

**PUBLIC REVIEW DRAFT**

**1420 VALLEY VIEW ROAD  
DRAFT ENVIRONMENTAL IMPACT REPORT  
SCH#2021030250**

**PREPARED FOR:**

City of Glendale  
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Glendale, CA 91206

**PREPARED BY:**

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**April 2023**





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## Acronyms and Abbreviations

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°C	degrees Celsius
°F	degrees Fahrenheit
µg/m <sup>3</sup>	micrograms per cubic meter
µPa	micropascal
AB	Assembly Bill
ADU	accessory dwelling unit
AQMP	air quality management plan
AR4	Fourth Assessment Report
ATCM	air toxic control measure
Basin	South Coast Air Basin
CAA	Clean Air Act
CAAQS	California ambient air quality standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCAA	California Clean Air Act
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CH <sub>4</sub>	methane
City	City of Glendale
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
EIR	Environmental Impact Report
EO	executive order
EPA	U.S. Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
Friant Ranch Project	Community Plan Update and Friant Ranch Specific Plan
FTBMI	Fernandeño Tataviam Band of Mission Indians
GHG	greenhouse gas
GMC	Glendale Municipal Code
GPD	Glendale Police Department
GVWR	gross vehicle weight rating
GWP	global warming potential
GWP	Glendale Water and Power



“Hot Spots” Act	Air Toxics “Hot Spots” Information and Assessment Act of 1987
Hz	Hertz
in/s	inch per second
IPCC	Intergovernmental Panel on Climate Change
L <sub>dn</sub>	day-night average sound level
L <sub>eq</sub>	equivalent sound level
LEV	Low-Emission Vehicle
L <sub>max</sub>	maximum Sound Level
L <sub>min</sub>	minimum sound level
LRA	Local Responsibility Area
LST	localized significance threshold
L <sub>v</sub>	vibration velocity level
L <sub>xx</sub>	percentile-exceeded sound level
MATES	Multiple Air Toxics Exposure Study
MMTCO <sub>2e</sub>	million metric tons of carbon dioxide equivalent
MRZ	Mineral Resource Zone
MTCO <sub>2e</sub>	metric tons of carbon dioxide equivalent
MWD	Metropolitan Water District of Southern California
N <sub>2</sub> O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NHTSA	National Highway Traffic Safety Administration
NO	nitric oxide
NO <sub>2</sub>	nitrogen dioxide
NOP	Notice of Preparation
NO <sub>x</sub>	nitrogen oxides
NRHP	National Register of Historic Places
O <sub>3</sub>	ozone
OEHHA	Office of Environmental Health Hazard Association
Pb	lead
PM	particulate matter
PM <sub>10</sub>	particulate matter 10 microns or less in diameter
PM <sub>2.5</sub>	particulate matter 2.5 microns or less in diameter
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
Project	1420 Valley View Road Project
Project site	1420 Valley View Road
RCNM	Roadway Construction Noise Model
ROG	reactive organic gas
RTP/SCS	2020–2045 Regional Transportation Plan/Sustainable Communities Strategy
SAFE	Safer Affordable Fuel-Efficient
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SF <sub>6</sub>	sulfur hexafluoride
SHPO	State Historic Preservation Officer

SIP	State Implementation Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SO <sub>2</sub>	sulfur dioxide
SRA	source receptor area
SRA	State Responsibility Area
TAC	toxic air contaminant
Tanner Act	Toxic Air Contaminant Identification and Control Act
TCR	tribal cultural resource
TGHS	The Glendale Historical Society
VMT	vehicle miles traveled
VOC	volatile organic compound

# Executive Summary

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This Executive Summary is provided in accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15123. It provides an overview of the proposed Project, which evaluates the demolition of existing structures and creation of a two-lot subdivision at 1420 Valley View Road in Glendale, California. As stated in State CEQA Guidelines Section 15123(a), “[a]n EIR shall contain a brief summary of the proposed actions and its consequences. The language of the summary should be as clear and simple as reasonably practical.” State CEQA Guidelines Section 15123(b) states, “[t]he summary shall identify: 1) each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; 2) areas of controversy known to the Lead Agency, including issues raised by agencies and the public; and 3) issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.” Accordingly, this summary includes a brief synopsis of the Project and its alternatives, environmental impacts and mitigation, areas of known controversy, and issues to be resolved during environmental review.

## ES.1 Project Overview

The structures at 1420 Valley View Road were demolished without first obtaining necessary approvals. The City of Glendale (City) is thus preparing an Environmental Impact Report (EIR) for the Project as defined by CEQA and set forth in Public Resources Code Sections 21000–21178 and California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387.

The City determined that preparation of an EIR was necessary because there was substantial evidence that the proposed Project may have a significant effect on the environment. The Project to be approved by the City is the subdivision of the existing single lot into two lots. The EIR includes an analysis of the potentially significant environmental impacts that could occur as a result of implementing the two-lot subdivision component of the Project—along with impacts that may have occurred as a result of the unapproved demolition—and is meant to inform agencies and the public of any significant environmental effects associated with the Project, describe and evaluate reasonable alternatives to the Project, and propose mitigation measures that would avoid or reduce any significant effects associated with the Project. It should be noted that the subject property at 1420 Valley View Road (Project site) is a residential land use that prior to 2018 was developed with a single-family residence. However, the Project site has since been cleared and the property has been sold to a different owner; therefore this analysis considers impacts as they may have occurred during the illegal demolition of all structures previously on the Project site, along with potential impacts associated with the two-lot subdivision.

## ES.2 Project Objectives

State CEQA Guidelines Section 15124(b) requires that the project description contain “a statement of the objectives sought by the proposed project,” which “should include the underlying purpose of the project and may discuss project benefits.” The underlying purpose of the two-lot subdivision component of the Project is to provide high-quality residential use that is consistent with the City’s R1-1 General Plan land use and zoning designation. The objectives of the two-lot subdivision component of the Project are as follows:

- Develop and revitalize an infill site with residential uses that is consistent with other residential uses and with the City's Low-Density Residential land use and zoning designation.
- Incorporate a comprehensive development site plan and layout that incorporate a more enhanced environment and architectural style that is reflective of the City.
- Maximize the value of a currently underutilized site through the subdivision of the Project site to facilitate an additional residential unit in the future, consistent with the General Plan's housing goals to increase the City's housing stock.
- Comply with the Glendale City Council requirements to evaluate the potential historic significance of the buildings previously on the site and complete an EIR for the Project.

## ES.3 Project Impacts and Mitigation Measures

### ES.3.1 Summary of Project Impacts and Mitigation Measures

Pursuant to State CEQA Guidelines Section 15382, a significant effect on the environment is defined as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the plan, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." Chapter 3, *Impact Analysis*, of this EIR describes in detail the significant environmental impacts that would result from implementation of the Project. Chapter 5, *Other CEQA Considerations*, provides a discussion of the Project's cumulative impacts and other CEQA considerations.

### ES.3.2 Significant and Unavoidable Impacts

Section 21100(b)(2)(A) of the State CEQA Guidelines provides that an EIR shall include a detailed statement setting forth "in a separate section: any significant effect on the environment that cannot be avoided if the project is implemented." Accordingly, this section provides a summary of significant environmental impacts of the plan that cannot be mitigated to a less-than-significant level.

Chapter 3 describes the potential environmental impacts of the Project and recommends various mitigation measures to reduce impacts, to the extent feasible. Chapter 5 describes any cumulative impacts and determines whether the incremental effects of this Project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available or the mitigation measures available were not sufficient to reduce the Project's impacts to a less-than-significant level. Note, the following list only summarizes these impacts; it is important to review the discussions in Chapters 3 and 5 to understand the full context of the impact determinations.

Implementation of the Project would result in the following significant and unavoidable environmental impacts, following implementation of any feasible mitigation measures:

- **Impact CUL-1:** This analysis in Section 3.2, *Cultural Resources*, concluded that a historical resource exists within the Project site and study area for the purposes of CEQA. Therefore, a substantial adverse change to a historical resource is expected as a result of the proposed

Project, which evaluates the demolition of the house and garage at the site, and division of the existing single-family lot into two lots upon which construction of two new single-family residences is proposed. The proposed Project would therefore have a significant and unavoidable impact on the environment for which feasible mitigation is unavailable.

## ES.4 Project Alternatives

State CEQA Guidelines Section 15126.6, as amended, mandates that all EIRs include a comparative evaluation of a proposed project with alternatives to the project that are capable of attaining most of the basic objectives, but would avoid or substantially lessen any of the significant effects of the project. CEQA requires an evaluation of a “range of reasonable” alternatives, including the “no project” alternative. The following alternatives are under consideration for the Project:

- **No Project/No Build Alternative:** The No Project Alternative represents a “no build” scenario in which the Project would not be constructed or operated. The No Project Alternative would not change the condition of the current Project site, as the structures on the site have previously been demolished; however, this alternative would not allow the Project site to be subdivided into two parcels.
- **No Subdivision Alternative:** For this alternative, the Project site would not be subdivided, and only one residence and potentially an accessory dwelling unit could be built on the site in the future, consistent with its previous use.

The goal for evaluating these alternatives is to identify those that would avoid or lessen the significant environmental effects of the Project, while attaining most of the Project objectives, listed in Section E.2.

According to CEQA, “among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (State CEQA Guidelines 15126.6(c)). In addition to the two Project alternatives, several alternatives were considered but rejected from further analysis in the EIR because they did not accomplish most of the basic Project objectives, they would be infeasible to construct, and/or they did not avoid significant impacts. These included:

- **No Project Alternative (Maintain 2018 Site Conditions):** Consideration of this no project alternative is not feasible because the residential structures have already been demolished and cannot be recreated in their previous form. As such, this alternative was considered but rejected from further consideration.
- **Alternative Locations:** Consideration of an alternative location for the Project is not feasible because the property owner owns this Project site, and the residential structures were demolished in 2018; no other site in the city would involve the same circumstance. As such, an alternative location to the Project site was considered but rejected from further consideration.
- **Relocation Alternative:** The relocation alternative is not feasible because the structures on the Project site have been illegally demolished so there are no longer any structures to relocate. As such, a relocation alternative was considered but rejected from further consideration as infeasible.
- **Replicating Structure and Design of Previous Residence Alternative:** This alternative was considered but rejected from further consideration as infeasible because of its potential to

create a false sense of history, in conflict with Secretary of the Interior's Standards for Rehabilitation.

## ES.5 Potential Areas of Controversy/Issues to Be Resolved

Pursuant to Section 15123(b)(2) of the State CEQA Guidelines, a lead agency is required to include areas of controversy raised by agencies and the public during the public scoping process in the EIR. Areas of controversy that were identified for the Project based on comments received on the Notice of Preparation during the 30-day public review period involve the timing of analysis due to the illegal demolition of the one-story single-family dwelling unit and detached garage. Initially, the property owner requested the demolition of the dwelling and garage structures prior to their evaluation. In May 2016, the City sent investigators to the Project site and found that nonpermitted demolition of the interior of the dwelling unit had been done, and a portion of the entire house was left without a roof (*Glendale News-Press* 2018).

On November 1, 2016, the City Council, on appeal of staff's determination that an EIR was necessary to determine the potential historic significance of the buildings proposed for demolition and resulting environmental effects of their demolition, upheld staff's determination and required the preparation of an EIR and accompanying Historical Resources Report to determine the historical significance of the former Craftsman-style home, and the potential effects of the demolition. In February 2018, the property owner demolished the dwelling unit and garage prior to the completion of the environmental analysis for the Project, as required by City Council, and without obtaining City approval.

## ES.6 How to Comment on this Draft EIR

If you work for a responsible state agency, the City of Glendale needs to know the views of your agency regarding the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the Project. Your agency may need to use the EIR when considering a permit or other approval for this Project. Please include the name of a contact person in your agency. Members of the public are not required to provide personal identifying information when they communicate with the Planning Commission or the Planning Division. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the Planning Division's website or in other public documents.

Please submit comments by May 19, 2023, to:

Erik Krause, Deputy Director of Community Development  
Community Development Department  
633 E. Broadway, Room 103, Glendale, CA 91206  
(818) 937-8156  
ekrause@glendaleca.gov

# Chapter 1

## Introduction and Scope of Environmental Impact Report

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The City of Glendale (City) Community Development Department, as the lead agency, is evaluating the demolition of the existing structures and proposing a two-lot subdivision at 1420 Valley View Road (Project) in Glendale, Los Angeles County. The structures were demolished without first obtaining the necessary approvals. The City has prepared an Environmental Impact Report (EIR) for the Project as defined by the California Environmental Quality Act (CEQA) and set forth in Public Resources Code Sections 21000–21178, and California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387.

The City determined that preparation of an EIR was necessary for the Project because there was “substantial evidence that the proposed Project may have a significant effect on the environment.” The Project to be approved by the City is the subdivision of the existing single lot at the Project site into two lots. The EIR includes an analysis of the potentially significant environmental impacts that could occur as a result of implementing the two-lot subdivision component of the Project—along with impacts that may have occurred as a result of the unapproved demolition—and is meant to inform agencies and the public of any significant environmental effects associated with the Project, describe and evaluate reasonable alternatives to the Project, and propose mitigation measures that would avoid or reduce any significant effects associated with the Project. It should be noted that the subject property at 1420 Valley View Road (Project site) is a residential land use that prior to 2018 was developed with a single-family residence. However, the Project site has since been cleared and the property has been sold to a different owner; therefore, this analysis considers impacts as they may have occurred during the illegal demolition of all structures previously on the Project site, along with potential impacts associated with the two-lot subdivision.

### 1.1 The California Environmental Quality Act

The basic purposes of CEQA are to (1) inform decision-makers and the public about the potential significant environmental effects of proposed activities; (2) identify the ways that environmental effects can be avoided or significantly reduced; (3) prevent significant, avoidable environmental effects by requiring changes in projects through the use of alternatives or mitigation measures when feasible; and (4) disclose to the public reasons why an implementing agency may approve a project even if significant unavoidable environmental effects are involved.

An EIR uses a multidisciplinary approach, applying social and natural sciences to make a qualitative and quantitative analysis of all the foreseeable environmental impacts that a proposed project would exert on the surrounding area. As stated in State CEQA Guidelines Section 15151:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.

This Draft EIR (State Clearinghouse Number 2021030250) has been prepared to comply with CEQA regulations and is to be used by local regulators and the public in their review of the potential

environmental impacts of the Project, its alternatives, and mitigation measures that would minimize or avoid the potential environmental effects of the two-lot subdivision component of the Project. The City will consider the information presented in this Draft EIR, along with other factors, prior to approving the two-lot subdivision component of the Project.

