

## Appendices

### **Appendix A2      Comments Letters on NOP**

## Appendices

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## NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691  
Phone (916) 373-3710



August 25, 2017

Peter Vierheilig  
City of Glendale  
613 E. Broadway, Room 14  
Glendale, CA 91206

Sent via e-mail: [pvierheilig@glendaleca.gov](mailto:pvierheilig@glendaleca.gov)

RE: SCH# 2017081003; Wilson Middle School Multi-Purpose Field Project, City of Glendale; Los Angeles County, California

Dear Mr. Vierheilig:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

**CEQA was amended significantly in 2014.** Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
  - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
  - a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
  - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

*This process should be documented in the Cultural Resources section of your environmental document.*

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an 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.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.



- b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Sincerely,

Gayle Totton, M.A., PhD.  
Associate Governmental Program Analyst

SENT VIA USPS AND E-MAIL:

August 23, 2017

[Pvierheilig@Glendaleca.gov](mailto:Pvierheilig@Glendaleca.gov)

Peter Vierheilig, Project Manager  
City of Glendale Community Services & Parks  
613 East Broadway Room 120  
Glendale, California 91206

**Notice of Preparation of Environmental Impact Report for the  
Wilson Middle School Multi-Purpose Field Project**

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send SCAQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files<sup>1</sup>. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

**Air Quality Analysis**

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts.

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<sup>1</sup> Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.



SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance<sup>2</sup> on strategies to reduce air pollution exposure near high-volume roadways can be found at: [https://www.arb.ca.gov/ch/rd\\_technical\\_advisory\\_final.PDF](https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF).

### **Mitigation Measures**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

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<sup>2</sup> In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

- Chapter 11 of SCAQMD's *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf?sfvrsn=5>
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

### **Alternatives**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

### **Permits**

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

### **Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD's webpage (<http://www.aqmd.gov>).

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) or call me at (909) 396-3308.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC170803-01

Control Number



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

**Notice of Preparation**

August 2, 2017

To: Reviewing Agencies

Re: Wilson Middle School Multi-Purpose Field Project  
SCH# 2017081003

Attached for your review and comment is the Notice of Preparation (NOP) for the Wilson Middle School Multi-Purpose Field Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Peter Vierheilig**  
**City of Glendale**  
**613 E. Broadway, Room 14**  
**Glendale, CA 91206**

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency



**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2017081003  
**Project Title** Wilson Middle School Multi-Purpose Field Project  
**Lead Agency** Glendale, City of

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**Type** NOP Notice of Preparation

**Description** The proposed project would result in the redevelopment of the existing grass field and paved basketball courts with a joint use multi-purpose synthetic turf field with football, soccer and lacrosse markings and surrounding rubberized surface jogging track, fitness equipment, perimeter security fence with privacy screening, restroom and storage/maintenance building(s), walkways, landscaping, irrigation, re-grading of the existing basketball court surface, and sports field lighting. The City's use of the proposed field would be from 5:00 p.m. to 10:00 p.m. Monday through Friday, and 8:00 a.m. to 10:00 p.m. on Saturday and Sunday. No permanent seating or bleachers are proposed. The project would not introduce new uses to project site; rather, the proposed project would allow for the extended use of the project site by outside sporting groups during nighttime hours.

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**Lead Agency Contact**

<b>Name</b>	Peter Vierheilig		
<b>Agency</b>	City of Glendale		
<b>Phone</b>	818-548-2000	<b>Fax</b>	
<b>email</b>			
<b>Address</b>	613 E. Broadway, Room 14		
<b>City</b>	Glendale	<b>State</b> CA	<b>Zip</b> 91206

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**Project Location**

<b>County</b>	Los Angeles			
<b>City</b>	Glendale			
<b>Region</b>				
<b>Cross Streets</b>	Monterey Road and Verdugo Rd.			
<b>Lat / Long</b>	34° 9.25' 44" N / 118° 14' 17.5" W			
<b>Parcel No.</b>				
<b>Township</b>	1	<b>Range</b>	13W	<b>Section</b>
				<b>Base</b>

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**Proximity to:**

<b>Highways</b>	SR 134
<b>Airports</b>	
<b>Railways</b>	
<b>Waterways</b>	
<b>Schools</b>	Wilson Middle School
<b>Land Use</b>	Z: R1 - Low Density Residential/Gneeral Plan: Public/Semi-public

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**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Landuse

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**Reviewing Agencies** Resources Agency; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4

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<b>Date Received</b>	08/02/2017	<b>Start of Review</b>	08/02/2017	<b>End of Review</b>	08/31/2017
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Resources Agency

☒ Resources Agency  
Nadell Gayou

☐ Dept. of Boating & Waterways  
Denise Peterson

☐ California Coastal Commission  
Elizabeth A. Fuchs

☐ Colorado River Board  
Lisa Johansen

☐ Dept. of Conservation  
Crina Chan

☐ Cal Fire  
Dan Foster

☐ Central Valley Flood Protection Board  
James Herola

☐ Office of Historic Preservation  
Ron Parsons

☒ Dept. of Parks & Recreation  
Environmental Stewardship Section

☐ S.F. Bay Conservation & Dev't. Comm.  
Steve Goldbeck

☒ Dept. of Water Resources  
Resources Agency  
Nadell Gayou

Fish and Game

☐ Depart. of Fish & Wildlife  
Scott Flint  
Environmental Services Division

☐ Fish & Wildlife Region 1  
Curt Babcock

☐ Fish & Wildlife Region 1E  
Laure Harnsberger

☐ Fish & Wildlife Region 2  
Jeff Drongosen

☐ Fish & Wildlife Region 3  
Craig Weighlman

☐ Fish & Wildlife Region 4  
Julie Vance

☒ Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation Program

☐ Fish & Wildlife Region 6  
Tiffany Ellis  
Habitat Conservation Program

☐ Fish & Wildlife Region 6 I/M  
Heidi Calvert  
Inyo/Mono, Habitat Conservation Program

☐ Dept. of Fish & Wildlife M  
William Paznokas  
Marine Region

Other Departments

☐ California Department of Education  
Lesley Taylor

☐ OES (Office of Emergency Services)  
Monique Wilber

☐ Food & Agriculture  
Sandra Schubert  
Dept. of Food and Agriculture

☐ Dept. of General Services  
Cathy Buck  
Environmental Services Section

☐ Housing & Comm. Dev.  
CEQA Coordinator  
Housing Policy Division

Independent Commissions, Boards

☐ Delta Protection Commission  
Erk Vink

☐ Delta Stewardship Council  
Kevan Samsam

☐ California Energy Commission  
Eric Knight

☒ Native American Heritage Comm.

