific Plan (DSP). This overaggressive plan is unacceptable and must be rejected.
7. **Nairi Shabatian** - Board member of the Park Central Homeowner Association, representing over 90 Glendale residents
- a) The Downtown Specific Plan (DSP) has already affected their neighborhood quality of life adversely. Roadways are overcrowded, there is no parking, open spaces and parks have disappeared, rents have increased and there is a housing crisis, especially in South Glendale.
  - b) Other mega projects are on the way so impacts will become worse.
  - c) We have already experienced disastrous mixed-use developments, where mega developments are built on narrow streets one lane each direction, where street parking becomes eliminated and instead parking permit districts are designated creating financial and administrative burdens for the public.
  - d) Only a few affordable units are provided in those buildings, some have no affordable units.
  - e) The first level commercial businesses do not have parking for their customers and this worsens the parking shortage for Glendale residents.
  - f) The DEIR identifies seven impacts that are significant and unavoidable (Aesthetics, Air Quality, Greenhouse Gas Emissions, Population and Housing, Public Services, Recreation and Transportation). These impacts jeopardize the mental and physical health of residents. These impacts have no mitigation, even with Alternative 1.
  - g) Reject the South Glendale Community Plan and develop a new one. It should focus on community needs for recreation, more open space and parks and more parking lots to counter balance the lack of on-street parking.

**Response 6.b**

The commenter is correct about the uncertainty of future transportation grants or funding. However, as stated in response to comment 5.a above, the density of the plan is predicated on the future expansion of local transit opportunities.

**Response 6.c**

Please refer to response to comment 5.a above. This comment will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 7.a – 7.e**

Please refer to response to comment 1.c above.

**Response 7.f**

The commenter is correct, adoption of the SGCP as proposed with result in significant and unavoidable impacts where no feasible mitigation measures are available to reduce impacts to less than significant levels. Please refer to response to comment 1.c above.

**Response 7.g**

Please refer to response to comment 1.c above.

**COMMENTS**

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**8. Catherine Jurca**

- a) This DEIR is upfront with assessing impacts of the project. Seven fundamental quality of life issues will be impacted to a significant and unavoidable level.
- b) The baseline is what is here now. While there are advantages to growth, there are a lot of problems with it. Especially given the pace of development, without necessary infrastructure.
- c) Park space in South Glendale is deficient. Need more than just paved sidewalks and plazas. Need real, green parks.
- d) Concerned with transit-oriented development around the rail station. Treating the Metrolink Station as if it were light rail is a concern. The Metrolink Station in Glendale has only 15 trains a day which is not going to compel people to leave their cars behind. Rapid bus is not going to compel people to leave their cars, either. The existing rapid bus on Broadway is underutilized and adding more BRD is not going to change that and make a dent in our transportation and traffic issues.
- e) The small lot ordinance is interesting because it is not really addressed in the DEIR. Small lot development increases density on lots where they are built. A single-family home would be removed and replaced with multiple small lots. Need to consider these in the DEIR—may have impacts.
- f) In support of doing No Project in the South Glendale Community Plan.

**9. Lucia Segladjian, MD**

- a) Concerned that the building of new complexes increases dust exposure, noised, increased pollution. Pollution is very hazardous for kids and the elderly. Concerned with the well-being and safety of residents and the community that may be threatened by more development.

**Response 8.a**

Please refer to response to comment 1.c and 7.f above.

**Response 8.b**

The environmental setting at the time the notice of preparation is published will normally constitute the baseline as is the case with the proposed Plan [CEQA Guidelines Section 15125 (a)]. Please refer to response to comment 1.c above.

**Response 8.c**

Please refer to response to comment 1.c above.

**Response 8.d**

The comment represents an opinion that will be documented with the Final EIR and made available for consideration by City Council before making a decision on the project.

**Response 8.e**

Section 6.1.2 of the Plan does include, under Item 2, timing the consideration of a small lot ordinance within one year of the adoption of the SGCP; however, any changes to the zoning or subdivision ordinance would be reviewed for CEQA impacts at such time an ordinance is brought before the City Council. Any changes to density would also be evaluated at that time.

**Response 8.f**

Please refer to response to comment 8.d above.

**Response 9.a**

The commenter is raising concerns with noise and air quality impacts associated with sensitive users. These impact areas are included in Sections 4.2 Air Quality and 4.11 Noise of the EIR. Regarding air quality, potential impacts to sensitive users were evaluated and mitigation measure are included in the Plan what would reduce impacts to less than significant levels for both construction and operation. These include mitigation measures MM 4.2-1 through 4.2-4. Cumulative impacts however would remain significant and unavoidable. Similar to air quality impacts, potential noise impacts to sensitive users were evaluated and mitigation measure are included in the Plan what would reduce impacts to less than significant levels for both construction and operation. These include mitigation measures MM 4.11-1 through 4.11-5.