### 1.1.1 Notice of Preparation

The City prepared a Notice of Preparation (NOP) of a Draft EIR and distributed it for agency and public review for the required 30-day review period from March 9, 2021, to April 9, 2021. The City received seven written responses to the NOP during the public review period. The NOP prepared for the Project and the NOP responses received are included in Appendix A. The intent of the NOP was to provide interested individuals, groups, public agencies, and others a forum to provide input to the City regarding the scope and focus of the EIR. No scoping meetings were held. Table 1-1 lists the issues relevant to the EIR that were brought up in the NOP written comments, as well as the EIR sections where the issues are addressed.

**Table 1-1. Notice of Preparation Written Comment Summary by Respondent**

Commenter	Date	Comment/Request	Response in Draft EIR
Mark Taraborelli	March 10, 2021	States opposition of the lot subdivision on the Project site and recommends that the Craftsman residence should be rebuilt due to the applicant's violation.	Comment noted.
Kim Szalay	March 10, 2021	Recommends that the property owner be fined as mitigation if the illegally demolished house was determined to be historically significant, and no planning/zoning exceptions should be made for any new development of the site.	Comment noted.
Fernandeño Tataviam Band of Mission Indians	March 11, 2021	States the Tribe will schedule a follow-up consultation meeting once the Draft EIR is available for review. Requests to confirm if measures provided in May 2019 will be implemented. States that the Tribe has no knowledge of cultural resources within the Project vicinity or concerns with the Project.	Section 3.5, <i>Effects Not Found to Be Significant</i>
Native American Heritage Commission	March 12, 2021	Recommends consultation with local tribes that are traditionally and culturally affiliated with the geographic area of the Project in accordance with Senate Bill 18 and Assembly Bill 52.	Section 3.5, <i>Effects Not Found to Be Significant</i>
Hank Schlenger	March 13, 2021	Recommends that the house should be restored due to the applicant's violation and the City should deny any requests to build on the lot.	Comment noted.
California Department of Transportation District 7	March 24, 2021	States that "no new Vehicle Miles Traveled would be generated from the Project. Therefore, impacts would be less than significant."	Section 3.5, <i>Effects Not Found to Be Significant</i>
Catherine Jurca	March 24, 2021	States that no precautions were taken to deal with hazardous materials such as lead paint and asbestos and the EIR must include a study of hazardous materials released into the soil and air.	Section 3.5, <i>Effects Not Found to Be Significant</i>



Commenter	Date	Comment/Request	Response in Draft EIR
California Department of Planning and Research, State Clearinghouse	March 24, 2021	Provides receipt of California Department of Transportation comments on the NOP.	Comment noted.

## 1.1.2 The Purpose of this Environmental Impact Report

The City has determined that an EIR is necessary to evaluate the impacts of the Project. The City prepared this Draft EIR to provide the public, trustee agencies, and responsible agencies with information about the potential effects on the local environment associated with implementation of the Project. This Draft EIR has been prepared in compliance with CEQA of 1970 (as amended), codified at California Public Resources Code Sections 21000 et seq., and the State CEQA Guidelines in the California Code of Regulations, Title 14, Division 6, Chapter 3. As described in Section 15121(a) of the State CEQA Guidelines, this Draft EIR is intended to serve as an informational document for public agency decision-makers. Accordingly, this Draft EIR has been prepared to identify and disclose the significant environmental effects, both past and future, of the Project; identify mitigation measures to minimize potentially significant effects of the two-lot subdivision component of the Project, and consider reasonable Project alternatives.

The environmental impact analyses in this Draft EIR are based on a variety of sources, including technical studies and field surveys. The Project is based on information provided in the accompanying Historical Resources Report prepared to determine the historical significance of the former Craftsman residence at 1420 Valley View Road and the potential effects of the demolition (Appendix B).

## 1.1.3 Level of CEQA Analysis in this Draft EIR

This Draft EIR evaluates the impacts related to implementing the Project at a project-specific level in a focused EIR. The EIR analysis focuses primarily on the changes in the physical environment that would result from construction and post-construction activities associated with the two-lot subdivision component of the Project, as required by State CEQA Guidelines Section 15168. This EIR identifies the environmental setting and regulatory framework under which the Project would be implemented and presents mitigation measures, as applicable, that would be applied to the Project to ensure that any impacts are reduced to the extent feasible. Where the analysis in this EIR determines that the two-lot subdivision component of the Project may result in a significant environmental effect, mitigation measures are provided, where feasible, to avoid, reduce, or compensate for those impacts. The mitigation measures identify clear performance standards that the Project must achieve to reduce the identified impact.

Furthermore, this EIR is consistent with the description of a project EIR under State CEQA Guidelines Section 15161. A project EIR examines the environmental impacts of a specific project. Accordingly, this EIR focuses on the changes in the environment that would result from implementation of the two-lot subdivision component of the Project, including construction and post-construction activities, as no operational activities are assumed and the site would remain vacant after subdivision is complete. As the lead agency, the City is required to consider the

information in the EIR along with any other available information in deciding whether to approve the Project and any associated approvals or entitlements. The basic requirements for an EIR include providing information that establishes the environmental setting (or Project baseline) and identifying environmental impacts, mitigation measures, Project alternatives, growth-inducing impacts, and cumulative impacts. Additionally, this EIR provides the primary source of environmental information for the lead agency to consider when exercising any permitting authority or approval power directly related to implementation of this Project.

### 1.1.4 Known Areas of Controversy and Issues of Concern

Pursuant to Section 15123(b)(2) of the State CEQA Guidelines, a lead agency is required to include areas of controversy raised by agencies and the public during the public scoping process in the EIR. Areas of controversy that were identified for the Project based on comments received on the NOP during the 30-day public review period involve the timing of analysis due to the illegal demolition of the one-story single-family dwelling unit and detached garage. Initially, the property owner requested the demolition of the dwelling and garage structures prior to their evaluation. In May 2016, the City sent investigators to the Project site and found that nonpermitted demolition of the interior of the dwelling unit had been carried out, and a portion or the entire house was left without a roof (*Glendale News-Press* 2018). On November 1, 2016, the City Council—on appeal of staff's determination that an EIR was necessary to determine the potential historic significance of the buildings proposed for demolition and resulting environmental effects of their demolition—upheld staff's determination and required the preparation of an EIR and accompanying Historical Resources Report to determine the historical significance of the former Craftsman building and the potential effects of the demolition. In February 2018, the property owner demolished the dwelling unit and garage prior to the completion of the environmental analysis for the Project, as required by City Council, and without obtaining City approval.

### 1.1.5 Document Format

This Draft EIR is organized into the following chapters and appendices:

**Executive Summary.** This chapter summarizes the contents of the Draft EIR.

**Chapter 1, Introduction.** This chapter discusses the CEQA process and the purpose of the Draft EIR and provides background information on the Project.

**Chapter 2, Project Description.** This chapter provides an overview of the Project, describes the Project's objectives, and details the characteristics of the Project.

**Chapter 3, Impact Analysis.** This chapter describes the environmental setting and identifies impacts of the Project for each of the following environmental resource areas: air quality, cultural resources, greenhouse gas emissions, and noise. Measures to mitigate any significant impacts of the two-lot subdivision component of the Project are presented for each resource area, as appropriate. This chapter analyzes the potential for the two-lot subdivision component of the Project to have significant cumulative effects when combined with other past, present, and reasonably foreseeable future projects in each resource area's cumulative geographic scope. This chapter also identifies the effects that were determined not to be significant.

**Chapter 4, Alternatives Analysis.** This chapter presents an overview of the alternatives development process and describes the alternatives to the two-lot subdivision component of the Project that were considered and evaluated in the Draft EIR.

**Chapter 5, Other CEQA Considerations.** This chapter describes the significant irreversible environmental changes, growth-inducing impacts, and energy impacts associated with the Project.

**Chapter 6, List of Preparers.** This chapter identifies authors and reviewers involved in preparing this Draft EIR.

**Chapter 7, References.** This chapter compiles the references cited in the Draft EIR and consultations with agencies on the Project.

**Appendices.** The appendices contain important information used to support the analyses and conclusions made in the Draft EIR. Appendices are provided for documenting the notice of preparation and scoping process, air quality emissions modeling results, greenhouse gas emissions estimates, and cultural resources assessment.

## 1.2 Intended Use of this EIR

The purpose of this Draft EIR is to evaluate the Project in accordance with CEQA. This EIR provides the environmental information and evaluation necessary to understand impacts related to the planning, construction, and operation of the Project. The Project is a small, localized project that would be implemented by the applicant, with the City as the CEQA lead agency. The decision-making body of the lead agency and responsible agencies are required to consider the Draft EIR prior to acting upon or approving the Project (State CEQA Guidelines Section 15050(b)). If the EIR is adopted and certified, the applicant may proceed with implementing the Project once all applicable regulatory permits are received. Anticipated Project approvals are set forth in this EIR (refer to Section 2.4, *Required Approvals*), as well as any additional approvals that may be necessary to allow planning, construction, operation, and maintenance activities.

## 1.3 Reviewing an EIR

### 1.3.1 Making Effective Comments

Readers are invited to review and comment on the adequacy and completeness of this Draft EIR in describing the potential impacts of the Project, their level of severity, any mitigation measures being proposed to reduce or avoid those impacts, and the alternatives to the Project being considered. The most effective comments are those that focus on the adequacy and completeness of the environmental analysis and that are supported by factual evidence. Comments that focus on whether the Project should be approved or denied are not comments on the adequacy of the Draft EIR.

### 1.3.2 Submitting Comments

In accordance with State CEQA Guidelines Section 15105, the Draft EIR has been submitted to the California Governor's Office of Planning and Research State Clearinghouse for review by state

agencies and, as such, is available for public review and comment for a 30-day review period beginning April 20, 2023, through May 19, 2023. A Draft EIR has been circulated to federal, state, and local agencies and interested parties, who may wish to review and issue comments on its contents. Written comments are to be submitted by mail or email to the following address:

**City of Glendale**

Erik Krause, Deputy Director of Community Development  
633 E. Broadway, Room 103  
Glendale, CA 91206  
Phone: (818) 937-8156; email: [ekrause@glendaleca.gov](mailto:ekrause@glendaleca.gov)

Comments on the Draft EIR must be received by 5:00 p.m. on the last day of the 30-day review period.

## 1.4 Final EIR

Once the Draft EIR public review period has ended, the City will prepare written responses to all comments received on the Draft EIR. The Final EIR will be composed of the Draft EIR, responses to comments received on the Draft EIR, and any changes or corrections to the Draft EIR that are made as part of the responses to comments. As the lead agency, the City has the option to make the Final EIR available for public review prior to considering the Project for approval (State CEQA Guidelines Section 15089(b)). Copies of proposed responses to public agency comments must be provided to those commenting agencies at least 10 days prior to certification (State CEQA Guidelines Section 15088(b)).

Prior to considering the two-lot subdivision component of the Project for approval, the City will review and consider the information presented in the Final EIR and will certify that the Final EIR has been adequately prepared in accordance with CEQA. Once the Final EIR is certified, the Glendale City Council may proceed to consider approval of the Project (State CEQA Guidelines Sections 15090, 15096(f)). Prior to approving the Project, the City must make written findings in accordance with State CEQA Guidelines Section 15091. In addition, the City must adopt a Statement of Overriding Considerations concerning each unmitigated significant environmental effect identified in the Final EIR (if any). The findings and Statement of Overriding Considerations will be included in the record of the Project's approval and mentioned in the Notice of Determination following State CEQA Guidelines Section 15093(c). Pursuant to State CEQA Guidelines Section 15094, the City will file a Notice of Determination with the Office of Planning and Research State Clearinghouse and Los Angeles County Clerk within 5 working days after approval of the Project.

### 1.4.1 Mitigation Monitoring and Reporting Program

CEQA requires lead agencies to “adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment” (State CEQA Guidelines Section 15097). The mitigation measures, if any, adopted as part of the Final EIR will be included in a Mitigation Monitoring and Reporting Program and implemented by the City.

This chapter of the Draft Environmental Impact Report (EIR) describes the location, objectives, and characteristics of the 1420 Valley View Road Project (Project) and the intended uses of this Draft EIR, as required by California Environmental Quality Act (CEQA) Guidelines Section 15124.

## 2.1 Project Setting

The City of Glendale (City) is in Los Angeles County, California, in the San Fernando Valley approximately 10 miles north of downtown Los Angeles. The Project's existing setting is representative of residential neighborhoods throughout the City. The neighborhood consists of single-family houses north and east of 1420 Valley View Road (Project site) and an increasingly dense cluster of multi-family apartments and condominiums to the west and south. The addition of multi-family complexes directly to the south and west of the property has resulted in a change of setting for the neighborhood, which had been exclusively single-family homes until the 1970s. Currently, all properties directly adjacent to 1420 Valley View Road have a build date of 1953 or later. Since approximately the 1970s, the neighborhood has been referred to as Verdugo Viejo (Sanborn Fire Insurance Company 1925, 1950:299A; City of Glendale 2013:1-2, 8-13; Nationwide Environmental Title Research 1972, 1977, 1989, 2010).

### 2.1.1 Location

The City is at the eastern end of the San Fernando Valley in Los Angeles County, at the southern base of the Verdugo Mountains, as shown on **Figure 2-1, Regional Vicinity**. Regional access to the City is provided by State Route 134 (Ventura Freeway), which runs east to west; by Interstate 5 (Golden State Freeway), which runs north to south; and by State Route 2 running north to south.

The Project site on 1420 Valley View Road consists of two contiguous lots associated with Assessor's Parcel Number 5633-003-052. The Project site encompasses approximately 15,000 square feet (0.34 acre) of vacant land on the east side of Valley View Road approximately 485 feet south of Kenneth Road, as shown on **Figure 2-2, Local Vicinity**. The Project is bounded by single- and multi-family residences to the north, south, east, and west. Access to the Project site is gained through access roads along Kenneth Road to the north and Loraine Street to the south.

### 2.1.2 Existing Conditions, Land Uses and Background

The existing general plan land use and zoning designation for the Project site is Low-Density Residential – Height District I (R1-I) as shown on **Figure 2-3, General Plan Land Use Map**, and **Figure 2-4, Zoning**. The R1 zone is the traditional low-density residential zone. The zone is designed to codify historic development standards in the older, flatter residential sections of the City.



