

GLENDAL LINK PROJECT

Final Environmental Impact Report



Submitted to:
City of Glendale
633 East Broadway, Room 103
Glendale, California 91206

Submitted by:



IMPACT SCIENCES, INC.

638 East Colorado Boulevard
Suite 301
Pasadena, CA 91101
(805) 437-1900

November 2013

GLENDALE LINK PROJECT

Final

Environmental Impact Report

Prepared for:

City of Glendale
633 East Broadway, Room 103
Glendale, California 91206

Prepared by:

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

November 2013

TABLE OF CONTENTS

Section	Page
1.0 Summary	1.0-1
2.0 Corrections and Additions.....	2.0-1
3.0 Responses to Comments.....	3.0-1
Topical Responses	
Topical Response 1	3.0-4
Topical Response 2	3.0-10
State and Local Agencies	
Letter No. 1. State of California, Native American Heritage Commission, September 17, 2013	3.0-12
Letter No. 2 California Department of Transportation, October 8, 2013.....	3.0-16
Private and Local Organizations	
Letter No. 3 Glendale Historical Society, October 14, 2013.....	3.0-21
Letter No. 4 Los Angeles Conservancy, October 14, 2013.....	3.0-58
Letter No. 5 Citizens Advocating Rational Development, October 13, 2013.....	3.0-66
Individuals	
Letter No. 6 Diane Lewis, October 7, 2013	3.0-76
Letter No. 7 Randall Bloomberg, October 7, 2013	3.0-78
Letter No. 8 Ely Lester, October 7, 2013.....	3.0-80
Letter No. 9 Carolyn West, October 7, 2013	3.0-82
Letter No. 10 Judy Bruce, October 7, 2013.....	3.0-84
Letter No. 11 Linkhorst, October 7, 2013	3.0-86
Letter No. 12 Joemy Wilson, October 8, 2013.....	3.0-88
Letter No. 13 Cathy Green, October 8, 2013.....	3.0-90
Letter No. 14 Sam Manoukian, October 8, 2013	3.0-92
Letter No. 15 Alexander Sardarian, October 8, 2013.....	3.0-94
Letter No. 16 David Alishan, October 8, 2013.....	3.0-96
Letter No. 17 John Ballon, October 8, 2013	3.0-98
Letter No. 18 Matteo Bitetti, October 8, 2013	3.0-100
Letter No. 19 Lawrence Cimmarusti, October 9, 2013	3.0-102
Letter No. 20 Pierre Chraghchian, October 9, 2013.....	3.0-104
Letter No. 21 Ara Aroustamian, October 9, 2013	3.0-106
Letter No. 22 Ellen Svaco, October 10, 2013	3.0-108
Letter No. 23 Nancy Bain, October 10, 2013.....	3.0-110
Letter No. 24 Bruce Merritt, October 10, 2013.....	3.0-112
Letter No. 25 Sue Flocco, October 10, 2013.....	3.0-114
Letter No. 26 Tom Jacobsmeier, October 10, 2013.....	3.0-117
Letter No. 27 Alex Avakian, October 10, 2013	3.0-119
Letter No. 28 Paul Berolzheimer, October 11, 2013.....	3.0-121
Letter No. 29 Albert Babayan, October 11, 2013.....	3.0-123
Letter No. 30 Marty Bracciotti, October 11, 2013.....	3.0-126
Letter No. 31 Kama Hayes, October 11, 2013.....	3.0-128
Letter No. 32 Rima Cameron, October 11, 2013.....	3.0-130
Letter No. 33 Janet Harootun, October 11, 2013	3.0-132

Letter No. 34	Gilda Killeen, October 11, 2013	3.0-134
Letter No. 35	Tatiana Eremima, October 11, 2013	3.0-136
Letter No. 36	Janine Massoomian, October 11, 2013	3.0-138
Letter No. 37	Denise Walker, October 11, 2013	3.0-140
Letter No. 38	Anita Rinaldi-Harnden, October 11, 2013	3.0-142
Letter No. 39	Catherine Jurca, October 11, 2013	3.0-144
Letter No. 40	Sonia Montejano, October 11, 2013	3.0-147
Letter No. 41	Ruth Campbell, October 11, 2013	3.0-149
Letter No. 42	Alex Rojas, October 11, 2013	3.0-151
Letter No. 43	Marilyn Oliver, October 11, 2013	3.0-153
Letter No. 44	Scott Lasken, October 11, 2013	3.0-155
Letter No. 45	Ara Mirzayan, October 12, 2013	3.0-157
Letter No. 46	Anita Weaver, October 12, 2013	3.0-159
Letter No. 47	Viktoryia Shypkova, October 12, 2013	3.0-161
Letter No. 48	Richard Lee, October 13, 2013	3.0-163
Letter No. 49	Don Savarese, October 13, 2013	3.0-165
Letter No. 50	Marcia Hanfor, October 13, 2013	3.0-167
Letter No. 51	Christina Rizzo, October 13, 2013	3.0-169
Letter No. 52	Jeff Sredni, October 13, 2013	3.0-171
Letter No. 53	Sean Bersell, October 14, 2013	3.0-173
Letter No. 54	Desiree Shier, October 14, 2013	3.0-180
Letter No. 55	Scott Fraser, October 14, 2013	3.0-182
Letter No. 56	Stephanie Schus, October 14, 2013	3.0-184
Letter No. 57	Tony Riccio, October 14, 2013	3.0-186
Letter No. 58	Gerri Cragnotti, October 14, 2013	3.0-191
Letter No. 59	Judy Cabrera, October 14, 2013	3.0-193
Letter No. 60	Ute Baum, October 14, 2013	3.0-195
Letter No. 61	Sharon Weisman, October 14, 2013	3.0-197
Letter No. 62	Bill Nicoll, October 14, 2013	3.0-199
Letter No. 63	Anna Rundle, October 14, 2013	3.0-201
Letter No. 64	Jean Christensen, October 14, 2013	3.0-203
Letter No. 65	Talin Zadourian, October 14, 2013	3.0-205
Letter No. 66	Elizabeth Berry, October 14, 2013	3.0-207
4.0	Mitigation Monitoring and Reporting Program	4.0-1

Appendices

F01	Supplemental Historical Report
F02	Feasibility Analysis
F03	Traffic

LIST OF TABLES

Table		Page
1.0-1	Summary Table of Project Impacts and Mitigation Measures	1.0-6
4.0-1	Mitigation Monitoring and Reporting Program Matrix.....	4.0-2

1.0 SUMMARY

CEQA REQUIREMENTS

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

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

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

The Final EIR shall consist of:

- (a) The Draft EIR or a revision of the Draft.*
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.*
- (c) A list of persons, organizations, and public agencies comment on the Draft EIR.*
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.*
- (e) Any other information added by the Lead Agency.*

USES OF THE FINAL EIR

The Final EIR allows the public and the decision makers an opportunity to review revisions to the Draft EIR, the response to comments, and other components of the EIR, such as the Mitigation Monitoring Program, prior to approval of the project. The Final EIR serves as the environmental document to support approval of the proposed project, either in whole or in part.

After completing the Final EIR, and before approving the project, the Lead Agency must make the following three certifications as required by Section 15090 of the *State CEQA Guidelines*:

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

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

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

REVISIONS TO THE DRAFT EIR

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

PROJECT LOCATION AND SETTING

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

PROJECT CHARACTERISTICS

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

OBJECTIVES OF THE PROJECT

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

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

SIGNIFICANT IMPACTS

The Draft EIR identified the following significant impacts:

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

ALTERNATIVES TO THE PROJECT

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

- **Alternative 1 – No Project/No Development Alternative**

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

- **Alternative 2 – Reduced Density/Reuse of 3901 San Fernando Road**

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

- **Alternative 3 – Industrial Only Alternative**

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

residential component associated with this alternative would reduce the demand for parks and recreational facilities.

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

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

Comparison of Alternatives

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

Of the other alternatives considered, the Industrial Only Alternative would avoid significant recreation impacts, but would not achieve key project objectives related to strengthening the vitality of south Glendale through creating transit oriented housing opportunities. The Reduced Density/Reuse Alternative is considered environmentally superior, as it substantially reduces construction related noise impacts and would achieve most of the project objectives, although as demonstrated in Table 7.0-1

Alternative 2 would attain the project objectives to a lesser extent than the proposed project. As described in Section 7.0 Alternatives of the Draft EIR, and in the Responses to Comments, the Reduced Density/Reuse Alternative would not be economically feasible. Appendix F02 provides economic details that demonstrate that the resulting revenue that could be attained with the Reduced Density/Reuse Alternative would not be sufficient to offset the cost of the land and Alternative 2 would not be economically feasible for this reason.

AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

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

- Demolition of the 3901 San Fernando Road structure.

ISSUES TO BE RESOLVED

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

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

SUMMARY OF PROJECT IMPACTS

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

**Table 1.0-1
Summary Table of Project Impacts and Mitigation Measures**

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
AESTHETICS			
Project Impacts			
The project would not have a substantial adverse effect on a scenic vista.	Less than significant.	None are required.	Less than significant.
The project would not substantially degrade the existing visual character or quality of the site and its surroundings.	Less than significant.	None are required.	Less than significant.
The project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Less than significant.	None are required.	Less than significant.
The project would not shade currently unshaded uses located off the site that are sensitive to shadow, such as residences, school playgrounds, parks, etc., for more than two continuous hours between 9:00 AM and 3:00 PM during the winter, or 9:00 AM and 5:00 PM during the summer.	Less than significant.	None are required.	Less than significant.
Cumulative Impacts			
The project and related projects would not have a substantial adverse effect on a scenic vista.	Less than significant.	None are required.	Less than significant.
The project and related projects would not substantially degrade the existing visual character or quality of the site and its surroundings.	Less than significant.	None are required.	Less than significant.
The project and related projects create new sources of substantial light or glare, which would adversely affect day or nighttime views in the area.	Less than significant.	None are required.	Less than significant.

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
AESTHETICS (continued)			
Cumulative Impacts (continued)			
The project and related projects shade currently unshaded uses located off the site that are sensitive to shadow, such as residences, school playgrounds, parks, etc., for more than two continuous hours between 9:00 AM and 3:00 PM during the winter, or 9:00 AM and 5:00 PM during the summer.	Less than significant.	None are required.	Less than significant.
AIR QUALITY			
Project Impacts			
The project would not conflict with or obstruct the implementation of the applicable air quality plan.	Less than significant.	None are required.	Less than significant.
The project would not exceed SCAQMD thresholds for criteria pollutants during construction or operation.	Less than significant.	None are required.	Less than significant.
The project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation as a result of operational activity.	Less than significant.	None are required.	Less than significant.
The project would not expose sensitive receptors to substantial pollutant concentrations.	Less than significant.	None are required.	Less than significant.
The project would not create objectionable odors affecting a substantial number of people.	Less than significant.	None are required.	Less than significant.
Cumulative Impacts			
Construction and operational emissions would not exceed the SCAQMD project-level thresholds of significance.	Less than significant.	None are required.	Less than significant.

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
CULTURAL RESOURCES			
Project Impacts			
The project would not result in the demolition of a resource of national, state, or local significance.	Less than significant	None are required.	Less than significant.
The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	Potentially significant	4.3-1 In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 200-meter (656-foot) radius shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. The appropriate mitigation measures may include recording the resource with the California Archaeological Inventory database or excavation, recordation, and preservation of the sites that have outstanding cultural or historic significance.	Less than significant.
The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Potentially significant	4.3-2 In the event that paleontological resources are unearthed during project subsurface activities, all earth-disturbing work within 100-meter (328-foot) radius shall be temporarily suspended or redirected until a paleontologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. The appropriate mitigation measures may include recording the resource with the California Inventory database or excavation, recordation, and preservation of the sites that have outstanding paleontological significance.	Less than significant.

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
CULTURAL RESOURCES (continued)			
Project Impacts (continued)			
The proposed project would not disturb any human remains, including those interred outside of formal cemeteries.	Potentially significant	4.3-3 If human remains are unearthed, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendant of the deceased Native American, who will then serve as consultant on how to proceed with the remains (i.e., avoid, reburial).	Less than significant
Cumulative Impacts			
The proposed project would result in the loss of a locally important resource. The nearby related projects are not historic resources and therefore would not result in a cumulative loss of historic resources.	Less than significant.	None are required.	Less than significant.

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
GEOLOGY AND SOILS			
Project Impacts			
The proposed project would not expose people or structures to strong seismic ground shaking.	Less than significant	None are required	Less than significant.
The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving ground failure including liquefaction.	Less than significant	None are required	Less than significant
The proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	Potentially significant	4.4-1 Geotechnical recommendations 7.1 through 7.11 contained in Section 7.0, Recommendations, of the Geotechnical Investigation Report prepared for the proposed project by Garcrest Engineering and Construction, Inc., dated May 2013, shall be implemented during project construction.	Less than significant
The proposed project would not be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life and property.	Less than significant	None are required	Less than significant
Cumulative Impacts			
The proposed project would not contribute to a cumulatively considerable impact related to geology and soils, impacts would be less than significant.	Less than significant	None are required	Less than significant
GREENHOUSE GAS EMISSIONS			
Project Impacts			
The proposed project would not generate GHG emission that would exceed SCAQMD thresholds.	Less than significant	None are required	Less than significant
The proposed project would not conflict with applicable plans or policies related to greenhouse gas emissions.	Less than significant	None are required	Less than significant
Cumulative Impacts			
The projects contribution to cumulative greenhouse gas emissions would be less than significant.	Less than significant	None are required	Less than significant

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
LAND USE AND PLANNING			
Project Impacts			
The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	Less than significant.	None are required.	Less than significant.
Cumulative Impacts			
The proposed project and related projects would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed project and related projects (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	Less than significant.	None are required.	Less than significant.
NOISE			
Project Impacts			
The proposed project would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Less than significant.	None are required.	Less than significant.
The proposed project would not result in a substantial permanent increase in ambient noise levels in the project site vicinity above levels existing without the proposed project.	Less than significant.	None are required.	Less than significant.

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
NOISE (continued)			
Project Impacts (continued)			
The proposed project would not result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	Significant.	<p>4.7-1 The applicant shall provide notification to adjacent residences at least 10 days in advance of construction activities that are anticipated to result in vibration levels above the thresholds.</p> <p>4.7-2 Prior to issuance of a demolition permit, the applicant shall submit a construction plan to the City for review and approval. The construction plan shall include phases of construction, anticipated equipment, and timetables for each phase/equipment type. The following features shall be included in the construction plan:</p> <ul style="list-style-type: none"> • Demolition, earthmoving, and ground-impacting operations shall be conducted so as not to occur in the same period. • Demolition methods shall minimize vibration, where possible (e.g., sawing masonry into sections rather than demolishing it by pavement breakers). • Earthmoving equipment on the construction site shall be operated as far away from vibration sensitive sites as possible. 	Significant and unavoidable
The proposed project would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project.	Potentially significant	4.7-3 All construction activity within the City of Glendale shall be conducted in accordance with Section 8.36.080 of the City of Glendale Municipal Code.	Less than significant.

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
NOISE (continued)			
Project Impacts (continued)			
		<p>4.7-4 The project applicant shall require through contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:</p> <ul style="list-style-type: none"> • Two weeks prior to the commencement of construction, notification must be provided to surrounding land uses within 1,000 feet of a project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period; • Ensure that construction equipment is properly muffled according to industry standards and be in good working condition; • Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible; • Schedule high noise-producing activities between the hours of 8:00 AM and 5:00 PM to minimize disruption on sensitive uses; • Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources; 	

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
NOISE (continued)			
Project Impacts (continued)			
		<p>4.7-4 (continued)</p> <ul style="list-style-type: none"> • Use electric air compressors and similar power tools rather than diesel equipment, where feasible; • Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes; and • Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City of Glendale or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit. 	

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
NOISE (continued)			
Project Impacts (continued)			
		<p>4.7-5 The project applicant shall require through contract specifications that construction staging areas along with the operation of earthmoving equipment within the project area be located as far away from vibration- and noise-sensitive sites as possible. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit.</p> <p>4.7-6 The project applicant shall require through contract specifications that heavily loaded trucks used during construction would be routed away from residential streets to the extent feasible. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit.</p>	
Cumulative Impacts			
The proposed project and related projects would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Less than significant.	None are required.	Less than significant.
The proposed project and related projects would not result in a substantial permanent increase in ambient noise levels in the project site vicinity above levels existing without the proposed project.	Less than significant.	None are required.	Less than significant.
The proposed project and related projects would not result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	Less than significant.	None are required.	Less than significant.

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
NOISE (continued)			
Cumulative Impacts (continued)			
The proposed project and related projects would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project.	Less than significant.	None are required.	Less than significant.
PUBLIC SERVICES – FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES			
Project Impacts			
The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.	Less than significant.	None are required	Less than significant.
Cumulative Impacts			
The proposed project and related projects could result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.	Potentially significant (emergency medical services).	4.8.1-1 The City of Glendale shall monitor the number of calls for emergency medical service responded to by the City's rescue ambulance for increases in demand, and based on a request by the Glendale Fire Department, subject to any required authorization, add an additional rescue ambulance and personnel.	Less than significant.
PUBLIC SERVICES – POLICE PROTECTION			
Project Impacts			
The proposed project would not result in substantial adverse impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.	Less than significant.	None are required.	Less than significant.

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
PUBLIC SERVICES – POLICE PROTECTION (continued)			
Cumulative Impacts			
The proposed project and related projects could result in a substantial adverse impact associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.	Potentially significant	4.8.2-1 The Glendale Police Department shall monitor the number of calls for service received on an annual basis and request additional City of Glendale general funds to add additional required police personnel and/or equipment as needed to provide adequate service.	Less than significant.
RECREATION			
Project Impacts			
The project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Potentially significant	4.8.3-1 In accordance with the requirements of the City of Glendale Municipal Code (Ordinance No. 5575 and Resolution Nos. 07-164, 10-199, 11-93, 12-86, 13-102), the project applicant shall pay the Development Impact Fee to the City. The current fee schedule is \$7,000 per unit for residential uses and \$2.67 per square foot of commercial uses.	Significant and unavoidable
The project would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.	Less than significant.	None are required.	Less than significant.
Cumulative Impacts			
The project and related projects would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The project's contribution would be cumulatively considerable.	Potentially significant	See mitigation measure 4.8.3-1	Significant and unavoidable.
The project and related projects would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.	Less than significant.	None are required.	Less than significant.

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
TRAFFIC			
Project Impacts			
The project would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.	Less than significant.	None are required.	Less than significant.
The project would not exceed, either individually or cumulatively, a Level of Service standard established by the County congestion management agency for designated roads or highways.	Less than significant.	None are required.	Less than significant.
The project would not substantially increase hazards due to a design feature or incompatible uses.	Less than significant.	None are required.	Less than significant.
The project would not result in inadequate emergency access.	Less than significant	None are required	Less than significant.
The project would not conflict with policies related to alternative transportation.	Less than significant	None are required	Less than significant
Cumulative Impacts			
The project combined with related projects would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity.	Less than significant	None are required	Less than significant
The project combined with related projects would not exceed a level of service standard established by the County congestion management agency.	Less than significant	None are required	Less than significant
The project combined with related projects would not increase hazards due to a design feature.	Less than significant	None are required	Less than significant
The project combined with related projects would not result in inadequate emergency access.	Less than significant	None are required	Less than significant.
The project combined with related project would not conflict with policies related to alternative transportation.	Less than significant	None are required	Less than significant

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
UTILITIES AND SERVICE SYSTEMS – WATER SERVICE			
Project Impacts			
The proposed project would have sufficient water supplies available to serve the proposed project from existing entitlements and resources, or are new or expanded entitlements needed.	Less than significant.	None are required.	Less than significant.
Cumulative Impacts			
The proposed project and related projects would have sufficient water supplies available to serve the proposed project and related projects from existing entitlements and resources, or are new or expanded entitlements needed.	Less than significant.	None are required.	Less than significant.
UTILITIES AND SERVICE SYSTEMS – SEWER			
Project Impacts			
The proposed project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	Less than significant.	None are required.	Less than significant.
The proposed project would not result in a determination by the wastewater treatment provider, which serves or may serve the proposed project that it has adequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments.	Significant	4.10.2-1 The project applicant shall pay a sewer impact fee for improvements and upgrades to the sewer system. These collected fees will be deposited by the City of Glendale into a specially created account to be used to fund capacity improvements.	Less than significant.

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
UTILITIES AND SERVICE SYSTEMS – SEWER (continued)			
Cumulative Impacts			
The proposed project and related projects would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	Less than significant.	None are required.	Less than significant
The proposed project and related projects would not exceed wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the proposed project and related projects' projected demand in addition to the provider's existing commitments.	Potentially significant.	4.10.2-2 Each project shall contribute sewer capacity increase fees for improvements and upgrades to alleviate sewer impacts within the City. Fees would be determined based on the City's sewer capacity increase fee methodology. These collected fees would be deposited into a specially created account to be used to fund capacity improvements of the Citywide drainage system.	Less than significant.
UTILITIES AND SERVICE SYSTEMS – SOLID WASTE			
Project Impacts			
The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs.	Less than significant.	None are required.	Less than significant.
Cumulative Impacts			
The proposed project and related projects would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	Potentially significant.	None feasible	Significant and unavoidable.

2.0 CORRECTIONS AND ADDITIONS

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

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

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

- (a) *A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:*
 - (1) *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
 - (2) *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
 - (3) *A feasible project alternative or mitigation measure considerably different from other previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponent decline to adopt it.*
 - (4) *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*
- (b) *Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.*

CORRECTIONS AND ADDITIONS

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

Executive Summary

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

4.3 Cultural Resources

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

The northern portion of the project site is developed with a one-story industrial/commercial building and associated surface parking lot that was constructed in the ~~1990s~~ 1960s.

7.0 Alternatives

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

Under this alternative ~~40~~ four affordable units would be provided.

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

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

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

Table 7.0-1
Alternative 2 Relationship to the Project Objectives

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

Provide employment opportunities for City residents

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

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

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

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

3.0 COMMENT LETTERS AND RESPONSES

INTRODUCTION

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

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

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

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

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

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

State and Local Agencies

1. State of California, Native American Heritage Commission, September 17, 2013
2. California Department of Transportation, October 8, 2013

Private and Local Organizations

3. Glendale Historical Society, October 14, 2013
4. Los Angeles Conservancy, October 14, 2013
5. Citizens Advocating Rational Development, October 13, 2013

Individuals

6. Diane Lewis, October 7, 2013
7. Randall Bloomberg, October 7, 2013
8. Ely Lester, October 7, 2013
9. Carolyn West, October 7, 2013
10. Judy Bruce, October 7, 2013
11. Linkhorst, October 7, 2013
12. Joemy Wilson, October 8, 2013
13. Cathy Green, October 8, 2013
14. Sam Manoukian, October 8, 2013
15. Alexander Sardarian, October 8, 2013
16. David Alishan, October 8, 2013
17. John Ballon, October 8, 2013
18. Matteo Bitetti, October 8, 2013
19. Lawrence Cimmarusti, October 9, 2013
20. Pierre Chraghchian, October 9, 2013
21. Ara Aroustamian, October 9, 2013
22. Ellen Svaco, October 10, 2013
23. Nancy Bain, October 10, 2013
24. Bruce Merritt, October 10, 2013
25. Sue Flocco, October 10, 2013
26. Tom Jacobsmeyer, October 10, 2013
27. Alex Avakian, October 10, 2013
28. Paul Berolzheimer, October 11, 2013
29. Albert Babayan, October 11, 2013
30. Marty Bracciotti, October 11, 2013
31. Kama Hayes, October 11, 2013
32. Rima Cameron, October 11, 2013

33. Janet Harootun, October 11, 2013
34. Gilda Killeen, October 11, 2013
35. Tatiana Eremima, October 11, 2013
36. Janin Massoomian, October 11, 2013
37. Denise Walker, October 11, 2013
38. Anita Rinaldi-Harnden, October 11, 2013
39. Catherine Jurca, October 11, 2013
40. Sonia Montejano, October 11, 2013
41. Ruth Campbell, October 11, 2013
42. Alex Rojas, October 11, 2013
43. Marilyn Oliver, October 11, 2013
44. Scott Lasken, October 11, 2013
45. Ara Mirzayan, October 12, 2013
46. Anita Weaver, October 12, 2013
47. Viktoryia Shypkova, October 12, 2013
48. Richard Lee, October 13, 2013
49. Don Savarese, October 13, 2013
50. Marcia Hanfor, October 13, 2013
51. Christina Rizzo, October 13, 2013
52. Jeff Sredni, October 13, 2013
53. Sean Bersell, October 14, 2013
54. Desiree Shier, October 14, 2013
55. Scott Fraser, October 14, 2013
56. Stephanie Schus, October 14, 2013
57. Tony Riccio, October 14, 2013
58. Gerri Cragnotti, October 14, 2013
59. Judy Cabrera, October 14, 2013
60. Ute Baum, October 14, 2013
61. Sharon Weisman, October 14, 2013
62. Bill Nicoll, October 14, 2013
63. Anna Rundle, October 14, 2013
64. Jean Christensen, October 14, 2013
65. Talin Zadourian, October 14, 2013
66. Elizabeth Berry, October 14, 2013

TOPICAL RESPONSES

Topical Response 1 – Historic Resources Assessment

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

Association with Historic Persons or Events

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

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

Content of Cited Newspaper Articles

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

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

¹ Historic Resource Assessment 3901 San Fernando Road, *Historic Resources Group*, 2013. p. 2.