☐ Debbie Treadway

☐ Public Utilities Commission  
Supervisor

☐ Santa Monica Bay Restoration  
Guangyu Wang

☐ State Lands Commission  
Jennifer Deleong

☐ Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques

Cal State Transportation Agency CalSTA

☐ Caltrans - Division of Aeronautics  
Phillip Crimmins

☐ Caltrans - Planning  
HQ LD-IGR  
Christian Bushong

☒ California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects

Dept. of Transportation

☐ Caltrans, District 1  
Rex Jackman

☐ Caltrans, District 2  
Marcelino Gonzalez

☐ Caltrans, District 3  
Eric Federicks - South  
Susan Zanchi - North

☐ Caltrans, District 4  
Patricia Maurice

☐ Caltrans, District 5  
Larry Newland

☐ Caltrans, District 6  
Michael Navarro

☒ Caltrans, District 7  
Diana Watson

☐ Caltrans, District 8  
Mark Roberts

☐ Caltrans, District 9  
Gayle Rosander

☐ Caltrans, District 10  
Tom Dumas

☐ Caltrans, District 11  
Jacob Armstrong

☐ Caltrans, District 12  
Maureen El Harake

Cal EPA

☐ Air Resources Board

☐ Airport & Freight  
Jack Wursten

☐ Transportation Projects  
Nesamani Kalandiyur

☐ Industrial/Energy Projects  
Mike Tolstrup

☐ California Department of Resources, Recycling & Recovery  
Sue O'Leary

☐ State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance

☐ State Water Resources Control Board  
Cindy Forbes - Asst Deputy  
Division of Drinking Water

☐ State Water Resources Control Board  
State Water Resources Control Div. Drinking Water # \_\_\_\_\_

☐ State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality

☐ State Water Resources Control Board  
Phil Crader  
Division of Water Rights

☐ Dept. of Toxic Substances Control  
CEQA Tracking Center

☐ Department of Pesticide Regulation  
C-FOA Coordinator

Regional Water Quality Control Board (RWQCB)

☐ RWQCB 1  
Cathleen Hudson  
North Coast Region (1)

☐ RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)

☐ RWQCB 3  
Central Coast Region (3)

☒ RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)

☐ RWQCB 5S  
Central Valley Region (5)

☐ RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office

☐ RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office

☐ RWQCB 6  
Lahontan Region (6)

☐ RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office

☐ RWQCB 7  
Colorado River Basin Region (7)

☐ RWQCB 8  
Santa Ana Region (8)

☐ RWQCB 9  
San Diego Region (9)

☐ Other \_\_\_\_\_

\_\_\_\_\_

☐ \_\_\_\_\_

Conservancy



**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613

For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

2017081003

**Project Title:** Wilson Middle School Multi-Purpose Field Project**Lead Agency:** Glendale Community Services & Parks Department**Contact Person:** Peter Vierheilg, Project Manager**Mailing Address:** 613 East Broadway, Room 14**Phone:** 818.548.2000**City:** Glendale**Zip:** 91206**County:** Los Angeles**Project Location:** County: Los Angeles

City/Nearest Community: Glendale

**Cross Streets:** Monterey Road and Verdugo Road**Zip Code:** 91206**Longitude/Latitude (degrees, minutes and seconds):** 34 ° 9.25 ' 44 " N / 118 ° 14 ' 17.5 " W **Total Acres:** 3.85**Assessor's Parcel No.:** N/A**Section:** S**Twp.:** T1**Range:** R13W**Base:****Within 2 Miles:** State Hwy #: SR-134**Waterways:** N/A**Airports:** N/A**Railways:** N/A**Schools:** Wilson Middle School**Document Type:****CEQA:** ☒ NOP☐ Early Cons☐ Neg Dec☐ Mit Neg Dec☐ Draft EIR☐ Supplement/Subsequent EIR

(Prior SCH No.)

**Other:****NEPA:**☐ NOI☐ EA☐ Draft EIS☐ FONSI**Other:**☐ Joint Document☐ Final Document☐ Other:

Governor's Office of Planning &amp; Research

**Local Action Type:**☐ General Plan Update☐ General Plan Amendment☐ General Plan Element☐ Community Plan☐ Specific Plan☐ Master Plan☐ Planned Unit Development☐ Site Plan☐ Rezone☐ Prezone☐ Use Permit☐ Land Division (Subdivision, etc.)

STATE CLEARINGHOUSE

☐ Annexation☒ Redevelopment☐ Coastal Permit☐ Other:**Development Type:**☐ Residential: Units

Acres

☐ Office: Sq.ft.

Acres

Employees

☐ Commercial: Sq.ft.

Acres

Employees

☐ Industrial: Sq.ft.