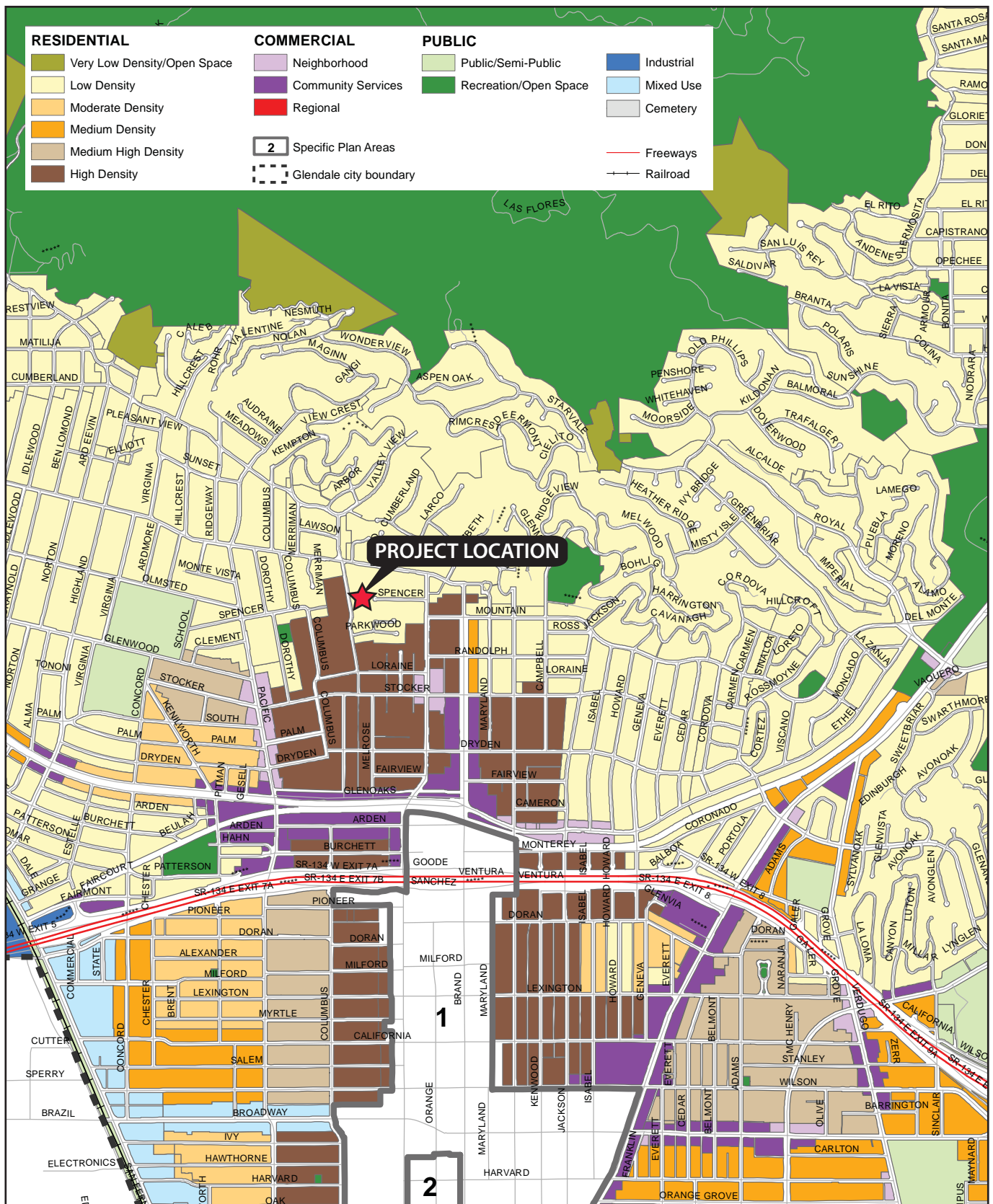
**Figure 2-1**  
**Regional Vicinity**  
**1420 Valley View Road EIR**







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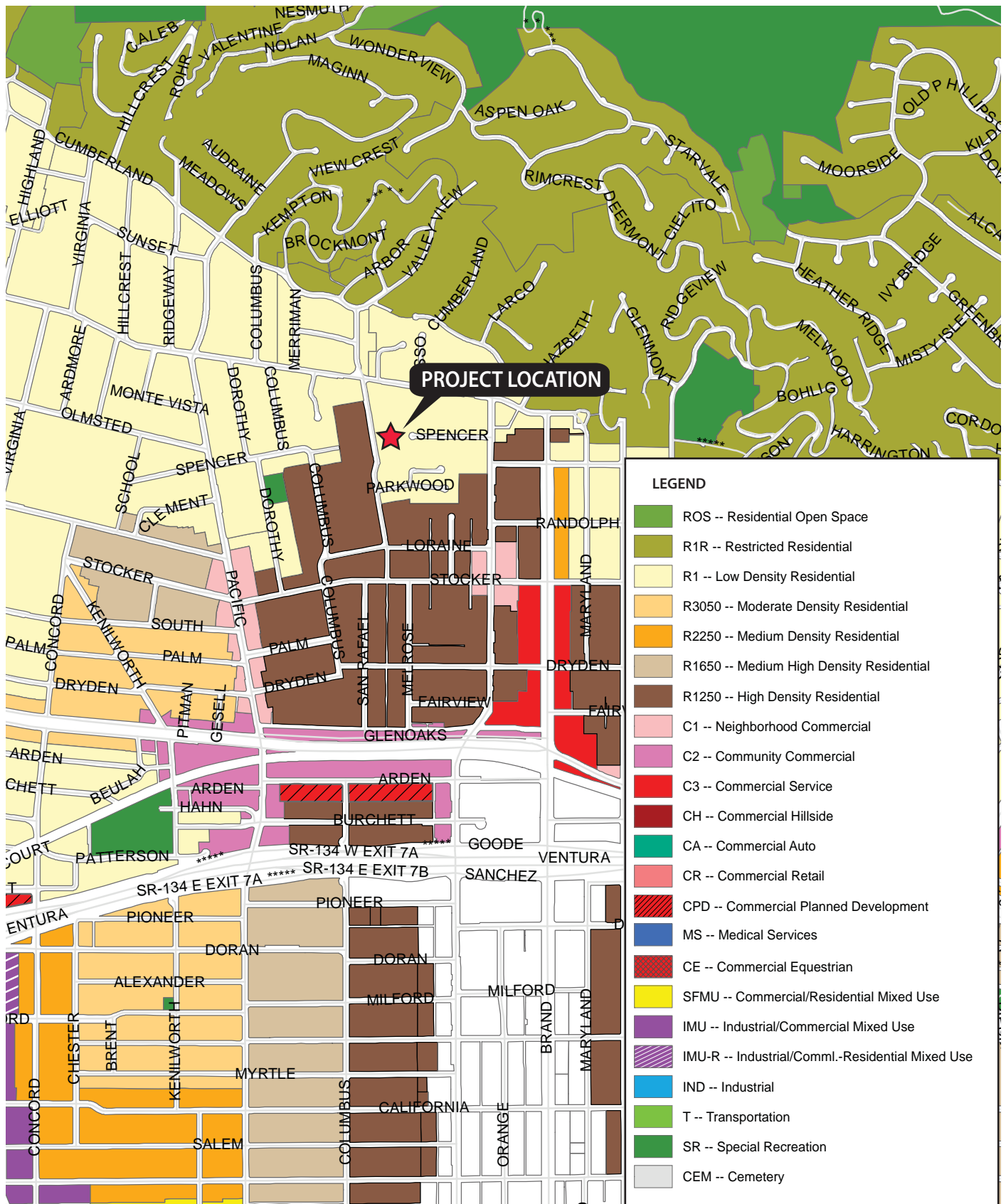


Source: City of Glendale 2018



Figure 2-3  
General Plan Land Use Map  
1420 Valley View Road EIR





Source: City of Glendale 2014

These standards have been developed to avoid rendering existing dwellings nonconforming to the extent feasible and to allow new low-density residential development or approved overlay zone uses in conformance with the comprehensive general plan in order to promote the public health, safety, and general welfare.

The property at 1420 Valley View Road was developed with one single-family residential development (house and garage) on a 15,000-square-foot lot. The one-story house previously situated on the lot was built in 1908 in the Craftsman Bungalow style. The detached garage was constructed later in 1922. On January 29, 2016, the property owner submitted an application requesting the demolition of the house and garage, with no other development proposed at that time. The application included structural engineering studies and a historic resource evaluation that concluded that the existing structures on the site were not eligible for inclusion on a register of historic places and were not contributors to a historic district. The applicant stated structural damage from termites and the 1994 Northridge earthquake and lack of maintenance (as the house was vacant for 2 years) as reasons for requesting demolition, as included in the demolition planning clearance application. In February 2016, City staff determined that this conclusion was based on inadequate research and that an EIR was necessary to evaluate the historic significance of the buildings proposed for demolition. On November 1, 2016, the City Council, on appeal by the applicant, upheld City staff's determination and required the preparation of an EIR. In February 2018, the property owner demolished the house and garage prior to the completion of the EIR, as required by the City Council, and without obtaining City approval.

Since 2018, the property has changed ownership. The new property owner has filed a Tentative Parcel Map to subdivide the lot into two parcels for the future development of two single-family dwellings. The Project site remains vacant with no structures or landscaping and will remain vacant until potential impacts on the historic resources previously on site are assessed in an EIR. The site is currently fenced off and undeveloped, with single-family and multi-family residential land uses surrounding the site, as shown on **Figures 2-5a** and **2-5b**, *Existing Site Conditions*.

## 2.2 Project Objectives

State CEQA Guidelines Section 15124(b) requires the project description to contain "a statement of the objectives sought by the proposed project," which "should include the underlying purpose of the project and may discuss project benefits." The underlying purpose of the two-lot subdivision component of the Project is to provide high-quality residential use that is consistent with the City's R1-1 general plan land use and zoning designation. The objectives of the two-lot subdivision component of the Project are as follows:

- Develop and revitalize an infill site with residential uses that is consistent with other residential uses and with the City's Low-Density Residential land use and zoning designation.
- Incorporate a comprehensive development site plan and layout that incorporate a more enhanced environment and architectural style that is reflective of the City.
- Maximize the value of a currently underutilized site through the subdivision of the Project site to facilitate an additional residential unit in the future, consistent with the general plan's housing goals to increase the City's housing stock.
- Comply with the Glendale City Council requirements to evaluate the potential historic significance of the buildings previously on the site and complete an EIR for the Project.



View of Project Site facing east.



View of Project Site from the north facing southeast.





View from Project Site facing northeast.



View from Project Site facing west.

## 2.3 Project Overview

The Project requires the completion of an EIR with an accompanying Historical Resources Report to determine the historical significance of the former Craftsman residence at 1420 Valley View Road and the potential effects of the illegal demolition. The potential impacts of subdivision of one lot into two lots are also considered in this focused EIR.

### 2.3.1 Project Characteristics

The Project site is currently vacant because of an unpermitted 2018 demolition of a 1908 single-family dwelling unit and garage structure. The Project now involves the discretionary action to subdivide and develop the lot via the proposed Tentative Parcel Map No. GLN 1639. Property owners of 1420 Valley View Road propose to subdivide the now-vacant lot and site of the former Craftsman dwelling to allow for the future development of two, one-story, single-family dwellings.

Even though the site is vacant, the previous demolition of the existing structures and their removal from the Project site in 2018 are evaluated in this EIR. Project demolition and hauling took 1 day to complete and required a backhoe and a bobcat as construction equipment for the demolition. The Project required seven to eight truck vehicle trips to haul materials from the Project site. Construction worker vehicle trips to and from the site were also assumed. Demolition was performed by a licensed demolition contractor and all required precautionary measures were taken in the demolition. As a part of the demolition, the sewer line was capped and all water and power connections were closed. No operational assumptions are included in the Project, as the current proposal is for the subdivision of one lot into two parcels to facilitate the future construction of two single-family dwellings. Currently no design plans are available for construction of any single-family dwellings on the Project site.

## 2.4 Required Approvals

The two-lot subdivision component of the Project is a private development proposal that involves private funds (no City, state, or federal funds). The approvals that would require discretionary actions by the City include:

- Certification of an EIR
- Tentative Parcel Map No. GLN 1639 to subdivide the site into two lots
- Demolition Permit (required to address violation of demolition without permits)
- Other entitlements and approvals as deemed necessary by the City to implement the Project

The Project will be reviewed and discussed at public hearings before the Planning Commission and City Council.

## Chapter 3

# Impact Analysis

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This Draft Environmental Impact Report (EIR) is prepared in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.), the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.), and applicable rules and regulations of regional and local entities. This Draft EIR evaluates the potential environmental impacts associated with the previous demolition of a single-family dwelling unit and garage structure and the subdivision of one lot into two lots at 1420 Valley View Road (Project) at the Project site in the City of Glendale (City) in Los Angeles County. This Draft EIR is intended to serve as an informational document for the public agency decision-makers and the public regarding the Project.

### 3.0 Overview

In accordance with Section 15126 of the State CEQA Guidelines, Chapter 3 provides an analysis of the direct and indirect environmental effects of the Project, both past and future. These impacts are evaluated with respect to existing conditions at the time the Notice of Preparation (NOP) was published on March 9, 2021 (see Appendix A) and as otherwise noted (refer to Section 3.0.2, *Environmental Baseline*, below). The determination of whether an impact is significant is based on the significance thresholds and methodology identified for each environmental issue.

#### 3.0.1 Approach to Environmental Analysis

In accordance with Appendix G of the State CEQA Guidelines, this chapter assesses the Project's potential effects on the following environmental resources:

- Section 3.1, Air Quality
- Section 3.2, Cultural Resources (Historical Resources)
- Section 3.3, Greenhouse Gas Emissions
- Section 3.4, Noise

Section 3.5, *Effects Not Found to Be Significant*, describes topics that were found to have no impacts or less-than-significant impacts. Based on the NOP and the analysis in this Draft EIR, no impacts or less-than-significant impacts would occur related to the following environmental topics:

- Aesthetics
- Agricultural and Forestry Resources
- Biological Resources
- Cultural Resources (Archaeological Resources)
- Energy
- Geology and Soils

- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Sections 3.1 through 3.5 of this Draft EIR contain discussions of the environmental setting, regulatory framework, and potential impacts related to past demolition of all onsite structures and implementation of the proposed two-lot subdivision component of the Project. These sections evaluate the potential environmental effects of the Project. The environmental analyses estimate the impacts on each resource category before the implementation of mitigation measures for the two-lot subdivision component of the Project. The analyses then estimate the impacts on each resource category after the implementation of mitigation measures, if any. Additional information regarding CEQA and the CEQA process is provided in Section 1.1, *The California Environmental Quality Act*, specifically Section 1.1.1, *Notice of Preparation*, for written comments provided during the NOP (Appendix A). Refer to Section 1.1.3, *Level of CEQA Analysis in this Draft EIR*, for the level of impact analysis expected in this EIR for the Project. As stated above, this Draft EIR evaluates the impacts related to the previous demolition of a single-family dwelling unit and garage structure and the proposed subdivision of one lot into two lots.