² Historic Resource Assessment 3901 San Fernando Road, *Historic Resources Group*, 2013. pp. 12-13.

³ Historic Resource Assessment 3901 San Fernando Road, *Historic Resources Group*, 2013. p. 13.

⁴ Los Angeles Times, *June 23, 1929*, p. E6.

Southern California including: “Industrial Realty Active, Property Brokers Report Many Transactions for Manufacturing Firms Recently”; “Industrial Structures Costs Low, Concrete Type Units Held Cheaper to Build Now Than in Several Years”; “New Plants Needs Held Beneficial, Factory Expansion Results in Purchase of Cranes from Local Manufacturer.”⁵

One article on the page about Glendale was entitled “Glendale Lists New Factories, Industrial Expansion Seen for Future; Many manufacturers Plan Plant Addition; City Seeks to Obtain More Enterprises.” The article mentions L.H. Wilson in terms of his positions as Chair of the Industrial Committee of the Chamber of Commerce and President of the Glendale Realty Board to comment on the general state of industrial development and building in Glendale. One paragraph stated that Wilson conducted surveys of the status of existing businesses. Another paragraph called Wilson an “industrial expert” and noted he was “erecting six buildings.” Wilson was listed one more time in a quote where he declared that “Glendale is progressing because of its policy of encouraging sound, well-established firms to locate here.” The article writer considered “several factors enter into the expansion of Glendale's industrial district,” including “Proximity to Los Angeles and its railroads, as well as to the harbor, low initial cost of factory sites, small labor turnover, low-priced gas for owner, and good roads contribute to the advantages the factory owner demands.”⁶ Although Wilson was mentioned, the article clearly addressed Glendale's industrial growth as a whole – Wilson was not the focus.

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

A *Los Angeles Times* article, “Industrial Will Make Rare Alloy,” makes mention of L.H. Wilson at the end of the article saying “the factory is held on a 99 year lease by L. H. Wilson Industrial Realty Ltd which has leased the structure and grounds to Dr. Stadt and his associates.”⁷ Another article cited in the *Report* was about a glass-tile factory site that had been leased from L. H. Wilson.⁸ In 1929, an article in the *Los Angeles Times* mentioned a shoe company on Standard Avenue that was moving to a factory building constructed by Wilson.⁹ Other newspaper articles referenced in the *Report* include one about the subject building in the local Glendale newspaper (November 19, 1930); another in the local newspaper entitled “Wilson

⁵ Los Angeles Times, June 23, 1929.

⁶ Los Angeles Times, June 23, 1929.

⁷ Los Angeles Times, September 15, 1929.

⁸ Los Angeles Times, December 16, 1928.

⁹ Los Angeles Times, July 7, 1929.

Brings New Factories” (August 4, 1928), a *Los Angeles Times* story about the Realty Board of Glendale's election, (Nov. 8, 1930), and Wilson's obituary from the *Glendale News-Press* from 1942. *Analysis of Newspaper Articles*

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

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

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

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

¹⁰ Los Angeles Times, October 14, 1928.

¹¹ Los Angeles Times, November 8, 1930.

supposition that his holdings were extensive or that he played a significant role in the widening project. The claim is speculative.

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

Architectural Style and Integrity

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

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

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

¹² Historic Resource Assessment 3901 San Fernando Road, *Historic Resources Group*, 2013, p. 5.

¹³ Glendale Evening News, *January 1, 1924*.

had roofs of clay tile, all of which have been removed. A parapet was added to the one-story wing, altering its original roof profile.

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

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

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

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

Most of these alterations listed above were recognized in the *Report*: “mansard roof was clad in clay tiles. The brickwork has since been exposed, and the clay tile roofing has been removed. Other alterations include the addition of a commercial billboard to the second floor roof; a parapet along the south façade of the one-story wing; a parapet atop the shed-roofed transitional bay between the one- and two-story volumes; the replacement of some second-story windows on the west (rear) façade; and the replacement of the ground floor storefronts with aluminum storefront systems.” Despite these numerous changes the *Report* comes to the erroneous conclusion that the building is historic. That error is compounded by the fact that the *Report* describes the two towers that were removed as “small rooftop towers at the southeast and northeast corners of the two-story element.” The photograph of the original building design,

however, shows that the tower element at the southeast corner (on the angled corner entry bay) is a prominent central feature of the building; it is not a “small rooftop tower.”

Architectural historians David Gebhard and Harriette Von Breton in their book, *L.A. in the Thirties: 1931–1941*, observed “the imagery employed for L.A.’s commercial architecture of the 30s mirrored the shifts in architectural fashion occurring throughout the U.S. during this decade.... L.A. architects discarded the favored packaging of the 20s, the Spanish Colonial Revival and the Zigzag Moderne or Art Deco, replacing these earlier garments with the Streamline Moderne and the Hollywood Regency.... The curved surfaces horizontal emphases, portholes, and glass brick of the Streamline Moderne made it plain that here indeed was the future... The urge to recreate Spain and the Mediterranean in California was no longer pursued with as great a passion as it had been in the 20s.”¹⁴

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

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

¹⁴ L.A. in the Thirties: 1931-1941, p. 43.

Topical Response 2 – Feasibility of Alternative 2

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

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

1. Having 54 fewer residential units means that income will fall by about \$1,263,000 annually (54 units x \$1,950 average monthly rent per unit = \$105,300 per month x 12 = \$1,263,000).
2. The commercial building has below-market rents from the existing retail, studio, and office space, which would continue under Alternative 2.
3. Since the land cost is fixed, whether 142 units or 88 units are constructed, it makes economic sense to maximize the number of units; as noted above, the land cost does not justify building only 88 units.
4. Many other costs are the same or substantially the same so that advise in favor of maximizing density, including such construction costs as elevators, fire escapes, staircases, exit signs, garage gate, pool landscaping, and common area amenities; marketing costs incurred after construction; sales

center and model costs; architectural and engineering fees; repair and maintenance; property insurance; replacement reserves; and payroll.

5. Retaining the commercial building will require substantial rehabilitation work at a considerable cost, including a new roof, handicap restrooms, elevator, fire sprinkler system, fire alarm system, and air conditioning units; extensive tenant improvements; extensive sound proofing of the existing studio; and rehabilitation of all windows to prevent leakage and energy loss.
6. Protecting the commercial building (built in the 1930s and composed of brick) during construction of the subterranean parking will involve a significant increase in costs because shoring will be needed for the building and must be over-engineered at the south end, and bracing and rackers will be necessary.
7. Added construction costs will also be incurred because the new building's structural design must take into account the seismic reinforcement of the commercial building (done in the 1990s), which is designed to react in a certain way in the event of an earthquake.
8. The economic benefits from the additional cost of constructing 54 more units far outweigh the loss of income from the proposed Project's reduced size.
9. The applicant cannot recover a development fee, without which a developer would not develop a project, for constructing an 88-unit project.

Relationship to the Project Objectives

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

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

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

September 17, 2013

Mr. Rather Duong, Planner

City of Glendale

633 East Broadway, Room 103
Glendale, CA 91026

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

Dear Mr. Duong:

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

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

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

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a

1

separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

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

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

1

Sincerely,



Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
Los Angeles County
September 17, 2013**

Beverly Salazar Folkes

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

Chumash
Tataviam
Fernandeño

**San Fernando Band of Mission Indians
John Valenzuela, Chairperson**

P.O. Box 221838
Newhall, CA 91322
tsen2u@hotmail.com
(661) 753-9833 Office
(760) 885-0955 Cell
(760) 949-1604 Fax

Fernandeño
Tataviam
Serrano
Vanyume
Kitanemuk

**LA City/County Native American Indian Comm
Ron Andrade, Director**

3175 West 6th St, Rm. 403
Los Angeles, CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

**Gabrielino/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson**

PO Box 693
San Gabriel, CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino Tongva

**Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.**

Private Address

tattnlaw@gmail.com
310-570-6567

Gabrielino Tongva

Randy Guzman - Folkes

6471 Cornell Circle
Moorpark, CA 93021
ndnRandy@yahoo.com
(805) 905-1675 - cell

Chumash
Fernandeño
Tataviam
Shoshone Paiute
Yaqui

**Kitanemuk & Yowlumne Tejon Indians
Delia Dominguez, Chairperson**

115 Radio Street
Bakersfield, CA 93305
deedominguez@juno.com
(626) 339-6785

Yowlumne
Kitanemuk

**Gabrielino /Tongva Nation
Sandonne Goad, Chairperson**

P.O. Box 86908
Los Angeles, CA 90086
sgoad@gabrielino-tongva.com
951-845-0443

Gabrielino Tongva

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

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

his list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SSCH#2013031055; CEQA Notice of Completion; draft Environmental Impact Report (EIR) for the Glendale Link Project; located in the City of Glendale; Los Angeles County, California.

Letter No. 1: Native American Heritage Commission

Response 1-1

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

The Final Mitigation Monitoring and Reporting Program in this Final EIR contains mitigation measures MM 4.3-1 and MM 4.3-3, which require that, in the event of an archeological find, all earthwork within a 200-meter radius shall be suspended until an archeologist has evaluated the nature and significance of the find. Measure 4.3-3 requires compliance with Public Resources Code Section 5097.98 in the event human remains are discovered.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Monday, October 14, 2013 8:56 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Dept. of Transportation Comment on DRAFT EIR / 3901 San Fernando Rd
Attachments: 20131014085501406.pdf

Importance: High

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

Rathar

-----Original Message-----

From: NSRicoh@ci.glendale.ca.us [<mailto:NSRicoh@ci.glendale.ca.us>]
Sent: Monday, October 14, 2013 5:55 AM
To: Duong, Rathar
Subject:

This E-mail was sent from "RNP600B6" (Aficio MP C4500).

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

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, OFFICE OF TRANSPORTATION PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-9140

FAX: (213) 897-1337

*Flex your power!
Be energy efficient!*

October 8, 2013

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

Re: Glendale Link Project

Draft Environmental Impact Report

SCH#2013031055 IGR#130923/EA

Vic: LA / 5 / 24.122

Dear Mr. Duong

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

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

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

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

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

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

"Caltrans improves mobility across California"

Mr. Rathar Duong
October 8, 2013
Page 2 of 2

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

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

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

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief
Caltrans, District 7

cc: Scott Morgan, State Clearinghouse

6

"Caltrans improves mobility across California"

Letter No. 2: California Department of Transportation**Response 2-1**

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

Response 2-2

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

Response 2-3

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

Response 2.4

The comment cautions the City of Glendale to not rely solely on the Los Angeles County's Congestion Management Program (CMP) criteria for analysis (i.e., adding 150 or more trips [in either direction])

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

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

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

Response 2-5

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

Response 2-6

The City acknowledges Caltrans' comments and looks forward to working collaboratively with Caltrans on future projects.

From: greg.grammer@glendalehistorical.org
[mailto:greg.grammer@glendalehistorical.org]
Sent: Monday, October 14, 2013 3:20 PM
To: Duong, Rathar
Cc: Platt, Jay; Haghani, Hassan
Subject: Glendale Link Project DEIR Comments

Dear Rathar:

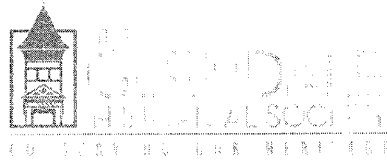
Please find attached The Glendale Historical Society's comment letter dated October 14, 2013 and a historic resource assessment on the building at 3901 San Fernando Road prepared by Historic Resources Group (HRG) dated October 14, 2013. Both the letter and HRG's report are submitted in response to the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

1

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

Regards,
Greg

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



October 14, 2013

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

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

Dear Mr. Duong:

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

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

2

Historic and Architectural Significance

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

3

The DEIR also determines that 3901 San Fernando Road is not associated with the lives of persons important to local, California, or national history, and states that "there is no evidence that [Wilson's] contribution to the development of San Fernando Road meets the threshold of historic significance." This

4

conclusion is likewise unsupported by the evidence. HRG's assessment shows through numerous contemporary accounts that Wilson was the leading figure in the effort to develop San Fernando Road as an industrial corridor, and was personally responsible for bringing at least 70 businesses to the area in the 1920s alone. Contrary to the assessment in the DEIR, it is HRG's opinion that L.H. Wilson does rise to the level of an important person in the history of Glendale.

4

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

5

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

6

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

7

According to California Environmental Quality Act (CEQA) guidelines, "resources which are deemed significant in a historical resource survey as provided under Section 5024.1(g) are to be presumed historically or culturally significant unless 'the preponderance of evidence' demonstrates they are not."¹ The property was found eligible for listing in the National Register in the City's 1995 San Fernando Road Corridor survey. Although it was erroneously associated with Tropico in the 1995 evaluation, that survey also noted that the building was "the only example of a Moorish Revival-style commercial building extant within the San Fernando Road project area." In addition to its association with Tropico, it was determined eligible "for its local architectural significance... and also for its association with the early commercial development of San Fernando Road." The building has not been significantly altered since 1995, and therefore it appears that there is sufficient evidence of historical significance for purposes of CEQA.

8

Environmentally Superior Alternative

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

9

¹
California Office of Historic Preservation, "CEQA & Historical Resources: CEQA Technical Advice Series," available online:
<http://ceqa.ca.gov/ceqa/more/as/page3.html>.

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

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

Sincerely,



Greg Grammer, President
The Glendale Historical Society

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



HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA
October 14, 2013

HISTORIC RESOURCES GROUP

12 S. Fair Oaks Avenue, Suite 200, Pasadena, CA 91105-1915
Telephone 626 793 2400, Facsimile 626 793 2401
historicla.com

PREPARED FOR

The Glendale Historical Society

P.O. Box 4173

Glendale, CA 91202

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

INTRODUCTION

Historic Resources Group has evaluated the commercial/industrial property located at 3901 San Fernando Road in the City of Glendale, California for potential historic significance. Our review included an observation of the project site; research of building permits, Sanborn fire insurance maps, and other primary and secondary sources; and a review of the Cultural Resources Section of the Draft Environmental Impact Report (DEIR) for the project currently proposed for the site.¹ The conclusions in this report are based on a review of the relevant historic contexts and an analysis of the eligibility criteria and integrity thresholds for listing in the National Register of Historic Places, the California Register of Historical Resources, and the Glendale Register of Historic Resources.

HISTORIC CONTEXT

The subject property is located on the northwest corner of the intersection of San Fernando Road and Central Avenue in the southernmost portion of the City of Glendale. This intersection was historically the commercial center of the town of Tropic, platted in 1887 by real estate speculators on land that had formerly been part of the Rancho San Rafael. The town was named after a nearby Southern Pacific rail depot, and evolved from ranch and farm lands into a small community inhabited by commuters to nearby Los Angeles.² In 1905 John A. Logan (1878-1960), a civic leader in the development of Tropic, built a two story brick building on the northwest corner of the intersection.³ The Logan Building housed the Tropic Mercantile on the ground floor; the second floor was a hall used by community organizations and for social events. The building also temporarily housed the Tropic Public Library from the time it was established until it moved to a permanent location.⁴ The property at that time had the address of 223 South San Fernando Road, which was later changed to 1519-1529 South San Fernando Road. Tropic was consolidated by the City of Glendale in 1918.⁵

10

Lloyd H. Wilson and San Fernando Road

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

¹ Kaplan Chen Kaplan, "3901 San Fernando Road, Glendale, California: Historic Structure Evaluation," August 27, 2013.

² Jones & Stokes Associates, "Historical Resources Technical Report for the Glendale Downtown Specific Plan EIR Draft," July 2006.

³ John Calvin Sherer, "History of Glendale and Vicinity," 1922.

⁴ "Tropico Library to Open," *Los Angeles Herald*, February 20, 1906, 7.

⁵ There is a documented misperception that the existing building on the site was the original home of the Tropic City Hall. The source of this confusion may stem from the use of the Logan Building as the temporary Tropic Public Library. However, the existing building was constructed after Tropic was annexed by the City of Glendale, and therefore could not have housed Tropic City Hall.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

figure in the development of San Fernando Road into the industrial corridor it remains today.⁶ Wilson was born in Missouri in 1878 and began his career in Chicago in the publishing and advertising businesses. He moved to Glendale with his family in 1921 and quickly launched a successful career in real estate development, specializing in industrial properties in the San Fernando Road area. Wilson played an important role in the city's commercial life for two decades and was "instrumental in promoting much of the city's industrial growth and development, especially in the western part of the city."⁷ Wilson shrewdly focused his development efforts on San Fernando Road, then primarily a residential district, because of its strategic location linking Los Angeles and the San Fernando Valley, and its proximity to both the Southern Pacific and Pacific Electric railways.⁸ He brokered deals with established businesses, persuading them to move to Glendale and selling or leasing them properties developed by his company, L.H. Wilson, Inc.⁹ Within two years Wilson was hailed as the "progressive realtor whose magic wand" had tripled and quadrupled real estate values in the area and enriched scores of investors:

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

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

⁶ "L.H. Wilson Makes Things Hum on San Fernando Road," *Glendale Evening News*, January 1, 1924.

⁷ "L.H. Wilson Summoned by Death," *Glendale News-Press*, September 5, 1942, 1.

⁸ "L.H. Wilson Makes Things Hum on San Fernando Road," *Glendale Evening News*, January 1, 1924.

⁹ "Progress in Southern California Industry," *Los Angeles Times*, June 23, 1929, E6.

¹⁰ "L.H. Wilson Makes Things Hum on San Fernando Road," *Glendale Evening News*, January 1, 1924.

¹¹ "Broker Builds City Industry," *Los Angeles Times*, October 14, 1928, A8.

¹² "Wilson Brings New Factories," *Glendale News-Press*, August 4, 1928.

¹³ "Broker Builds City Industry," *Los Angeles Times*, October 14, 1928, A8.

¹⁴ "Progress in Southern California Industry," *Los Angeles Times*, June 23, 1929, E6.

¹⁵ "Wilson Brings New Factories," *Glendale News-Press*, August 4, 1928.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

Company,¹⁶ the Hollywood Shoe Manufacturing Company,¹⁷ the Hollywood Mosaic Tile Company,¹⁸ the Indium Steel and Alloys Company,¹⁹ and the West Coast Style Shoes Co.²⁰

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

*We kept away from the stereotyped design of industrial structures and decided to erect a building that would be a credit not only to the industrial section of Glendale but to the business or residential districts as well. Not only have we set our faces steadily against anything shoddy in construction but we insisted on architecture and designs that have added a beautiful building to those that we have erected in this industrial area.*²¹

In addition to his business activities, Wilson was prominent in a number of Glendale professional and civic organizations. He joined the Glendale Realty Board upon his move to Glendale and was recognized as a leader in the organization for the remainder of his life.²² He served as a Board director for 20 years and, during his term as president in 1929 and 1930, oversaw its complete reorganization under a new charter as the Glendale Real Estate Board.²³ When he resigned from the board shortly before his death he was named an honorary life director in recognition of his service.²⁴ Wilson also represented the Glendale Board as a director of the California Real Estate Association. He was a leader in organizing the Glendale Industrial association and helped formulate its policies as an executive member. He served a term as president of the Glendale parks board; several terms as a director of the Glendale Chamber of Commerce; and was an active member of several fraternal and social organizations.²⁵

3901 San Fernando Road

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

¹⁶ "Glass-Tile Factory To Be Built," *Los Angeles Times*, December 16, 1928, E4.

¹⁷ "New Plant Announced in Glendale," *Los Angeles Times*, July 7, 1929, D5.

¹⁸ "Glendale Firm Builds Factory for Tile Making," *Los Angeles Times*, July 14, 1929, D7.

¹⁹ "Industrial Will Make Rare Alloy," *Los Angeles Times*, September 15, 1929, D2.

²⁰ "Guests Will See Making of Shoes," *Glendale News-Press*, November 19, 1930.

²¹ "Wilson Brings New Factories," *Glendale News-Press*, August 4, 1928.

²² "L.H. Wilson Summoned by Death," *Glendale News-Press*, September 5, 1942, 1.

²³ "Realty Board of Glendale Holds Election," *Los Angeles Times*, November 8, 1930, 13.

²⁴ "L.H. Wilson Summoned by Death," *Glendale News-Press*, September 5, 1942, 3.

²⁵ Ibid.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

complex project required the demolition of existing buildings along both sides of the street, involving 540 separate parcels and more than 1,000 property owners.²⁶ Among the buildings affected by the street widening plan was the 1905 Logan Building, which Wilson had purchased soon after arriving in Glendale. The Logan Building was demolished in 1929, and in its place the following year Wilson built the present building, the subject of this assessment.²⁷

In keeping with his stated design philosophy for the area, Wilson erected a brick building in the Mediterranean Revival style, consisting of a two-story commercial block facing San Fernando Road with a one story industrial wing along South Central Avenue (then called West Eulalia Street).²⁸ The building was of brick construction with exterior walls veneered in plaster,²⁹ and featured decorative brick detailing around window and door openings, a brick cornice, small rooftop towers, and pointed arches in the one-story wing along West Eulalia Street. The building's industrial wing at that time had the address of 343 West Eulalia Street and was originally occupied by the West Coast Style Shoes Co.; L.H. Wilson, who invested in West Coast Style Shoes and served as one of its directors, was credited with bringing the company to Glendale.³⁰ L.H. Wilson, Inc. maintained its real estate and development offices in the commercial portion of the building until 1938. Since that time, a number of different businesses have occupied the building.³¹ L.H. Wilson died in 1942, at the age of 64.³²

In 1935, the street address of Wilson's building was changed again to include 3901, 3903, 3905, and 3905 ½ San Fernando Road, as well as 1601 and 1605 South Central Avenue. According to Sanborn fire insurance maps all of these addresses occupied the two-story portion of the building; the one-story wing does not appear to have had a separate address at that time.³³

Mediterranean Revival Architecture

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

²⁶ "Allays Fears of Widening Orders on San Fernando," *Glendale News-Press*, January 8, 1929, 1.

²⁷ City of Glendale permit file.

²⁸ "Guests Will See Making of Shoes," *Glendale News-Press*, November 19, 1930.

²⁹ City of Glendale plastering inspection record, August 22, 1930.

³⁰ "Guests Will See Making of Shoes," *Glendale News-Press*, November 19, 1930.

³¹ Glendale City Directories.

³² "L.H. Wilson Summoned by Death," *Glendale News-Press*, September 5, 1942, 1.

³³ Sanborn fire insurance map, 1950.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

substantial buildings to house commercial and industrial uses. The Mediterranean Revival style is distinguished by its eclectic mix of architectural elements from several regions around the Mediterranean Sea, including Spain, Italy, southern France, and North Africa. Much of the American architecture of the late 19th and early 20th centuries can be broadly classified as Mediterranean in origin, including the Beaux Arts, Mission Revival, Spanish Colonial Revival, and Italian Renaissance Revival styles. But by the 1920s the lines between these individual styles were frequently blurred and their distinguishing characteristics blended by architects who drew inspiration from throughout the Mediterranean region. These imaginative combinations of details from varied architectural traditions resulted in the emergence of a distinct Mediterranean Revival style.

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

Architectural Description of 3901 San Fernando Road

The property at 3901 San Fernando Road is prominently located on the northwest corner of the intersection of San Fernando Road and South Central Avenue. It contains a one- and two-story commercial/industrial building constructed in 1930. The building is set flush to the sidewalk on the two street sides and to the north property line, and is bounded by an alley on the west. It is Mediterranean Revival in style and has a rectangular plan, with the southeast corner clipped at a 45 degree angle. The building is of unreinforced brick construction and has a two-story mass with a flat mansard roof fronting on San Fernando Road, and a one-story wing with a bow truss roof along South Central Avenue. The mansard is clad in asphalt composition shingles; the flat and bowed roofs are covered in built-up roofing. The walls are veneered in textured cement plaster and trimmed with extensive brick details including decorative quoined window and door surrounds, a double string course framing combed plaster at the second floor level, and a decorative eave cornice composed of two staggered courses of saw tooth headers over spaced headers (at the two story portion) and soldiers (at the one story portion).

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

Individual retail unit entrances consist of non-original, single, fully glazed metal doors set in glazed metal storefront systems on the east and south façades. A glazed metal door on the north end of the east façade leads to an interior staircase serving the second floor. Fenestration on the east and south façades of the two-story portion consists of large rectangular storefront openings at the ground floor, glazed with non-original metal storefront systems with dark tinted glazing. There are original paired and individual rectangular, fixed, steel sash windows with upper and lower hopper inserts at the second floor. Fenestration on the building's one story wing consists of Moorish-style pointed arches with clear glazed metal storefront over plaster and brick bulkheads along Central Avenue.³⁴ The westernmost bay on the south façade has a parapet that projects above the roofline, forming a square tower with a stucco cornice and a brick vent opening centered over the pointed arch below. A continuous stucco parapet has been added above the cornice on the south façade. There is a large sliding industrial fire door on the west façade of the one story portion, and a single metal slab door with a transom light that has been blocked. There is one original steel casement window with wood subsill on the second floor west façade; all other fenestration on this façade has been replaced. Fenestration on the north façade consists of large rectangular original steel sash windows. An exterior staircase on the north façade leads to a wood slab door with transom light at the second floor level.