Acres

Employees

☐ Educational:☒ Recreational: Field Lighting for 10,000 sf Multi-purpose field☐ Water Facilities: Type

MGD

☐ Transportation: Type☐ Mining: Mineral☐ Power: Type

MW

☐ Waste Treatment: Type

MGD

☐ Hazardous Waste: Type☐ Other:**Project Issues Discussed in Document:**☒ Aesthetic/Visual☐ Agricultural Land☒ Air Quality☒ Archeological/Historical☒ Biological Resources☐ Coastal Zone☒ Drainage/Absorption☐ Economic/Jobs☐ Fiscal☒ Flood Plain/Flooding☐ Forest Land/Fire Hazard☒ Geologic/Seismic☒ Minerals☒ Noise☒ Population/Housing Balance☒ Public Services/Facilities☒ Recreation/Parks☒ Schools/Universities☐ Septic Systems☒ Sewer Capacity☒ Soil Erosion/Compaction/Grading☒ Solid Waste☒ Toxic/Hazardous☒ Traffic/Circulation☐ Vegetation☒ Water Quality☐ Water Supply/Groundwater☐ Wetland/Riparian☒ Growth Inducement☒ Land Use☐ Cumulative Effects☐ Other:**Present Land Use/Zoning/General Plan Designation:****Zoning:** R1 - Low Density Residential/ General Plan: Public/Semi-Public**Project Description:** (please use a separate page if necessary)

The proposed project would result in the redevelopment of the existing grass field and paved basketball courts with a joint use multi-purpose synthetic turf field with football, soccer and lacrosse markings and surrounding rubberized surface jogging track, fitness equipment, perimeter security fence with privacy screening, restroom and storage/maintenance building(s), walkways, landscaping, irrigation, re-grading of the existing basketball court surface, and sports field lighting. The City's use of the proposed field would be from 5:00 p.m. to 10:00 p.m. Monday through Friday, and 8:00 a.m. to 10:00 p.m. on Saturday and Sunday. No permanent seating or bleachers are proposed. The project would not introduce new uses to the project site; rather, the proposed project would allow for the extended use of the project site by outside sporting groups during nighttime hours.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".  
If you have already sent your document to the agency please denote that with an "S".

<input checked="" type="checkbox"/> Air Resources Board	<input type="checkbox"/> Office of Historic Preservation
<input type="checkbox"/> Boating & Waterways, Department of	<input checked="" type="checkbox"/> Office of Public School Construction
<input type="checkbox"/> California Emergency Management Agency	<input checked="" type="checkbox"/> Parks & Recreation, Department of
<input type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Pesticide Regulation, Department of
<input checked="" type="checkbox"/> Caltrans District #7	<input type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Caltrans Division of Aeronautics	<input checked="" type="checkbox"/> Regional WQCB #4
<input type="checkbox"/> Caltrans Planning	<input type="checkbox"/> Resources Agency
<input type="checkbox"/> Central Valley Flood Protection Board	<input type="checkbox"/> Resources Recycling and Recovery, Department of
<input type="checkbox"/> Coachella Valley Mtns. Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Comm.
<input type="checkbox"/> Coastal Commission	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mtns. Conservancy
<input type="checkbox"/> Corrections, Department of	<input type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input checked="" type="checkbox"/> SWRCB: Water Quality
<input type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input checked="" type="checkbox"/> Fish & Game Region #5	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> Food & Agriculture, Department of	<input type="checkbox"/> Toxic Substances Control, Department of
<input type="checkbox"/> Forestry and Fire Protection, Department of	<input type="checkbox"/> Water Resources, Department of
<input type="checkbox"/> General Services, Department of	<input checked="" type="checkbox"/> Other: South Coast Air Quality Management District
<input type="checkbox"/> Health Services, Department of	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Housing & Community Development	
<input checked="" type="checkbox"/> Native American Heritage Commission	

### Local Public Review Period (to be filled in by lead agency)

Starting Date August 1, 2017

Ending Date August 31, 2017

### Lead Agency (Complete if applicable):

Consulting Firm: Placeworks

Address: 700 S. Flower Street, Suite 600

City/State/Zip: Los Angeles, CA 90017

Contact: Julian Capata

Phone: 213.623.1443

Applicant: Glendale Community Services & Parks Dept.

Address: 613 East Broadway

City/State/Zip: Glendale, CA 91206

Phone: 818.548.2000

Signature of Lead Agency Representative: \_\_\_\_\_

Date: 08-01-2017

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

COMMENT CARD

August 17, 2017 at 6:30 PM – Wilson Middle School Multi-Purpose Project Scoping Meeting

Please let us know your comments/concerns regarding the Wilson MS Multi-Purpose Project EIR

(please print):

I OWN AN APARTMENT AT THE COLONIAL COTTAGES. I BOUGHT MY CONDO 2 YEARS AGO. I ENJOY THE PEACE AND QUIET OF THIS CONDOMINIUM SET UP. MY CONDO IS LOCATED IN THE BACK, CLOSE TO THE ALLEY NEXT TO THE WILSON MIDDLE SCHOOL. I THINK THAT THE PROJECT THAT IS BEING PLANNED WILL BE ONLY A TERRIBLE DISTURBANCE TO THE WHOLE NEIGHBORHOOD!!! THE PARKING IS ALSO A BIG PROBLEM AROUND THIS AREA, AND THE BACK ALLEY ANOTHER EVEN BIGGER PROBLEM!!! AS IT IS WE ALREADY HAVE PROBLEMS WHEN PEOPLE BRINGING CHILDREN TO SCHOOL, DRIVE THROUGH LIKE IF THEY WERE IN A HIGHWAY---- WE SHOULD HAVE SOME BUMPS TO PREVENT THIS PROBLEM.

I, AND MANY OF THE PEOPLE IN THIS AREA, ARE AGAINST THIS STUPID PROJECT!!! TRY TO FIND ANOTHER FIELD WHERE IT HAS NO RESIDENTIAL ISSUES. WE WANT OUR PEACE AND QUIET!

BESIDES, THE PROPERTY VALUES ARE GOING TO DROP!

PLEASE CONSIDER THE PEOPLE LIVING IN THIS AREA!