**COMMENTS**

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**10. Rondi Werner**

- a) Alarmed by the SGCP because the significant and unavoidable impacts identified in the DEIR will harm Glendale.
- b) Glendale wanted to choose the most aggressive plan to study in South Glendale because that is a worst case scenario.
- c) We need a plan that does not lessen the quality of life.
- d) Seemed confusing that the bicycle plan was rolled into this one when it hasn't been voted on yet, when it looked like that plan was going to make things go from bad to worse as far as levels of service at intersections (ex. from B to F, etc.). It almost looks like the plan is to make driving so horrendous that people leave their cars at home. It doesn't really take into account that these are commuter hours and these are when people are coming here to work and most don't have a workable option.
- e) Transit-oriented development is interesting to talk about, but Glendale does not have a decent transportation system. It is not integrated, it is not high quality. To point at Amtrak as though that's a viable option for people to get around Glendale or even to get to Glendale when it's primarily people going through Glendale seems disingenuous at best. It seems they should pause this completely, develop decent transportation systems and then talk about transit-oriented development.

**11. Greg Astorian - Planning Commission Chairperson**

- a) Was there public outreach on the South Glendale Community Plan, other than the meetings with Council in summer 2016?
- b) I have a question about the affordable housing overlay as shown as blocks along certain roadways. This isn't the only place where affordable housing is anticipated or can be provided, correct? We are not inferring that that is the only areas where affordable housing can go?

**Response 10.a**

Please refer to response to comment 1.c and 7.f above.

**Response 10.b**

The proposed project along with the alternatives were identified following three public workshops with Council on July 12, July 19 and July 26, 2016. These alternatives primarily differ by the expanding availability of public transportation and planned housing/mixed use along transportation corridors and commercial centers.

**Response 10.c**

Please refer to response to comment 8.d above.

**Response 10.d**

The Bicycle Transportation Plan (BTP) is included as part of the baseline conditions of the EIR since it was adopted by City Council on August 28, 2012 and is part of the travel demand model. In addition, the Glendale Citywide Pedestrian Plan, although it has not yet been adopted, was included in the analysis as a related project pursuant to CEQA Guidelines 15130.

**Response 10.e**

There are several transportation options the city is actively pursuing to increase transit options for Glendale residents. As discussed in response to comment 5.a above, density increases are tied to creating these new modes of transportation, such as the street car and bus rapid transit lines.

**Response 11.a**

Public outreach is in Chapter 5 of the South Glendale Community Plan. Specific meetings to discuss the SGCP included in Chapter 5, Section 5.2 on pages 5-4 and 5-5.

**Response 11.b**

During the three workshops identified in response to comment 10.b above, council requested that the SGCP look at placing an affordable housing overlay along the corridors where the expansion of transit service is anticipated. This is not meant to infer that the corridors are the only place where affordable housing can be constructed.

**COMMENTS**

- c) The numbers with “no project” are 2,587 units (interesting how accurate these numbers are) and are projected to yield 6,985 residents whether we like it or not by 2040. Versus, the full-fledged project which is in front of us that proposes 10,300 units and yielding 27,000 residents—and alternatives somewhere in between. We are living in a state that last year passed somewhere around 15 different laws related to affordable housing. I believe this EIR, regardless of the level of the project, which City Council will certify is light on addressing the issue of affordable housing. One of my suggestions is that the EIR should clearly state what affordable housing means.
- d) What is AMI for low, moderate and “workforce” housing? What does this mean for rents? We need to be more direct with that.
- e) I believe that now is the time for this City and this EIR to start considering, regardless of the alternatives chosen, inclusionary housing as a requirement for affordable housing. Inclusionary housing is the only way you will be able to get affordable housing developed. You have to incentivize development of affordable housing, but that is a discussion for a different day. I believe the City Council has already commissioned Kaiser-Marston to do a study of affordable housing and inclusionary housing so this definitely needs to be addressed in South Glendale.
- f) On your EIR 4.12.1- Population and Housing. It is of utmost importance that this Council hears that affordability is a huge issue here and a statewide issue. People are paying upwards of 50% of their income for rent. Unless we address this issue we will always be behind the eight ball. When the Downtown Specific Plan was adopted, it created what it needed to. Now we need to change course and we need to focus attention on affordable housing and how to incentivize that.
- g) Now, I want to focus attention on Appendix B, Section 12 Historic Resources Survey. I watched the Myrtle Street issue last night at Council [March 6, 2018 CC meeting 6pm]. The first question I have is that anywhere between 400-680 properties will be impacted by the proposed designations identified in this study. It is important to me that these property owners be notified. We have to do an outreach to the property owners of these properties. Same thing for the property owners of land proposed for zone changes next to downtown.
- h) Senate Bill 827 [current year 2018] by an Oakland Senator is a big issue and everyone should look at this. Even at the project density proposed as part of the South Glendale Community Plan, it pales in comparison with Senate Bill 827. So, the DEIR should at least give up an opinion of what will happen to this Community Plan if this bill is adopted.