Alterations

Although it has undergone several alterations over time, the building located at 3901 San Fernando Road has not been significantly altered since it was surveyed in 1995, and it continues to convey its historic significance. The building retains most of its original industrial steel sash fixed and hopper windows, textured cement plaster veneer at the exterior walls, distinctive Moorish-style pointed arches, and extensive decorative brickwork. A 1930 photograph in the *Glendale News-Press* indicates that there were small rooftop towers at the southeast and northeast corners of the two-story element; these have since been removed. The same photo also conclusively demonstrates that the one-story wing is an original element of the building and not a later addition, and that it did not have an overhanging eave.³⁵ Photographs from the late 1940s and early 1950s, included in Appendix 4.3 of the DEIR, indicate that the decorative brickwork was at that time painted,

³⁴ "Guests Will See Making of Shoes," *Glendale News-Press*, November 19, 1930. The article's accompanying photograph conclusively demonstrates that the one-story wing was an original and integral part of the building and not a later addition. The article is included in the "Historic Photograph" section below.

³⁵ Ibid.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

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

³⁶ City of Glendale permit file.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

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

National Register of Historic Places

The National Register of Historic Places is "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and indicate what properties should be considered for protection from destruction or impairment,"³⁷ and is administered by the National Park Service. Listing in the National Register assists in preservation of historic properties through recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for Federal or Federally-assisted projects; eligibility for Federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

In order for a building to qualify for listing in the National Register of Historic Places, it must meet one or more identified criteria of historic significance. "Historic significance" is defined by the National Park Service as "the importance of a property to the history, architecture, archaeology, engineering, or culture of a community, state, or the nation."³⁸ Historic significance is achieved by association with important events, activities, or patterns; association with important persons; distinctive physical characteristics of design, construction, or form; or potential to yield important information.³⁹ The criteria for listing in the National Register follow established guidelines for determining the significance of properties. Sites, districts, structures, or landscapes of potential significance are eligible for listing if they meet any or all of the following criteria:

- A. Associated with events that have made a significant contribution to the broad patterns of our history;
- B. Associated with the lives of persons significant in our past;

³⁷ U.S. Department of the Interior, *National Register Bulletin 16A: How to Complete the National Register Registration Form* (Washington, D.C.: National Park Service, 1997).

³⁸ Ibid, 3.

³⁹ Ibid, 3.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.⁴⁰

In addition to meeting one or more of the criteria listed above, properties must also possess “historic integrity.” Historic integrity is the ability of a property to convey its significance and is defined as the “authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s prehistoric or historic period.”⁴¹ The National Park Service defines seven aspects of integrity: location, design, setting, materials, craftsmanship, feeling, and association.

California Register of Historical Resources

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

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

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

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

⁴¹ U.S. Department of the Interior, *National Register Bulletin 16A: How to Complete the National Register Registration Form* (Washington, D.C.: National Park Service, 1997).

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

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

City of Glendale Register of Historic Resources

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

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

EVALUATION OF POTENTIAL SIGNIFICANCE

Previous Surveys and Evaluations

The building located at 3901 San Fernando Road was surveyed in a 1995-1996 reconnaissance survey for the City of Glendale's San Fernando Road Corridor Redevelopment Project.⁴² The building was identified as "the only example of a Moorish

⁴² Harland Bartholomew & Associates, "Final Reconnaissance Survey, City of Glendale San Fernando Road Corridor Redevelopment Project," 1996.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

Revival-style commercial building extant within the San Fernando Road project area.” It was determined eligible for listing in the National Register “for its local architectural significance in association with Tropico as the former Tropico Town Hall, and also for its association with the early commercial development of San Fernando Road.”⁴³ It was assigned a California Historical Resources Status Code of 3S, which at that time was defined as “appears eligible for listing in NR as a separate property.”⁴⁴ It is not listed in the California State Historical Resources Inventory.⁴⁵

Historic Resource Assessment 3901 San Fernando Road

Evaluation of Integrity

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

- **Location:** The building remains on its original site and therefore retains integrity of location.
- **Design:** The building has undergone some alterations over time. The original ground floor storefronts and doors have been replaced; the clay roof tiles have been removed; a parapet has been added along the south façade; and the small rooftop towers have been removed. However, the building retains significant character-defining features of its original Mediterranean Revival-style design, including its rectangular plan; one- and two-story massing; textured plaster veneer at exterior walls; steel sash windows at the second floor; pointed Moorish arches; decorative brick window surrounds, eave cornices, and stringcourse; flat mansard roof; and large square tower on the south façade. It therefore retains integrity of design.
- **Setting:** The existing neighborhood of parking lots, strip malls, and new construction does not reflect the property’s historic setting of mixed commercial and residential uses. The building does not retain integrity of setting.
- **Materials:** Although it has undergone a number of minor alterations over time, the building retains a majority of its historic materials, including its brick construction,

⁴³ Harland Bartholomew & Associates, “Reconnaissance Survey, City of Glendale San Fernando Road Corridor Redevelopment Project,” DPR 523A form, 3901 San Fernando Road, December 1995.

⁴⁴ Harland Bartholomew & Associates, DPR 523A form, 3901 San Fernando Road, December 1995. The 1995 DPR also lists a second NRHP Status Code of 5, “Ineligible for the NR but still of local interest.” It is assumed that this status code was listed in error, as it directly contradicts the higher status code of 3S as well as the narrative finding of significance.

⁴⁵ State of California, Office of Historic Preservation, Historic Resources Inventory, August 2011. It does not appear that the 1995 survey was submitted to the State Office of Historic Preservation for inclusion in the HRI.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

textured exterior plaster veneer, decorative brick details, and steel sash windows. However, the replacement of the original storefronts and doors, clay roof tiles, and small towers indicate that the building does not retain sufficient integrity of materials for consideration for listing in the National Register of Historic Places.

- **Workmanship:** Although it has undergone alterations over time, the building retains the physical evidence of period construction techniques, including its masonry construction, plaster veneer, and decorative brick details. It therefore retains integrity of workmanship.
- **Feeling:** The building retains the significant physical features that convey its significance as a Mediterranean Revival-style commercial building that housed the offices of L.H. Wilson, Inc. It therefore retains integrity of feeling.
- **Association:** Although it has undergone a number of alterations, the property continues to convey its important association with L.H. Wilson and with the early development of San Fernando Road as a major industrial corridor. It therefore retains integrity of association.

Evaluation for the National Register of Historic Places

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

Evaluation for the California Register of Historical Resources

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

Criteria 1 and 2

3901 San Fernando Road is associated with events that have made a significant contribution to the broad patterns of local and regional history, through its close association with the early development of San Fernando Road as a major industrial corridor. It is also closely associated with L.H. Wilson, who is important to local history as

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

the leading figure credited with the development of San Fernando Road as a major industrial corridor. Wilson erected the building in 1930 and kept his offices there from 1930 to 1938, during the period that he was influential in the development of this area of Glendale. Although there were a number of real estate investors and realtors working in Glendale during this period, Wilson was consistently cited in contemporary news stories as an important and influential person in the development of San Fernando Road. The building is a rare remaining example of this period of development along San Fernando Road, reflecting Wilson's vision for the area. Given the building's important associations and rarity of type, it appears eligible for listing in the California Register under Criteria 1 and 2.

Criterion 3

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

Evaluation for listing in the Glendale Register of Historic Resources

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

⁴⁶ It is HRC's professional opinion that 3901 San Fernando Road is eligible for listing in the California Register under three criteria; however, it should be noted that a building is eligible for listing if it meets one or more of the criteria.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

completely altered, like the nearby Seeley's Building (originally constructed in 1925 and remodeled with a Streamline Moderne façade in the 1940s), or demolished. Due to its association with the early development of San Fernando Road; its association with important local person L.H. Wilson; its distinctive architecture; and the rarity of type, 3901 San Fernando Road appears eligible for listing in the Glendale Register of Historic Resources.

CONCLUSION

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

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

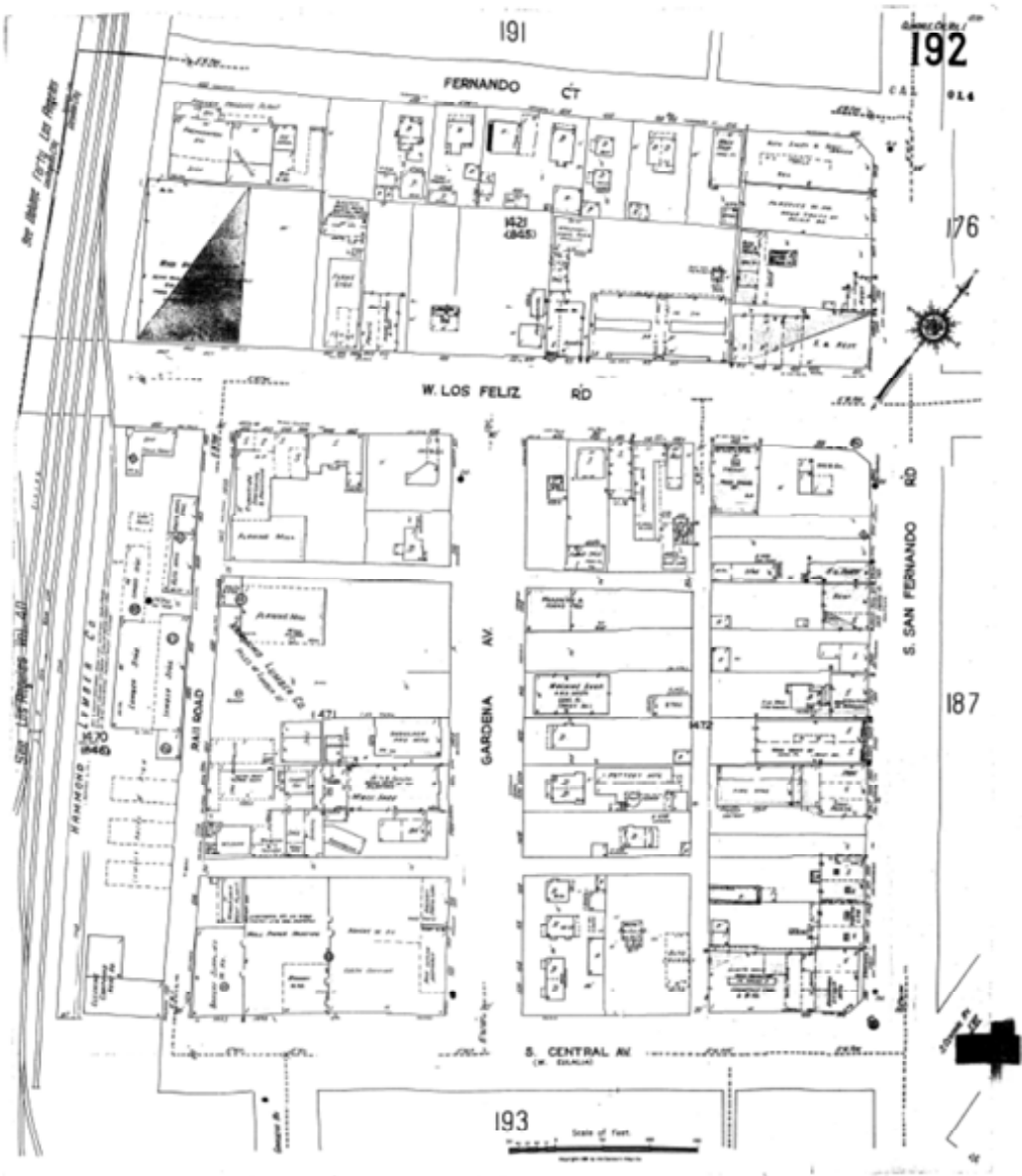
HISTORIC RESOURCES GROUP

PERMIT HISTORY

15

Date	Owner	Description
1/8/1929	L.H. Wilson	Demolition
6/12/1930	L.H. Wilson	Commercial building
5/6/1938	Pomona Mutual Bldg & Loan	Reinforce footings and foundation
9/6/1944	Sound Equip. Corp.	Alterations
3/12/1948	John H. Olsen	Plumbing fixtures and electrical outlets
3/7/1950	Hoppers Office Furniture	Sign
1/28/1955	Pacific Outdoor Advance	Neon sign
4/14/1955	L.B. Hair Oil	Neon sign
5/5/1962	R.A. Young Co.	Electrical
5/8/1964	Carlos Ramirez, Americus Factory	Install 12 new electrical motors
2/26/1970	John Olson	New water heater
7/15/1982	Not named	Re-roof
2/28/1983	E. Linder	Exterior stair
3/14/1983	Ernest A. Lindner	New gas outlets
1/4/1988	Ernest A. Lindner	Repair mansard roof and cracked plaster
4/28/1993	George Garkian	T-bar ceiling

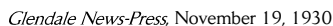
HISTORIC RESOURCE ASSESSMENT**3901 San Fernando Road, Glendale, CA****HISTORIC RESOURCES GROUP**



HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP



3901 San Fernando Road, Glendale, CA

Glendale Link Project Final EIR
November 2013



East Façade and partial South Façade, San Fernando Road and South Central Avenue, looking northwest. Historic Resources Group, August 2013.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP



Partial South Façade, South Central Avenue, looking north. Historic Resources Group, August 2013.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP



Partial South Façade, South Central Avenue, looking west. Historic Resources Group, August 2013.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP



Southwest corner, South Central Avenue, looking northeast. Historic Resources Group, August 2013.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP



West Façade, alley, looking southeast. Historic Resources Group, August 2013.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP



North Façade, looking southeast. Historic Resources Group, August 2013.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP



Detail of windows, East Façade. Historic Resources Group, August 2013.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP



Detail of brick eave cornice, South Façade. Historic Resources Group, August 2013.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

BIBLIOGRAPHY

26

- "Allays Fears of Widening Orders on San Fernando." *Glendale News-Press*, January 8, 1929, 1.
- "Broker Builds City Industry." *Los Angeles Times*, October 14, 1928, A8.
- City of Glendale permit file.
- "Glass-Tile Factory to be Built." *Los Angeles Times*, December 16, 1928, E4.
- Glendale City Directories.
- "Glendale Firm Builds Factory for Tile Making." *Los Angeles Times*, July 14, 1929, D7.
- "Guests Will See Making of Shoes." *Glendale News-Press*, November 19, 1930.
- Harland Bartholomew & Associates. "Final Reconnaissance Survey, City of Glendale San Fernando Road Corridor Redevelopment Project," 1996.
- ____. "Reconnaissance Survey, City of Glendale San Fernando Road Corridor Redevelopment Project," DPR 523A form, 3901 San Fernando Road, December 1995.
- "Industrial Will Make Rare Alloy." *Los Angeles Times*, September 15, 1929, D2.
- Jones & Stokes Associates. "Historical Resources Technical Report for the Glendale Downtown Specific Plan EIR Draft," July 2006.
- Kaplan Chen Kaplan. "3901 San Fernando Road, Glendale, California, Historic Structure Evaluation," August 27, 2013.
- "L.H. Wilson Makes Things Hum on San Fernando Road." *Glendale Evening News*, January 1, 1924.
- "L.H. Wilson Summoned by Death." *Glendale News-Press*, September 5, 1942, 1-3.
- "New Plant Announced in Glendale." *Los Angeles Times*, July 7, 1929, D5.
- "Progress in Southern California Industry." *Los Angeles Times*, June 23, 1929, E6.
- "Realty Board of Glendale Holds Elections." *Los Angeles Times*, November 8, 1930.
- Sanborn Fire Insurance Maps.
- Sherer, John Calvin. "History of Glendale and Vicinity," 1922.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

State of California, Office of Historic Preservation. Historic Resources Inventory, August 2011.

27

"Tropico Library to Open." *Los Angeles Herald*, February 20, 1906, 7.

U.S. Department of the Interior. *National Register Bulletin 16A: How to Complete the National Register Registration Form*. Washington, D.C.: National Park Service, 1997.

"Wilson Brings New Factories." *Glendale News-Press*, August 4, 1928.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP

Letter No. 3: Glendale Historical Society

Response 3-1

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

Response 3-2

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

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

Response 3-3

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

Response 3-4

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

Response 3-5

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

Response 3-6

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

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

Response 3-7

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

Road does not qualify for the California Register of Historic Places or the Glendale Register of Historic Places on the basis of its architecture, nor, as discussed in **Response 3-2** through **3-5** does the building's association with L.H. Wilson make it eligible for listing on the California or Glendale Registers.

Response 3-8

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

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

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

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

¹⁵ http://ohp.parks.ca.gov/?page_id=23317

Response 3-9

Refer to **Topical Response 2** and **Appendix F02** regarding the feasibility of Alternative 2. As described in **Topical Response 2** and Chapter 7.0 of the Draft EIR, this alternative does not meet the project objectives as fully or sufficiently as the proposed project.

Response 3-10

The HRG report is addressed in **Topical Response 1** and **Appendix F01** of the Final EIR.

From: Adrian Fine [<mailto:afine@laconservancy.org>]
Sent: Monday, October 14, 2013 3:46 PM
To: Duong, Rathar
Subject: Glendale Link Project - 3901-3915 San Fernando Road

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

Dear Mr. Duong:

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

Best, Adrian

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

Get connected: Follow the Conservancy on [Twitter](#) and become a [Facebook](#) fan today!
[Join the Conservancy](#) and become an advocate for preservation in L.A. County.

1



523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 office
213 623 3909 FAX
213 430 4219 EVENT HOTLINE
laconservancy.org

Submitted electronically

Rathar Duong, Planner
City of Glendale
633 East Broadway, Suite 103
Glendale, California 91206
Email: RDuong@ci.glendale.ca.us

October 14, 2013

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

Dear Mr. Duong:

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

2

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

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

3

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

¹ A Subsequent EIR or Supplement to an EIR may be required when "substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects." CEQA Guidelines §§15162, 15163.



local historic registers. The Conservancy believes there is substantial evidence provided within the record that otherwise would support an alternative conclusion, one that clearly demonstrates the building at 3901-3915 San Fernando Road meets the minimum threshold for CEQA and consideration as an historical resource.

3

The City of Glendale's San Fernando Road Corridor Redevelopment Project² identified the building at 3901-3915 San Fernando Road as "the only example of a Moorish Revival-style commercial building extant within the San Fernando Road project area." At that time it was determined eligible for listing in the National Register of Historic Places and appearing eligible for the California Register. No evidence demonstrates that the building at 3901-3915 San Fernando Road has been significantly altered since the mid-1990s and the time of the redevelopment project. The DEIR assessment incorrectly states the building has had "major alterations" and therefore lacks significant integrity, rendering it ineligible for listing at the local, state and national levels. Material evidence does not support this claim, nor does the independent assessment performed on the building by Historic Resources Group (HRG).³

4

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

5

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

6

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

7

A key policy under CEQA is the lead agency's duty to "take all action necessary to provide the people of this state with... historic environmental qualities...and preserve for future generations...examples of major periods of California history."⁴ To this end, CEQA "requires public agencies to deny approval of a project

² Harland Bartholomew & Associates, "Final Reconnaissance Survey, City of Glendale San Fernando Road Corridor Redevelopment Project," 1996.

³ Historic Resource Assessment, 3901 San Fernando Road, Glendale, CA. October 9, 2013.

⁴ Public Resources Code §21001 (b), (c).



with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”⁵

Courts often refer to the EIR as “the heart” of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid those impacts.⁶ The CEQA Guidelines require a range of alternatives to be considered in the EIR that would feasibly attain most of basic project objectives but would avoid or “substantially lessen” the project’s significant adverse environmental effects. The lead agency cannot merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.⁷

7

The project’s alternative analysis incorrectly states, “[N]either the proposed project nor Alternative 2 would result in significant impacts; therefore impacts related to cultural resources would be similar to the proposed project.”⁸ The Conservancy disagrees and believes there is a significant impact to a known cultural resource. The DEIR all but acknowledges this by providing Alternative 2 -- a reuse/reduced density alternative -- yet fails to state the purpose of this alternative or the importance of the building at 3901-3915 San Fernando Road. Other alternatives may be available but have not been analyzed within the DEIR. Once acknowledged as a historical resource, we believe there needs to be a broader range of reuse/preservation alternatives.

Alternative 2 meets “most of the project objectives” and is considered the “environmentally superior” alternative.⁹ However, the DEIR concludes Alternative 2 “would not be sufficient to offset the cost of the land and would not be economically feasible for the applicant for this reason.” While generally economic analysis within a DEIR is not considered paramount under CEQA, the applicant relies on this argument to demonstrate why Alternative 2 is infeasible. CEQA defines feasibility as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.”¹⁰ In order to prove economic infeasibility the applicant must provide specific “evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.”¹¹

8

⁵ *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

⁶ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

⁷ PRC §§ 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.

⁸ Alternatives Analysis, Glendale Link Project Draft EIR, page 7.0-6. September 2013.

⁹ Alternatives Analysis, Glendale Link Project Draft EIR, pages 7.0-12 and 7.0-19. September 2013.

¹⁰ CEQA Guidelines, § 15364

¹¹ *Citizens of Goleta Valley v. Board of Supervisors*, (1988) 197 Cal. App. 3d 1167, 1181



Despite the applicant's claim, there is no economic analysis provided that supports this within the DEIR. The DEIR's one-sentence rejection of a reuse alternative is imprecise, incomplete and largely unsubstantiated, ultimately failing to establish the infeasibility of retaining the building at 3901-3915 San Fernando Road.

8

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

9

About the Conservancy

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

10

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

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: Jay Platt, City of Glendale
The Glendale Historical Society



Letter No. 4: Los Angeles Conservancy

Response 4-1

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

Response 4-2

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

Response 4-3

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

Response 4-4

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

The comment also states that no evidence demonstrates that the building at 3901–3915 San Fernando Road has been significantly altered since the mid-1990s and the time of the survey. As described in more

detail in the Draft EIR, the 1996 survey included several inaccuracies and as a result, cannot satisfy the criteria required of a historic survey by Public Resources Code section 5024.1(g).

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

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

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

Response 4-5

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

Response 4-6

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

Response 4-7

The comment relates to the alternatives analysis in the Draft EIR and suggests a broader range of alternatives should be analyzed. Page 7.0-1 of the Draft EIR states “based on the *State CEQA Guidelines*, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the proposed project; (2) the ability of alternatives to avoid or lessen the significant impacts associated with the project; (3) the ability of the alternatives to meet the objectives of the project; and (4) the feasibility of the alternatives. These factors would be unique for each project.” Further *State CEQA Guidelines* Section 15126.6(a) states “an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.”

The Draft EIR states on page 7.0-4 that Alternative 2 “is being considered due to public comment letters received that suggested incorporating the existing building into the proposed project.” Alternative 2 satisfies all of the requirements for an alternative in that it is potentially feasible and meets most of the project objectives. This alternative responds to specific concerns raised during the Notice of Preparation process and provides enough information to facilitate public participation. It should also be noted that the alternatives discussion, as indicated above, focuses on those alternatives that would avoid or substantially lessen a significant impact of the proposed project. Two significant impacts were identified in the Draft EIR, construction related noise and recreation impacts. Alternative 2 is presented as the environmentally superior alternative as it would result in a smaller residential building and therefore would reduce potential noise impacts on nearby sensitive uses. Numerous other alternatives that retain the building could have been considered (e.g., maintaining the building façade, maintaining a portion of the building, etc.). However, ultimately, these alternatives would have resulted in similar effects as Alternative 2. Specifically they would have included residential units without full payment of mitigation for recreation and would result in construction related noise impacts. As such, inclusion of additional variations on Alternative 2 would not have provided any additional important information or materially changed the alternatives analysis.

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

Response 4-8

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

Response 4-9

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

Response 4-10

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

From: Nicholas Green <nick@rationaldev.org>
Sent: Sunday, October 13, 2013 5:44 PM
To: Duong, Rathar
Cc: nick@rationaldev.org
Subject: DEIR Challenge from CARD (Citizens Advocating Rational Development) for Glendale Link Project - 3901-3915 San Fernando Road
Attachments: Glendale The Link Project - EIR Challenge.docx; ATT24647135.htm

Mr. Duong,

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

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

Thank you!



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

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

Dear Mr. Duong,

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

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

1

ENERGY

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

2

WATER SUPPLY

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

3

What the DEIR fails to do is:

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

4

5

6

7

8

9

10

11

12

13

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

For the foregoing reasons, this EIR is fatally flawed.

14

AIR QUALITY/GREENHOUSE EMISSIONS/CLIMATE CHANGE

The EIR lacks sufficient data to either establish the extent of the problem which local emissions contribute to deteriorating air quality, greenhouse emissions or the closely related problem of global warming and climate change, despite the fact that these issues are at the forefront of scientific review

due to the catastrophic effects they will have on human life, agriculture, industry, sea level risings, and the many other serious consequences of global warming.

14

This portion of the EIR fails for the following reasons:

15

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

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

16

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

17

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

18

For the foregoing reasons, the EIR is fatally flawed.

19

ALTERNATIVE ANALYSIS

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

20

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

Very truly yours,

CITIZENS ADVOCATING RATIONAL DEVELOPMENT

NICK R. Green

President

Letter No. 5: Citizens Advocating Rational Development

Response 5-1

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

Response 5-3

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

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

Response 5-3

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

Response 5-4

Table 4.10.1-2 in the Draft EIR identifies projected water demand for each project development option based on standard water consumption rates for the types of development proposed. As shown in Table 4-10.1.2, there is sufficient water available to serve the proposed project.

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

Response 5-5

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

Response 5-6

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

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

Response 5-7

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

Response 5-8

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

Response 5-9

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

Response 5-10

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

Response 5-11

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

Response 5-12

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

Response 5-13

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

Global climate change has the potential to result in a range of environmental effects, among which is the potential to increase the frequency and severity of droughts, which could affect the future availability of water supply throughout the state. As discussed in **Responses 5-10 and 5-11**, above, the Draft EIR identifies adequate water supplies to meet projected demand in a multiple-dry-year scenario,

i.e., drought conditions, and to meet projected demand generated by the proposed project and related projects.