THANK YOU IN ADVANCE

ZULAY FROMMEL

1206 E. GLENDALE BLVD.

91206 GLENDALE CALIF.

E/MAIL ZULAY.ITU@HOTMAIL.COM

Name:

Address:

Please return this comment card to Peter Vierheilig, Project Manager, City of Glendale, at the end of the Scoping Meeting or fold in half, staple, and mail it to the City of Glendale using the address provided (see reverse).



City of Glendale, Community Services & Parks Department  
Attn: Peter Vierheilig, Project Manager  
613 E. Broadway, Room 120  
Glendale, CA 91206



## Julian Capata

---

**From:** ernestoonofre@gmail.com  
**Sent:** Friday, September 1, 2017 1:56 PM  
**To:** Vierheilig, Peter  
**Cc:** Rodriguez, Carol; Danette Roe  
**Subject:** Turning Wilson Middle School into a Park

The school yard should be available as it was before — available to everybody after school hours.

I lived through that setting and use of this school yard for 30 years without experiencing major incidents with others; there were only one or two minor ones with rude people who used to play baseball.

The planned project would alter the use of the school yard 180 degrees and would affect negatively the neighborhood environment with noise, crowded parking, pollution/littering and fights (?) with other people.  
Yes, there are going to be rude people.

By continuing the use of the school yard as before, we would be letting daylight dictate the time to go home without having to deal with intense lighting until 10 p.m.

And the removal of natural grass would cause a great increase in temperatures, making sleeping and living a nightmare for adjacent neighbors.

Ernesto Onofre, President  
Colonial Cottages HOA  
1208 E. Glenoaks Blvd.  
Glendale , CA 91206

**From:** aldo mascheroni  
**To:** [Vierheilig, Peter](#)  
**Cc:** ["Ross Paulson"; Goglia, Gabrielle](#)  
**Subject:** Wilson Middle School Multi-Purpose Project  
**Date:** Wednesday, August 30, 2017 3:11:47 PM

---

To whom it may concern:

This correspondence is submitted concerning the proposed field improvements for the Wilson Middle School by the Regional Commissioner and Board of Directors of AYSO Region 88 ("AYSO"). **AYSO very much favors the proposal for a new artificial turf field with lights for the Wilson Middle School.**

#### **Overview of AYSO:**

AYSO Region 88 is the primary recreational soccer program for children and their families here in Glendale and La Crescenta. Since the City of Glendale does not run a large-scale year-round soccer program, AYSO fills that important community need. AYSO serves children preschoolers to high school students, from age 3 through 19. AYSO registration is open to all children, regardless of ability. AYSO is able to provide a low-cost, affordable soccer program, primarily due to the fact that no one within AYSO Region 88 receives any compensation whatsoever---AYSO is run entirely by volunteers, including volunteer coaches, volunteer referees, volunteer Board members, and volunteer field personnel.

This year AYSO Region 88 has registered over 3,200 children for the Fall season. There are over 1,000 volunteers within AYSO Region 88 and all volunteers have undergone background checks and specific training for their volunteer work, including mandatory Safe Haven training. AYSO Region 88 has proudly served the children and families of Glendale and La Crescenta for the last 40 years.

#### **Wilson Middle School Field Improvement Project Discussion:**

Generally speaking, the City of Glendale lacks a sufficient number of fields that are suitable for playing soccer, both for children and adults. AYSO Region 88, which serves children, has utilized field permits the City and the Glendale Unified School District ("GUSD" or the "School District") for practices and games at certain fields, including Wilson Middle School ("Wilson MS"). AYSO would like to continue using the Wilson MS field for games on weekends and also for weekday evening practices. Wilson MS is very centrally located for many residents of Glendale and La Crescenta for practices and games for their children.

One of the important reasons that Wilson MS is particularly important to AYSO is that the field is sufficiently large to allow 9 v. 9 games and 11 v. 11 games. The Wilson field is larger than fields at many of the elementary schools. One of the requirements of the game of soccer is that the playing space must be of a certain size, depending upon the age group involved. For example, the minimum field size for youth soccer (11 per team) is 50 yards by 100 yards; high school minimum requirements are 55 yards by 100 yards, and generally such fields exceed these minimum requirements. Thus, the Wilson MS field is particularly suitable for an artificial turf field that could continue to be used for youth soccer games.

#### **Conclusion:**

AYSO has a good record of stewardship for the fields it uses and has been helpful in the development of youngsters in our community. We believe that the proposed field improvements for the Wilson Middle School would be good for the whole community.

Sincerely,

Aldo Mascheroni  
Regional Commissioner  
AYSO Region 88  
[Rc88@ayso88.org](mailto:Rc88@ayso88.org)

To: Peter Vierheilig, Project Mgr., Glendale Comm. Serv. & Parks Dept.

From: Danette Roe ,1208 E. Glenoaks Blvd. , Glendale , CA 91206

Date August 30, 2017 **Modified** on Sept. 1, 2017

## **Comments on Proposal for Wilson MS Multi-Purpose Field**

EIR needs to study the areas listed below and determine negative impact on children and adults using the field, as well as the extensive impact on residential neighbors in close proximity:

1. Increased fine particulate matter in the air as a result of location very near **FWY 2 and Fwy 134**. The children and adults will be outdoors breathing this air as they exercise.\*\*Has this been measured to date??  
As stated in the Initial Report, the construction will add to this as well.
2. Light and noise pollution every day up to 10 pm. This will be unacceptable for neighbors in a zoned residential area.
3. The increase in air temperature of a large artificial turf field as opposed to a grass field. Water savings may be minimal as many turf fields require watering prior to games. For example, LAUSD reversed many school turf projects for this reason, as well as health dangers found in turf components.
4. Lack of parking and small areas for entrance and exit – perhaps only one. Wilson MS principal said all community users would be required to go in/out from the alley side, even if they park in the school lot. This will result in additional foot and car traffic in the alley. This narrow space will not accommodate two-way traffic in higher volumes.
5. Lack of study about alley traffic. The school already has trouble with this now. The study proposes to look at only four street intersections.
6. Added problems with security with open restrooms and mixed age groups from 5-10 pm daily. Are city parks leaving restrooms open all these hours? Open access and use could result in undesirable, unsupervised activity.