The discussion of cumulative impacts and the potential for the Project to have significant cumulative effects when combined with other past, present, and reasonably foreseeable future projects in each resource area's cumulative geographic scope is provided in Section 5.4, *Cumulative Impacts Analysis*. Chapter 4, *Alternatives Analysis*, describes the alternatives to the Project that were considered and provides the analysis in comparison with the Project.

### 3.0.2 Environmental Baseline

Pursuant to State CEQA Guidelines Section 15125(a), this EIR measures the physical impacts of the Project against a "baseline" of physical environmental conditions at and in the vicinity of the Project site. The environmental baseline is the combined circumstances existing at the time the NOP of the EIR was published, which is March 9, 2021, for setting and analysis for several environmental categories. However, the baseline also includes a time when the single-family dwelling unit and garage structures remained intact prior to their demolition in February 2018. Due to the complexity of the analysis, both periods of time are considered the "existing" condition for this EIR. Discussion of the baseline condition is detailed or restated in the impact analyses as applicable and as relevant to the resource area being evaluated.

### 3.0.3 Impacts and Mitigation

Each section in Chapter 3 includes an evaluation of the direct and reasonably foreseeable indirect impacts associated with implementation of the two-lot subdivision component of the Project, along with impacts that may have occurred during the illegal demolition of all structures previously on the Project site. Under CEQA, the significance of the impact needs to be described. A significant impact on the environment is defined as a substantial, or potentially substantial, adverse change in the environment (Public Resources Code Section 21068). The impact findings used in this document are as follows.

- **No Impact.** This impact would cause no discernible change in the environment as measured by the applicable significance criteria; therefore, no mitigation would be required.
- **Less than Significant.** This impact would cause no substantial adverse change in the environment as measured by the applicable significance criteria; therefore, no mitigation would be required.
- **Significant.** This impact would cause a substantial adverse change in the physical conditions of the environment. Impacts determined to be significant based on the applicable significance criteria fall into two categories: (1) those impacts for which there is feasible mitigation available that would avoid or reduce the environmental impacts to less-than-significant levels, and (2) those impacts for which there is either no feasible mitigation available or for which, even with implementation of feasible mitigation measures, there would remain a significant impact on the environment. Those impacts that cannot be reduced to a less-than-significant level by mitigation are identified as *significant and unavoidable*.
- **Significant and Unavoidable.** This impact would cause a substantial adverse change in the environment and cannot be avoided or mitigated to a less-than-significant level if the two-lot subdivision component of the Project is implemented. Even if the impact finding is still considered significant with the application of mitigation, the applicant or implementing agency is obligated to incorporate all feasible measures to reduce the severity of the impact.

Whenever possible, agency decision-makers adopt feasible mitigation to reduce a project's significant impacts to a less-than-significant level. The term *mitigation* denotes measures required to reduce residual environmental impacts. However, no mitigation measures are proposed for implementation by the Project in this EIR.



## 3.1 Air Quality

This section describes the environmental and regulatory setting for air quality, discusses local and regional air quality impacts that resulted from the Project and its elements, and determines significance of impacts.

As noted, the Project site is a residential land use that prior to 2018 was developed with a single-family residence. However, the Project site has since been cleared; therefore, this analysis considers impacts as they may have occurred during the illegal demolition of all structures previously on the Project site. Air quality impacts associated with future development of the proposed two-lot subdivision were not analyzed, as detailed project-specific information is not known at this time.

### 3.1.1 Existing Conditions

#### Regulatory Setting

The federal Clean Air Act (CAA) and its subsequent amendments form the basis for the nation's air pollution control effort. The U.S. Environmental Protection Agency (EPA) is responsible for implementing most aspects of the CAA. A key element of the CAA is the National Ambient Air Quality Standards (NAAQS) for criteria pollutants. The CAA delegates enforcement of the NAAQS to the states. In California, the California Air Resources Board (CARB) is responsible for enforcing air pollution regulations and ensuring the NAAQS and California Ambient Air Quality Standards (CAAQS) are met. CARB, in turn, delegates regulatory authority for stationary sources and other air quality management responsibilities to local air agencies. The Project area is within the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The following sections provide more detailed information on federal, state, and local air quality regulations that applied to the Project.

#### Federal

##### Clean Air Act and National Ambient Air Quality Standards

The CAA was first enacted in 1963 and has been amended numerous times in subsequent years (1965, 1967, 1970, 1977, and 1990). The CAA establishes federal air quality standards, known as NAAQS, for six criteria pollutants and specifies future dates for achieving compliance. The CAA also mandates that the states submit and implement a State Implementation Plan (SIP) for local areas that do not meet those standards. The plans must include pollution control measures that demonstrate how the standards will be met.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or meet interim milestones. Table 3.1-1 shows the NAAQS currently in effect for each criteria pollutant, as well as the CAAQS (discussed further below).

**Table 3.1-1. Federal and State Ambient Air Quality Standards**

Criteria Pollutant	Average Time	California Standards	National Standards <sup>1</sup>	
			Primary	Secondary
Ozone	1-hour	0.09 ppm	None <sup>2</sup>	None <sup>2</sup>
	8-hour	0.070 ppm	0.070 ppm	0.070 ppm
Particulate matter (PM <sub>10</sub> )	24-hour	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>
	Annual mean	20 µg/m <sup>3</sup>	None	None
Fine particulate matter (PM <sub>2.5</sub> )	24-hour	None	35 µg/m <sup>3</sup>	35 µg/m <sup>3</sup>
	Annual mean	12 µg/m <sup>3</sup>	12.0 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>
Carbon monoxide	8-hour	9.0 ppm	9 ppm	None
	1-hour	20 ppm	35 ppm	None
Nitrogen dioxide	Annual mean	0.030 ppm	0.053 ppm	0.053 ppm
	1-hour	0.18 ppm	0.100 ppm	None
Sulfur dioxide <sup>3</sup>	Annual mean	None	0.030 ppm	None
	24-hour	0.04 ppm	0.014 ppm	None
	3-hour	None	None	0.5 ppm
	1-hour	0.25 ppm	0.075 ppm	None
Lead	30-day Average	1.5 µg/m <sup>3</sup>	None	None
	Calendar quarter	None	1.5 µg/m <sup>3</sup>	1.5 µg/m <sup>3</sup>
	3-month average	None	0.15 µg/m <sup>3</sup>	0.15 µg/m <sup>3</sup>
Sulfates	24-hour	25 µg/m <sup>3</sup>	None	None
Visibility-reducing particles	8-hour	See table note 4	None	None
Hydrogen sulfide	1-hour	0.03 ppm	None	None
Vinyl chloride	24-hour	0.01 ppm	None	None

Source: CARB 2016.

<sup>1</sup> National standards are divided into primary and secondary standards. Primary standards are intended to protect public health, whereas secondary standards are intended to protect public welfare and the environment.

<sup>2</sup> The federal 1-hour standard of 12 parts per hundred million was in effect from 1979 through June 15, 2005. The revoked standard is referenced because it was employed for such a long period and is a benchmark for SIPs.

<sup>3</sup> The annual and 24-hour NAAQS for SO<sub>2</sub> only apply for 1 year after designation of the new 1-hour standard to those areas that were previously in nonattainment for 24-hour and annual NAAQS.

<sup>4</sup> CAAQS for visibility-reducing particles is defined by an extinction coefficient of 0.23 per kilometer – visibility of 10 miles or more due to particles when relative humidity is less than 70 percent.

µg/m<sup>3</sup> = micrograms per cubic meter; ppm = parts per million; SO<sub>2</sub> = sulfur dioxide

### EPA Diesel Emissions Standards

EPA has established a series of increasingly strict emission standards for new off-road diesel equipment, on-road diesel trucks, and locomotives. New equipment used within the Project area, including heavy-duty trucks and off-road construction equipment, is required to comply with these emission standards.

### Corporate Average Fuel Economy Standards

The National Highway Traffic Safety Administration (NHTSA) Corporate Average Fuel Economy standards require substantial improvements in fuel economy and reductions in emissions of criteria air pollutants and precursors, as well as greenhouse gases (GHGs), from all light-duty vehicles sold

in the United States. On August 2, 2018, NHTSA and EPA proposed an amendment to the fuel efficiency standards for passenger cars and light trucks and established new standards for model years 2021 through 2026 that would maintain the then-current 2020 standards through 2026. This was known as the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule. On September 19, 2019, NHTSA and EPA issued a final action on the One National Program Rule, which is considered Part One of the SAFE Vehicles Rule and a precursor to the proposed fuel efficiency standards. The One National Program Rule enabled NHTSA and EPA to provide nationwide uniform fuel economy and air pollutant standards by (1) clarifying that federal law preempts state and local tailpipe standards, (2) affirming NHTSA's statutory authority to set nationally applicable fuel economy standards, and (3) withdrawing California's CAA preemption waiver to set state-specific standards.

NHTSA and EPA published their decision to withdraw California's waiver and finalize the regulatory text related to the preemption on September 27, 2019 (84 *Federal Register* 51310). California, 22 other states, the District of Columbia, and two cities filed suit against Part One of the SAFE Vehicles Rule on September 20, 2019 (*California et al. v. United States Department of Transportation et al.*, 1:19-cv-02826, U.S. District Court for the District of Columbia). On October 28, 2019, the Union of Concerned Scientists, Environmental Defense Fund, and other groups filed a protective petition for review after the federal government sought to transfer the suit to the District of Columbia (*Union of Concerned Scientists v. National Highway Traffic Safety Administration*). The lawsuit filed by California and others has been stayed, pending resolution of the petition.

NHTSA and EPA published final rules on April 30, 2020, to amend and establish national air pollutant and fuel economy standards (Part Two of the SAFE Vehicles Rule) (85 *Federal Register* 24174). The revised rule changed the national fuel economy standards for light-duty vehicles from 46.7 miles per gallon to 40.4 miles per gallon in future years. California, 22 other states, and the District of Columbia filed a petition for review of the final rule on May 27, 2020.<sup>1</sup>

On January 20, 2021, the President issued an executive order directing NHTSA and EPA to review the SAFE Vehicles Rule, Part One, and propose a new rule for suspending, revising, or rescinding it by April 2021 (86 *Federal Register* 7037). The executive order also required NHTSA and EPA to propose a new rule for suspending, revising, or rescinding Part Two by July 2021 (86 *Federal Register* 7037).

On April 22, 2021, NHTSA announced its proposal to repeal the SAFE Vehicles Rule, Part One, allowing California the right to set its own standards (NHTSA 2021).

## State

### California Clean Air Act and California Ambient Air Quality Standards

In 1988, the state legislature adopted the California Clean Air Act (CCAA), which established a statewide air pollution control program. The CCAA requires all air districts in the state to endeavor to meet the CAAQS by the earliest practical date. Unlike the CAA, the CCAA does not set precise attainment deadlines. Instead, the CCAA establishes increasingly stringent requirements for areas that will require more time to achieve the standards. CAAQS are generally more stringent than NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride. The CAAQS and NAAQS are shown in Table 3.1-1, and Table 3.1-2

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<sup>1</sup> *California et al. v. United States Department of Transportation et al.*, 1:19-cv-02826, U.S. District Court for the District of Columbia.

provides the Los Angeles County portion of the Basin's attainment status with respect to NAAQS and CAAQS.

**Table 3.1-2. Federal and State Attainment Status for the Los Angeles County Portion of the South Coast Air Basin**

Criteria Pollutant	Federal Designation	State Designation
O <sub>3</sub> (1-hour)	--	Nonattainment
O <sub>3</sub> (8-hour)	Nonattainment—Extreme (P)	Nonattainment
CO	Maintenance—Serious (P)	Attainment
PM <sub>10</sub>	Maintenance—Serious (P)	Nonattainment
PM <sub>2.5</sub>	Nonattainment—Serious (P)	Nonattainment
NO <sub>2</sub>	Maintenance (P)	Attainment
SO <sub>2</sub>	Attainment	Attainment
Lead	Nonattainment (P)	Attainment
Sulfates	(No Federal Standard)	Attainment
Hydrogen sulfide	(No Federal Standard)	Unclassified
Visibility-reducing particles	(No Federal Standard)	Unclassified

Source: CARB 2021a; EPA 2021a.

O<sub>3</sub> = ozone, CO = carbon monoxide; PM<sub>10</sub> = particulate matter less than or equal to 10 microns; PM<sub>2.5</sub> = particulate matter less than or equal to 2.5 microns; NO<sub>2</sub> = nitrogen dioxide; SO<sub>2</sub> = sulfur dioxide; (P) = designation applies to a portion of Los Angeles County

CARB and regional air districts are responsible for achieving California's air quality standards. The standards are to be achieved through district-level air quality management plans, which are incorporated into the SIP. In California, EPA has delegated authority to prepare SIPs to CARB, which, in turn, has delegated that authority to individual air districts. CARB has traditionally established state air quality standards, maintained oversight authority for air quality planning, developed programs for reducing emissions from motor vehicles, developed air emissions inventories, collected air quality and meteorological data, and approved SIPs.

The CCAA substantially increases the authority and responsibilities of air districts. The CCAA designates air districts as lead air quality planning agencies, requires air districts to prepare air quality plans, and grants air districts the authority to implement transportation control measures. The CCAA also emphasizes control over "indirect and area-wide sources" of air pollutant emissions. The CCAA gives local air pollution control districts explicit authority to regulate indirect sources and establish traffic control measures.

### **Mobile Source Regulations**

Mobile source emissions represent a significant source of criteria pollutant and toxic air contaminant (TAC) emissions for the state. CARB has established various regulations to address exhaust emissions standards for both on-road and off-road vehicles.