Further, in *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, the California Superior Court held that CEQA does not require a lead agency to evaluate the potential impacts of the environment on a project. The effects of climate change on water supplies are at present uncertain, and it would be inappropriate at this time to speculate what impact such effects may have on water supplied to and by Glendale Water and Power since CEQA does not require the Lead Agency to engage in speculation about impacts. *State CEQA Guidelines*, 14 CCR Section 15145.

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

Response 5-14

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

Response 5-15

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

Response 5-16

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

Response 5-17

While climate change is generally understood to affect local rainfall and snow pack levels, it is not possible to make a precise link between the emissions of any single project, including the one analyzed in the Draft EIR, on those levels. Climate change is a global issue in which emissions from sources in Asia or Africa have as much impact on rainfall in California as emissions from local sources do. In the context of

global changes in weather or climate emissions from any individual project are inconsequential. Therefore, impacts can only be considered in terms of cumulative emissions, which is what the SCAQMD significance thresholds address.

Response 5-18

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

Response 5-19

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

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

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

Response 5-20

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

Response 5-21

Section 7.0, Alternatives, of the Draft EIR, identifies feasible alternatives to the proposed project that may reduce the significant impacts identified for the project, as required by Section 15126.6 of the *State CEQA*

Guidelines. Chapter 7.0 of the Draft EIR includes a discussion of alternatives to the proposed project. Each alternative is evaluated according to the topic areas addressed in the Draft EIR including land use. As stated in Chapter 7.0, none of the alternatives evaluated would result in additional land use impacts compared to the proposed project.

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

Duong, Rathar

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

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

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

Sent from my iPad

1

Letter No. 6: **Diane Lewis**

Response 6-1

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

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

Dear R Duong,

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

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

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

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

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

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

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

Thank you!

Randall Von Bloomberg
concerned citizen

1

10/8/2013

Letter No. 7: Randall Bloomberg

Response 7-1

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

Duong, Rathar

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

Dear Mr. Duong,

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

1

Thank you,
Ely Lester

1411 Hillcrest Ave.
Glendale CA.

10/8/2013

Letter No. 8: **Ely Lester**

Response 8-1

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

Duong, Rathar

From: Carolyn West [mjpcomacho@yahoo.com]

Sent: Monday, October 07, 2013 6:03 PM

To: Duong, Rathar

Subject: RE: 3901 San Fernando Rd.

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

1

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

10/8/2013

Letter No. 9: Carolyn West

Response 9-1

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

Duong, Rathar

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

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

Sent from my iPad

1

Letter No. 10: **Judy Bruce**

Response 10-1

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

Duong, Rathar

From: Warensnec@aol.com

Sent: Monday, October 07, 2013 9:39 PM

To: Duong, Rathar

Subject: Please spare 3901 San Fernando Rd

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

1

Thank you,
The Linkchorst Family,
La Crescenta, CA

10/8/2013

Letter No. 11. Linkchorst

Response 11-1

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

Duong, Rathar

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

Dear Mr. Duong,

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

1

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

Sincerely,

Joemy Wilson
Glendale homeowner since 1986

10/8/2013

Letter No. 12. **Joemy Wilson**

Response 12-1

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

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

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

1

Cathy Green, CPC, ERPA



647 W. Broadway
Glendale, CA 91204

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

www.cmcpenpro.com

To ensure compliance with requirements imposed by the IRS, we are informing you that this communication is not intended to be tax advice, and as such cannot be used to avoid tax-related penalties or to promote, market or recommend these or related matters to a third party.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

10/8/2013

Letter No. 13: Cathy Green

Response 13-1

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

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Wednesday, October 09, 2013 10:18 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / Link Project

From: Sam Manoukian [<mailto:remaxglendale@msn.com>]
Sent: Tuesday, October 08, 2013 9:23 PM
To: Duong, Rathar
Subject: Link Project

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

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

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

1

Sam S. Manoukian, CCIM

#1 COMMERCIAL RE/MAX AGENT IN THE WORLD

RE/MAX OPTIMA-Director of Commercial Division

333 E. Glenoaks Blvd. Suite 100, Glendale, CA 91207

Dir: 818-547-6324 Fax: 818-450-0712

Email: remaxglendale@msn.com

www.glendaleinvestments.com

OVER \$1BILLION IN CLOSED TRANSACTIONS

Letter No. 14: **Sam Manoukian**

Response 14-1

The comment includes statements in support of the proposed project and the Draft EIR's determination that the building at 3901 San Fernando Road is not an historic resource. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Wednesday, October 09, 2013 10:17 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / Link Project

From: Alexander Sardarian [<mailto:alsard@gmail.com>]
Sent: Tuesday, October 08, 2013 7:20 PM
To: Duong, Rathar
Subject:

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

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

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

Alexander Sardarian

1

Letter No. 15: **Alexander Sardarian**

Response 15-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Tuesday, October 08, 2013 3:12 PM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / Glendale Link Project

Another comment

From: David Alishan [<mailto:carwshpro@hotmail.com>]
Sent: Tuesday, October 08, 2013 3:10 PM
To: Duong, Rathar
Subject: Glendale Link Project

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

1

Thanks
David Alishan
1905 vassar street
Glendale 91204

Letter No. 16: **David Alishan**

Response 16-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: John Ballon [<mailto:bonjallon@gmail.com>]
Sent: Tuesday, October 08, 2013 10:18 AM
To: Duong, Rathar
Subject: Please Help Preserve 3901 San Fernando

Dear Rathar Duong,

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

1

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

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

2

Thank you kindly,

John Ballon
Glendale Resident

Letter No. 17: John Ballon

Response 17-1

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

Response 17-2

The comment expresses an opinion on the importance of L.H. Wilson and the architectural integrity of the building. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the building's connection to L.H. Wilson, the development of the San Fernando Corridor and the architectural integrity of the building. The opinions of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Matteo Bitetti [<mailto:matteobitetti@icloud.com>]
Sent: Wednesday, October 09, 2013 5:39 PM
To: Duong, Rathar
Subject: Re: Preserve -- repurpose

3901 San Fernando Road
Hopper's Office Furniture Building

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

> Hi Matteo. Which project are you referencing? Thanks

>

> Rathar

>

> -----Original Message-----

> From: Matteo Bitetti [<mailto:matteobitetti@icloud.com>]

> Sent: Wednesday, October 09, 2013 5:32 PM

> To: Duong, Rathar

> Subject: Preserve -- repurpose

>

> Please do not tear down our city's land marks.

>

>

1

Letter No. 18: Matteo Bitetti

Response 18-1

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

CIMMARUSTI HOLDINGS, LLC

October 9, 2013

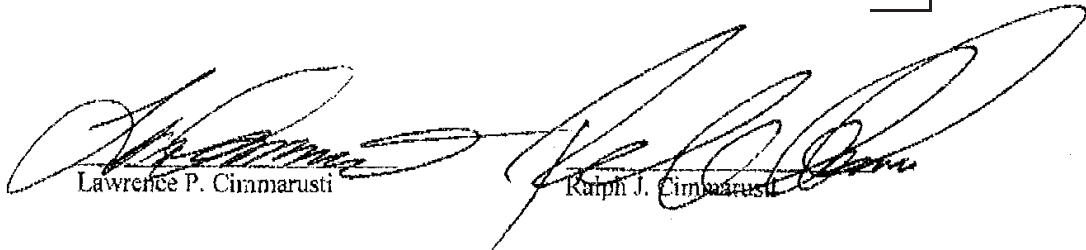
We have been residents of Glendale for many years. We are finally pleased to see quality developments in South Glendale.

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

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

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

1



Lawrence P. Cimmarusti

Ralph J. Cimmarusti

CIMMARUSTI HOLDINGS, LLC.
3031 Riverside Drive • Los Angeles, CA 90039 • (323)674-0203 • Fax: (323)674-0212

Letter No. 19: **Lawerence Cimmarusti**

Response 19-1

The comment includes statements in support of the proposed project and the Draft EIR's determination that the building at 3901 San Fernando Road is not an historic resource. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Wednesday, October 09, 2013 3:17 PM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / The Link

From: Pierre Chraghchian [<mailto:pierre@aswf.us>]
Sent: Wednesday, October 09, 2013 2:52 PM
To: Duong, Rathar
Subject: The Link

I am a long time resident of Glendale and my business is located on San Fernando Rd. I am literally in South Glendale on a daily basis. A quality development like The Link is very much needed in this part of the city. My partner and I travel to Silverlake, Atwater or downtown Glendale for lunch. These communities have restaurants, coffee houses and services that are much needed in South Glendale. The Link will result in quality business establishments to support the South Glendale business community.

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

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

Pierre Chraghchian

1

Letter No. 20: **Pierre Chraghchian**

Response 20-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Wednesday, October 09, 2013 11:22 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / LINK GLENDALE

From: Ara Aroustamian [<mailto:ara@lawaa.com>]
Sent: Wednesday, October 09, 2013 11:16 AM
To: Duong, Rathar
Subject: LINK GLENDALE

I have been a resident of Glendale and have had a law practice in Glendale for many years. A quality development in South Glendale is a long time coming.

The Link Project, with its proximity to the metrolink station and bus transportation is what every city desires. I am pleased that the existing buildings will be demolished, because they really have made that area of south Glendale unsightlier than the remainder.

Being an attorney, I have carefully reviewed the DEIR on your website. I can't wait to see another beautiful building across the street from the Camden mixed use project. Glad that the gigantic billboard and the ugly building will disappear. Moreover, badly needed low income housing will be added to the city supply at no cost to the taxpayers.. This 142 unit mixed use project has my complete support.

1

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

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of AROUSTAMIAN & ASSOCIATES. Any unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you received this communication in error, please notify us immediately by return email or by email to ARA@LAWAA.COM, and destroy this communication and all copies thereof, including all attachments. This email is covered by the Electronic Communications Privacy Act, 18 U.S.C. sections 2510 - 2521 and is legally privileged.

Letter No. 21: **Ara Aroustamian**

Response 21-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Ellen Svaco <es999@aol.com>
Sent: Thursday, October 10, 2013 7:51 PM
To: Duong, Rathar
Subject: 3901 San Fernando Road

Don't tear it down, it's an old historical commercial building. Glendale has done a good job of preserving historical homes but not commercial buildings. Which is why Old Town in Pasadena is gorgeous and charming and Brand Blvd. in Glendale is essentially a shit box. Thanks, Ellen Svaco

1

Sent from my iPhone

Letter No. 22: **Ellen Svaco**

Response 22-1

The comment expresses an opinion opposed to the proposed project. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of a reuse alternative. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Nancy Michael <FrenchJacket@Earthlink.Net>
Sent: Thursday, October 10, 2013 9:40 PM
To: Duong, Rathar
Subject: Building on San Fernando

Sir:

Please do not let them tear down the lovely old 30s building on San Fernando Rd (3901). It is part of Glendale's history and should be preserved.

Thank you.

Nancy Bain

1

Letter No. 23. **Nancy Bain**

Response 23-1

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

From: Bruce Merritt <brucegmerritt@sbcglobal.net>
Sent: Thursday, October 10, 2013 7:47 PM
To: Duong, Rathar
Subject: 3901 San Fernando Road

Dear Mr. Duong:

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

1

Sincerely yours,

Bruce Merritt

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

Letter No. 24: Bruce Merritt

Response 24-1

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

From: SFlocco@cainc.com
Sent: Thursday, October 10, 2013 8:24 PM
To: Duong, Rathar
Subject: Glendale Link

Hello,

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

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

1

2

3

4

5

6

7

Letter No. 25: Sue Flocco

Response 25-1

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

Response 25-2

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

Response 25-3

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

Response 25-4

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

Response 25-5

Refer to **Response 25-3**.

Response 25-6

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

Response 25-7

Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the alleged significance of the 3901 San Fernando Road building, including its connection to the development of the San Fernando Corridor and the architectural integrity of the building. The comment further expresses an opinion opposing the demolition of the building. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Tom Jacobsmeyer <tvjake2@gmail.com>
Sent: Thursday, October 10, 2013 7:34 PM
To: Duong, Rathar
Cc: Mary Kay Prather
Subject: Do not tear down 3901 San Fernando Rd.

3901 San Fernando, built in 1930 is a distinctive example of Mediterranean Revival architecture and is one of the few remaining commercial structures of that style left in Glendale. It is historically important for its association with L.H. Wilson, who built the structure and maintained his offices there. Wilson was a real estate agent and civic leader who was a leading proponent and facilitator of the creation of the San Fernando Road commercial corridor as we know it today.

Some options for the city are:

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

We cannot afford to lose any more.

*Tom Jacobsmeyer,
 1135 Geneva St
 Glendale, CA 91207*

1

2

3

4

5

Letter No. 26: Tom Jacobsmeyer

Response 26-1

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

Response 26-2

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

Response 26-3

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

Response 26-4

The comment states the buildings' association with L.H. Wilson makes it historically and architecturally significant. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the building's connection to L.H. Wilson and the development of the San Fernando Corridor.

Response 26-5

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

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Thursday, October 10, 2013 9:57 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / The Link Project

From: Alex A [mailto:alexavakian@gmail.com]
Sent: Thursday, October 10, 2013 9:55 AM
To: Duong, Rathar
Subject: The Link Project

To Whom it may concern:

I am a resident of Glendale and have been for the past 8 years. I believe this High Quality Mixed Use Project will benefit the Community of Glendale and add new Quality apartment units for its citizens and for new people looking to move into the City.

Also the mixed use area along with the Studio space will provide jobs and commerce along the San Fernando Road corridor.

I especially like the location being close to the Transit Center. The Residents and Business employees will be able to use Public Transportation to go throughout the city of Glendale and Metro Link will allow them to reach destinations close and far.

The new LINK Project will beautify this GATEWAY location of South Glendale. To put it mildly, the existing building and billboard are not up to par, at all.

I also appreciate the fact that this Project will bring new Jobs and new Residents that will eat, shop and spend their money at the existing businesses in town.

Since the city is in the middle of a budget crisis, the park and additional fees in the millions of dollars generated from this project will be of great benefit to the city as well.

This is an important Project for our City and it has my complete and unequivocal support as I would like to see it become a reality.

Best,

---Alex Avakian

1

Letter No. 27: **Alex Avakian**

Response 27-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Paul Berolzheimer <zerodbspl@yahoo.com>
Sent: Friday, October 11, 2013 5:15 PM
To: Duong, Rathar
Subject: 3901 San Fernando

I'd like to register my preference that the building at 3901 San Fernando Road NOT be demolished, and that it's architectural and historic character be retained. I've always admired that building, and we must do what we can to preserve the visual and aesthetic character of our city.

***Thank you,
-Paul Berolzheimer
Glendale 91205
818-331-8514***

1

Letter No. 28: Paul Berolzheimer

Response 28-1

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

From: Albert Babayan <albert@thecondopeople.com>
Sent: Friday, October 11, 2013 5:09 PM
To: Duong, Rathar
Subject: Link Project
Attachments: Link 13.docx

Hello sir,

Enclose please find the support letter for this project.

You can call me, if you have any questions.

Albert Babayan
Real Estate People, Inc.
Tel: (818)409-0050
Cell (818)469-9388
Fax:(818)507-8988
Email: albert@thecondopeople.com

10/11/2013

To Whom It May Concern,

I have been a real estate broker and a resident of Glendale for many years. It is great to see a project of this magnitude come to south Glendale, where there has been a lack of decent development for as long as I have lived in Glendale.

The existing buildings no longer fit in this area due to the extensive planning and rezoning undertaken by the city staff and approved by the city council. After looking at the DEIR, I believe that all the buildings on the property need to be demolished in order to have uniform development.

The Link Project will be for south Glendale what Americana has been for Brand Boulevard.

1

Albert Babayan

Real Estate People, Inc.

(818)409-0050 x 301

Letter No. 29: **Albert Babayan**

Response 29-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Marty Bracciotti <martyjoe@sbcglobal.net>
Sent: Friday, October 11, 2013 4:39 PM
To: Duong, Rathar
Subject: 3901 San Fernando/Glendale Link Project: OPPOSED

Dear Rathar,

This email is in OPPOSITION to the demolition of the historic and architecturally significant building located at 3901 San Fernando, known at the Glendale Link Project.

My family lives within walking distance of this beautiful building and have often admired it. We ask that you not let this developer destroy one of the few remaining commercial buildings in our neighborhood that not only ties us with our past, but brings a unique quality to our neighborhood that new construction cannot. I cannot believe that Glendale would even consider trashing one its crown jewels.

1

On Monday, October 11, 2013 this building was featured on the TV show Undercover Boss. The developer obviously knows that unique character and beauty of this building has value, as did the TV producer.

I DO SUPPORT Alternative 2 the Reduced Density/Reuse Alternative as it would not only save this stunning building, but give the new project some class and pizzaz. Please preserve the quality of life in our neighborhood and do not let the developer demolish this building.

2

Thank you for your consideration

Marty Bracciotti
318 Roads End Street
Glendale, CA 91205
cell (213) 894-1633

Letter No. 30: Marty Bracciotti

Response 30-1

The comment expresses an opinion opposed to the proposed project. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 30-2

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

From: Kama Hayes <kamahayes@yahoo.com>
Sent: Friday, October 11, 2013 2:49 PM
To: Duong, Rathar
Subject: Opposition to the Demolition of 3901 San Fernando Road - Support Re-Use

Hello there - I am a lifelong resident of Los Angeles, and moved to Glendale last November (2012).

One of the things that I love about Glendale is the feel of early California and one of the things that drew me away from my long time home in Hollywood was the over abundance of new development.

Please do not allow for the Demolition of the wonderful Spanish storefront building on San Fernando Road. There is no reason why this great piece of architecture can't be incorporated into the new development.

Please, please, please vote in support of saving this structure!

**Kama Hayes
515 E. Chestnut Street
Glendale, CA 91205**

Kama Hayes
Art Department Coordinator
UROK Productions
(213) 534-3825 (tel)
(213) 534-3884 (fax)

Letter No. 31: **Kama Hayes**

Response 31-1

The comment expresses an opinion opposed to the proposed project. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Rima G. Cameron [<mailto:rimag@charter.net>]
Sent: Friday, October 11, 2013 3:39 PM
To: Duong, Rathar
Subject: 3901 San Fernando Rd

I am writing to express my strong opposition to the proposed demolition of the building located at 3901 San Fernando Rd. As a member of the Glendale Historical Society and the owner of home #84 on the Glendale Register of Historic Resources, I appreciate deeply the importance of maintaining Glendale's historic treasures. [The building in question is a marvelous 1930 Mediterranean Revival and has been determined to be eligible for listing on the California and the Glendale Registers of Historic Resources.] I urge you to oppose the demolition and instead approve the preservation alternative identified in the Draft of the Environmental Impact Report that retains the existing building with a smaller-scale project.

1

2

3

Thank you for your consideration of my comments.

Rima Gregorian Cameron

Letter No. 32: Rima Cameron

Response 32-1

The comment expresses an opinion opposed to the proposed project. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 32-2

The commenter expresses an opinion on the architecture of the building and its eligibility for listing on the California and National Registers. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. As stated therein, the building at 3901 San Fernando Road has been determined to be ineligible for the local, state, and national historic registers.

Response 32-3

The comment expresses an opinion in support of Alternative 2. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Friday, October 11, 2013 1:57 PM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / The Link Project

From: JANET HAROOTUN [<mailto:jharootuncpa@gmail.com>]
Sent: Friday, October 11, 2013 1:53 PM
To: Duong, Rathar
Subject: The Link Project

To whom it may concern:

I have been a resident of Glendale and have had an accounting practice in Glendale for many years. I am so glad that a quality development is being proposed in south Glendale .

The DEIR on your website, was very comprehensive. No doubt the historical society of Glendale will oppose this project. However, they seem to think any old building in Glendale is historical. I have been to the furniture shop located in the building on many occasions. That building has no historical value. It is an old dilapidated building. I am glad that the experts agree with me.

I can't wait to see a new state of the art building replace the existing buildings located at the gateway to Glendale...

Sincerely,

Janet Harootun, CPA
520 N Central Ave. Suite 650
Glendale CA 91203
Tel: 818-502-4900 fax 818-502-4903
website: www.jharootuncpa.com

Circular 230 Notification - IRS regulations require us to advise you that, unless otherwise specially noted, any federal tax advice in this communication (including any attachments) was not intended or written to be used, and it cannot be used, by any taxpayer for the purpose of avoiding penalties; furthermore, this communication was not intended or written to support the promotion or marketing of any of the transactions or matters it addresses.

* The information in this transmittal (including attachments, if any) is privileged and confidential and is intended only for the recipient(s) listed above. Any review, use, disclosure, distribution or copying of this transmittal is prohibited except by or on behalf of the recipient.

If you have received this transmittal in error, please notify me immediately by reply email and destroy all copies.

1

Letter No. 33: **Janet Harootun**

Response 33-1

The comment includes statements in support of the proposed project and the Draft EIR's determination that the building at 3901 San Fernando Road is not an historic resource. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Friday, October 11, 2013 1:32 PM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / Glendale link project

From: Gilda Killeen [<mailto:gildakilleen@hotmail.com>]
Sent: Friday, October 11, 2013 1:26 PM
To: Duong, Rathar
Subject: Glendale link project

I am writing this letter to support of the Glendale Link Project. I travel up and down San Fernando Rd on many occasions. I am so happy that the ugly building with a billboard on top will be demolished and will be replaced with a beautiful mixed use project. The addition of the lowincome units as part of the project will benefit the needy in this city at no additional cost to the taxpayers. I am glad that someone has finally taken steps to replace that building and billboard.

1

Sincerely,
Gilda

Sent from my iPhone

Letter No. 34: **Gilda Killeen**

Response 34-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Friday, October 11, 2013 1:20 PM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / LINK PROJECT

-----Original Message-----

From: Tatiana E [mailto:tatmakeup@yahoo.com]
Sent: Friday, October 11, 2013 12:44 PM
To: Duong, Rathar
Subject: LINK PROJECT

Good day!

I really like the Link project, the vibrant colors will bring life to this dreary part of Glendale, and will replace the bleak looking building and mega billboard located on top of it. The existing building may have looked good during the time it was constructed, however, now it does not fit in this neighborhood. It is absolutely characterless. A mishmash. Composition roof, where once there was clay, black aluminum window frames and doors that were recently installed, parapets to block the air conditioning units on top of the building.

The DEIR does a great job. I don't like alternative 2 in the EIR. I think by constructing a new building next to this old building. The old building is going to seem uglier and more out of place than it already is. I support the demolition of the existing buildings, and the construction of the Link.

Tatiana Eremina,
resident of Glendale

1

Letter No. 35: **Tatiana Eremima**

Response 35-1

The comment includes statements in support of the proposed project and in opposition to Alternative 2.
The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Janine mass [<mailto:janinemass123@gmail.com>]
Sent: Friday, October 11, 2013 12:07 PM
To: Duong, Rathar
Subject: City of Glendale

I am a long time resident of Glendale and am so pleased to see this beautiful proposed developments in South Glendale.

With all the development concentrated in north Glendale it is important to finally tie the two sides of the city together. I like the name Link. The city of Tropic where this project is located used to be called the link city, because it tied Los Angeles to Glendale. These developments in south Glendale will once again tie Atwater, and Silver Lake to Glendale.

To those that may argue that the existing building is historical, I would point out the Americana project which they also opposed. Look at the numerous benefits it has brought for our community.

The existing building is an old building, and there is absolutely nothing historical about it. They use term historical as loosely as possible so that it will fit their goals.

The DEIR is an excellent document. Lets make Glendale a great city for the next generation. Progress is made through action and not inaction. Lets tear down and build quality projects and housing.

1

--

Respectfully,

Janin Massoomian
Insurance Specialist
CA License # 0728798
Tel: 818. 645-6744
Fax: 877.494.5085
Email: Insurancechoice4u@gmail.com

Letter No. 36: **Janin Massoomian**

Response 36-1

The comment includes statements in support of the proposed project and the Draft EIR's determination that the building at 3901 San Fernando Road is not an historic resource. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Friday, October 11, 2013 12:03 PM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / Glendale Link Project

From: Denise Walker [<mailto:denisewalker3@yahoo.com>]
Sent: Friday, October 11, 2013 10:46 AM
To: Duong, Rathar
Subject: Glendale Link Project

I am in favor of finding an alternative to the Glendale Link Project that preserves the building at 3901 San Fernando Road.

I have lived in Glendale for 42 years. My Mediterranean-style home was built in 1925, and has beautiful details. I am very proud of how I have maintained its original character. When I travel elsewhere, I'm always impressed by the way other cities and countries re-purpose their old buildings to maintain the charm and character of the old buildings. I hate to see historical buildings demolished, if at all possible. New construction seldom has the appeal of the old buildings.

Please do the right thing and find a way to incorporate the existing structure into the development proposed for the site.