Please notify me as soon as the EIR is complete and another community meeting is scheduled. I plan to attend, along with many others in our Homeowners Association.

Thank you for adding these comments to the community input to the EIR for the Wilson MS Multi-purpose Field.

August 30th 2017

Peter Vierheilig  
Project Manager  
City of Glendale Community Services & Parks Dept.  
613 East Broadway Rm 120  
Glendale, CA 91206

**RE: WILSON MIDDLE SCHOOL MULTI-PURPOSE PROJECT**

Dear Mr. Vierheilig,

I live on North Adams street, in the direct vicinity of Wilson Middle School. Are you aware of the parking crisis in these neighborhoods? The school offers minimal parking at best, and currently any time there is an activity, parents and whomever take the precious street parking spots that we rely on as residents here. The school sometimes offers the field you are proposing for parking at these events and still all street parking is all taken up by guests. This is also the case during the week, as teachers take these spots during the day and parents crowd the neighborhood to pick up the kids after school.

First off, building a multi-purpose park with no plans for additional parking will put a severe strain on the residents here. There simply are not enough street parking spots. Secondly, the impact of bulldozing and building this close to residents will also severely impact the quality of life through dust contamination, possible fungus or mold spores suddenly becoming airborne with health risk issues, as the ground is torn up. Then the building materials. Rubber jogging tracks outgas profusely, even decades after installation. I personally suffer from reactive airway disorder, which is not unlike asthma at times. The dust conditions here are bad enough. All these factors and more, make this a toxic project.

I understand the developers of this project see a different value in it's potential construction, but I personally would need to relocate after living here 13 years. If I have to relocate, based on the toxic conditions proposed, all the costs associated with such a desperate move would be the responsibility of the Glendale Community Services & Parks, so I would suggest you put that in the budget.

Best regards,



Rusty Whitcroft  
806 North Adams Street  
Glendale, CA 91206

(818)636-6409

Dear Onnig,

Congratulations on another terrific Cruise Night in Glendale and our first CicLAvia. I enjoyed both events.

Thanks to the live streaming of the commission meeting I heard about the success of the One Glendale Program. Congratulations to those who created the program and who figured out a way to pay for it. The data and the survey results are impressive and the kids are having fun, staying busy, and learning good habits too.

It's hard to be against opportunities for kids to play sports, but it's absolutely necessary to limit the hours when the activities are in the heart of a quiet residential neighborhood.

Thursday night I attended the meeting at Wilson MS because I don't want to see noise inserted into their neighborhood until 9 or 10 at night 7 days a week. In their neighborhood daytime noise may be routine, but night time noise should not be there. I know for a fact it is not a pleasant experience. There are people whose young kids are in bed by 9 for school the next day and some adults need to be in bed early because of their work schedule. If there is something that can be developed to prevent noise from going into all those homes, yards, and walkways, it would be great. If that project goes forward, noise mitigation has to be factored in. People need to be able to rest and relax at home indoors and outdoors and no one should have to figure out a way to deal with unwanted sounds day and night.

When we first met and talked about Palmer Park, there was a sycamore tree near me on the south side of the park. On January 23 a tree on the west side of the park came down and the same morning a big heavy limb broke off from high up in that sycamore tree. It took the power lines with it so many houses on my street had no power until after dark. I assume it was due to safety that the city removed that tall sycamore tree soon after that limb came down, but that tree was part of the plan to reduce noise in our neighborhood. Now it's gone and as Koko said at a meeting last winter, the empty space is too close to the fence to plant new trees.

Now that summer is over it is time to enforce the 8 pm closing time for basketball and skateboarding. There's a skateboarder that often brings music in the late afternoon that we can hear clearly from the skate park so we have a variety of noises to deal with during the time the park is open.

Basketball players continue playing after the lights go out (now at 8:05). I've included the photos of the signs that say the courts and skate park close at 8. In daylight they can be read, but after dark the information can't be read easily from a distance. Thus there are people who arrive after dark to use the park who may never notice the signs. The signs fit in with the Glendale's new logo and image, but the information needs to be painted with reflective paint or something that can be read easily after the lights go out.

I'd also like to see a sign that says "Play basketball at night at Pacific Park" and "Verdugo Skate Park is open at night" or something similar so people know they have to play elsewhere after 8 pm.

Tonight I noted park use. There were at least 8 people playing basketball at 8:10 and the skate park was being used too. I heard skating at 8:40. There were basketball players on the court at 8:40 and 9:10. At



9:20 there was still one person pounding the ball on the court. At 9:40 people were still playing basketball.

I appreciated President Kalfayan's question at the commission meeting asking if you have been receiving comments from the neighbors. You and Koko haven't heard from me for several weeks because I've been patiently waiting for school to start in hopes that the activity would cease when the lights go out. Now I know that play continues very late despite school.

Many times it's just one person playing. Often there are quite a few people that persist in playing in the dark. When I'm over at the park when the lights are out, the white backboard is still visible. It's really irritating that activity often begins at 7 am and continues all day and night seven days a week despite the school schedule and despite the lights being out.

Thanks for looking into the possibility of new signage so the hours are clear and people know what options they have. Do the police ever make a friendly trip through the park at 8 or 9 pm?

Thanks so much for your help on this. My new neighbors said they can hear the basketballs every time they step out of their home too. Sometimes I can hear it when I'm in my study even with the TV on. The basketball and skateboards can be heard easily from the sidewalk in front of my home so there's no relief outdoors anywhere at my house.