#### ***Low-Emission Vehicle Program Regulation***

On-road vehicles include, but are not limited to, light-duty automobiles, light-duty to heavy-duty trucks, and buses. In 1990, CARB adopted the first Low-Emission Vehicle (LEV) regulations, which required car manufacturers to produce cleaner light-duty and medium-duty vehicles with stricter emissions controls for model years 1994 to 2003. The three primary elements of the first LEV

regulations were (1) tiers of exhaust emission standards for increasingly more stringent categories of low-emission vehicles, (2) a mechanism requiring each auto manufacturer to phase-in a progressively cleaner mix of vehicles from year to year with the option of credit banking and trading, and (3) a requirement that a specified percentage of passenger cars and light-duty trucks be zero-emission vehicles with no exhaust or evaporative emissions (CARB 2020a). The most recent version is LEV III and was adopted in 2012 as part of the Advanced Clean Cars program. LEV III focuses on increasing the stringency of emissions standards for criteria pollutants and GHG emissions for passenger vehicles through the 2025 model year (CARB 2020b).

### ***Statewide Truck and Bus Regulation***

CARB adopted the Truck and Bus Regulation in 2008 to focus its efforts on reducing emissions of diesel particulate matter (DPM), nitrogen oxides (NO<sub>x</sub>), and other criteria pollutants from diesel-fueled vehicles. This regulation applies to any diesel-fueled vehicle as well as any dual-fuel or alternative-fuel diesel vehicle that travels on public highways, yard trucks with on-road engines, yard trucks with off-road engines used for agricultural operations, school buses, and vehicles with a gross vehicle weight rating (GVWR) of more than 14,000 pounds. The purpose of the regulation is to require trucks and buses registered in the state to have 2010 or newer engines by 2023. Compliance schedules have been established for lighter vehicles (GVWR of 14,000–26,000 pounds) and heavier vehicles (GVWR of more than 26,001 pounds) (CARB 2020c). As of January 1, 2020, only vehicles that met the requirements of the Trucks and Bus Regulation were allowed to register with the California Department of Motor Vehicles.

### ***Air Toxic Control Measures***

In 2004, CARB developed multiple air toxic control measures (ATCMs) to address specific mobile- and stationary-source issues that adversely affect public health. The ATCMs focused on reducing the public's exposure to DPM and TAC emissions. The "Limit Diesel-Fueled Commercial Motor Vehicle Idling" ATCM required drivers of heavy-duty trucks with a GVWR of more than 10,000 pounds to not idle the primary engine for more than 5 minutes at any given time or operate an auxiliary power system for more than 5 minutes within 100 feet of a restricted area<sup>2</sup> (CARB 2008). In addition, CARB set operating requirements for new emergency standby engines (i.e., diesel-fueled compression-ignition engines of less than 50 brake horsepower). Specifically, new engines shall not operate more than 50 hours per year for maintenance and testing purposes. This does not limit engine operation for emergency use, or the emissions testing required to show compliance with 17 California Code of Regulations Section 93115.6(a)(3).

### ***Off-Road Diesel Vehicle Regulation***

Off-road vehicles include, but are not limited to, diesel compression-ignition equipment; spark-ignition gasoline and liquified petroleum gas equipment; support equipment at ports, airports, and railways; and marine vehicles. In 2007, CARB aimed to reduce emissions of DPM, NO<sub>x</sub>, and other criteria pollutants from off-road diesel-fueled equipment with adoption of the In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation). The Off-Road Regulation applies to all diesel-fueled equipment or alternative-fuel diesel equipment with a compression-ignition engine greater than 25 horsepower (e.g., tractors, bulldozers, backhoes) as well as dual-fuel equipment. The regulation also applies to all equipment that is rented or leased (CARB 2008). The purpose of the

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<sup>2</sup> *Restricted area* means any real property zoned for individual or multi-family housing units, schools, hotels, motels, hospitals, senior care facilities, or childcare facilities that has one or more of such units on it.

regulation is to reduce emissions by retiring, repowering, or replacing older, dirtier engines with newer, cleaner engines. The regulation established a compliance schedule for owners of small, medium, and large fleets. The schedule for large and medium fleets requires full implementation by 2023; small fleets have until 2028 (CARB 2008).

### ***Toxic Air Contaminant Regulation***

California regulates TACs primarily through the Toxic Air Contaminant Identification and Control Act (Tanner Act) and the Air Toxics “Hot Spots” Information and Assessment Act of 1987 (“Hot Spots” Act). In the early 1980s, CARB established a statewide comprehensive air toxics program to reduce exposure to air toxics. The Tanner Act created California’s program to reduce the public’s exposure to air toxics. The “Hot Spots” Act supplements the Tanner Act by requiring a statewide air toxics inventory, notification for people who were exposed to a significant health risk, and facility plans to reduce risks.

## **Regional**

### **South Coast Air Quality Management District**

The Project lies within the Los Angeles County portion of the Basin, which is under the jurisdiction of SCAQMD. SCAQMD has jurisdiction over an area of approximately 10,743 square miles, including all of Orange County, Los Angeles County (except for the Antelope Valley), the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The Basin is a sub-region of SCAQMD’s jurisdiction. Although air quality in this area has improved, the Basin requires continued diligence to meet air quality standards.

SCAQMD has adopted a series of air quality management plans (AQMPs) to meet the CAAQS and NAAQS. These plans require, among other emissions-reducing activities, control technology for existing sources, control programs for area sources and indirect sources, an SCAQMD permitting system that allows no net increase in emissions from any new or modified (i.e., previously permitted) emissions sources, and transportation control measures. The most recent publication is the 2016 AQMP, which is intended to serve as a regional blueprint for achieving the federal air quality standards for healthful air.

The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options and includes available, proven, and cost-effective strategies to pursue multiple goals in promoting reductions in GHG emissions and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP focuses on demonstrating NAAQS attainment dates for the 2008 8-hour ozone (O<sub>3</sub>) standard, the 2012 annual particulate matter 2.5 microns or less in diameter (PM<sub>2.5</sub>) standard, and the 2006 24-hour PM<sub>2.5</sub> standard. The 2016 AQMP includes both stationary and mobile source strategies to ensure that rapidly approaching attainment deadlines are met, that public health is protected to the maximum extent feasible, and that the region is not faced with burdensome sanctions if the NAAQS are not met by the established date (SCAQMD 2017).

SCAQMD published the *CEQA Air Quality Handbook* in November 1993 to help local governments analyze and mitigate project-specific air quality impacts. This handbook provides standards, methodologies, and procedures for conducting air quality analyses as part of CEQA documents prepared within SCAQMD’s jurisdiction. In addition, SCAQMD has several supplemental documents, including *Air Quality Significance Thresholds*, *Final Localized Significance Threshold Methodology*, and *Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM<sub>2.5</sub> Significance Thresholds*

(SCAQMD 2006, 2008a, 2019). These documents provided guidance for evaluating localized effects from mass emissions and were used in the preparation of this analysis.

### **Southern California Association of Governments**

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties. SCAG addresses regional issues related to transportation, the economy, community development, and the environment, and is the federally designated metropolitan planning organization for a majority of the region and the largest metropolitan planning organization in the nation. As required by federal and state law, SCAG develops plans pertaining to transportation, growth management, hazardous waste management, housing, and air quality. SCAG data are used in the preparation of air quality forecasts and the conformity analysis included in the AQMP.

SCAG is responsible for developing long-range transportation plans and a sustainability strategy for a vast and varied region. The centerpiece of that planning work is Connect SoCal, the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California’s greenhouse gas emission reduction goals and federal CAA requirements (SCAG 2020). The RTP/SCS is focused on creating dynamic, connected built environments that support multimodal mobility, reduced reliance on single-occupancy vehicles, and reduced air pollutant emissions through the implementation of center-focused placemaking, and development in priority growth areas, such as job centers, transit priority areas, and high quality transit areas (SCAG 2020).

### **City of Glendale**

The City of Glendale General Plan’s Air Quality Element outlines goals and policies for reducing air pollutant emissions. The goal and objectives applicable to the Project are provided below.

**Goal 1:** Air Quality will be healthful for all residents of Glendale.

- **Objective 1.a:** Reduce Glendale’s contribution to regional emissions in a manner both efficient and equitable to residents and businesses, since emissions generated within Glendale affect regional air quality.
- **Objective 1.c:** Comply with the Air Quality Management Plan prepared by the SCAQMD and SCAG.

## **3.1.2 Environmental Setting**

The Project site is within the Basin, an area covering approximately 6,745 square miles and bounded by the Pacific Ocean to the west and south and the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, in addition to the San Geronio Pass area in Riverside County. The terrain and geographical location determine the distinctive climate of the Basin, which is a coastal plain with connecting broad valleys and low hills.

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Basin is a function of the

area's natural physical characteristics (i.e., weather and topography) as well as human-made influences (i.e., development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Basin, making it an area of high pollution potential.

The greatest air pollution impacts in the Basin occur from June through September and are generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. These conditions frequently reduce pollutant dispersion, thereby causing elevated air pollution levels. Pollutant concentrations in the Basin vary with location, season, and time of day. Ozone concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Basin and adjacent desert.

Ambient air monitoring and evaluation studies conducted by SCAQMD in the Basin are compiled in the regularly updated Multiple Air Toxics Exposure Study (MATES), the most recent of which is the MATES IV study; the final draft was released to the public in May 2015. The MATES IV study estimated that the average carcinogenic risk throughout the Basin attributed to TACs is approximately 1,023 in one million (SCAQMD 2015a). Approximately 84 percent of all risk is attributed to DPM emissions, but DPM showed a 70 percent reduction compared to MATES III in 2008 (SCAQMD 2015a). The MATES V Draft Report was released by SCAQMD in April 2021. The MATES V study found that DPM is still the largest contributor to air toxics cancer risk; however, the levels of DPM are 50 percent lower at the MATES IV monitoring stations and 86 percent lower since MATES II in 2000 (SCAQMD 2021). Contrary to previous iterations of the MATES studies, which only focused on the inhalation pathway, MATES V evaluated cancer risk and chronic impacts using both inhalation and non-inhalation pathways (i.e., dermal absorption and ingestion).

## Local Climate

Climate data from the Glendale Stapenhorst monitoring station in 2021 was used to characterize the varying climate conditions near the Project area.

At the Glendale Stapenhorst climate monitoring station, the average summer (August) high and low temperatures were 87.2 degrees Fahrenheit (°F) and 59.4°F, respectively. The average winter (January) high and low temperatures were 65.3°F and 40.1°F, respectively. Rainfall varies widely from year to year, with an annual average of 16.37 inches (WRCC 2021).

The closest wind monitoring data was obtained from SCAQMD monitoring data for the Burbank Airport monitoring station, which is approximately 6 miles northwest of the Project area. Wind speeds at Burbank Airport average 5.7 miles per hour and have a predominant wind direction from south-southeast to north-northwest.

## Local Air Quality

The closest monitoring station to the Project site with representative air quality data is the Los Angeles-North Main Street monitoring site at 1630 North Main Street in the city of Los Angeles. This station had monitoring data for O<sub>3</sub>, NO<sub>x</sub>, carbon monoxide (CO), and particulate matter (PM) (particulate matter 10 microns or less in diameter [PM<sub>10</sub>] and PM<sub>2.5</sub>). Table 3.1-3 presents monitoring data from this monitoring station.



**Table 3.1-3. Ambient Air Quality Data for the Project Area (2017–2019)**

Pollutant Standards	Los Angeles-North Main Street (1630 North Main Street)		
	2017	2018	2019
<b><i>Ozone (O<sub>3</sub>)<sup>8</sup></i></b>			
Maximum 1-hour concentration (ppm)	0.116	0.098	0.093
Maximum 8-hour concentration (ppm)	0.086	0.073	0.080
<b>Number of days standard exceeded<sup>1</sup></b>			
CAAQS 1-hour (>0.09 ppm)	6	2	0
CAAQS 8-hour (>0.070 ppm)	14	4	2
NAAQS 8-hour (>0.070 ppm)	14	4	2
<b><i>Carbon Monoxide (CO)<sup>9</sup></i></b>			
Maximum 1-hour concentration (ppm)	2.0	2.0	2.0
Maximum 8-hour concentration (ppm)	1.8	1.7	1.6
<b>Number of days standard exceeded<sup>1</sup></b>			
NAAQS 1-hour (≥35 ppm)	0	0	0
CAAQS 1-hour (≥20 ppm)	0	0	0
NAAQS 8-hour (≥9.0 ppm)	0	0	0
CAAQS 8-hour (≥9.0 ppm)	0	0	0
<b><i>Nitrogen Dioxide (NO<sub>2</sub>)<sup>8</sup></i></b>			
State maximum 1-hour concentration (ppb)	0.080	0.070	0.069
State second-highest 1-hour concentration (ppb)	0.080	0.070	0.069
Annual average concentration (ppb)	0.020	0.018	0.018
<b>Number of days standard exceeded<sup>1</sup></b>			
CAAQS 1-hour (180 ppb)	0	0	0
<b><i>Particulate Matter (PM<sub>10</sub>)<sup>8</sup></i></b>			
National maximum 24-hour concentration (μg/m <sup>3</sup> ) <sup>2</sup>	64.6	68.2	62.4
National second-highest 24-hour concentration (μg/m <sup>3</sup> ) <sup>2</sup>	47.8	66.1	57.3
State maximum 24-hour concentration (μg/m <sup>3</sup> ) <sup>3</sup>	96.2	81.2	93.9
State second-highest 24-hour concentration (μg/m <sup>3</sup> ) <sup>3</sup>	76.5	76.2	64.7
National annual average concentration (μg/m <sup>3</sup> )	25.7	30.2	23.0
State annual average concentration (μg/m <sup>3</sup> ) <sup>4</sup>	*	34.0	*
<b>Number of days standard exceeded<sup>1,5</sup></b>			
NAAQS 24-hour (>150 μg/m <sup>3</sup> )	0	0	0
CAAQS 24-hour (>50 μg/m <sup>3</sup> )	40	31	15
<b><i>Particulate Matter (PM<sub>2.5</sub>)<sup>8</sup></i></b>			
National maximum 24-hour concentration (μg/m <sup>3</sup> ) <sup>6</sup>	54.9	61.4	43.5
National second-highest 24-hour concentration (μg/m <sup>3</sup> ) <sup>6</sup>	49.2	43.8	33.4
State maximum 24-hour concentration (μg/m <sup>3</sup> ) <sup>7</sup>	61.7	48.7	43.5
State second-highest 24-hour concentration (μg/m <sup>3</sup> ) <sup>7</sup>	54.9	48.7	33.4
National annual average concentration (μg/m <sup>3</sup> )	12.0	12.8	10.8
State annual average concentration (μg/m <sup>3</sup> )	16.3	16.0	10.8
<b>Measured number of days standard exceeded<sup>1</sup></b>			
NAAQS 24-hour (>35 μg/m <sup>3</sup> )	6	6	1

Source: CARB 2021b, EPA 2021b.