Thank you,
Denise Walker
Glendale 91207

1

Letter No. 37: Denise Walker

Response 37-1

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

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Friday, October 11, 2013 12:01 PM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR /3901 San Fernando Blvd is an important part of Glendale's history and our city's identity

From: Russell Harnden [<mailto:anitarinaldi@pacbell.net>]
Sent: Friday, October 11, 2013 12:18 AM
To: Duong, Rathar
Subject: 3901 San Fernando Blvd is an important part of Glendale's history and our city's identity

Dear Mr. Duong,

I am a resident of Glendale who is very interested in preserving Glendale's rich history. Historic buildings provide us and future generations a wonderful opportunity to explore the history of our "Jewel City". Glendale has already removed so much of it's historic commercial buildings and we have very few left to enjoy and study. [The historic building at 3901 San Fernando Rd. is a beautiful piece of 1930's Mediterrean Revival architecture and housed a very important business which helped create the San Fernando corridor making Glendale the proud city we know today.] Please consider Alternative 2 which would allow the building to remain completely intact, but repurposed for contemporary usage. This action will create a win win outcome for us all and a beautiful piece of Glendale's history will be preserved for generations to come.

1

2

3

Thank you for your consideration, and your support for city of Glendale's rich history.

Anita Rinaldi-Harnden

Letter No. 38: Anita Rinaldi-Harnden

Response 38-1

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

Response 38-2

Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the building's connection to L.H. Wilson and the development of the San Fernando Corridor, as well as a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers.

Response 38-3

The comment expresses an opinion in support of Alternative 2. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Friday, October 11, 2013 12:00 PM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / please stop the demolition of building at 3901 San Fernando Road
Attachments: jurca-3901sanfernando.docx; ATT22998937.htm

From: Catherine Jurca [<mailto:cathjurca@gmail.com>] **On Behalf Of** Catherine Jurca
Sent: Friday, October 11, 2013 9:37 AM
To: Duong, Rathar
Subject: please stop the demolition of building at 3901 San Fernando Road

Dear Mr. Duong:

I am a Glendale homeowner and resident, writing to urge you to prevent the demolition of the building at 3901 San Fernando Rd. As reported in the Glendale News Press, a thorough report by an independent historic resource consultant finds the building to be eligible for listing on both local and state historic registers. It is a rare and fine example of Mediterranean Revival architecture. Moreover, it was built by Lloyd Wilson, an important civic leader and businessman who helped develop and expand the San Fernando Rd. commercial corridor, an important feature of the south Glendale landscape through the present day. In the developer's draft EIR, the minimization of Wilson's role in Glendale's development is absolutely bewildering and calls its findings into serious question. The building's significance is both architectural and broadly historical.

Preserving 3901 San Fernando Rd. does not preclude development of the property. The draft EIR introduces an alternative proposal (#2--Reuse/Reduced Density) that meets the project's goals while diminishing negative environmental consequences and preserving this south Glendale structure. While the developer states that it is not economically viable, he provides no data. The city should insist that whatever the plans for the site are, preservation is given the highest priority.

It is dismaying how little regard Glendale has shown for its historic commercial resources. I hope that 3901 San Fernando Rd. will mark a turning point. If the city's goals are to attract "young professionals" to live here, it needs to provide them with the kinds of older, architecturally interesting, human-scale buildings that make the neighboring communities they flock to now so attractive--places like Atwater Village, Eagle Rock, Pasadena, Silver Lake, etc. It is not the case that "if you build it they will come." This population needs to be lured to Glendale with the right kind of building, like the existing Mediterranean Revival building. Beyond that, the building is a beautiful asset to anyone who cares about our city's aesthetics and history. Preserving it will demonstrate that Glendale considers its treasures worth preserving and is becoming more thoughtful about development.

Thank you for your consideration.

Sincerely,
Catherine Jurca

1845 Niodrara Dr.
Glendale, CA 91208

October 11, 2103

Rathar Duong
Planning Division
City of Glendale
633 E Broadway, Room 103
Glendale, CA 91026

Dear Mr. Duong:

I am a Glendale homeowner and resident, writing to urge you to prevent the demolition of the building at 3901 San Fernando Rd. As reported in the Glendale News Press, a thorough report by an independent historic resource consultant finds the building to be eligible for listing on both local and state historic registers. It is a rare and fine example of Mediterranean Revival architecture. Moreover, it was built by Lloyd Wilson, an important civic leader and businessman who helped develop and expand the San Fernando Rd. commercial corridor, an important feature of the south Glendale landscape through the present day. In the developer's draft EIR, the minimization of Wilson's role in Glendale's development is absolutely bewildering and calls its findings into serious question. The building's significance is both architectural and broadly historical.

Preserving 3901 San Fernando Rd. does not preclude development of the property. The draft EIR introduces an alternative proposal (#2--Reuse/Reduced Density) that meets the project's goals while diminishing negative environmental consequences and preserving this south Glendale structure. While the developer states that it is not economically viable, he provides no data. The city should insist that whatever the plans for the site are, preservation is given the highest priority.

It is dismayingly how little regard Glendale has shown for its historic commercial resources. I hope that 3901 San Fernando Rd. will mark a turning point. If the city's goals are to attract "young professionals" to live here, it needs to provide them with the kinds of older, architecturally interesting, human-scale buildings that make the neighboring communities they flock to now so attractive--places like Atwater Village, Eagle Rock, Pasadena, Silver Lake, etc. It is not the case that "if you build it they will come." This population needs to be lured to Glendale with the right kind of building, like the existing Mediterranean Revival building. Beyond that, the building is a beautiful asset to anyone who cares about our city's aesthetics and history. Preserving it will demonstrate that Glendale considers its treasures worth preserving and is becoming more thoughtful about development.

Thank you for your consideration.

Sincerely,

Catherine Jurca

Letter No. 39: Catherine Jurca

Response 39-1

Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the building's connection to L.H. Wilson and the development of the San Fernando Corridor, as well as a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers.

Response 39-2

Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 39-3

The comment expresses general opinions about the City of Glendale and the preservation of buildings. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Friday, October 11, 2013 11:59 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR/ 3901 SAN FERNANDO ROAD

From: Sonia Montejano [<mailto:stmontejano@gmail.com>]
Sent: Friday, October 11, 2013 11:52 AM
To: Duong, Rathar
Subject: 3901 SAN FERNANDO ROAD

Dear Rather Duong,

I am contacting you as a concerned citizen over the possible demolition of one of the few remaining examples of a Mediterranean Revival architectural style commercial building on the corner of San Fernando and Central Blvd.

Recently, the city of Glendale had been undergoing a wave of construction projects, impacting it's population density and future traffic congestion. I moved to Glendale because it still retained a "small town" feel, though very much a modern city. It would be shame to allow this structure to be demolition, and it why I must express my opposition. It is not OK.

Please do not allow the proposed demolition of said structure! There are many other options before that drastic measure is taken. I ask you to please consider preserving this beautiful building from our past and allow it to remain standing for all to see.

Sincerely,

Sonia T. Montejano

Letter No. 40: Sonia Montejano

Response 40-1

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

From: Ruth Campbell <lzglotz@pacbell.net>
Sent: Friday, October 11, 2013 12:45 AM
To: Duong, Rathar
Subject: SAVE 3901 SAN FERNANDO ROAD!

I like to think that the people who run Glendale are smarter than the politicians who are destroying Los Angeles. In L.A., they don't seem to care about preserving the past. Glendale generally (but not always) does the right thing and protects its old buildings. I moved here because of all the beautiful old buildings. That's the absolute truth.

Please protect 3901 San Fernando Road and tell the owner that he'll have to tear down some other building -- one that doesn't matter -- if he wants to pursue his oversized (and, I'm sure, characterless) building. STOP HIM, please! I'm very concerned about this, and very angry that yet another greedy developer wants to destroy a charming piece of Glendale's past to rake in a lot of money for himself.

Sincerely, Ruth Campbell

Letter No. 41: **Ruth Campbell**

Response 41-1

The comment expresses an opinion opposed to the proposed project. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Friday, October 11, 2013 9:27 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR for the LINK / Don't demolish our history.

From: Alexander Rojas [mailto:alexrojas5@yahoo.com]
Sent: Friday, October 11, 2013 9:24 AM
To: Duong, Rathar
Subject: Don't demolish our history.

The thought of demolishing the building that stands at 3901 San Fernando Rd is so very wrong. The city of Glendale is tearing down nearly every sign of it's architectural history at a frightening rate. There's almost nothing left of what once was.

The building at 3901 San Fernando Rd is a rare example of Mediterranean Revival commercial architecture that was once so prominent in Glendale. Once it's gone, it's gone for good. No photograph can replicate or replace the real experience of being in the physical presence of such wonderful buildings.

PLEASE DO NOT TEAR DOWN THIS BUILDING.

Alex Rojas

1

Letter No. 42: **Alex Rojas**

Response 42-1

The comment expresses an opinion opposed to the proposed project. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Marilyn Oliver <mtowriter@yahoo.com>
Sent: Friday, October 11, 2013 6:49 PM
To: Duong, Rathar
Subject: glendale Link Project

I am writing to oppose the demolition of the building locted at 3910 San Fernando Road which is part of the Glendale Link Project. This building has historic significance as it was a major building in the town formerly known as Tropico which was annexed to Glendale. It also has architectural significance as it is in the Mediterranean revival style which was popular in the 1920's and '30's. I live in the Silverlake district of LosAngeles which is near Glendale, but when I go to my doctor in the Glendale memorial office building across the street from this structure,I often park in front of it and admire it as a historic building. Glendale has a history of losing historic structures. This is why I urge you to support an adaptive reuse of this structure as what has occurred at the Seeley Mattress building at the corner of Brand andSan Fernando Rd. which has incorporated lofts but saved the original structure.

Sincerely, Marilyn T. Oliver, member of theGlendale Historical Society.

1

2

3

Letter No. 43: Marilyn Oliver

Response 43-1

Refer to **Topical Response 1** Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the historic significance of the building located at 3901 San Fernando Road. As explained therein, this building has no connection to the town formerly known as Tropic.

Response 43-2

Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers.

Response 43-3

Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of a reuse alternative.

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Monday, October 14, 2013 8:21 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / Opposition of Demolition of Historic Building at 3901 San Fernando Road

-----Original Message-----

From: Scott Lasken [<mailto:scott@stratagemdesigninc.com>]
Sent: Friday, October 11, 2013 8:45 AM
To: Duong, Rathar
Subject: Opposition of Demolition of Historic Building at 3901 San Fernando Road

Mr. Duong,

I support an alternative for the Glendale Link Project that preserves the building.

The city should pursue Alternative 2-Reuse/Reduced Density Alternative for the Glendale Link Project, which meets the developer's goals while allowing for preservation and adaptive reuse of the building.

The existing structure is a rare example of Mediterranean Revival commercial architecture in Glendale.

The building's association with L.H. Wilson, a leading advocate for the development of the San Fernando commercial corridor, makes it historically as well as architecturally significant.

The city of Glendale has an unfortunate history of allowing demolition of potentially historic structures. We cannot afford to lose any more.

Please do not demolish this building!

Thank you,
Scott Lasken
Stratagem Design, Inc.
2572 Gardner Place
Glendale, CA 91206
(818) 242-3513
scott@stratagemdesigninc.com
www.stratagemdesigninc.com

1

2

3

4

Letter No. 44: **Scott Lasken**

Response 44-1

Refer to **Response 26-2.**

Response 44-2

Refer to **Response 26-3.**

Response 44-3

Refer to **Response 26-4.**

Response 44-4

Refer to **Response 26-5.**

Ian Hillway

From: Ara Mirzayan <aramirzayan@yahoo.com>
Sent: Saturday, October 12, 2013 5:54 PM
To: Duong, Rathar
Subject: Link Project in South Glendale

I have owned a home in Glendale for over twenty years. I periodically travel to South Glendale, and am finally pleased to see quality developments in that part of the city. I hope that one day we will have a community similar to Silverlake or Atwater in that part of town. The Link Project will replace an eye soar on San Fernando Rd. The billboard on top of that building is an embarrassment for the City of Glendale. A gateway to the city is befitting of a beautiful project .

After reviewing the DEIR on your website, I am satisfied with the contents of that report. I completely support the demolition of the existing buildings and the construction of the beautiful 142 unit building.

Regards, Ara Mirzayan

1

Letter No. 45: **Ara Mirzayan**

Response 45-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Anita Weaver <anitaweaver1@gmail.com>
Sent: Saturday, October 12, 2013 2:46 PM
To: Duong, Rathar
Subject: Please save 3901 San Fernando Road

Dear Mr. Duong,

We are longtime Glendale resident homeowners. One of the features of this beautiful city that attracted us to settle here was the historic residential and commercial architecture. I'm not going to reiterate all of the more than reasonable arguments I'm sure that you have already heard or will hear about 3901 San Fernando Road's place in Glendale's commercial history and its special architectural features. I would like you rather to think for a moment of this prominently sited building's impact on the many Glendale drivers who pass by it every day and also of the many pedestrians who stroll past it, not to mention the people who live on the neighboring streets. If metering devices were installed on the street and on the sidewalk that measured the degree of positive emotional response that this beautiful, nostalgic, and impressive building instilled in its observers (even if they're not consciously aware of it), I think that any question of its demolition would be rendered moot. If there were a row of spectacular jacaranda trees lining the sidewalk and the city came and cut them down, people who got pleasure from the sight of the trees, who experienced a moment of bliss and contemplation of the wonders of nature and the beauty of their city would be rightfully upset. 3901 San Fernando is like that row of jacarandas. It is a feature, not a burden. It is a gem that was born in a time of bright optimism for Glendale's future, a time when that optimism was directly translated into creating a graceful and striking building in which everyone in the city could take pride. That is its mission and it should be allowed to continue to fulfill it.

1

Thank you for listening.
Anita Weaver
Bill Clifton

Letter No. 46: **Anita Weaver**

Response 46-1

The commenter expresses an opinion opposed to the proposed project. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Viktoryia Shypkova <vikulyala@gmail.com>
Sent: Saturday, October 12, 2013 1:48 AM
To: Duong, Rathar
Subject: Community support

I support the development of south Glendale and the Link Project.. I like that it is so close to the metrolink station and bus transportation.

I am pleased that the existing buildings will be demolished, because they really have made this area of south Glendale which is a key gateway into the city look like an area unbecoming to the great city. Moreover, I am happy that badly needed low income housing will be added to the city supply at no cost to us taxpayers. This 142 unit mixed use project has my support.

1

Viktoryia Shypkova
Glendale Resident

Sent from my iPhone

Letter No. 47: **Viktoryia Shypkova**

Response 47-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Richard Lee <rc.lee@charter.net>
Sent: Sunday, October 13, 2013 10:04 PM
To: Duong, Rathar
Subject: Re: Opposition to the Demolition of 3901 San Fernando Road

Mr. Duong:

We support the project alternative for the Glendale Link Project that would preserve and incorporate the existing structure into the commercial/residential development proposed for the site.

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

Thank you,

Richard & Carol Lee
925 Penshore Terrace
Glendale, CA 91207
626-300-4990

Letter No. 48: Richard Lee

Response 48-1

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

Response 48-2

Refer to **Response 26-2**.

Response 48-3

Refer to **Response 26-3**.

Response 48-4

Refer to **Response 26-4**.

Response 48-5

Refer to **Response 26-5**.

From: donald savarese <dsavarese@att.net>
Sent: Sunday, October 13, 2013 8:11 PM
To: Duong, Rathar
Subject: 3901 San Fernando Peservation

I support the **project alternative** for the Glendale Link Project. It is importan sthat the city preserve and use these existing historical structures.

1

Don Savarese (Glendale resident for 42 years)
1223 Loreto Dr.
Glendale, CA 91207

Letter No. 49: **Don Savarese**

Response 49-1

The comment expresses an opinion in support of Alternative 2. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of Alternative 2. Please also refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers.

From: Marcia Hanford <marcia.hanford@gmail.com>
Sent: Sunday, October 13, 2013 7:36 PM
To: Duong, Rathar
Subject: Comments: Glendale Link Project - draft EIR

Dear Mr. Duong:

Re: 3901 San Fernando Road, Glendale Link Project

I strongly recommend that Alternative 2 be chosen when the City evaluates the Draft Environmental Impact Report, as it would retain most of the original structure. Buildings in southern Glendale have been demolished at an alarming rate over the years, and the building at this prominent location is a statement of the importance of Glendale's history.

If Alternative 2 is indeed financially infeasible, we need to see the numbers so that the City and engaged parties can work with the developer to identify modifications that would address this factor. Of course the developer needs to be made whole, but all projects have the potential for multiple iterations. The economic success is important to every stake holder in the community.

Thank you for putting my opinion on record.

Marcia Hanford
Resident since 1980
818-246-2379

1

2

Letter No. 50: Marcia Hanford

Response 50-1

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

Response 50-2

Refer to **Response 50-1**.

From: Christina Rizzo <pinkladyjewelry@aol.com>
Sent: Sunday, October 13, 2013 6:20 PM
To: Duong, Rathar
Subject: 3901 San Fernando Rd.

Dear Rathar,

I am writing to express my opposition to the demolition of the building at 3901 San Fernando Rd., and support for the Alternative 2-Reuse/Reduced Density Alternative to incorporate this structure into the proposed development.

I am a young resident of Glendale, and have recently purchased my first home here. The City of Glendale has allowed too many of its precious architectural resources to be demolished, obliterating major parts of the city's heritage and history for current and future generations. The City should treasure the remaining buildings that were erected during its infancy, not demolish them. In light of current events in Beverly Hills, where historically significant homes have been overlooked and destroyed in favor of new construction or are set for demolition, Glendale should take steps to protect the historical buildings that remain for current and future generations to enjoy and appreciate. There are many communities that appreciate their old buildings, and retain them through re-use, making those places attractive and desirable. Glendale has historically not been one of those communities, but has the potential to be should this type of destruction cease. Once the old buildings are gone, they are gone forever.

Thank you for your attention to this matter.

Sincerely,

Christina Rizzo

1

2

Letter No. 51: **Christina Rizzo**

Response 51-1

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

Response 51-2

The comment expresses an opinion opposed to the proposed project and general opinions about the City of Glendale and the preservation of buildings. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Jeff Sredni <jsredni@gmail.com>
Sent: Sunday, October 13, 2013 12:50 AM
To: Duong, Rathar
Subject: Oppose demolition of 2901 San Fernando

I oppose the proposed demolition of the building at 3901 San Fernando Road.

Why not preserve the building? What are the plans for the site if the building was demolished? Please advise. Thanks!

1

Jeff

Letter No. 52. **Jeff Sredni**

Response 52-1

The comment expresses an opinion opposed to the proposed project. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Please refer to Chapter 3.0 Project Description of the Draft EIR for the proposed project plans.

From: Bersell/Norris [<mailto:1213NorthMaryland@mindspring.com>]
Sent: Monday, October 14, 2013 9:22 AM
To: Duong, Rathar
Cc: Platt, Jay
Subject: Comments on Draft EIR -- Glendale Link Project

Rather, Attached for the record are my comments on the Draft Environmental Impact Report for the Glendale Link Project.

Thank you for the opportunity to provide this input.

Sean Bersell
1213NorthMaryland@mindspring.com
818-531-4362

SEAN DEVLIN BERSELL
1213 North Maryland Avenue
Glendale, CA 91207-1305
1213NorthMaryland@mindspring.com

October 14, 2013

Rathar Duong
Planning Division
City of Glendale
633 E Broadway, Room 103
Glendale, CA 91026-4386

RE: Draft EIR for Glendale Link Project

Dear Mr. Duong,

I am writing to oppose demolition of 3901 San Fernando Road. The Draft Environmental Impact Report [EIR] for the Glendale Link Project makes at least two serious errors: (1) in failing to recognize the historical significance of the contributions of Lloyd H. (L. H.) Wilson to the development of the San Fernando Road corridor as we know it today; and (2) in not acknowledging that 3901 San Fernando Road is associated with events that have made a significant contribution to history of Glendale and surrounding regions. These omissions contributed substantially to the finding that “impacts [of project implementation] related to cultural resources would be less than significant.”¹ I believe that once the errors are corrected, the impacts on cultural resources will be found to be significant and, therefore, the current Alternative 2–Reduced Density/Reuse Alternative, which would mitigate those impacts, should be adopted.

1

L. H. Wilson and the San Fernando Road Area

The Draft EIR concludes that the Mediterranean Revival structure at 3901 San Fernando Road, which would be demolished to make way for the Glendale Link Project, is not eligible for inclusion in the Glendale Register in part because “[t]here is no evidence that [L. H.] Wilson’s business activities were a significant achievement in comparison with the accomplishment of other realtors and developers of the period.” A review of the historical record demonstrates that this conclusion is erroneous.

2

“The name L. H. Wilson has become synonymous with the remarkable development along the San Fernando road. When you say San Fernando road you think of Wilson. When you say Wilson you think of San Fernando road.”

“L. H. Wilson Makes Things Hum on San Fernando Road”
Glendale Evening News, January 1, 1924

L. H. Wilson built 3901 San Fernando Road, recruited an industrial enterprise to the building, and maintained his office there from 1930-1938. Far from being just one of many real estate agents operating in Glendale at the time, Wilson was a major developer and booster of the San Fernando Road corridor. As noted in his obituary, Wilson "was instrumental in promoting much of the city's industrial growth and development, particularly in the western part of the city."²

In addition to Wilson's earlier contributions to the development of the San Fernando Road corridor noted in the Draft EIR, Wilson was a driving force in the development of the corridor through the time that 3901 San Fernando was built. In 1928, it was reported that Wilson was responsible for bringing 70 industrial concerns to Glendale in the prior eight years, including 14 in that year alone.³ Wilson had significant holdings along San Fernando and would lease land he owned to industrial concerns and in a number of cases erect the structures.⁴ In 1928 alone, he built nine industrial buildings and sold five of them.⁵ A June 1929 article notes that Wilson was in the process of erecting six industrial buildings on West Windsor that were already leased.⁶ After constructing 3901 San Fernando, he leased a portion of it to a shoe factory.⁷ It is clear from these accounts and others that Wilson was a significant force, and possibly the most significant force, in the creation of the San Fernando Road corridor as we know it today.⁸

In addition, as a property owner and developer in the San Fernando Road corridor, Wilson was an active proponent of the effort to widen San Fernando Road in the late 1920s.⁹ The widening of San Fernando in Glendale took many years. First proposed in 1923 and authorized and partially funded in 1924,¹⁰ work did not begin until December 1930 due to the need to acquire the rights to 540 properties along the expanded alignment (at a cost of more than \$1,000,000).¹¹ The former road was of varying widths, was too narrow to accommodate the increasing traffic, and poorly paved.¹² Additionally, with the designation of the section of San Fernando Road through Glendale as a portion of U.S. Route 99 in 1926, the road became part of the major west coast artery from Mexico to Canada, bringing even more traffic to the thoroughfare. The original plan was to make San Fernando Road 100 feet wide in Glendale, but when the expansion was finally undertaken, the width was reduced to 62-1/2 feet in the northern portion and 66 feet in the southern section.¹³ As a result of this project, San Fernando Road became the boulevard that exists today.

Although the full extent of his involvement with the widening project is not known, Wilson was described as "one of the leaders of the improvement" and appears to have been an informal liaison for the project with the business community.¹⁴ The Final EIR for the Glendale Link Project should explore more fully Wilson's involvement with the San Fernando Road widening.

Wilson was a member of the board of directors of the Glendale Realty Board for 20 years and was its president from 1928-1930, notably including the time when 3901 San Fernando was built.¹⁵ As the Realty Board president, Wilson was a civic booster of Glendale. For example, in June of 1929, the Los Angeles Times did a feature article on new manufacturing facilities in Glendale that appears to have relied on Wilson as its sole source, describing him as an "industrial expert."¹⁶

Wilson was also a civic leader. He served a term as president of the Glendale parks board and several terms as a director of the Glendale Chamber of Commerce. He was active in a number of fraternal and social organizations and was a director of the California Real Estate association.¹⁷

Notably, when Wilson passed away, it was front page news.¹⁸

Based on the foregoing, there is no doubt that L. H. Wilson was an integral figure in the development of the San Fernando Road corridor of Glendale as we know it today, as was acknowledged in his lifetime. The San Fernando Road corridor was a significant factor in the economic development and growth of Glendale and adjacent areas in the 1920s and 1930s (and beyond). L. H. Wilson, therefore, was a significant figure in the history of Glendale in the first half of the twentieth century.

Significance of 3901 San Fernando Road to Local and Regional History

3901 San Fernando Road is an example of the type of industrial building with aesthetically pleasing design and architecture that L. H. Wilson built on spec in the San Fernando Road corridor and then leased or sold to industrial tenants. In this case, the industrial tenant was the West Coast Style Shoes factory.¹⁹

In discussing another of his industrial buildings, Wilson articulated his development ethos:

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

“Wilson Brings New Factories”
Glendale News-Press, August 4, 1928

3901 San Fernando reflects that ethos. It is not just a utilitarian structure; rather, it was designed to complement a predominant architectural style of its time and is unusually attractive for an industrial building.

Since 3901 San Fernando Road is an example of the type of industrial building that L. H. Wilson built on spec in the San Fernando Road corridor, the building is associated with events that have made a significant contribution to the board patterns of local and regional history and is identified with important events in the city’s history and exemplifies significant contributions to the broad economic heritage of the city of Glendale, specifically, the development of the San Fernando Road corridor by L. H. Wilson.

2

3

Conclusion

I respectfully request that the final EIR for the Glendale Link Project incorporate the facts I have provided and that the evaluations of Criteria 1 and 2 for eligibility for the California Register of Resources Places and Criteria 1 and 2 for eligibility for the Glendale Register of Historic Resources be revised to reflect that L. H. Wilson significantly contributed to the history of the city of Glendale and that 3901 San Fernando Road is historically significant.