Have you seen Steph Curry's ad for Infiniti? It confirms that dribbling a basketball is a noisy activity just as the powerful car is noisy. The basketball and the car definitely get one's attention.

Thanks for your help.

Sincerely,

Kay Hostetler

Judith A. Smith  
508 N. Sunset Canyon Drive  
Burbank, CA 91206  
Email: jalesniak@hotmail.com

August 20, 2017

City of Glendale Community Services and Parks Department  
613 E. Broadway, Room 120  
Glendale, CA 91206

Re: Wilson Middle School Multi-Purpose Field Project

Gentlemen:

As a property owner at 806 N. Adams Street, I attended the meeting on August 17, 2017. I would like to summarize the comments I made at the meeting in opposition to the referenced project.

- The neighborhood does not have sufficient street parking as it is now and with approval of this project, it will create a monster problem for the residents who live there.
- This is a residential neighborhood and the residents value peace and quiet. Bringing a soccer field and park into the neighborhood will create noise until 10:00 pm and beyond. This is totally unacceptable.
- The light pollution created by having six 60' lights will be offensive to the neighborhood.
- The property values will decrease as a result of this project.
- The neighborhood will not be as safe since gangs often congregate at such places after hours.

I strongly oppose this project and ask that you seriously consider dropping this idea and leaving the sports facilities as they currently remain throughout the city.

Sincerely,

  
Judith Smith

## **Vierheilig, Peter**

---

**From:** Carole Weling <weling6659@gmail.com>  
**Sent:** Thursday, August 17, 2017 5:41 PM  
**To:** Ochoa, Scott; Garcia, Michael; Kassakhian, Ardashes; Najarian, Ara; Sinanyan, Zareh; Gharpetian, Vartan; Devine, Paula; Bulanikian, Onnig; Vierheilig, Peter; Grant, Michael  
**Subject:** FIVE HUNDRED EIGHTY THREE ACRES OF ---- OPEN SPACE

I have been working all day to secure information regarding the designated "open spaces" the city has purchased through the years for park development.

I am getting "half or no information" about the total of 583 acres that the city has purchased for parks and open space.

The city and the school district is now attempting to CRAM DOWN THE THROATS of the property owners that are around WILSON MIDDLE SCHOOL -- A PROPERTY THAT IS DESIGNATED --- R1 --- TO BECOME A 365 DAYS A YEAR BUSINESS WITH ALL THE TRAPPINGS.

The attempt to circumvent our zoning laws will open the flood gates for others. R1 IS R1. Residential --- making a business for some will create--- NOISE, TRASH, POLICE PRESENCE, LIGHTING ISSUES, TRAFFIC -  
VERDUGO ROAD IS CURRENTLY A SPEEDWAY- INSURANCE COVERAGE ISSUES, HOURS OF USE ISSUES, INGRESS AND EGRESS ISSUES----JUST TO NAME A FEW OF THE PROBLEMS.

I HOPE THAT THE CITY WILL LISTEN AND MOVE THIS PROJECT TO A BETTER LOCATION SUCH AS SOME OF THE PROPERTY THEY CITY HAS PURCHASED FOR PARKS, OR BRAND PARK THAT ALREADY HAS MOST OF THE NEEDED FACILITY FOR THIS ACTIVITY.

I am also concerned how the city intends to compensate property owners affected by this proposal for lost property values. I am currently securing all the information necessary on each entity --

The City of Glendale (which is under insured), the school district, the company for the EIR which will render the usual  
no significant impact (Placeworks, Inc.) and the AYSO just to name a few. Must provide their insurance so these entities my be given NOTICE.

The reality of this proposal--- to be voted on by the city council--- has not one member that will be effected by this negative proposal. Even the Principal at Wilson packs his bags and go home to another ---- city. What does anyone care that will not be effected. This principal is so uninformed that he thinks the ingress and egress at the alley is a good idea.

REMEMBER --- VERDUGO AND LA CANADA--no plaques and roses for the dead.

Carole Weling (COPY TO CALHAHAN AND BLAINE --- FIFTY MILLION AGAINST THE CITY OF DANA POINT  
A CITY THAT WOULD NOT LISTEN.

GLENDALE HAS ONE OF THE WORST DRIVING RECORDS IN THE---COUNTRY---RANKING NUMBER 5.

NOW THE CITY IS PROPOSING CHILDREN RUNNING ACROSS VERDUGO RD TO ACCESS THE FIELD.

COMMENT CARD

August 17, 2017 at 6:30 PM – Wilson Middle School Multi-Purpose Project Scoping Meeting

Please let us know your comments/concerns regarding the Wilson MS Multi-Purpose Project EIR

(please print):

My concern is that noise and lights seven days a week will be installed into a quiet peaceful neighborhood. People are used to having activities at Wilson MS, but the activities end when daylight ends.

What noise barrier will reduce the sound of the activities that will carry into the neighborhood?

If one lives next to a high school football stadium, lights and noise will be present one or two nights a week for a few weeks during football season. By contrast the city and the school district are expecting Wilson MS neighbors to endure noise and lighting 7 nights a week every week until 10pm. There is no comparison.

There must be other locations in Glendale or in Glendale parks where a multipurpose field could be created that would have parking for participants and their fans with no homes and apartments nearby.

If you can develop an idea for something to absorb the sound, that would be great. Maybe there is something that could be installed to satisfy needs for recreation and for quiet spaces. Nearby neighbors need their space at home as a place to retreat and refresh their energy.

Name: Kay Hostetler  
Address: 1263 Oakridge Dr. Glendale, CA 91205

Please return this comment card to Peter Vierheilig, Project Manager, City of Glendale, at the end of the Scoping Meeting or fold in half, staple, and mail it to the City of Glendale using the address provided (see reverse).