<sup>1</sup> An exceedance is not necessarily related to a violation of the standard.

<sup>2</sup> National statistics are based on standard conditions data. In addition, national statistics are based on samplers using federal reference or equivalent methods.

<sup>3</sup> State statistics are based on approved local samplers and local conditions data.

<sup>4</sup> State criteria for ensuring that data are sufficiently complete for calculating valid annual averages are more stringent than the national criteria.

<sup>5</sup> Measurements usually are collected every 6 days.

<sup>6</sup> National statistics are based on samplers using federal reference or equivalent methods.

<sup>7</sup> State statistics are based on local approved samplers.

<sup>8</sup> Data from CARB source.

<sup>9</sup> Data from EPA source.

$\mu\text{g}/\text{m}^3$  = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standards; NAAQS = National Ambient Air Quality Standards; ppm = parts per million; ppb = parts per billion; \* = insufficient data available to determine the value; - = data not available

The monitoring data show the following trends for pollutant concentrations:

- No exceedances of the 1-hour nitrogen dioxide ( $\text{NO}_2$ ), 1-hour CO, 8-hour CO, or 24-hour  $\text{PM}_{10}$  federal standards occurred.
- The 1-hour  $\text{O}_3$  state standard as well as the 8-hour  $\text{O}_3$  state and federal standards were exceeded in each of the most recent years.
- The 24-hour  $\text{PM}_{10}$  state standard was exceeded in each of the most recent years.
- The 24-hour  $\text{PM}_{2.5}$  federal standard was exceeded in each of the most recent years.

As discussed above, the CAAQS and NAAQS define clean air and represent the maximum amount of pollution that can be present in outdoor air without any harmful effects on people and the environment. Existing violations of the  $\text{O}_3$  and PM ambient air quality standards indicate that certain individuals exposed to this pollutant may experience certain health effects, including increased incidence of cardiovascular and respiratory ailments.

## Local Health Risk

According to SCAQMD inhalation cancer risk data (MATES IV), the Project area is in a cancer risk zone with an estimated cancer risk of 870 in one million<sup>3</sup> (SCAQMD 2015b). For comparison, the average cancer risk throughout the Basin is 1,023 in one million.

## Sensitive Receptors and Locations

Sensitive receptors are defined as locations where pollutant-sensitive members of the population may reside or where the presence of air pollutant emissions could adversely affect use of the land. Sensitive members of the population include those who may be more negatively affected by poor air quality than other members of the population, such as children, the elderly, or the infirm. In general, residential areas, hospitals, daycare facilities, elder-care facilities, elementary schools, and parks typically contain a high concentration of these sensitive population groups (CARB 2005). Sensitive receptors for the Project site included residences adjacent to the Project site in all directions.

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<sup>3</sup> Cancer risk is expressed as the estimated probability that an individual has of developing cancer from their exposure per million people exposed.

## Description of Relevant Air Pollutants

Air pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law. These regulated air pollutants, which are known as *criteria air pollutants*, are categorized as primary and secondary pollutants. Primary air pollutants are those that are emitted directly from sources. CO, volatile organic compounds (VOCs), NO<sub>x</sub>, sulfur dioxide (SO<sub>2</sub>), and most coarse and fine PM (PM<sub>10</sub> and PM<sub>2.5</sub>), including lead (Pb) and fugitive dust, are primary air pollutants. Of these, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are criteria pollutants. VOCs and NO<sub>x</sub> are criteria pollutant precursors and go on to form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. O<sub>3</sub> and NO<sub>2</sub> are the principal secondary pollutants. The following descriptions of each criteria air pollutant and their health effects are based on information provided by SCAQMD (SCAQMD 2017).

### Nitrogen Dioxide

NO<sub>2</sub> is a reddish-brown gas with a bleach-like odor. Nitric oxide (NO) is a colorless gas, formed from nitrogen (N<sub>2</sub>) and oxygen (O<sub>2</sub>) under conditions of high temperature and pressure, which are generally present during combustion of fuels (e.g., motor vehicles). NO reacts rapidly with the oxygen in air to form NO<sub>2</sub>, which is responsible for the brownish tinge of polluted air. The two gases, NO and NO<sub>2</sub>, are referred to collectively as NO<sub>x</sub>. In the presence of sunlight, atmospheric NO<sub>2</sub> reacts and splits to form an NO molecule and an oxygen atom. The oxygen atom can react further to form O<sub>3</sub>, via a complex series of chemical reactions involving hydrocarbons.

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO<sub>2</sub> at levels found in homes with gas stoves, which are higher than the ambient NO<sub>2</sub> levels found in Southern California homes that generally have fewer or no stoves. In healthy people, increase in resistance to air flow and airway contraction is observed after short-term exposure to NO<sub>2</sub> (SCAQMD 2017). Larger decreases in lung functions are observed in individuals with asthma and/or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups. More recent studies have found associations between NO<sub>2</sub> exposures and cardiopulmonary mortality, decreased lung function, respiratory symptoms, and emergency room asthma visits.

### Ozone

O<sub>3</sub>, or smog, is a photochemical oxidant that is formed when VOC and NO<sub>x</sub> (both by-products of the internal combustion engine) react with sunlight. VOC are compounds made up primarily of hydrogen and carbon atoms (hydrocarbons). Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Other sources of VOC are emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. The two major forms of NO<sub>x</sub> are NO and NO<sub>2</sub>. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO<sub>2</sub> is a reddish-brown irritating gas formed by the combination of NO and oxygen. In addition to serving as an integral participant in O<sub>3</sub> formation, NO<sub>x</sub> also directly acts as an acute respiratory irritant and increases susceptibility to respiratory pathogens.

O<sub>3</sub> poses a higher risk to those who already suffer from respiratory diseases (e.g., asthma), children, older adults, and people who are active outdoors. Exposure to O<sub>3</sub> at certain concentrations can make

breathing more difficult, cause shortness of breath and coughing, inflame and damage the airways, aggregate lung diseases, increase the frequency of asthma attacks, and cause chronic obstructive pulmonary disease. Studies show associations between short-term O<sub>3</sub> exposure and non-accidental mortality, including deaths from respiratory issues. Studies also suggest long-term exposure to O<sub>3</sub> may increase the risk of respiratory-related deaths (EPA 2021c). The concentration of O<sub>3</sub> at which health effects are observed depends on an individual's sensitivity, level of exertion (i.e., breathing rate), and duration of exposure. Studies show large individual differences in the intensity of symptomatic responses. One study found no symptoms in the least responsive individual after a 2-hour exposure to 400 parts per billion of O<sub>3</sub> and a 50 percent decrease in forced airway volume in the most responsive individual. Although the results vary, evidence suggests that sensitive populations (e.g., asthmatics) may be affected on days when the 8-hour maximum O<sub>3</sub> concentration reaches 80 parts per billion (EPA 2020).

In addition to its harmful effects on human health, O<sub>3</sub> has been tied to crop damage, typically in the form of stunted growth, leaf discoloration, cell damage, and premature death. O<sub>3</sub> can also act as a corrosive and oxidant, resulting in property damage, such as the degradation of rubber products and other materials.

### **Carbon Monoxide**

CO, a colorless, odorless, relatively inert gas, is a trace constituent in the unpolluted troposphere produced by natural processes and human activities. In remote areas far from human habitation, CO occurs in the atmosphere at an average background concentration of 0.04 parts per million (ppm), primarily as a result of natural processes, such as forest fires and the oxidation of methane. Global atmospheric mixing of CO from urban and industrial sources creates higher background concentrations (up to 0.20 ppm) near urban areas. The major source of CO in urban areas is incomplete combustion of carbon-containing fuels, mainly gasoline.

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise and electrocardiograph changes indicative of worsening oxygen supply to the heart. Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin. Therefore, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include those with diseases involving heart and blood vessels, fetuses, and people with chronic hypoxemia (oxygen deficiency) as seen in high altitudes. Exposure to CO at high concentrations can also cause fatigue, headaches, confusion, dizziness, and chest pain. Ambient CO has no ecological or environmental effects (CARB 2021c).

### **Sulfur Dioxide**

SO<sub>2</sub> is a colorless gas with a sharp odor. It reacts in air to form sulfuric acid, which contributes to acid precipitation, and sulfates, which are components of PM. Main sources of SO<sub>2</sub> include coal and oil used in power plants and industries. Exposure for a few minutes to low levels of SO<sub>2</sub> can result in airway constriction in some asthmatics, the vast majority of whom are sensitive to the effects of SO<sub>2</sub>. In asthmatics, increase in resistance to airflow, as well as reduction in breathing capacity leading to severe breathing difficulties, is observed after acute higher exposure to SO<sub>2</sub>. In contrast, healthy individuals do not exhibit similar acute responses, even after exposure to higher concentrations of SO<sub>2</sub>.

**Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)**

PM consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of particulates are now generally considered: inhalable coarse particles, or PM<sub>10</sub>, and inhalable fine particles, or PM<sub>2.5</sub>. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. However, wind on arid landscapes also contributes substantially to local particulate loading.

Particulate pollution can be transported over long distances and may adversely affect humans, especially people who are naturally sensitive or susceptible to breathing problems. Numerous studies have linked PM exposure to premature death in people with preexisting heart or lung disease. Other symptoms of exposure may include nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (SCAQMD 2017). Depending on its composition, both PM<sub>10</sub> and PM<sub>2.5</sub> can also affect water quality and acidity, deplete soil nutrients, damage sensitive forests and crops, affect ecosystem diversity, and contribute to acid rain (EPA 2021d).

**Lead**

Pb in the atmosphere is present as a mixture of a number of lead compounds. Leaded gasoline and lead smelters have been the main sources of lead emitted into the air. However, because of the phasing out of leaded gasoline, there has been a dramatic reduction in atmospheric Pb over the past three decades. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. In adults, increased Pb levels are associated with increased blood pressure. Pb poisoning can also cause anemia, lethargy, seizures, and death; there is no evidence to suggest that Pb has direct effects on the respiratory system.

**Toxic Air Contaminants**

In addition to the criteria air pollutants discussed above, TACs are another group of pollutants of concern. Some examples of TACs include benzene, butadiene, formaldehyde, and hydrogen sulfide. Potential TAC-related health effects include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs, with varying degrees of toxicity. Individual TACs vary greatly with respect to the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

TACs do not have ambient air quality standards but are regulated by EPA and CARB. In 1998, CARB identified PM from diesel-fueled engines (i.e., DPM) as a TAC. DPM is composed of two phases, gas and particle, and both phases contribute to health risks. The gas phase is composed of many of the urban hazardous air pollutants, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde, and polycyclic aromatic hydrocarbons. The particle phase is also composed of many different types of particles by size or composition. Fine and ultra-fine PM is of the greatest health concern and may be composed of elemental carbon with adsorbed compounds, such as organic compounds, SO<sub>2</sub>, nitrates, metals, and other trace elements. CARB completed a risk management process that identified potential cancer risks for a range of activities and land uses that are affected by the use of diesel-fueled engines (CARB 2000a). High-volume freeways, stationary diesel engines, and facilities that attract constant and heavy volumes of diesel vehicle traffic (e.g., distribution centers, truck stops) were identified as areas that pose the highest risk for adjacent receptors. Other

facilities associated with increased risk include warehouse distribution centers, large retail or industrial facilities, high-volume transit centers, and schools with a high volume of bus traffic. Health risks from TACs are a function of both the concentration and the duration of exposure.

Unlike TACs emitted from industrial and other stationary sources, most DPM is emitted from diesel-powered vehicles and equipment, primarily construction and mining equipment, agricultural equipment, truck-mounted refrigeration units, and trucks and buses traveling on freeways and local roadways. Agricultural and mining equipment is not commonly used in the urban parts of the Basin, and construction equipment typically operates at various locations for only a limited time. As a result, the readily identifiable locations where DPM is emitted in the Basin include high-traffic roadways and other areas with substantial truck traffic. CARB estimated that about 70 percent of the total known cancer related to air toxics is attributable to DPM (CARB 2021d).

CARB's Diesel Risk Reduction Plan is intended to reduce DPM emissions and associated health risks substantially through the introduction of ultra-low-sulfur diesel fuel, a step that has already been implemented, and cleaner diesel engines (CARB 2000b). The technology for reducing DPM emissions from heavy-duty trucks is well established, and both state and federal agencies are moving aggressively to regulate engines and emission control systems to reduce and remediate diesel emissions. This plan also established airborne toxic control measures for mobile sources, including on-road and off-road vehicles, as well as stationary sources. With implementation of ATCMs, statewide DPM concentrations decreased from approximately 1.8 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) to approximately 0.61  $\mu\text{g}/\text{m}^3$  between 1990 and 2012, resulting in a 66 percent reduction over that period (CARB 2021d). CARB continues to explore strategies to reduce DPM emissions through engine retrofit mandates, cleaner diesel fuels, advanced engine technologies, and alternative fuels. CARB estimates that, by 2035, DPM emissions will be less than half of what they were in 2010.

### 3.1.3 Impact Analysis

This section describes the impact analysis related to air quality for the Project. It describes the methods used to determine impacts of the Project and the thresholds used to conclude whether an impact was significant.

#### Methods for Analysis

The methodology for assessing the Project's air quality impacts from demolition activities is presented below. Air quality impacts from operations of future development of the Project site are not included in this EIR.

#### Demolition Mass Emissions

Prior to 2018, the Project site was developed with a single-family residence. However, the site has since been cleared. This analysis considers impacts as they may have occurred during the illegal demolition of all structures previously on the subject site. Although demolition activities have already occurred, this EIR analyzes whether the demolition activities at the Project site resulted in any significant impacts on air quality.

The Project-generated criteria pollutant and TAC emissions during its one day of demolition activities. Demolition activities generated criteria pollutant and TAC emissions from off-road equipment and fugitive dust from demolition debris and mobile sources, which included vehicle trips for workers and haul trucks traveling to and from the Project site. These sources generated

both exhaust and fugitive dust emissions of PM<sub>10</sub> and PM<sub>2.5</sub>. Construction emissions estimates were generated using the California Emissions Estimator Model (CalEEMod, version 2020.4.0), developed by the California Air Pollution Control Officers Association. The construction analysis was based on a combination of Project-specific information provided by the applicant as well as conservative default assumptions generated by CalEEMod. Modeling details for the Project are provided in Appendix C of this Draft EIR.