Because 3901 San Fernando Road is associated with a person who significantly contributed to the history of the city and is associated with events that have made a significant contribution to history of Glendale and surrounding regions, the property is eligible for listing on both the California Register and the Glendale Register and the city, therefore, should not approve the demolition of the structure but, rather, should adopt Alternative 2-Reuse/Reduced Density Alternative for the Glendale Link Project.

Thank you for the opportunity to provide this information.

Sincerely,



Sean Devlin Bersell

¹ Draft EIR, p. 4.3-24.

² "L. H. Wilson Summoned by Death," Glendale News-Press, 5 Sep 1942, p. 1.

³ "Broker Builds City Industry," Los Angeles Times, 14 Oct 1928, p. A8; "Wilson Brings New Factories," Glendale News-Press, 4 Aug 1928.

⁴ See, e.g., "Glendale Firm Builds Factory for Tile Making," Los Angeles Times, 14 Jul 1929, p. D7.

⁵ "Broker Builds City Industry," *supra*.

⁶ "Glendale Lists New Factories," Los Angeles Times, 23 Jun 1929, p. E6.

⁷ "Thursday Visitors' Day at Glendale's New Shoe Factory," Glendale News-Press, 19 Nov 1930, p. 5.

⁸ See "Wilson Urges Industries in City," Glendale Daily Press, 23 Apr 1924, p. 1; "Chemical Plant Leases Factory," Glendale News-Press, 25 Feb 1928, p. 1 Development Section; "Wilson Brings New Factories," *supra*; "Broker Builds City Industry," *supra*; "Glass-Tile Factory To Be Built," Los Angeles Times, 16 Dec 1928, p. E4; "Glendale Lists New Factories," *supra*; "Glendale Firm Builds Factory for Tile Making," *supra*; "New Plant Announced in Glendale," Los Angeles Times, 17 Jul 1929, p. D5; "Industrial Will Make Rare Alloy," Los Angeles Times, 15 Sep 1929, p. D2.

⁹ "Allays Fears of Widening Orders on San Fernando," Glendale News-Press, 8 Jan 1929, p. 1; "Property Owners Urge Road's Early Widening," Glendale News-Press, 25 Feb 1929, p. 2.

¹⁰ "Circulate Widening Petition," Los Angeles Times, 18 Nov 1923, p. V5; "To Widen San Fernando Road," Los Angeles Times, 30 Apr 1924, p. F1; "Supervisors Get Busy," Los Angeles Times, 27 Jul 1924, p. F6.

¹¹ "Award List Announced in Glendale," Los Angeles Times, 16 Sep 1928, p. F8; "Allays Fears of Widening Orders on San Fernando," *supra*; "Paving and Widening to Give Work," Los Angeles Times, 2 Nov 1930, p. E3; "Award Contract on San Fernando," Glendale News-Press, 20 Nov 1930, p. 1 (the project cost was \$180,000); "Men Will Begin Work Monday in San Fernando," Glendale News-Press, 13 Dec 1930, p. 14.

¹² "Circulate Widening Petition," *supra*; "Supervisors Get Busy," *supra*; "New Outlets Needed," Los Angeles Times, 6 Aug 1925, p. A4.

¹³ "Supervisors Get Busy," *supra*; "Paving and Widening to Give Work," *supra*.

¹⁴ "Allays Fears of Widening Orders on San Fernando," *supra*.

¹⁵ "Realty Board of Glendale Holds Election," Los Angeles Times, 8 Nov 1930, p. 13.

¹⁶ "Glendale Lists New Factories," *supra*.

¹⁷ "L. H. Wilson Summoned by Death," *supra*.

¹⁸ "L. H. Wilson Summoned by Death," *supra*.

¹⁹ "Thursday Visitors' Day at Glendale's New Shoe Factory," *supra*.

Letter No. 53: Sean Bersell

Response 53-1

The comment provides introductory text to the comments below. Refer to **Responses 53-2** through **53-4** for responses to specific comments.

Response 53-2

The comment provides statements regarding L.H. Wilson's role in the development of San Fernando Road. Refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding L.H. Wilson and the development of San Fernando Road.

In addition to the points addressed in **Topical Response 1** and the Draft EIR regarding L.H. Wilson, the commenter points to L.H. Wilson's possible involvement in the widening of San Fernando Road. The widening of San Fernando Road was one of several road widening and highway improvement projects in Los Angeles County in the 1920s. While local government officials and citizens supported these programs, there is no evidence that L. H. Wilson had a significant role in the widening of San Fernando Road in Glendale. Research conducted on Wilson's life and provided in Appendix 4.3 of the Draft EIR, and **Appendix F01** of the Final EIR, did not uncover any substantial connection between L.H. Wilson and the widening of San Fernando Road.

Response 53-3

The comment relates to the perceived architectural significance of the 3901 San Fernando Road building. Refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the significance of the building, its architectural integrity, its eligibility for listing on local, state, and national historic registers, and its association with events that have made a significant contribution to the broad patterns of local and regional history.

Response 53-4

Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the building's eligibility for listing on the California or Glendale registers. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the economic feasibility of Alternative 2.

From: Desiree Shier [mailto:desiree.shier@sbcglobal.net]
Sent: Monday, October 14, 2013 8:37 AM
To: Duong, Rathar
Subject: 3901 San Fernando Road

Rathar,

I hope you are doing well. I wanted to take a minute to encourage you and the City of Glendale to pursue Alternative 2-Reuse/Reduced Density Alternative for the Glendale Link Project. I feel this meets the developer's goals while allowing for preservation and adaptive reuse of the building. It would be so unfortunate to loose this rare example of Mediterranean Revival commercial architecture at 3901 San Fernando in Glendale. We have very few of these buildings left in Glendale and to demolish this building would be a travesty.

1

2

Please consider the Alternative option.

Thank you,

Desiree Shier
Glendale Resident / Chairperson of Historic Preservation Commission

Letter No. 54: **Desiree Shier**

Response 54-1

Refer to **Response 26-2.**

Response 54-2

Refer to **Response 26-3.**

From: scofraser@gmail.com on behalf of Scott Fraser <Scott.Fraser@USC.edu>
Sent: Monday, October 14, 2013 7:53 AM
To: Duong, Rathar
Subject: Concern about 3901 San Fernando Road

Dear Mr. Duong,

I am writing to ask that the Mediterranean Revival structure at 3901 San Fernando Road be preserved as part of any development plans for the site. I drive by it frequently, and it's a lovely building, certainly eligible for the local register of historic resources.

Having spent my half century in the Pasadena-Glendale area, I have seen historic preservation done badly and well. When done right, Pasadena's thriving old-town results. Glendale's record on historic preservation, particularly of commercial buildings, is very disappointing. It seems like the city's architecture is becoming more mediocre with every passing day; that is certainly no way to entice people to move here or to shop here.

Please make preservation an important part of improving the city's image.

Sincerely,

**Scott Fraser
Glendale, CA**

Scott E. Fraser
Director of Science Initiatives
Provost Professor of Biological Sciences
& Biomedical Engineering
University of Southern California
Molecular and Computational Biology
1050 Childs Way 401 Ray R Irani Hall
Los Angeles, CA 90089
213 740-2414 telephone
scoffraser@USC.edu

Biological Imaging Center
Beckman Institute (139-74)
Caltech, Pasadena, CA 91125
626 395-2790 telephone
sefraser@caltech.edu

Letter No. 55: Scott Fraser

Response 55-1

The comment expresses an opinion in support of Alternative 2. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of Alternative 2. Please also refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the building's eligibility for listing on local, state, and national historic registers.

Response 55-2

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

From: Stephanie.Schus <sschus@aol.com>
Sent: Monday, October 14, 2013 12:14 AM
To: Duong, Rathar
Subject: Proposed demolition of 3901 San Fernando Road building

Mr. Duong:

I would like to state my opposition to the proposed demolition of the building at 3901 San Fernando Road. It is my understanding this building has been deemed eligible for historic designation on both the city of Glendale Register and the state of California Register by an independent preservation expert. Destroying this unusual example of Mediterranean Revival commercial architecture makes little sense.

1

What I do support is the project alternative for the Glendale Link Project that would preserve and incorporate the existing structure into the commercial-residential development proposed for this site. Thus, I hope the city will pursue Alternative 2- Reuse/Reduced Density Alternative for this project, as it appears to meet the developer's objectives, concurrently allowing for the preservation and adaptive reuse of the existing building.

2

I hope you and the Planning Department will consider my comments and suggestions in your deliberation about the fate of this historically significant and architecturally significant Glendale building.

Respectfully,
Stephanie Schus
Royal Blvd.

Letter No. 56: Stephanie Schus

Response 56-1

The comment expresses an opinion opposed to the proposed project. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. As stated therein, the building at 3901 San Fernando Road has been determined to be ineligible for the local, state, and national historic registers.

Response 56-2

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

From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Monday, October 14, 2013 11:08 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / Do Not Demolish

From: Tony [<mailto:tony@eliteadventuretours.com>]
Sent: Monday, October 14, 2013 11:05 AM
To: Duong, Rathar
Cc: tghs@glendalehistorical.org
Subject: Do Not Demolish

As a Glendale resident & business owner we agree and believe that this structure should be preserved and celebrated.
<http://myemail.constantcontact.com/Action-Needed-Re--Proposed-Demolition-of-Historic-Structure-on-San-Fernando-Road.html?soid=1102335654902&aid=IhYhI-H8YIo>

1

Tony Riccio
EliteAdventureTours.com
818-216-0067
888-328-6871





Preservation Alert!

TGHS requests that you contact the city by October 14 and voice your opposition to the proposed demolition of the building at 3901 San Fernando Road, which has been identified by an independent preservation expert as eligible for historic designation on both the Glendale and California Registers. Please let the city know that you prefer the project alternative that would preserve and incorporate the existing structure into the commercial/residential development proposed for the site.

<http://myemail.constantcontact.com/Action-Needed-Re--Proposed-Demolition-of-Histori...> 10/15/2013

3901 San Fernando, built in 1930 and pictured above, is a distinctive example of Mediterranean Revival architecture and is one of the few remaining commercial structures of that style left in Glendale. It is historically important for its association with L.H. Wilson, who built the structure and maintained his offices there. Wilson was a real estate agent and civic leader who was a leading proponent and facilitator of the creation of the San Fernando Road commercial corridor as we know it today.

The current owner of the property has proposed tearing the building down and erecting a five-story mixed-use structure, with 15,000 square feet of commercial space on the ground floor and 142 housing units above. The proposal is known as the Glendale Link Project.

A Draft Environmental Impact Report (EIR) prepared for the project identifies an alternative ("Alternative 2--Reduced Density/Reuse Alternative") that would preserve the existing structure while still allowing for residential and commercial development of the property. The alternative to demolition was requested by TGHS and is discussed in detail here.

The city needs to hear from the community about this project. Please email Rathar Duong in the city of Glendale Planning Department (RDuong@ci.glendale.ca.us) and inform the city that you support an alternative for the Glendale Link Project that preserves the building. It's best to use your own words, but some of the points you may wish to consider:

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

<http://myemail.constantcontact.com/Action-Needed-Re--Proposed-Demolition-of-Histori...> 10/15/2013

- The city of Glendale has an unfortunate history of allowing demolition of potentially historic structures. We cannot afford to lose any more.

The deadline for submitting comments is Monday, October 14, at 5:00 p.m., so please take a moment and email the city today. Your comments can make the difference in whether this building will survive or be demolished.

Thank you for helping to preserve Glendale's architectural heritage and history.

The Glendale Historical Society
P.O. Box 4173
Glendale, California 91202

<http://myemail.constantcontact.com/Action-Needed-Re--Proposed-Demolition-of-Histori...> 10/15/2013

Letter No. 57: Tony Riccio

Response 57-1

The comment expresses an opinion opposed to the proposed project and in support of the preservation of the building at 3901 San Fernando Road. The comment expresses an opinion in support of Alternative 2. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 57-2

The commenter provides information from the Glendale Historical Society website relating to the proposed project. The comment does not raise a specific environmental concern within the context of CEQA. This information will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Gerri Cagnotti [<mailto:gerricrag@me.com>]
Sent: Monday, October 14, 2013 11:52 AM
To: Duong, Rathar
Subject: 3901 San Fernando Rd

Dear Mr. Duong,

I am writing to show my support for preserving the Mediterranean Revival building on the above address. Glendale has not been very diligent over the years in preserving our historical resources. Unlike other cities, we have not taken care of our city in that way. It is very simple and cavalier for a developer to suggest "let's just tear this down" and start fresh. Glendale currently already has enough of that kind of building going on all along Central Ave and other adjacent streets, not to mention all the tasteless remodeling and demolition that has taken away part of our history in the past.

The ideal solution when faced with buildings of this history and architecture would be to pursue solutions that would meet the developers goal while allowing for preservation and create adaptive reuse of the building.

Thank you for listening,
Gerri Cagnotti
Owner/Broker
G&C Properties
818-244-5400 Ofc/818-383-1499 cell
www.gerricagnotti.com
www.character-homes.com
BRE# 0346376

Misspellings compliments of my iPad auto correct.

Letter No. 58: **Gerri Cagnotti**

Response 58-1

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of Alternative 2. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: judy cabrera <judymcabrera@gmail.com>
Sent: Monday, October 14, 2013 12:23 PM
To: Duong, Rathar
Subject: 3901 San Fernando

Please do all that you can to prevent the demolition of this building. Glendale has already lost so many of its historic structures. Here is an opportunity to send a message to developers and the community that the city is willing to go out on a limb to hang on to these old treasures.

Judy Cabrera
1442 Imperial Drive

1

Letter No. 59: **Judy Cabrera**

Response 59-1

The comment expresses an opinion opposed to the proposed project. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: gartenart@aol.com
Sent: Monday, October 14, 2013 12:47 PM
To: rdduong@ci.glendale.ca.us
Subject: Glendale Link Project - Save Glendale History

Dear Mr. Duong:

It pains me to see another one of Glendale's potential gems go to the chopping block, and I am here to write you that I am opposed to the 'wholesale slaughter' that is planned for this piece of historical property/building. I must add my voice to the many others who want to prevent this from happening, and I think you should adopt Alternative 2 - Reuse/Reduced Density Alternative for this project.

Glendale has far too few historical and precious 'linkages' to the past, and we want and must preserve and keep for the future these properties that bind us together as a city, as identification to worthwhile beautiful buildings which enrich us all. We must not level these structures in order to put up, often hastily and often poorly designed and shoddily built new structures.

I remember we lost the original Fire Station to make way for the Americana - give me a break. I happen to think that colossus of a development would have gained greatly by preserving and incorporating the humble station and would have given a 'link' to the past; how wonderful that would have been, and the builder would have had a little jewel in his midst.

Please do all you can to unearth this hidden rarity and let it shine again with all its numerous cousins.

Ute Baum
Dina Hughes
1208 Cottage Grove
Glendale, Ca. 91205

1

2

Letter No. 60: **Ute Baum**

Response 60-1

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 60-2

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

From: Weisman William <wdweisman@yahoo.com>
Sent: Monday, October 14, 2013 12:17 PM
To: Duong, Rathar
Subject: 3901 San Fernando Road

Mr. Duong,

My husband Bill and I agree with the Glendale Historical Society regarding 3901 San Fernando Road. We would like to see the historic building preserved and support alternative 2 - reduced density/reuse alternative.

Please let the decision makers know of our opinion.

Thank you,

*Sharon Weisman
Far North Glendale*

1

Letter No. 61: Sharon Weisman

Response 61-1

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Bill Nicoll <billnicoll@myopera.com>
Sent: Monday, October 14, 2013 12:44 PM
To: Duong, Rathar
Subject: 3901 San Fernando Rd.

Hello Rathar

I want to add my name to those opposing the demolition of another important structure in Glendale's history. Far too many structures have been lost in the modernization of the city. Wherever possible, historical structures should be integrated into the planning and design of new projects. And, this is one of those.

Thank you,

Bill Nicoll

1

Letter No. 62: Bill Nicoll

Response 62-2

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of Alternative 2. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. As stated therein, the building at 3901 San Fernando Road has been determined to be ineligible for the local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: anna rundle <annarundle@aol.com>
Sent: Monday, October 14, 2013 1:10 PM
To: Duong, Rathar
Subject: 3901 SAN FERNANDO ROAD

As a member of the Glendale Historical Society, and a believer in preserving as much of Glendale's past as is practical, I am asking that the Society pursue the preservation of the building at 3901 San Fernando Road.

WE HAVE ALLOWED TOO MANY MEDITERRANEAN REVIVAL BUILDINGS IN THE CITY DISAPPEAR - LET'S KEEP THIS ONE!

ANNA RUNDLE

1

Letter No. 63: **Anna Rundle**

Response 63-1

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

From: Jean Christensen [<mailto:jwc1520@gmail.com>]

Sent: Monday, October 14, 2013 4:58 PM

To: Duong, Rathar

Subject: 3901 San Fernando

Please add this building to the Glendale historic list of buildings. Too many of the buildings along this corridor have been lost. It is important to keep representatives of the 1930s. This building is unique to the area.

Jean Christensen

1

Letter No. 64: **Jean Christensen**

Response 64-1

The comment expresses an opinion opposed to the proposed project. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. As stated therein, the building at 3901 San Fernando Road has been determined to be ineligible for the local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

It is exiting to see a new development in south Glendale. This part of the city has been stagnant for many years and it is about time that a developer stepped up to the plate.

The project will replace two dreary and characterless building not to mention the huge billboard. This gateway location should represent the city of Glendale.

The people that will argue that the building is historical never leave their North Glendale comfort zone to see what is going on in south Glendale and what conditions people live in.

The project will create much desired quality low income housing adjacent to a transportation center. The community as a whole will benefit hugely from this development..

This 142 unit, mixed use project has my full support.

1

Talin Zadourian

Glendale Resident.

Letter No. 65: **Talin Zadourian**

Response 65-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.

From: Duong, Rathar [<mailto:RDuong@ci.glendale.ca.us>]
Sent: Monday, November 04, 2013 10:10 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: FW: Potential demolition of Historic site

This email went into the Junk E-mail folder; as such, I did not see it until now.

Rathar

-----Original Message-----

From: Berry, Elizabeth B [<mailto:eberry@csun.edu>]
Sent: Monday, October 14, 2013 8:05 PM
To: Duong, Rathar
Subject: Potential demolition of Historic site

I am concerned that once again Glendale is considering the demolition of an historical building without considering its significance and a possible alternative.

Recently, the city seems to have become more enlightened in its recognition of the importance of preserving historic and architecturally interesting buildings. However, I understand that there is a possibility of destroying 39901 San Fernando Road, which was built in the 1930's and is a rare example of Mediterranean Revival commercial. There is an option: Alternate 2 Reuse Reduce density Alternate to Glendale Link Project. So much ill advised development has overridden wise and informed conservation in Glendale.

I hope it won't continue with this project.

I have lived here fifty years and have been so pleased with successful attempts to preserve historic sites; I hope this case will be successful.

Sincerely,

Elizabeth Berry, 1210 Cortez Drive Glendale, 91207

1

Letter No. 66: **Elizabeth Berry**

Response 66-1

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to **Topical Response 2** regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

PURPOSE

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act (CEQA). It is the intent of this program to (1) verify satisfaction of the required mitigation measures of the EIR; (2) provide a methodology to document implementation of the required mitigation; (3) provide a record of the Monitoring Program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) utilize existing review processes wherever feasible.

INTRODUCTION

The Mitigation Monitoring Program describes the procedures that will be used to implement the mitigation measures adopted in connection with the approval of the project and the methods of monitoring such actions. A Monitoring Program is necessary only for impacts which would be significant if not mitigated. The following consists of a monitoring program table noting the responsible entity for mitigation monitoring, the timing, and a list of all project-related mitigation measures.

**Table 4.0-1
Mitigation Monitoring and Reporting Program Matrix**

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Effectiveness
Impact – Cultural Resources				
4.3-1 In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 200-meter (656-foot) radius shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. The appropriate mitigation measures may include recording the resource with the California Archaeological Inventory database or excavation, recordation, and preservation of the sites that have outstanding cultural or historic significance.	During ground-disturbing construction activities	Community Development Department		
4.3-2 In the event that paleontological resources are unearthed during project subsurface activities, all earth-disturbing work within 100-meter (328-foot) radius shall be temporarily suspended or redirected until a paleontologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. The appropriate mitigation measures may include recording the resource with the California Inventory database or excavation, recordation, and preservation of the sites that have outstanding paleontological significance.	During ground-disturbing construction activities	Community Development Department		
4.3-3 If human remains are unearthed, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendant of the deceased Native American, who will then serve as consultant on how to proceed with the remains (i.e., avoid, rebury).	During ground-disturbing construction activities	Community Development Department		
Impact – Geology and Soils				
4.4-1 Geotechnical recommendations 7.1 through 7.11 contained in Section 7.0 , Recommendations, of the Geotechnical Investigation Report prepared for the proposed project by Garcrest Engineering and Construction, Inc., dated May 2013, shall be implemented during project construction.	Prior to issuance of grading permit	Department of Building and Safety		

4.0 Mitigation Monitoring and Reporting Program

Mitigation Measure		Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Effectiveness
Impact - Noise					
4.7-1	The applicant shall provide notification to adjacent residences at least 10 days in advance of construction activities that are anticipated to result in vibration levels above the thresholds.	Prior to construction	Community Development Department		
4.7-2	<p>Prior to issuance of a demolition permit, the applicant shall submit a construction plan to the City for review and approval. The construction plan shall include phases of construction, anticipated equipment, and timetables for each phase/equipment type. The following features shall be included in the construction plan:</p> <ul style="list-style-type: none"> • Demolition, earthmoving, and ground-impacting operations shall be conducted so as not to occur in the same period. • Demolition methods shall minimize vibration, where possible (e.g., sawing masonry into sections rather than demolishing it by pavement breakers). • Earthmoving equipment on the construction site shall be operated as far away from vibration sensitive sites as possible. 	Prior to issuance of grading permit	Community Development Department, Public Works Department		
4.7-3	All construction activity within the City of Glendale shall be conducted in accordance with Section 8.36.080 of the City of Glendale Municipal Code.	During ground-disturbing construction activities	Community Development Department		

4.0 Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Effectiveness
Impact – Noise (continued)				
<p>4.7-4 The project applicant shall require through contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:</p> <ul style="list-style-type: none"> • Two weeks prior to the commencement of construction, notification must be provided to surrounding land uses within 1,000 feet of a project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period; • Ensure that construction equipment is properly muffled according to industry standards and be in good working condition; • Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible; • Schedule high noise-producing activities between the hours of 8:00 AM and 5:00 PM to minimize disruption on sensitive uses; • Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources; • Use electric air compressors and similar power tools rather than diesel equipment, where feasible; • Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes; and • Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City of Glendale or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit. 	Prior to issuance of grading permit	Community Development Department, Public Works Department		

4.0 Mitigation Monitoring and Reporting Program

Mitigation Measure		Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Effectiveness
Impact – Noise (continued)					
4.7-5	The project applicant shall require through contract specifications that construction staging areas along with the operation of earthmoving equipment within the project area be located as far away from vibration- and noise-sensitive sites as possible. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit.	Prior to issuance of grading permit	Community Development Department, Public Works Department		
4.7-6	The project applicant shall require through contract specifications that heavily loaded trucks used during construction would be routed away from residential streets to the extent feasible. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit.	Prior to issuance of grading permit	Community Development Department, Public Works Department		
Impact – Fire Protection and Emergency Medical Services					
4.8.1-1	The City of Glendale shall monitor the number of calls for emergency medical service responded to by the City's rescue ambulance for increases in demand, and based on a request by the Glendale Fire Department, subject to any required authorization, add an additional rescue ambulance and personnel.	Ongoing	Glendale Fire Department		
Impact – Police Protection					
4.8.2-1	The Glendale Police Department shall monitor the number of calls for service received on an annual basis and request additional City of Glendale general funds to add additional required police personnel and/or equipment as needed to provide adequate service.	Ongoing	Glendale Police Department		
Impact – Recreation					
4.8.3-1	In accordance with the requirements of the City of Glendale Municipal Code (Ordinance No. 5575 and Resolution Nos. 07-164, 10-199, 11-93, 12-86, 13-102), the project applicant shall pay the Development Impact Fee to the City. The current fee schedule is \$7,000 per unit for residential uses and \$2.67 per square foot of commercial uses.	Prior to tentative tract map approval	Community Development Department, Community Services		

4.0 Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Monitoring Timing	Responsible Monitoring Entity	Mitigation Measure Complete?	Effectiveness
Impact – Utilities and Service Systems - Sewer				
4.10.2-1 The project applicant shall pay a sewer impact fee for improvements and upgrades to the sewer system. These collected fees will be deposited by the City of Glendale into a specially created account to be used to fund capacity improvements.	Prior to tentative tract map approval	Community Development Department, Public Works Department		
4.10.2-2 Each project shall contribute sewer capacity increase fees for improvements and upgrades to alleviate sewer impacts within the City. Fees would be determined based on the City's sewer capacity increase fee methodology. These collected fees would be deposited into a specially created account to be used to fund capacity improvements of the Citywide drainage system.	Ongoing (prior to applicable project approval)	Community Development Department, Public Works Department		

APPENDIX F01

Supplemental Historical Report

**3901 San Fernando Road
Los Angeles, California**

**Supplemental Report
Link Project
Draft EIR**

November 7, 2013

Submitted by:

**Kaplan Chen Kaplan
2526 Eighteenth Street
Santa Monica, CA 90405**

**David Kaplan, Historic Architect
Pam O'Connor, Architectural Historian**

This report has been prepared to address comments received on the Draft Environmental Impact Report for the proposed Link Project located at 3901 San Fernando Road.