**RESPONSES****Response 11.c**

The information presented to the Planning Commission at the March 7<sup>th</sup> meeting were estimates. The project amount in the Plan, which is based on capacity at sites anticipated to turn over by 2040, is 10,337 units and 27,910 residents. The term affordable housing used in the plan is the definition established by the State of California Health and Safety Code Sections 50079.5 (low income), 50093 (very low income) and 50105 (moderate income).

**Response 11.d**

See response to comment 11.c above.

**Response 11.e**

A discussion of inclusionary housing is scheduled to go before the City Council in summer of 2018. Currently the city has an inclusionary housing ordinance in place (GMC Chapter 3.35) that applies only the former San Fernando Corridor Redevelopment Area.

**Response 11.f**

See response to comment 11.b and 11.d above.

**Response 11.g and 11.h**

See response to comment 1.c above.

**COMMENTS**

- i) Where is the public benefit to this plan? Where are the parks? If we don't have parks we create conflicts.
- j) Congestion? We can't have the cart before the horse for transportation.
- k) We need affordable housing.
- l) Where is the public benefit for the residents of the City of Glendale?
- m) This DEIR needs to reflect these comments—Affordability and Parks—no matter the alternative chosen.

**12. Talin Shahbazian - Planning Commissioner**

- a) There is a lack of open space in South Glendale. Discussion of open space is still missing in the plan and needs to be addressed.
- b) Another missing item relates to Police and Fire. For Fire we should consider putting a Civic designation on the plan for land use to accommodate future fire stations.
- c) A general comment, bringing back the Downtown Specific Plan area into the review process used elsewhere in the City, whereby various boards and commissions review development proposals, should be considered. Right now projects in the downtown go directly to Council and do not benefit from assessment from review from all the Commissions. Having downtown development exposed to different Boards and Commissions will allow each Commission to identify issues, concerns and provide recommendations to Council concerning how to address these issues. This isn't something that is in the South Glendale Community Plan, but is something that will help improve development within the South Glendale project area.

**13. Leonard Manoukian - Planning Commissioner**

- a) Eventually I think we will need a new high school property, probably in South Glendale. Has anyone reached out to GUSD about where they would put this high school? They would need to find land (look how much is taken by Glendale High), and purchase it. Glendale High School is filled to the brim now, so by 2040, eventually we are going to need more space for schools.
- b) Open Space and Park Space, we need to address that and I agree with other Commissioners.

**RESPONSES**

**Response 11.i**

Please refer to Topical Response No. 5 Recreation – Parks and Open Space.

**Response 11.j**

Please refer to response to comment 5.a.

**Response 11.k – 11.m**

Please refer to response to comment 5.a, 11.b and 11.d above.

**Response 12.a**

Please refer to Topical Response No. 5 Recreation – Parks and Open Space.

**Response 12.b**

Please refer to response to comment 1.c above.

**Response 12.c**

Please refer to response to comment 1.c above.

**Response 13.a**

Impacts on public services such as police, fire and schools were evaluated in Section 4.13.3 of the Draft EIR. Implementation of the proposed SGCP would increase the number of students attending GUSD schools within the proposed SGCP area; however, payment of development impact fees has been deemed to provide full and complete school facilities mitigation. Therefore, the proposed project would reduce the potential impacts on schools to a less than significant level.

**Response 13.b**

Please refer to Topical Response No. 5 Recreation – Parks and Open Space.

**COMMENTS**

**RESPONSES**

**14. Chang Lee** - Planning Commissioner

**Response 14.a**

- a) Where did this aggressive growth in the Community Plan come from? I know it was directed by Council to study this. Growth in the Community Plan needs to be responsible. Why was an aggressive plan chosen for study?

Please refer to response to comment 10.b above.

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