Regarding localized effects, SCAQMD has developed localized significance thresholds (LSTs) to aid in the analysis of construction emissions associated with land use development projects. Specifically, LSTs have been developed for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> that represent the maximum emissions of these pollutants that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and therefore would not cause or contribute to localized air quality impacts related to public health. SCAQMD's LST methodology focuses on onsite emissions from construction equipment (i.e., loaders, backhoes, forklifts) and fugitive dust from soil disturbance activities. The LST methodology and look-up tables are not designed to evaluate impacts from offsite sources such as mobile sources.

For purposes of this analysis, the calculation of fugitive dust emissions generated during demolition activities does not include dust control measures. The calculated Project emissions are evaluated against the applicable SCAQMD thresholds of significance discussed below to assess whether potential air quality impacts occurred. All emissions modeling output files are provided in Appendix C of this Draft EIR.

## Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would be considered to have had a significant effect if it resulted in any of the following conditions.

- Conflict with or obstruction of implementation of the applicable air quality plan.
- A cumulatively considerable net increase of any criteria pollutant for which the Project region is a nonattainment area for an applicable federal or state ambient air quality standard.
- Exposure of sensitive receptors to substantial pollutant concentrations.
- Other emissions (such as those leading to odors) affecting a substantial number of people.

## Regional Thresholds

The City has not developed specific thresholds for air quality impacts. Instead, it relies on SCAQMD's CEQA Air Quality Handbook when acting as lead agency for CEQA purposes. Appendix G, Section III, of the State CEQA Guidelines states that, where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make determinations regarding air quality impacts. Given SCAQMD's regulatory role in the Basin, the significance thresholds and analysis methodologies established by SCAQMD are relied upon by the City in the context of the questions from Appendix G of the State CEQA Guidelines to make determinations regarding air quality impacts. The SCAQMD significance thresholds and analysis methodologies are relied on here with respect to this analysis to determine if the Project's emissions resulted in air quality impacts.

SCAQMD has established air quality significance thresholds that are applicable to both construction and operational emissions generated by CEQA projects within its jurisdiction. These significance

thresholds were derived using regional emissions modeling to determine maximum allowable mass quantities of pollutant emissions that could be generated by individual projects without adversely affecting air quality and creating public health concerns based on existing pollution levels. Only demolition activities are associated with the Project; therefore, only SCAQMD construction thresholds were used in this analysis. These regional pollutant emission thresholds are shown in Table 3.1-4.

**Table 3.1-4. SCAQMD Regional Air Quality Significance Thresholds**

Pollutant	Mass Daily Thresholds (pounds/day)
	Construction
Volatile organic compounds (VOC) <sup>1</sup>	75
Nitrogen oxides (NO <sub>x</sub> )	100
Carbon monoxide (CO)	550
Sulfur oxides (SO <sub>x</sub> )	150
Suspended particulate matter (PM <sub>10</sub> )	150
Fine particulate matter (PM <sub>2.5</sub> )	55
Lead (Pb) <sup>2</sup>	3

Source: SCAQMD 2019.

<sup>1</sup> The terms VOC and reactive organic gases (ROG) are used interchangeably. SCAQMD uses VOC, and CalEEMod uses ROG.

<sup>2</sup> The Project would result in no lead emissions sources during the construction period or operations. As such, lead emissions are not evaluated herein.

## Localized Thresholds

Aside from regional air quality impacts, projects in the Basin are also required to analyze local air quality impacts. SCAQMD has developed LSTs that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and therefore would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of that pollutant for each of the 38 source receptor areas (SRAs) in the Basin (SCAQMD 1999). The LSTs, which are found in the mass rate look-up tables in SCAQMD's *Final Localized Significance Threshold Methodology* document, were developed for the analysis of projects that are less than or equal to 5 acres in size and applicable only to the following criteria pollutants: NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The analysis of localized air quality impacts focuses only on the onsite activities of a project and does not include emissions that are generated off site, such as on-road haul or delivery truck trips (SCAQMD 2008a).

The mass rate look-up tables developed by SCAQMD present LST values in the form of allowable emissions (in pounds per day) as a function of receptor distance from a project's site boundary. These LST values were developed by SCAQMD for 1-acre, 2-acre, and 5-acre sites. The LSTs established for each of the aforementioned site acreages represent the level of pollutant emissions that would not exceed the most stringent applicable federal or state ambient air quality standards. As the Project site is approximately 0.34 acre in size, the applicable LSTs for a site of this size was based on a 1-acre site. The construction LSTs for a 0.34-acre site with a 25-meter receptor distance in SRA 7 (East San Fernando Valley), which is where the Project site is located, are shown in Table 3.1-5.



**Table 3.1-5. SCAQMD Localized Significance Thresholds**

Pollutant	Mass Daily Thresholds (pounds/day)
	Construction <sup>1</sup>
Nitrogen oxides (NO <sub>x</sub> ) <sup>2</sup>	80
Carbon monoxide (CO)	498
Suspended particulate matter (PM <sub>10</sub> )	4
Fine particulate matter (PM <sub>2.5</sub> )	3

Source: SCAQMD 2008b.

<sup>1</sup> LSTs based on a 1-acre site with a 25-meter receptor distance in SRA 7 (East San Fernando Valley). While SCAQMD's mass rate look-up tables present LST values for receptor distances of 25, 50, 100, 200, and 500 meters from a project's site boundary, for the purpose of this analysis only the LST values at a receptor distance of 25 meters are provided because LSTs at this distance are the most conservative and best meet the distances at which the nearest offsite sensitive receptors are from the Project site among the distances in SCAQMD's LST look-up tables. According to SCAQMD's LST methodology, it is recommended that projects with boundaries closer than 25 meters from the nearest receptor use the LSTs for receptors at 25 meters.

<sup>2</sup> The localized thresholds listed for NO<sub>x</sub> in this table take into consideration the gradual conversion of NO to NO<sub>2</sub>. The analysis of localized air quality impacts associated with NO<sub>x</sub> emissions focuses on NO<sub>2</sub> levels because of their association with adverse health effects.

### Health-Based Thresholds for Project-Generated Pollutants of Human Health Concern

The California Supreme Court's 2018 decision in *Sierra Club v. County of Fresno* (6 Cal. 5th 502), hereafter referred to as the Friant Ranch Decision, reviewed the long-term regional air quality analysis contained in the EIR for the proposed Community Plan Update and Friant Ranch Specific Plan (Friant Ranch Project). The Friant Ranch Project proposed a 942-acre master-plan development in unincorporated Fresno County, within the San Joaquin Valley Air Basin, which is currently designated as a nonattainment area with respect to the NAAQS and CAAQS for O<sub>3</sub> and PM<sub>2.5</sub>. The court found that the EIR's air quality analysis was inadequate because it failed to provide enough detail "for the public to translate the bare [criteria pollutant emissions] numbers provided into adverse health impacts or to understand why such a translation is not possible at this time." The court's decision notes that environmental documents must attempt to connect a project's air quality impacts to specific health effects or explain why it is not technically feasible to perform such an analysis.

All criteria pollutants generated by the Project would be associated with some form of health risk (e.g., asthma, lower respiratory problems). Criteria pollutants can be classified as either regional pollutants or localized pollutants. Regional pollutants can be transported over long distances and affect ambient air quality far from the emissions source. Localized pollutants affect ambient air quality near the emissions source. O<sub>3</sub> is considered a regional criteria pollutant, whereas CO, NO<sub>2</sub>, SO<sub>2</sub>, and lead are localized pollutants. PM can be both a local and a regional pollutant, depending on its composition. The primary criteria pollutants of concern generated by the Project would be O<sub>3</sub> precursors (reactive organic gases [ROG] and NO<sub>x</sub>), CO, and PM, including DPM.

The sections that follow discuss thresholds and analysis considerations for regional and local Project-generated criteria pollutants with respect to their human health implications.

### **Regional Project-Generated Criteria Pollutants (Ozone Precursors and Regional PM)**

Adverse health effects from regional criteria pollutant emissions, such as O<sub>3</sub> precursors and PM, generated by the Project are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and

character of exposed individuals [e.g., age, gender]). Therefore, O<sub>3</sub> precursors (ROG and NO<sub>x</sub>) contribute to the formation of groundborne O<sub>3</sub> on a regional scale. Emissions of ROG and NO<sub>x</sub> generated in an area may not correlate to a specific O<sub>3</sub> concentration in that same area. Similarly, some types of particulate pollutants may be transported over long distances or formed through atmospheric reactions. As such, the magnitude and locations of specific health effects from exposure to increased O<sub>3</sub> or regional PM concentrations are the product of emissions generated by numerous sources throughout a region, as opposed to a single individual project. Moreover, exposure to regional air pollution does not guarantee that an individual will experience an adverse health effect. As discussed above, there are large individual differences in the intensity of symptomatic responses to air pollutants. These differences are influenced, in part, by the underlying health condition of an individual, which cannot be known.

Models and tools have been developed to correlate regional criteria pollutant emissions to potential community health impacts. Although models are capable of quantifying O<sub>3</sub> and any secondary PM formation and associated health effects, these tools were developed to support regional planning and policy analysis and have limited sensitivity to small changes in criteria pollutant concentrations induced by individual projects. Therefore, translating project-generated criteria pollutants to the locations where specific health effects could occur or the resultant number of additional days of nonattainment is not possible with any degree of accuracy.

The technical limitations of existing models (e.g., for correlating project-level regional emissions to specific health consequences) are recognized by air quality management districts throughout the state, including the San Joaquin Valley Air Pollution Control District (SJVAPCD) and SCAQMD, which provided amici curiae briefs for the Friant Ranch Project's legal proceedings. In its brief, the SJVAPCD acknowledged that health risk assessments for localized air toxics, such as DPM, are common; however, "it is not feasible to conduct a similar analysis for criteria air pollutants because currently available computer modeling tools are not equipped for this task" (SJVAPCD 2015). The SJVAPCD further notes that emissions solely from the Friant Ranch Project, which equate to less than one-tenth of 1 percent of total NO<sub>x</sub> and VOCs in the valley, are not likely to yield valid information and that any such information would not be "accurate when applied at the local level." SCAQMD presents similar information in its brief, stating that "it takes a large amount of additional precursor emissions to cause a modeled increase in ambient O<sub>3</sub> levels" (SCAQMD 2015c).<sup>4</sup>

As discussed above, air districts develop region-specific CEQA thresholds of significance in consideration of existing air quality concentrations as well as attainment or nonattainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates that there are known safe concentrations of criteria pollutants. Although recognizing that air quality is a cumulative problem, air districts typically consider projects that generate criteria pollutant and O<sub>3</sub> precursor emissions that are below the thresholds to be minor in nature. Such projects would not adversely affect air quality or exceed the NAAQS or CAAQS. Emissions generated by the Project could increase photochemical reactions and the formation of tropospheric O<sub>3</sub> and secondary PM, which, at certain concentrations, could lead to increased incidences of specific health consequences. Although these health effects are associated with O<sub>3</sub> and particulate pollution, the effects are a result of cumulative and regional emissions.

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<sup>4</sup> For example, SCAQMD's analysis of its 2012 Air Quality Attainment Plan showed that the modeled NO<sub>x</sub> and ROG reductions of 432 and 187 tons per day, respectively, reduced levels by only 9 parts per billion. Analysis of SCAQMD's Rule 1315 showed that emissions of NO<sub>x</sub> and ROG of 6,620 and 89,180 pounds per day, respectively, contributed to 20 premature deaths per year and 89,947 school absences (SCAQMD 2015c).

Therefore, the Project's incremental contribution cannot be traced to specific health outcomes on a regional scale, and a quantitative correlation of Project-generated regional criteria pollutant emissions to specific human health impacts is not included in this analysis.

#### ***Localized Project-Generated Criteria Pollutants (PM, NO<sub>2</sub>, and CO)***

Localized pollutants generated by a project are deposited and potentially affect populations near the emissions source. Because these pollutants dissipate with distance, emissions from individual projects can result in direct and material health impacts on adjacent sensitive receptors. Models and thresholds are readily available to quantify these potential health effects and evaluate their significance. As discussed above, SCAQMD has developed LSTs for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> that represent the maximum emissions from a project's onsite activities that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and therefore would not cause or contribute to localized air quality impacts related to public health. The applicable LSTs for assessing the potential local air quality impacts from the Project's onsite emissions during demolition activities are presented in Table 3.1-5.

#### ***Toxic Air Contaminants***

The California Supreme Court has held that lead agencies are not required to analyze the impacts of the environment on a project's future users or residents unless the project exacerbates existing environmental hazards (see *California Building Industry Association v. Bay Area Air Quality Management District* [2015] 62 Cal.41h 369) or when the legislature has indicated by specific California Public Resources Code sections (21096, 21151.8, 21155.1, 21159.21, 21159.22, 21159.23, and 21159.24) that specifically defined environmental hazards associated with airport noise and safety, school projects, certain kinds of infill housing, and transit priority projects must be addressed. Certain land use types proposed under a project may introduce emission sources (e.g., generators, delivery trucks) that would exacerbate existing environmental TAC hazards.

Regarding sensitive receptors' exposure to substantial pollutant concentrations, SCAQMD states that a project would have a significant impact from TACs if:

- The project emits carcinogenic materials or TACs that exceed the maximum incremental cancer risk of ten in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million or an acute or chronic hazard index of 1.0).

#### ***Carbon Monoxide Hot Spots***

Heavy traffic congestion can contribute to high levels of CO. Individuals exposed to these CO "hot spots" may have a greater likelihood of developing adverse health effects. The potential for a project to result in localized CO impacts at intersections resulting from addition of its traffic volumes is assessed against the health-based CAAQS and NAAQS for CO. SCAQMD states that a project impact is significant if it causes or contributes to an exceedance of the following attainment standards:

- 1-hour standards of 20 ppm (state) and 35 ppm (federal)
- 8-hour standards of 9.0 ppm (state) and 9 ppm (federal)

#### ***Asbestos***

There are no quantitative thresholds related to receptor exposure to asbestos. However, SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) specifies work practices to limit asbestos emissions from building demolition and renovation activities that include the removal

and disturbance of asbestos-containing materials. This rule is generally designed to protect uses surrounding demolition or renovation activity from exposure to asbestos emissions. Rule 1403 requires surveys of any facility being demolished or renovated for the presence of asbestos-containing materials. Rule 1403 also establishes notification procedures, handling operations, warning label requirements, and removal procedures, including complying with the limitations of the National Emission Standards for Hazardous Air Pollutants regulations as listed in Code of Federal Regulations, Title 40, Part 61.