Association with Historic Persons or Events

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

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

Content of Cited Newspaper Articles

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

The *Report* also cites a *Los Angeles Times* article "Progress in Southern California Industry" which is the heading of the page in the newspaper.⁴ The page contained many articles about activity throughout Southern California including: "Industrial Realty Active, Property Brokers Report Many Transactions for Manufacturing Firms Recently"; "Industrial Structures Costs Low, Concrete Type Units Held Cheaper to Build Now Than in Several Years"; "New Plants Needs Held Beneficial, Factory Expansion Results in Purchase of Cranes from Local Manufacturer."⁵

¹ *Historic Resource Assessment 3901 San Fernando Road*, Historic Resources Group, 2013. p. 2.

² *Ibid.*, pp. 12-13.

³ *Ibid.*, p. 13.

⁴ *Los Angeles Times*, June 23, 1929, p. E6.

⁵ *Los Angeles Times*, June 23, 1929.

One article on the page about Glendale was entitled "Glendale Lists New Factories, Industrial Expansion Seen for Future; Many manufacturers Plan Plant Addition; City Seeks to Obtain More Enterprises." The article mentions L.H. Wilson in terms of his positions as Chair of the Industrial Committee of the Chamber of Commerce and President of the Glendale Realty Board to comment on the general state of industrial development and building in Glendale. One paragraph stated that Wilson conducted surveys of the status of existing businesses. Another paragraph called Wilson an "industrial expert" and noted he was "erecting six buildings." Wilson was listed one more time in a quote where he declared that "Glendale is progressing because of its policy of encouraging sound, well-established firms to locate here." The article writer considered "several factors enter into the expansion of Glendale's industrial district," including "Proximity to Los Angeles and its railroads, as well as to the harbor, low initial cost of factory sites, small labor turnover, low-priced gas for owner, and good roads contribute to the advantages the factory owner demands."⁶ Although Wilson was mentioned, the article clearly addressed Glendale's industrial growth as a whole – Wilson was not the focus.

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

A *Los Angeles Times* article, "Industrial Will Make Rare Alloy", makes mention of L.H. Wilson at the end of the article saying "the factory is held on a 99 year lease by L. H. Wilson Industrial Realty Ltd which has leased the structure and grounds to Dr. Stadt and his associates."⁷ Another article cited in the *Report* was about a glass-tile factory site that had been leased from L. H. Wilson.⁸ In 1929, an article in the *Los Angeles Times* mentioned a shoe company on Standard Avenue that was moving to a factory building constructed by Wilson.⁹ Other newspaper articles referenced in the *Report* include one about the subject building in the local Glendale newspaper (November 19, 1930); another in the local newspaper entitled "Wilson Brings New Factories" (August 4, 1928), a *Los Angeles Times* story about the Realty Board of Glendale's election, (Nov. 8, 1930), and Wilson's obituary from the *Glendale News-Press* from 1942. *Analysis of Newspaper Articles*

A comprehensive analysis of these newspaper articles reveals that while Wilson was mentioned in about 10 stories in the 1920s, those references were not consistent and in most cases, were not significant. The story with the headline "L. H. Wilson Makes Things Hum on San Fernando Road" from 1924 was a marketing piece in the New Year's

⁶ *Ibid.*

⁷ *Los Angeles Times*, September 15, 1929.

⁸ *Los Angeles Times*, December 16, 1928.

⁹ *Los Angeles Times*, July 7, 1929.

Day promotional content. In other stories Wilson was mentioned in a limited fashion. One news story from 1928 is two paragraphs long and simply states that Wilson "built nine industrial buildings and sold five" but provides no further information.¹⁰ It also mentioned that Wilson had "a hand" in 70 "industrial concerns." This short story did not explain Wilson's level of involvement or define what constituted an "industrial concern." The article certainly does not support a claim that Wilson established 70 buildings and/or businesses. Other articles reference Wilson at the end and simply note that he had leased property to others. The references in these newspaper articles do not support the contention that Wilson was an "important and influential person" of historic significance based on his professional career as a real estate broker, speculator and developer.

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

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

Moreover, the *Report* states that Wilson "with his extensive holdings along San Fernando Road, was a leader in the effort to widen" San Fernando Road. However, there is no data provided to support the supposition that his holdings were extensive or that he played a significant role in the widening project. The claim is speculative.

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

Architectural Style and Integrity

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

¹⁰ *Los Angeles Times*, October 14, 1928.

¹¹ *Los Angeles Times*, November 8, 1930.

¹² *Historic Resource Assessment 3901 San Fernando Road*, Historic Resources Group, 2013. p. 5.

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

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

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

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

The San Fernando Road façade also featured a tower at its north end. This tower feature was capped with a clay tile roof. Attached to it, delineating the end of the building was a projecting wall that held a decorative window with a clay tile overhang and also held a

¹³ *Glendale Evening News*, January 1, 1924.

period projecting blade sign. All of these elements have been removed. Photographs showing these alterations are attached to this report.

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

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

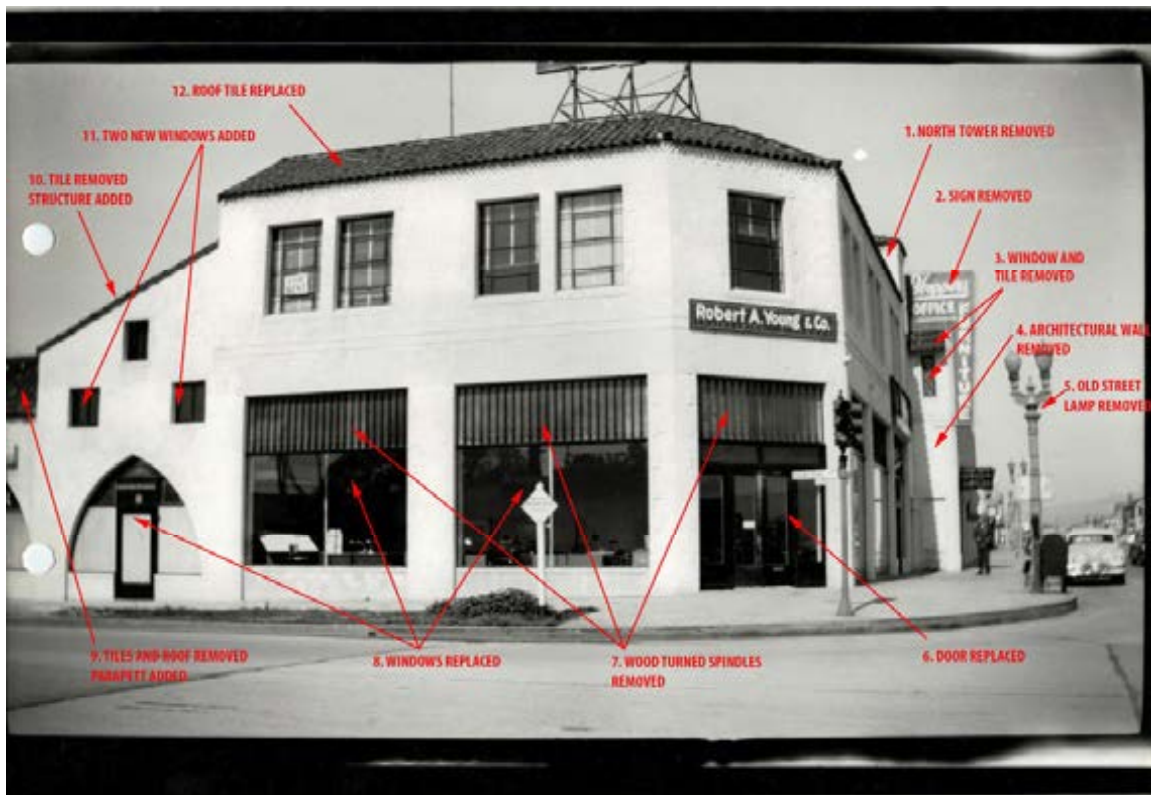
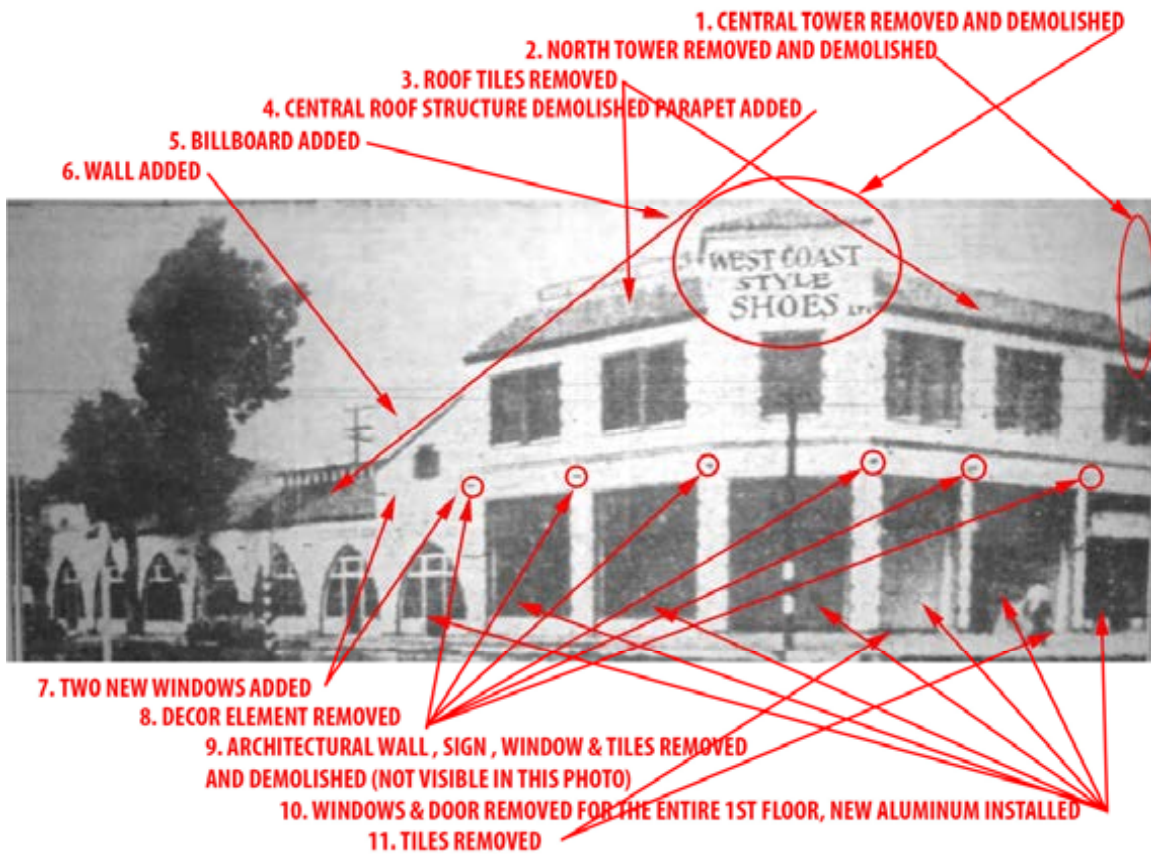
Architectural historians David Gebhard and Harriette Von Breton in their book, *L.A. in the Thirties: 1931-1941*, observed "the imagery employed for L.A.'s commercial architecture of the 30s mirrored the shifts in architectural fashion occurring throughout the U.S. during this decade.... L.A. architects discarded the favored packaging of the 20s, the Spanish Colonial Revival and the Zigzag Moderne or Art Deco, replacing these earlier garments with the Streamline Moderne and the Hollywood Regency.... The curved surfaces horizontal emphases, portholes, and glass brick of the Streamline Moderne made it plain that here indeed was the future... The urge to recreate Spain and the Mediterranean in California was no longer pursued with as great a passion as it had been in the 20s."¹⁴

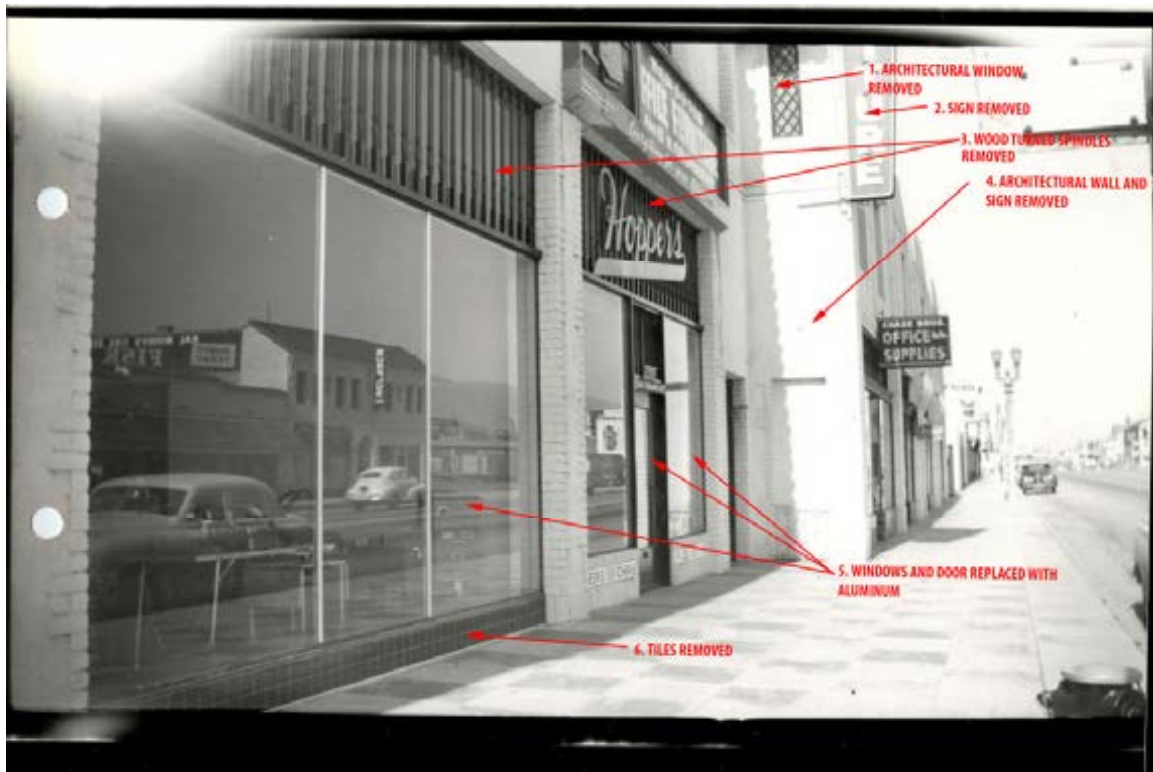
The use of the Mediterranean style with its Moorish influences at the subject building occurred as this style was in its waning years. Most of the significant character-defining elements that defined the original Mediterranean and Spanish Colonial Revival style of the building--the prominent clay-tile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

¹⁴ *L.A. in the Thirties: 1931-1941*, p. 43.

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

Photographs





Response to Comments on Feasibility of Alternative 2

This comment supports Alternative 2 – Reduced Density/Reuse of 3901 San Fernando Road ("Alternative 2"), and questions the DEIR's determination that Alternative 2 would not be economically feasible because the reduced development density and revenue from this Alternative would not be sufficient to offset the cost of the proposed Project's land. *See* DEIR at page 7.0-19. This comment states that no economic analysis has been provided. The DEIR, however, details the features of Alternative 2 that substantiate the determination that this Alternative's reduced density and revenue would not offset the cost of land, including its reduced number of residential units (88 units instead of the proposed Project's 142 units, or 54 fewer units), its diminished square footage for the proposed commercial retail from 11,600 square feet ("s.f."), as contemplated for the propose project, to 6,400 s.f., its reduction of building size from 5 stories to 4 stories, and the retention and rehabilitation of the existing commercial building, including costs associated with this retention and rehabilitation. *See, e.g.,* DEIR at pages 3.0-6 – 3.0-15, 7.0-4, 7.0-5 and 7.0-19.

The City has received and evaluated information from the applicant which supports the determination that Alternative 2 is not economically feasible as a result of these features of Alternative 2. *See the pro forma* and notes attached notes. This data indicates that, assuming a mixed-use residential and retail development with Alternative 2's features, this development would have a stabilized value of \$27,880,160, total development costs of \$27,601,224 and a combined residual land value (for both the retail and apartment parcels) of \$1,386,998. Because the applicant acquired the parcels forming the proposed Project site at a price of \$3.3 million, development of Alternative 2 would result in a shortfall of nearly \$2 million between its residual

land value and the cost of the land's acquisition. When the total development costs of Alternative 2 and land acquisition cost are taken into account, development of Alternative 2 would result in a loss of over \$3 million ($\$27,601,224$ (development costs) + $\$3,300,000$ (land acquisition cost) = $\$30,901,224$ - $\$27,880,160$ (stabilized value of development) = $\$3,021,064$ in loss). In view of these shortfalls, development of Alternative 2 makes no economic sense and is financially infeasible. This infeasibility springs from both reduced revenue and untenable costs based on the following considerations, among others:

1. Having 54 fewer residential units means that income will fall by about \$1,263,000 annually ($54 \text{ units} \times \$1,950 \text{ average monthly rent per unit} = \$105,300 \text{ per month} \times 12 = \$1,263,000$).
2. The commercial building has below-market rents from the existing retail, studio and office space, which would continue under Alternative 2.
3. Since the land cost is fixed, whether 142 units or 88 units are constructed, it makes economic sense to maximize the number of units; as noted above, the land cost does not justify building only 88 units.
4. Many other costs are the same or substantially so that advise maximizing density, including such construction costs as elevators, fire escapes, staircases, exit signs, garage gate, pool landscaping, and common area amenities; marketing costs incurred after construction; sales center and model costs; architectural and engineering fees; repair and maintenance; property insurance; replacement reserves; and payroll.

5. Retaining the commercial building will require substantial rehabilitation work at a considerable cost, including a new roof, handicap restrooms, elevator, fire sprinkler system, fire alarm system, and air conditioning units; extensive tenant improvements; extensive sound proofing of the existing studio; and rehabilitation of all windows to prevent leakage and energy loss.
6. Protecting the commercial building, built in the 1930s and composed of brick, during construction of the subterranean parking will involve a significant increase in costs because shoring will be needed for the building and must be over-engineered at the south end and bracing and rackers will be necessary.
7. Added construction costs will also be incurred because the new building's structural design must take into account the seismic reinforcement of the commercial building (done in the 1990s), which is designed to react in a certain way in the event of an earthquake.
8. The economic benefits from the additional cost of constructing 54 more units far outweigh the loss of income from the proposed Project's reduced size.
9. The applicant cannot recover a development fee, without which a developer would not develop a project, for constructing an 88 unit project.

1. Alternative will have $142-88=54$ fewer units. This results in an income reduction of approximately \$1,263,000 a year. (54×1950)
2. Alternative will result in continued sub market rents from the existing retail and studio and office spaces in the corner building.
3. Total parking that will be required and provided is 186 stalls, 221 are required under the proposed project. There is only a parking saving of 35 stalls. Cost saving of parking at \$20,000 a stall is only \$700,000
4. There is an increased cost to protect the corner building while digging the subterranean parking. The building was constructed in the 30's and is made from brick. The shoring needs to be over engineered at the south end, bracing and rackers will be necessary, resulting in additional construction cost.
5. The existing building was seismically reinforced in the early nineties and is designed to react a certain way in the event of an earthquake. The new building structural design needs to take that into consideration. (additional cost)
6. The corner building needs extensive rehabilitation work. New roof, handicap bathrooms, possible elevator, fire sprinkler system, fire alarm system, new air conditioning units, rehabilitation of all windows to prevent leakage and energy loss, and extensive tenant improvements. (substantial additional cost)
7. The studio in the existing building requires extensive sound proofing. All windows and doors must be replaced with sound proof windows and doors. The ceiling height has been a handicap for the business. The ceiling height must be increased. (substantial additional cost)
8. There are economies of scale in large construction. The building will still need elevators, fire escapes stair cases, exit signs, garage gate, pool landscaping, model unit, recreation room, common area amenities, etc.... (common area costs) which have about the same cost, whether or not the building is 88 unit or a 142 unit building.
9. The benefit from the additional cost of construction for the 54 units far outweighs the loss of income from the reduction in the size of the project.
10. The land cost whether you construct 142 units or 88 units is the same. It makes logical sense to maximize the number of units. Furthermore, the land cost does not justify the construction of only 88 units.
11. The marketing costs at the end of construction are the same whether 88 or 142 units.
12. Sales center cost and model costs are the same whether 88 units or 142 units.
13. There is not a substantial reduction in architectural or engineering fees from 142 units to 88 units.
14. The developer takes a risk and devotes time and effort in the fruition of a project. For this the developer charges a fee. Without this fee a developer will never undertake to develop a project. For a developer the time spent for a 88 unit project or 142 unit project are the same and the risk factor is almost the same. The developer can not recover his fees for the construction of a 88 unit project all things being equal.
15. The expenses of the project upon completion, such as payroll repair and maintenance, make ready, contract services, advertising and marketing and promotion, administrative, utilities, property insurance and replacement reserves will be substantially the same whether it is 88 units or a 142 units.
16. There are economies of scale involved in both the construction and operation of any project that can not be ignored.

LLG Responses to the Caltrans Comment Letter Glendale Link Project

Response 2.1

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

Response 2.2

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

Response 2.3

The comment requests that the I-5 mainline freeway segments be analyzed to future year 2020 conditions. As such, the two mainline freeway segments along the I-5 Freeway (north of Los Feliz Boulevard and south of Glendale Boulevard) were analyzed. The supplemental freeway analysis was prepared based on the latest edition of the Highway Capacity Manual (2010) operational analysis methodologies pursuant to the California Department of Transportation's (Caltrans) *Guide for the Preparation of Traffic Impact Studies*, December, 2002. Based on the analysis results presented in **Table A** and application of the Caltrans LOS standards and guidelines to the year 2020 future with project scenario, the proposed project is not expected to create significant impacts at any of the study freeway segments. Incremental, but not significant, traffic impacts are noted at the study freeway segments. Copies of the HCM freeway analysis data worksheets are provided in the **Appendix**.

Response 2.4

The comment is noted and will be forwarded to City of Glendale staff for their review and consideration.

Response 2.5

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

Response 2.6

The comment is noted and will be forwarded to City of Glendale staff for their review and consideration.

Table A
CALTRANS FREEWAY IMPACT ANALYSIS [1]
WEEKDAY PEAK HOURS

Freeway Segment	Peak Hour	Dir	Year 2020 Without Project			Project Trip Ends [5]	Year 2020 With Project			Density Increase With Project [7]	Significant Project Impact
			Traffic Volumes [2]	Density (pc/mi/ln) [3]	LOS [4]		Traffic Volumes [6]	Density (pc/mi/ln) [3]	LOS [4]		
I-5 Freeway north of Los Feliz Boulevard	AM	NB	8,164	39	E	(1)	8,163	39	E	0.0	No
		SB	9,052	48	F	2	9,054	48	F	0.0	No
	PM	NB	9,373	53	F	2	9,375	53	F	0.0	No
		SB	8,260	39	E	1	8,261	39	E	0.0	No
I-5 Freeway south of Glendale Boulevard	AM	NB	7,736	35	D	3	7,739	35	D	0.0	No
		SB	8,581	43	E	0	8,581	43	E	0.0	No
	PM	NB	8,881	46	F	1	8,882	46	F	0.0	No
		SB	7,832	36	E	3	7,835	36	E	0.0	No

[1] Freeway analysis based on the Highway Capacity Manual 2010, operational analysis methodologies, per the Caltrans' *Guide for the Preparation of Traffic Impact Studies*, December 2002.

[2] Source: "2011 Traffic Volumes on California State Highways", Caltrans, 2011. The year 2011 volumes were increased by an annual average growth rate of 1.0% per year to derive the year 2020 without project traffic volumes based on the "2010 Congestion Management Program," Los Angeles County Metropolitan Transportation Authority, October 2010.

[3] pc/mi/ln: passenger cars per mile per lane

[4] Freeway mainline Levels of Service were based on the following criteria:

Density (pc/mi/ln)	LOS
<= 11	A
> 11-18	B
> 18-26	C
> 26-35	D
> 35-45	E
> 45	F

[5] Based on the project trip generation and trip distribution for the project.

[6] Derived by combining the year 2020 without project traffic volumes and the proposed project volumes.

[7] Derived by subtracting the density of the year 2020 with project conditions with the year 2020 without project conditions.