Kay V. Hostetler  
1263 Oakridge Dr.  
Glendale, CA 91205

Place  
Stamp  
Here

City of Glendale, Community Services & Parks Department  
Attn: Peter Vierheilig, Project Manager  
613 E. Broadway, Room 120  
Glendale, CA 91206



COMMENT CARD

August 17, 2017 at 6:30 PM – Wilson Middle School Multi-Purpose Project Scoping Meeting

Please let us know your comments/concerns regarding the Wilson MS Multi-Purpose Project EIR

(please print):

1. EXAM CURRENT, HIGHLY CONGESTED PARKING NOT JUST IN IMMEDIATE SURROUNDINGS BUT INTO NEARBY RESIDENTIAL AREAS
2. LIGHTS - MINIMIZE IMPACT OF LIGHTING NOT JUST IN SURROUNDING COMMUNITY; LOOK AT IMPACT OF LIGHT POLLUTION ON NIGHT SKY - CHECK INTERNATIONAL DARK-SKY ASSN.
3. LIMIT WEEKNIGHTS TO 9 PM - FRIDAY, SAT. SUN. CONSIDER 10 PM
4. POLICE & SECURITY - MUST HAVE FOR COMFORT OF NEIGHBORS, SITE IS VERY CLOSE TO FREEWAYS & HOMELESS ENCAMPMENT ON WILSON. MUST HAVE SECURITY ON SITE AT ALL TIMES WHEN OPEN FOR PUBLIC USE - ESPECIALLY RESTROOMS

THIS COULD BE VERY BENEFICIAL FOR AREA CHILDREN & SPORTS PROGRAMS AS WELL AS ADULTS IN AREA IF ABOVE ISSUES ARE CAREFULLY CONSIDERED AND SOLUTIONS PROPOSED.

Name:

ORALIA VAN LEUVEN

Address:

904 VERDUGO CIRCLE DR

Please return this comment card to Peter Vierheilig, Project Manager, City of Glendale, at the end of the Scoping Meeting or fold in half, staple, and mail it to the City of Glendale using the address provided (see reverse).



Ms. Oralia Van Leuven  
904 Verdugo Circle Dr.  
Glendale, CA 91206-1534

SANTA CLAYTON CA 913

22 AUG 2007 PM 10



City of Glendale, Community Services & Parks Department  
Attn: Peter Vierheilg, Project Manager  
613 E. Broadway, Room 120  
Glendale, CA 91206



## Vierheilig, Peter

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**From:** Paul Manchester <wilwhimsey@sbcglobal.net>  
**Sent:** Thursday, August 17, 2017 11:57 AM  
**To:** Vierheilig, Peter  
**Subject:** Wilson Middle School Multi-Purpose Project

Peter Vierheilig, Project Manager  
City of Glendale Community Services & Parks Department.  
Phone Number 818.548.2000  
[PVierheilig@Glendaleca.gov](mailto:PVierheilig@Glendaleca.gov)  
City of Glendale Community Services & Parks Department  
613 East Broadway Rm 120  
Glendale, California 9120  
Wilson Middle School Multi-Purpose Project

Dear Mr. Vierheilig,

I live two buildings north of Wilson Middle School on Verdugo Road. I can see how developing outside usage of the playing fields at the middle school can seem very attractive and a good use of existing facilities, but I am concerned about the impact these events will have on parking in the neighborhood.

During the school year, when there are school events like soccer games and the like, street parking is extremely difficult for the neighborhood. I have one parking space for my unit. If I wish to have someone over for dinner or lunch when an event is on, my guests end up parking blocks away from my home. My neighbor Sabrina and her husband have two cars and one space. When an event happens at the school they end up parking blocks away from their home.

At the moment though, this frustration is mitigated by the knowledge that it is only during school events. So we plan our lives around school events. During soccer season I do not plan on people coming to my home when games are happening. One neighbor suggested that I bookmark the middle school web calendar to help plan events at my home. At the moment we have the respite of evenings and weekends when school is not in session - which is when we need the street parking the most. It sort of works out at the moment. We are patient with the school events as they are not all the time.

We are concerned that if the playing field's evenings and weekends are scheduled with outside events, we will no longer have sufficient parking and our quality of life will be impacted. The people pushing this plan obviously do not live close to the school. For this plan to move forward there needs to be a plan for parking that does not depend on street parking in the neighborhood. Perhaps, shuttles for event goers and permit parking for the neighborhood?

I can be at the meeting tonight at Wilson Middle School at 630, but I have guests arriving at 715, so I will probably leave about 7. I assume the beginning of the event will be more about presentation than input, so I am putting my concerns in an email.

If you have any questions or thoughts, I would be happy to hear them or be useful in discovering solutions that work.

Best of wishes- I know it is difficult balancing many wishes. But the parking in the neighborhood is a big deal and will greatly impact quality of life in the neighborhood.

Sincerely,

Paul Manchester  
815 North Verdugo Road  
Glendale, CA 91206  
323 656-8498  
[wilwhimsey@sbcglobal.net](mailto:wilwhimsey@sbcglobal.net)  
*Paul Manchester*

[http://fugitivecolors.com/PaulManchester\\_illustration.pdf](http://fugitivecolors.com/PaulManchester_illustration.pdf)

COMMENT CARD

August 17, 2017 at 6:30 PM – Wilson Middle School Multi-Purpose Project Scoping Meeting

Please let us know your comments/concerns regarding the Wilson MS Multi-Purpose Project EIR

(please print):

*Parking and noise already a big problem.  
(Vendigo Rd & Freeway)*

Name:

Address:

Please return this comment card to Peter Vierheilig, Project Manager, City of Glendale, at the end of the Scoping Meeting or fold in half, staple, and mail it to the City of Glendale using the address provided (see reverse).

536 Grove St  
Men Ca 91206



City of Glendale, Community Services & Parks Department  
Attn: Peter Vierheilig, Project Manager  
613 E. Broadway, Room 120  
Glendale, CA 91206

# COMMENT CARD

August 17, 2017 at 6:30 PM – Wilson Middle School Multi-Purpose Project Scoping Meeting

Please let us know your comments/concerns regarding the Wilson MS Multi-Purpose Project EIR  
(please print):

Noise - M→F till 10PM seriously!