APPENDIX

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/2013*
 Analysis Time Period *Weekday AM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Northbound*
 From/To *North of Los Feliz Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future Pre-Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V *8160* veh/h Peak-Hour Factor, PHF *0.94*
 AADT veh/day %Trucks and Buses, P_T *5*
 Peak-Hr Prop. of AADT, K %RVs, P_R *0*
 Peak-Hr Direction Prop, D General Terrain: *Level*
 DDHV = AADT x K x D veh/h Grade % Length *mi*
 Up/Down %

Calculate Flow Adjustments

f_p *1.00* E_R *1.2*
 E_T *1.5* $f_{HV} = 1/[1+P_T(E_T - 1) + P_R(E_R - 1)]$ *0.976*

Speed Inputs

Lane Width *12.0* ft
 Rt-Side Lat. Clearance *6.0* ft
 Number of Lanes, N *4*
 Total Ramp Density, TRD *1.00* ramps/mi
 FFS (measured) mph
 Base free-flow Speed, BFFS *75.4* mph

Calc Speed Adj and FFS

f_{LW} *0.0* mph
 f_{LC} *0.0* mph
 TRD Adjustment *3.2* mph
 FFS *72.2* mph

LOS and Performance Measures

Operational (LOS)

$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$ *2224* pc/h/ln
 S *57.8* mph
 $D = v_p / S$ *38.5* pc/mi/ln
 LOS *E*

Design (N)

Design (N)

Design LOS
 $v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$ pc/h/ln
 S mph
 $D = v_p / S$ pc/mi/ln
 Required Number of Lanes, N

Glossary

N - Number of lanes S - Speed
 V - Hourly volume D - Density
 v_p - Flow rate FFS - Free-flow speed
 LOS - Level of service BFFS - Base free-flow speed
 DDHV - Directional design hour volume

Factor Location

E_R - Exhibits 11-10, 11-12 f_{LW} - Exhibit 11-8
 E_T - Exhibits 11-10, 11-11, 11-13 f_{LC} - Exhibit 11-9
 f_p - Page 11-18 TRD - Page 11-11
 LOS, S, FFS, v_p - Exhibits 11-2, 11-3

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday AM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Southbound*
 From/To *North of Los Feliz Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future Pre-Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	<i>9052</i>	veh/h	Peak-Hour Factor, PHF	<i>0.94</i>
AADT		veh/day	%Trucks and Buses, P _T	<i>5</i>
Peak-Hr Prop. of AADT, K			%RVs, P _R	<i>0</i>
Peak-Hr Direction Prop, D			General Terrain:	<i>Level</i>
DDHV = AADT x K x D		veh/h	Grade % Length	<i>mi</i>
			Up/Down %	

Calculate Flow Adjustments

f _p	<i>1.00</i>	E _R	<i>1.2</i>
E _T	<i>1.5</i>	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	<i>0.976</i>

Speed Inputs

Lane Width	<i>12.0</i>	ft
Rt-Side Lat. Clearance	<i>6.0</i>	ft
Number of Lanes, N	<i>4</i>	
Total Ramp Density, TRD	<i>1.00</i>	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	<i>75.4</i>	mph

Calc Speed Adj and FFS

f _{LW}	<i>0.0</i>	mph
f _{LC}	<i>0.0</i>	mph
TRD Adjustment	<i>3.2</i>	mph
FFS	<i>72.2</i>	mph

LOS and Performance Measures

Operational (LOS)

v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	<i>2468</i>	pc/h/ln
S	<i>51.3</i>	mph
D = v _p / S	<i>48.1</i>	pc/mi/ln
LOS	<i>F</i>	

Design (N)

Design (N)

Design LOS	
v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes	S - Speed
V - Hourly volume	D - Density
v _p - Flow rate	FFS - Free-flow speed
LOS - Level of service	BFFS - Base free-flow speed
DDHV - Directional design hour volume	

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday PM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Northbound*
 From/To *North of Los Feliz Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future Pre-Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	9373	veh/h	Peak-Hour Factor, PHF	0.94
AADT		veh/day	%Trucks and Buses, P _T	5
Peak-Hr Prop. of AADT, K			%RVs, P _R	0
Peak-Hr Direction Prop, D			General Terrain:	Level
DDHV = AADT x K x D		veh/h	Grade % Length	mi
			Up/Down %	

Calculate Flow Adjustments

f _p	1.00	E _R	1.2
E _T	1.5	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	0.976

Speed Inputs

Lane Width	12.0	ft
Rt-Side Lat. Clearance	6.0	ft
Number of Lanes, N	4	
Total Ramp Density, TRD	1.00	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	75.4	mph

Calc Speed Adj and FFS

f _{LW}	0.0	mph
f _{LC}	0.0	mph
TRD Adjustment	3.2	mph
FFS	72.2	mph

LOS and Performance Measures

Operational (LOS)

v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	2555	pc/h/ln
S	48.7	mph
D = v _p / S	52.5	pc/mi/ln
LOS	F	

Design (N)

Design (N)

Design LOS	
v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes	S - Speed
V - Hourly volume	D - Density
v _p - Flow rate	FFS - Free-flow speed
LOS - Level of service	BFFS - Base free-flow speed
DDHV - Directional design hour volume	

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday PM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Southbound*
 From/To *North of Los Feliz Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future Pre-Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	<i>8260</i>	veh/h	Peak-Hour Factor, PHF	<i>0.94</i>
AADT		veh/day	%Trucks and Buses, P _T	<i>5</i>
Peak-Hr Prop. of AADT, K			%RVs, P _R	<i>0</i>
Peak-Hr Direction Prop, D			General Terrain:	<i>Level</i>
DDHV = AADT x K x D		veh/h	Grade % Length	<i>mi</i>
			Up/Down %	

Calculate Flow Adjustments

f _p	<i>1.00</i>	E _R	<i>1.2</i>
E _T	<i>1.5</i>	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	<i>0.976</i>

Speed Inputs

Lane Width	<i>12.0</i>	ft
Rt-Side Lat. Clearance	<i>6.0</i>	ft
Number of Lanes, N	<i>4</i>	
Total Ramp Density, TRD	<i>1.00</i>	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	<i>75.4</i>	mph

Calc Speed Adj and FFS

f _{LW}	<i>0.0</i>	mph
f _{LC}	<i>0.0</i>	mph
TRD Adjustment	<i>3.2</i>	mph
FFS	<i>72.2</i>	mph

LOS and Performance Measures

Operational (LOS)

v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	<i>2252</i>	pc/h/ln
S	<i>57.2</i>	mph
D = v _p / S	<i>39.4</i>	pc/mi/ln
LOS	<i>E</i>	

Design (N)

Design (N)

Design LOS	
v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes	S - Speed
V - Hourly volume	D - Density
v _p - Flow rate	FFS - Free-flow speed
LOS - Level of service	BFFS - Base free-flow speed
DDHV - Directional design hour volume	

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday AM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Northbound*
 From/To *South of Glendale Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future Pre-Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	<i>7736</i>	veh/h	Peak-Hour Factor, PHF	<i>0.94</i>
AADT		veh/day	%Trucks and Buses, P _T	<i>5</i>
Peak-Hr Prop. of AADT, K			%RVs, P _R	<i>0</i>
Peak-Hr Direction Prop, D			General Terrain:	<i>Level</i>
DDHV = AADT x K x D		veh/h	Grade % Length	<i>mi</i>
			Up/Down %	

Calculate Flow Adjustments

f _p	<i>1.00</i>	E _R	<i>1.2</i>
E _T	<i>1.5</i>	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	<i>0.976</i>

Speed Inputs

Lane Width	<i>12.0</i>	ft
Rt-Side Lat. Clearance	<i>6.0</i>	ft
Number of Lanes, N	<i>4</i>	
Total Ramp Density, TRD	<i>1.00</i>	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	<i>75.4</i>	mph

Calc Speed Adj and FFS

f _{LW}	<i>0.0</i>	mph
f _{LC}	<i>0.0</i>	mph
TRD Adjustment	<i>3.2</i>	mph
FFS	<i>72.2</i>	mph

LOS and Performance Measures

Operational (LOS)

v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	<i>2109</i>	pc/h/ln
S	<i>60.4</i>	mph
D = v _p / S	<i>34.9</i>	pc/mi/ln
LOS	<i>D</i>	

Design (N)

Design (N)

Design LOS	
v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes S - Speed
 V - Hourly volume D - Density
 v_p - Flow rate FFS - Free-flow speed
 LOS - Level of service BFFS - Base free-flow speed
 DDHV - Directional design hour volume

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday AM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Southbound*
 From/To *South of Glendale Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future Pre-Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	<i>8581</i>	veh/h	Peak-Hour Factor, PHF	<i>0.94</i>
AADT		veh/day	%Trucks and Buses, P _T	<i>5</i>
Peak-Hr Prop. of AADT, K			%RVs, P _R	<i>0</i>
Peak-Hr Direction Prop, D			General Terrain:	<i>Level</i>
DDHV = AADT x K x D		veh/h	Grade % Length	<i>mi</i>
			Up/Down %	

Calculate Flow Adjustments

f _p	<i>1.00</i>	E _R	<i>1.2</i>
E _T	<i>1.5</i>	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	<i>0.976</i>

Speed Inputs

Lane Width	<i>12.0</i>	ft
Rt-Side Lat. Clearance	<i>6.0</i>	ft
Number of Lanes, N	<i>4</i>	
Total Ramp Density, TRD	<i>1.00</i>	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	<i>75.4</i>	mph

Calc Speed Adj and FFS

f _{LW}	<i>0.0</i>	mph
f _{LC}	<i>0.0</i>	mph
TRD Adjustment	<i>3.2</i>	mph
FFS	<i>72.2</i>	mph

LOS and Performance Measures

Operational (LOS)

v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	<i>2339</i>	pc/h/ln
S	<i>55.0</i>	mph
D = v _p / S	<i>42.6</i>	pc/mi/ln
LOS	<i>E</i>	

Design (N)

Design (N)

Design LOS	
v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes S - Speed
 V - Hourly volume D - Density
 v_p - Flow rate FFS - Free-flow speed
 LOS - Level of service BFFS - Base free-flow speed
 DDHV - Directional design hour volume

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday PM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Northbound*
 From/To *South of Glendale Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future Pre-Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	<i>8881</i>	veh/h	Peak-Hour Factor, PHF	<i>0.94</i>
AADT		veh/day	%Trucks and Buses, P _T	<i>5</i>
Peak-Hr Prop. of AADT, K			%RVs, P _R	<i>0</i>
Peak-Hr Direction Prop, D			General Terrain:	<i>Level</i>
DDHV = AADT x K x D		veh/h	Grade % Length	<i>mi</i>
			Up/Down %	

Calculate Flow Adjustments

f _p	<i>1.00</i>	E _R	<i>1.2</i>
E _T	<i>1.5</i>	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	<i>0.976</i>

Speed Inputs

Lane Width	<i>12.0</i>	ft
Rt-Side Lat. Clearance	<i>6.0</i>	ft
Number of Lanes, N	<i>4</i>	
Total Ramp Density, TRD	<i>1.00</i>	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	<i>75.4</i>	mph

Calc Speed Adj and FFS

f _{LW}	<i>0.0</i>	mph
f _{LC}	<i>0.0</i>	mph
TRD Adjustment	<i>3.2</i>	mph
FFS	<i>72.2</i>	mph

LOS and Performance Measures

Operational (LOS)

v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	<i>2421</i>	pc/h/ln
S	<i>52.7</i>	mph
D = v _p / S	<i>45.9</i>	pc/mi/ln
LOS	<i>F</i>	

Design (N)

Design (N)

Design LOS	
v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes S - Speed
 V - Hourly volume D - Density
 v_p - Flow rate FFS - Free-flow speed
 LOS - Level of service BFFS - Base free-flow speed
 DDHV - Directional design hour volume

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday PM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Southbound*
 From/To *South of Glendale Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future Pre-Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	7832	veh/h	Peak-Hour Factor, PHF	0.94
AADT		veh/day	%Trucks and Buses, P _T	5
Peak-Hr Prop. of AADT, K			%RVs, P _R	0
Peak-Hr Direction Prop, D			General Terrain:	Level
DDHV = AADT x K x D		veh/h	Grade % Length	mi
			Up/Down %	

Calculate Flow Adjustments

f _p	1.00	E _R	1.2
E _T	1.5	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	0.976

Speed Inputs

Lane Width	12.0	ft
Rt-Side Lat. Clearance	6.0	ft
Number of Lanes, N	4	
Total Ramp Density, TRD	1.00	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	75.4	mph

Calc Speed Adj and FFS

f _{LW}	0.0	mph
f _{LC}	0.0	mph
TRD Adjustment	3.2	mph
FFS	72.2	mph

LOS and Performance Measures

Operational (LOS)

$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	2135	pc/h/ln
S	59.9	mph
D = v _p / S	35.7	pc/mi/ln
LOS	E	

Design (N)

Design (N)

Design LOS	
$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes	S - Speed
V - Hourly volume	D - Density
v _p - Flow rate	FFS - Free-flow speed
LOS - Level of service	BFFS - Base free-flow speed
DDHV - Directional design hour volume	

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday AM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Northbound*
 From/To *North of Los Feliz Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future With Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	<i>8163</i>	veh/h	Peak-Hour Factor, PHF	<i>0.94</i>
AADT		veh/day	%Trucks and Buses, P _T	<i>5</i>
Peak-Hr Prop. of AADT, K			%RVs, P _R	<i>0</i>
Peak-Hr Direction Prop, D			General Terrain:	<i>Level</i>
DDHV = AADT x K x D		veh/h	Grade % Length	<i>mi</i>
			Up/Down %	

Calculate Flow Adjustments

f _p	<i>1.00</i>	E _R	<i>1.2</i>
E _T	<i>1.5</i>	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	<i>0.976</i>

Speed Inputs

Lane Width	<i>12.0</i>	ft
Rt-Side Lat. Clearance	<i>6.0</i>	ft
Number of Lanes, N	<i>4</i>	
Total Ramp Density, TRD	<i>1.00</i>	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	<i>75.4</i>	mph

Calc Speed Adj and FFS

f _{LW}	<i>0.0</i>	mph
f _{LC}	<i>0.0</i>	mph
TRD Adjustment	<i>3.2</i>	mph
FFS	<i>72.2</i>	mph

LOS and Performance Measures

Operational (LOS)

$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	<i>2225</i>	pc/h/ln
S	<i>57.8</i>	mph
D = v _p / S	<i>38.5</i>	pc/mi/ln
LOS	<i>E</i>	

Design (N)

Design (N)

Design LOS	
$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes	S - Speed
V - Hourly volume	D - Density
v _p - Flow rate	FFS - Free-flow speed
LOS - Level of service	BFFS - Base free-flow speed
DDHV - Directional design hour volume	

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday AM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Southbound*
 From/To *North of Los Feliz Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future With Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	<i>9054</i>	veh/h	Peak-Hour Factor, PHF	<i>0.94</i>
AADT		veh/day	%Trucks and Buses, P _T	<i>5</i>
Peak-Hr Prop. of AADT, K			%RVs, P _R	<i>0</i>
Peak-Hr Direction Prop, D			General Terrain:	<i>Level</i>
DDHV = AADT x K x D		veh/h	Grade % Length	<i>mi</i>
			Up/Down %	

Calculate Flow Adjustments

f _p	<i>1.00</i>	E _R	<i>1.2</i>
E _T	<i>1.5</i>	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	<i>0.976</i>

Speed Inputs

Lane Width	<i>12.0</i>	ft
Rt-Side Lat. Clearance	<i>6.0</i>	ft
Number of Lanes, N	<i>4</i>	
Total Ramp Density, TRD	<i>1.00</i>	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	<i>75.4</i>	mph

Calc Speed Adj and FFS

f _{LW}	<i>0.0</i>	mph
f _{LC}	<i>0.0</i>	mph
TRD Adjustment	<i>3.2</i>	mph
FFS	<i>72.2</i>	mph

LOS and Performance Measures

Operational (LOS)

v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	<i>2468</i>	pc/h/ln
S	<i>51.3</i>	mph
D = v _p / S	<i>48.1</i>	pc/mi/ln
LOS	<i>F</i>	

Design (N)

Design (N)

Design LOS	
v _p = (V or DDHV) / (PHF x N x f _{HV} x f _p)	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes	S - Speed
V - Hourly volume	D - Density
v _p - Flow rate	FFS - Free-flow speed
LOS - Level of service	BFFS - Base free-flow speed
DDHV - Directional design hour volume	

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday PM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Northbound*
 From/To *North of Los Feliz Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future With Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	9375	veh/h	Peak-Hour Factor, PHF	0.94
AADT		veh/day	%Trucks and Buses, P _T	5
Peak-Hr Prop. of AADT, K			%RVs, P _R	0
Peak-Hr Direction Prop, D			General Terrain:	Level
DDHV = AADT x K x D		veh/h	Grade % Length	mi
			Up/Down %	

Calculate Flow Adjustments

f _p	1.00	E _R	1.2
E _T	1.5	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	0.976

Speed Inputs

Lane Width	12.0	ft
Rt-Side Lat. Clearance	6.0	ft
Number of Lanes, N	4	
Total Ramp Density, TRD	1.00	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	75.4	mph

Calc Speed Adj and FFS

f _{LW}	0.0	mph
f _{LC}	0.0	mph
TRD Adjustment	3.2	mph
FFS	72.2	mph

LOS and Performance Measures

Operational (LOS)

$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	2556	pc/h/ln
S	48.7	mph
D = v _p / S	52.5	pc/mi/ln
LOS	F	

Design (N)

Design (N)

Design LOS	
$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes S - Speed
 V - Hourly volume D - Density
 v_p - Flow rate FFS - Free-flow speed
 LOS - Level of service BFFS - Base free-flow speed
 DDHV - Directional design hour volume

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday PM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Southbound*
 From/To *North of Los Feliz Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future With Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	8261	veh/h	Peak-Hour Factor, PHF	0.94
AADT		veh/day	%Trucks and Buses, P _T	5
Peak-Hr Prop. of AADT, K			%RVs, P _R	0
Peak-Hr Direction Prop, D			General Terrain:	Level
DDHV = AADT x K x D		veh/h	Grade % Length	mi
			Up/Down %	

Calculate Flow Adjustments

f _p	1.00	E _R	1.2
E _T	1.5	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	0.976

Speed Inputs

Lane Width	12.0	ft
Rt-Side Lat. Clearance	6.0	ft
Number of Lanes, N	4	
Total Ramp Density, TRD	1.00	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	75.4	mph

Calc Speed Adj and FFS

f _{LW}	0.0	mph
f _{LC}	0.0	mph
TRD Adjustment	3.2	mph
FFS	72.2	mph

LOS and Performance Measures

Operational (LOS)

$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	2252	pc/h/ln
S	57.2	mph
D = v _p / S	39.4	pc/mi/ln
LOS	E	

Design (N)

Design (N)

Design LOS	
$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes S - Speed
 V - Hourly volume D - Density
 v_p - Flow rate FFS - Free-flow speed
 LOS - Level of service BFFS - Base free-flow speed
 DDHV - Directional design hour volume

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday AM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Northbound*
 From/To *South of Glendale Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future With Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	<i>7739</i>	veh/h	Peak-Hour Factor, PHF	<i>0.94</i>
AADT		veh/day	%Trucks and Buses, P _T	<i>5</i>
Peak-Hr Prop. of AADT, K			%RVs, P _R	<i>0</i>
Peak-Hr Direction Prop, D			General Terrain:	<i>Level</i>
DDHV = AADT x K x D		veh/h	Grade % Length	<i>mi</i>
			Up/Down %	

Calculate Flow Adjustments

f _p	<i>1.00</i>	E _R	<i>1.2</i>
E _T	<i>1.5</i>	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	<i>0.976</i>

Speed Inputs

Lane Width	<i>12.0</i>	ft
Rt-Side Lat. Clearance	<i>6.0</i>	ft
Number of Lanes, N	<i>4</i>	
Total Ramp Density, TRD	<i>1.00</i>	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	<i>75.4</i>	mph

Calc Speed Adj and FFS

f _{LW}	<i>0.0</i>	mph
f _{LC}	<i>0.0</i>	mph
TRD Adjustment	<i>3.2</i>	mph
FFS	<i>72.2</i>	mph

LOS and Performance Measures

Operational (LOS)

$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	<i>2110</i>	pc/h/ln
S	<i>60.4</i>	mph
D = v _p / S	<i>34.9</i>	pc/mi/ln
LOS	<i>D</i>	

Design (N)

Design (N)

Design LOS	
$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes	S - Speed
V - Hourly volume	D - Density
v _p - Flow rate	FFS - Free-flow speed
LOS - Level of service	BFFS - Base free-flow speed
DDHV - Directional design hour volume	

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday AM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Southbound*
 From/To *South of Glendale Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future With Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	<i>8581</i>	veh/h	Peak-Hour Factor, PHF	<i>0.94</i>
AADT		veh/day	%Trucks and Buses, P _T	<i>5</i>
Peak-Hr Prop. of AADT, K			%RVs, P _R	<i>0</i>
Peak-Hr Direction Prop, D			General Terrain:	<i>Level</i>
DDHV = AADT x K x D		veh/h	Grade % Length	<i>mi</i>
			Up/Down %	

Calculate Flow Adjustments

f _p	<i>1.00</i>	E _R	<i>1.2</i>
E _T	<i>1.5</i>	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	<i>0.976</i>

Speed Inputs

Lane Width	<i>12.0</i>	ft
Rt-Side Lat. Clearance	<i>6.0</i>	ft
Number of Lanes, N	<i>4</i>	
Total Ramp Density, TRD	<i>1.00</i>	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	<i>75.4</i>	mph

Calc Speed Adj and FFS

f _{LW}	<i>0.0</i>	mph
f _{LC}	<i>0.0</i>	mph
TRD Adjustment	<i>3.2</i>	mph
FFS	<i>72.2</i>	mph

LOS and Performance Measures

Operational (LOS)

$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	<i>2339</i>	pc/h/ln
S	<i>55.0</i>	mph
D = v _p / S	<i>42.6</i>	pc/mi/ln
LOS	<i>E</i>	

Design (N)

Design (N)

Design LOS	
$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes S - Speed
 V - Hourly volume D - Density
 v_p - Flow rate FFS - Free-flow speed
 LOS - Level of service BFFS - Base free-flow speed
 DDHV - Directional design hour volume

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday PM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Northbound*
 From/To *South of Glendale Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future With Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	8882	veh/h	Peak-Hour Factor, PHF	0.94
AADT		veh/day	%Trucks and Buses, P _T	5
Peak-Hr Prop. of AADT, K			%RVs, P _R	0
Peak-Hr Direction Prop, D			General Terrain:	Level
DDHV = AADT x K x D		veh/h	Grade % Length	mi
			Up/Down %	

Calculate Flow Adjustments

f _p	1.00	E _R	1.2
E _T	1.5	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	0.976

Speed Inputs

Lane Width	12.0	ft
Rt-Side Lat. Clearance	6.0	ft
Number of Lanes, N	4	
Total Ramp Density, TRD	1.00	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	75.4	mph

Calc Speed Adj and FFS

f _{LW}	0.0	mph
f _{LC}	0.0	mph
TRD Adjustment	3.2	mph
FFS	72.2	mph

LOS and Performance Measures

Operational (LOS)

$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	2421	pc/h/ln
S	52.7	mph
D = v _p / S	45.9	pc/mi/ln
LOS	F	

Design (N)

Design (N)

Design LOS	
$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes S - Speed
 V - Hourly volume D - Density
 v_p - Flow rate FFS - Free-flow speed
 LOS - Level of service BFFS - Base free-flow speed
 DDHV - Directional design hour volume

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	

BASIC FREEWAY SEGMENTS WORKSHEET

General Information

Analyst *FSB*
 Agency or Company *LLG Engineers*
 Date Performed *11/05/13*
 Analysis Time Period *Weekday PM Peak Hour*

Site Information

Highway/Direction of Travel *I-5 Southbound*
 From/To *South of Glendale Boulevard*
 Jurisdiction *Caltrans*
 Analysis Year *Year 2020 Future With Project*

Project Description *Glendale Tropico Project/1-12-3981-1*

☒ Oper.(LOS)

☐ Des.(N)

☐ Planning Data

Flow Inputs

Volume, V	7835	veh/h	Peak-Hour Factor, PHF	0.94
AADT		veh/day	%Trucks and Buses, P _T	5
Peak-Hr Prop. of AADT, K			%RVs, P _R	0
Peak-Hr Direction Prop, D			General Terrain:	Level
DDHV = AADT x K x D		veh/h	Grade % Length	mi
			Up/Down %	

Calculate Flow Adjustments

f _p	1.00	E _R	1.2
E _T	1.5	f _{HV} = 1/[1+P _T (E _T - 1) + P _R (E _R - 1)]	0.976

Speed Inputs

Lane Width	12.0	ft
Rt-Side Lat. Clearance	6.0	ft
Number of Lanes, N	4	
Total Ramp Density, TRD	1.00	ramps/mi
FFS (measured)		mph
Base free-flow Speed, BFFS	75.4	mph

Calc Speed Adj and FFS

f _{LW}	0.0	mph
f _{LC}	0.0	mph
TRD Adjustment	3.2	mph
FFS	72.2	mph

LOS and Performance Measures

Operational (LOS)

$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	2136	pc/h/ln
S	59.8	mph
D = v _p / S	35.7	pc/mi/ln
LOS	E	

Design (N)

Design (N)

Design LOS	
$v_p = (V \text{ or } DDHV) / (PHF \times N \times f_{HV} \times f_p)$	pc/h/ln
S	mph
D = v _p / S	pc/mi/ln
Required Number of Lanes, N	

Glossary

N - Number of lanes S - Speed
 V - Hourly volume D - Density
 v_p - Flow rate FFS - Free-flow speed
 LOS - Level of service BFFS - Base free-flow speed
 DDHV - Directional design hour volume

Factor Location

E _R - Exhibits 11-10, 11-12	f _{LW} - Exhibit 11-8
E _T - Exhibits 11-10, 11-11, 11-13	f _{LC} - Exhibit 11-9
f _p - Page 11-18	TRD - Page 11-11
LOS, S, FFS, v _p - Exhibits 11-2, 11-3	