Why not put turf at soccer fields  
near LA Zoo - they are often not used.

Name:

Address:

Please return this comment card to Peter Vierheilig, Project Manager, City of Glendale, at the end of the Scoping Meeting or fold in half, staple, and mail it to the City of Glendale using the address provided (see reverse).

**From:** S B  
**To:** [Vierheilig, Peter](#)  
**Subject:** Wilson Middle School Multi-Purpose Project  
**Date:** Saturday, August 05, 2017 12:48:42 PM

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Hello Peter,

Thank you for the information via mail for the proposed multi-purpose project at Wilson middle School.

As nearby residents to the school, we do have specific concerns about the proposal.

First, parking. It states that no means for additional parking are being considered. This is a great mistake. Given the scope of community interest in such a facility, the parking needs will definitely spill over to the already overcrowded street parking. Our street has parking available on one side only, and every time the school has an event, participants park illegally, block driveways, and take away the already limited parking for the residents on Woodbury Road.

This can be remedied in a few ways:

1. Have the school open up their parking and / or the soccer field to allow for parking on the site.
2. Have the current plans which neglect to create additional parking, modified to include additional and adequate parking for the projected use of the site.
3. Have the residents on affected nearby streets with already reduced parking availability, given signs indicting the area is a sepcial permit zone with residents given the permits at no additonal cost for being home owners in the area. (Though people will undoubtedly ignore such permitted areas and park anyway, the zone would mitigate some of the problem and the increased revenue from parking fines could offset necessary patrols for crime prevention).

Additionally, the positive correlation of increased crime and night time activities, especially tied to sporting events, is well chronicalled in peer-reviewed scientific literature. For example, a 2012 study by Bellis et. al., found the need to predict such crime and in turn plan for the increased budgetary costs associated with policing the area and responding to crimes critical to off-setting the increased liklihood of night-time crime with gatherings. Among other areas of concern, the study finds that "nights preceding work-free days see more than double levels of assaults presentations". Further, "criminal justice systems work to contain a culture where celebrations, sports events, and holidays lead to greater violence." (<https://bmcpublichealth.biomedcentral.com/articles/10.1186/1471-2458-12-746>)

This is a very serious concern for the safety and well being of all residents in the city of Glendale. Tax paying residents who purchased homes in quiet streets deserve the continued quiet and safety these investments provide. Changing the area to include community attractions which negatively impact parking and increase police patrols and response from statisitcally likely increase of crime is not suporting those residents.

A study by Foster et. al., finds, "crime might be a necessary and acceptable trade-off for living in a (potentially) more vibrant, liveable walkable community." The study cited the perception of safety in areas where crime is actually increased due to urbanisation design of park faciitiies. Specifically, home within 400 meters were most significantly affected. (<https://doi.org/10.1016/j.socscimed.2015.04.013>)

Finally, the area is home to many indigenous Oak and Sycamore trees. The addition of community members smoking not only impact the quality of air for the residents but these protected trees. Light and noise pollution for the nearby residents is another valid concern for quality of life.

We disapprove the proposed Wilson Middle School Multi-Purpose Project.

Shawn Bush  
Joe Castro  
625 Woodbury Road  
Glendale, CA

[818.395.2192](#)





TO: Peter Vierheilig, Project Manager

October 10, 2017

RE: Wilson Middle School Multi-Purpose Field

I live on Galer place, a small cul-de-sac directly across from the entrance to Wilson Middle School. My home was built in the late 1920's, when Galer Place was a full-sized street as the 134 Freeway was not yet built. In fact, Wilson was not built then either.

My neighborhood has gone through a lot. My street and several other streets nearby were torn in two by the freeway. I live with constant freeway noise. And living so close to Wilson has its problems as well: traffic congestion twice per day and sometimes three times when there is a school event. I have seen more than 25 cars waiting on my little cul-de-sac street for school to get out, blocking all residents' driveways. After I moved here (25 years ago), I had to remember to avoid leaving or arriving home at certain times since access to my property would be impossible.

My point here is: It's not fair to abuse the people who live here. It's not right to make our lives even worse by putting bright lights at Wilson so additional persons can play soccer (or whatever) 7 nights a week until 10:00 PM! And frankly, I don't appreciate that this project will undoubtedly reduce my property value. I'll bet no one making this proposal lives in this immediate area. You don't want it in your backyard? Neither do I.

Glendale already has a very nice Sports Complex and the Scholl Canyon Athletic Fields. There are numerous parks in Glendale with basketball courts and the following parks include ballfields: Verdugo Park, Pelanconi Park, Montrose Park, Glorietta Park and Dunsmore Park.

The traffic on Monterey and Verdugo is already bad – parking is always at a premium. Where are the participants going to park? I'll tell you where: my tiny street, Monterey Road, Verdugo and Adams; the same streets that are already burdened with traffic and congestion from Wilson Middle School.

Monterey and Verdugo are also frequently used by various emergency vehicles. It would seem illogical to have extra vehicles and people searching for parking, getting in/out of parking spaces until after 10:00 PM, seven days a week when emergency vehicles need to have easy access.

Since this is directed at GUSD, why don't you propose to utilize Glendale High that already has parking and the big lights? What about the College? How often are those fields used at night outside of football season? Please don't make these changes to Wilson. My own opinion: we have enough sports opportunities in Glendale. Why not more art, dance, music, and theatre venues/opportunities?

Sincerely,



Kathleen Henderson



Peter Verheilig

Project Manager

City of Glendale Community Serv & Parks Dept  
613 East Broadway Room 120  
Glendale CA 91206

SMITH CLARKSON, CA 912  
10 OCT 2007 PM 8 L



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