## Cumulative Impacts

Potential cumulative air quality impacts would result when other projects' pollutant emissions combine to degrade air quality conditions below acceptable levels. This could occur on a local level (e.g., increased vehicle emissions at congested intersections or concurrent construction activities at sensitive receptor locations) or a regional level (e.g., potential O<sub>3</sub> impacts from multiple past, present, and reasonably foreseeable projects within the Basin). Given that both localized and regional pollution is regulated at the air basin level, the Basin is the resource study area for the purposes of air quality.

The Basin experiences chronic exceedances of the NAAQS and CAAQS and is currently in nonattainment status for O<sub>3</sub> (federal and state standards), PM<sub>10</sub> (federal and state standards), and PM<sub>2.5</sub> (federal and state standards). Consequently, cumulative development in the Basin as a whole could violate an air quality standard or contribute to an existing or projected air quality violation. Based on SCAQMD's cumulative air quality impact methodology, SCAQMD recommends that if an individual project results in air emissions of criteria pollutants that exceed SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. Conversely, if a project's emissions do not exceed the recommended daily thresholds for project-specific impacts, its impacts would not be cumulatively considerable and would not contribute to nonattainment of applicable air quality standards in the Basin.

## Impacts and Mitigation Measures

### **Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan (Less Than Significant)**

The 2016 AQMP was adopted by SCAQMD as a program to lead the Basin into compliance with criteria pollutant standards and other federal requirements for which the Basin is not in compliance. The AQMP relies on emissions forecasts based on the demographic and economic growth projections provided by the SCAG 2016 RTP/SCS (SCAQMD 2017). SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies" (SCAQMD 2017). A project is considered to be consistent with the AQMP and not obstruct its implementation if, in part, it is consistent with the demographic and economic growth projections used in the formulation of the AQMP. SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency must assess: (1) whether the project would directly obstruct implementation of the plan through an increase in the frequency or severity of existing air quality violations, would cause or contribute to new violations, or would delay timely attainment of air quality standards; and (2) whether the project is consistent with the

demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based (SCAQMD 1993).

## Demolition

The first consistency criterion is related to violations of the CAAQS and NAAQS. Demolition emissions associated with the Project were temporary in nature and did not have a long-term impact on the region's ability to meet California and federal air quality standards. As described under Impact AQ-2 and Impact AQ-3 below, maximum daily emissions of air pollutants from demolition activities did not exceed SCAQMD's regional or localized significance threshold values. Therefore, the Project did not result in air quality violations.

The second consistency criterion requires that the Project be consistent with the demographic and economic assumptions upon which the applicable air quality plan is based. The most applicable air quality plan for the Project is the 2016 AQMP, which is based on the SCAG 2016–2040 RTP/SCS (SCAG 2016). The Project's demolition activities had a duration of one day with a minimal number of workers and would not have conflicted with the long-term employment projections upon which the AQMP is based. Overall, the Project's demolition activities would not conflict with the AQMP, and impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

### **Impact AQ-2: Result in cumulatively considerable net increase of any criteria pollutant for which the Project region is a nonattainment area for an applicable federal or state ambient air quality standard (Less Than Significant)**

## Demolition

The Project's demolition activities generated criteria pollutant emissions from off-road equipment, fugitive dust from demolition debris, and worker and haul trucks trips traveling to and from the Project site. The demolition activity had a duration of one day in 2018. The modeled peak daily emissions of criteria air pollutants and O<sub>3</sub> precursors associated with the Project's demolition activities are presented in Table 3.1-6. As shown in Table 3.1-6, demolition activities did not exceed SCAQMD's daily significance thresholds for any criteria pollutant. Therefore, the Project had a less-than-significant impact with respect to regional emissions.

Furthermore, the Project's demolition emissions ceased once demolition was completed and only had a duration of one day. Based on the Project's short-term duration and because the Project's emissions did not exceed SCAQMD thresholds, the Project would not have long-term effects on regional emissions.

**Table 3.1-6. Regional Criteria Pollutant Emissions**

Phase Name	Estimated Daily Regional Pollutant Emissions (pounds/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> Total	PM <sub>2.5</sub> Total
Demolition	<1	8	5	<1	3	<1
<b>Maximum daily emissions</b>	<b>&lt;1</b>	<b>8</b>	<b>5</b>	<b>&lt;1</b>	<b>3</b>	<b>&lt;1</b>
SCAQMD regional thresholds	75	100	550	150	150	55
<b>Exceeds threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Modeling output provided in Appendix C of this Draft EIR.

### Mitigation Measures

No mitigation is required.

### Impact AQ-3: Expose sensitive receptors to substantial pollutant concentrations (Less Than Significant)

The term *sensitive receptors* refers to uses associated with people who are considered to be more sensitive than others to air pollutants. The reasons for greater than average sensitivity include pre-existing health problems, proximity to emissions sources, or duration of exposure to air pollutants. Schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because children, the elderly, and the infirmed are more susceptible to respiratory distress and other air quality-related health problems on average than the general public. Residential areas are considered sensitive to poor air quality because people usually stay home for extended periods of time, with associated greater exposure to ambient air quality. Recreational uses are also considered sensitive due to the greater exposure to ambient air quality conditions because vigorous exercise associated with recreation places a high demand on the human respiratory system.

### Localized Pollutant Emissions

To assess the localized air quality impacts resulting from the Project on nearby sensitive receptors during demolition activities, the daily onsite emissions generated from the Project were evaluated against SCAQMD's applicable construction LSTs for a 1-acre site.

The mass rate look-up tables provided by SCAQMD provide only LSTs at receptor distances of 25, 50, 100, 200, and 500 meters. The LSTs for a receptor distance of 25 meters were used to evaluate the localized air quality impacts associated with the Project's peak-day emissions because this distance most closely corresponds to the location of the nearest offsite sensitive receptors to the Project site.

The localized onsite emissions that occurred during the Project's demolition activities are provided in Table 3.1-7. As shown in Table 3.1-7 daily emissions generated on site by the Project's demolition activities did not exceed any of the applicable SCAQMD LSTs. Therefore, the Project had a less-than-significant impact.

**Table 3.1-7. Localized Criteria Pollutant Emissions**

Phase Name	Maximum Daily Localized Emissions (pounds/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub> Total	PM <sub>2.5</sub> Total
Demolition	4	4	3	<1
<b>Maximum daily emissions</b>	<b>4</b>	<b>4</b>	<b>3</b>	<b>&lt;1</b>
SCAQMD localized thresholds	80	498	4	3
<b>Exceeds threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Modeling output provided in Appendix C of this Draft EIR.

### CO Hotspots

The Project's demolition activities included minimal vehicle trips, including 6 one-way trips for workers and 16 one-way trips for haul trucks for debris disposal. Based on the minimal vehicle trips, the Project did not result in CO concentrations at local intersections that would have exceeded CO standards. Impacts were less than significant.

### Toxic Air Contaminants

#### Asbestos

Demolition activities were conducted by a licensed contractor who implemented the required precautionary measures for performing demolition activities in a professional manner that limited asbestos emissions. Therefore, impacts were less than significant.

#### DPM

As discussed previously, DPM is classified as a carcinogenic TAC by CARB and is the primary pollutant of concern with regard to health risks to sensitive receptors during the Project's demolition activities. Diesel-powered construction equipment as well as heavy-duty truck movement and hauling emitted DPM that potentially exposed nearby sensitive receptors to pollutant concentrations. However, health risk impacts from DPM require an extended exposure duration over several months and even years. The Office of Environmental Health Hazard Association (OEHHA) does not recommend assessing cancer risk from projects lasting less than 2 months (OEHHA 2015). Because the Project had a duration of one day, which is substantially less than stipulated in OEHHA's guidance for estimating health risks, the Project did not expose sensitive receptors to substantial DPM concentrations. Impacts were less than significant.

### Mitigation Measures

No mitigation is required.

#### **Impact AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (Less Than Significant)**

During the Project's demolition activities, exhaust from equipment may have produced discernible odors typical of most construction sites. Such odors were, at worst, a temporary source of nuisance to adjacent uses, if at all, and did not affect a substantial number of people. Additionally, heavy-duty haul truck trips could have created an occasional "whiff" of diesel exhaust for nearby receptors.

These odors did not affect a substantial number of people because demolition activities only had a duration of one day and truck trips were distributed throughout the day. Overall, odors associated with the Project's demolition activities were temporary and intermittent in nature. The Project did not create a significant level of objectionable odors affecting a substantial number of people.

**Mitigation Measures**

No mitigation is required.



## 3.2 Cultural Resources

This section describes the geographic and regulatory setting for cultural resources, discusses cultural resources impacts that would have occurred as result of construction (specifically demolition) of the existing structure, determines the significance of impacts (where applicable), and identifies mitigation measures (where applicable), that would have reduced or avoided significant impacts, where feasible. Much of the content in this EIR section is taken from the 1420 Valley View Road Project Historical Resources Report (April 2023) included as Appendix B of this Draft EIR.

The subject property at 1420 Valley View Road (Project site) is a residential land use that prior to 2018 was developed with a single-family residence and detached garage. However, the Project site has since been cleared. Therefore, this analysis considers impacts as they may have occurred during the illegal demolition of all structures previously on the Project site, along with potential impacts associated with the two-lot subdivision.

### 3.2.1 Existing Conditions

#### Regulatory Setting

##### National Register of Historic Places Criteria

For the purposes of compliance with federal laws and some local programs, cultural resource significance is evaluated in terms of eligibility for listing in the National Register of Historic Places (NRHP). The NRHP significance criteria that were applied to evaluate the cultural resources for the Project are defined in 36 Code of Federal Regulations 60.4 as follows:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and

- (a) that are associated with events that have made a significant contribution to the broad patterns of our history; or
- (b) that are associated with the lives of persons who are significant in our past; or
- (c) that embody the distinctive characteristics of a type, period, or method of construction or represent the work of a master or possess high artistic values or represent a significant and distinguishable entity whose components may lack individual distinction; or
- (d) that have yielded, or may be likely to yield, information that is important in prehistory or history.

The question of integrity is an additional factor that must be addressed. The Secretary of the Interior describes integrity as “the ability of a property to convey its significance.” In other words, a property must retain certain intact physical features to convey its significance under one or more of the NRHP criteria. Integrity is judged on seven aspects: location, design, setting, workmanship, materials, feeling, and association. These seven factors can be roughly grouped into three types of integrity considerations. Location and setting relate to the relationship between the property and its environment. Design, materials, and workmanship most often apply to historic buildings and relate to construction methods and architectural details. Feeling and association are the least objective

criteria, pertaining to the overall ability of the property to convey a sense of the historical time and place in which it was constructed (National Park Service 1995).

Certain kinds of properties are usually not considered for listing in the NRHP, including properties that have been moved or are less than 50 years of age at the time of evaluation. However, these properties can be eligible if they meet special requirements, called Criteria Considerations, in addition to being eligible under one or more of the regular criteria (A through D). Under Criterion Consideration B, a property that has been moved from its original location may be eligible if that property is significant for architectural value or a surviving property that is associated with an important person or event. Under Criterion Consideration G, a property that has not achieved significance within the past 50 years is not considered eligible for the NRHP unless it is of exceptional importance.

### **California Register of Historical Resources**

The National Historic Preservation Act of 1966 mandated the selection and appointment in each state of a State Historic Preservation Officer (SHPO). Each SHPO is tasked, among other duties, with maintaining an inventory of historic properties. In California, the state legislature established additional duties for the SHPO. These include maintenance of the California Register of Historical Resources (CRHR). Established by California Public Resources Code (PRC) Section 5024.1(a) in 1992, the CRHR serves as “an authoritative guide in California to be 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 feasible, from substantial adverse change.” According to PRC Section 5024.1(c), the CRHR criteria broadly mirror those of the NRHP. The CRHR criteria are found at PRC Section 5024.1(c), and provide that a resource may be listed as a historical resource in the CRHR if it meets any of the following NRHP criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

Although the CRHR criteria allow for exceptions, the minimum age and threshold for the CRHR is 50 years. Properties that are less than 50 years of age may be eligible for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand their historic importance. In addition to meeting one or more of the historical significance criteria, the resource must possess integrity. Integrity is defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance” (State of California 2011).

There are several ways for resources to be included in the CRHR. A resource’s listing in the CRHR can be based on a nomination and public consideration process. Additionally, a resource that is subject to a discretionary action by a governmental entity may be evaluated for CRHR eligibility. Properties that are listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

## Historical Resources

Established in 1970, CEQA directs state and local government entities to analyze and publicly disclose environmental impacts of proposed projects. Moreover, it requires the development and adoption of mitigation measures to lessen impacts.

PRC Section 21060.5 defines the term *environment* to include “objects of historic... significance.” For the purposes of CEQA, “historical resources” are defined pursuant to Section 15064.5(a) of the State CEQA Guidelines. The text below is abbreviated and excerpted.

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR (PRC Section 5024.1, Title 14 California Code of Regulations, Section 4850 et seq.) is considered a resource.
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC, or identified as significant in a historic resource survey meeting the requirements in Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the CRHR (PRC Section 5024.1, Title 14 California Code of Regulations, Section 4852).
4. The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC) does not preclude a lead agency from determining that the resource may be a historical resource, as defined in PRC Section 5020.1(j) or 5024.1.

## City of Glendale Register of Historic Resources

Glendale Municipal Code, Chapter 15.20.050 contains the following local guidance regarding listing resources in the Glendale Register of Historic Resources (GRHR):

Upon recommendation of the historic preservation commission, city council shall consider and make findings for additions to the Glendale Register of Historic Resources. The designation of any resource that is proposed for inclusion in the Glendale Register of Historic Resources as a designated historic resource shall be granted only if city council first finds that the resource meets one (1) or more of the following criteria:

- (1) The resource is identified with important events in national, state, or city history, or exemplifies significant contributions to the broad cultural, political, economic, social, tribal, or historic heritage of the nation, state, or city, and retains historic integrity.
- (2) The resource is associated with a person, persons, or groups who significantly contributed to the history of the nation, state, region, or city, and retains historic integrity.
- (3) The 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, and retains historic integrity.

- (4) The 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 retains historic integrity. (Ord. 5949 § 6, 2020; Ord. 5784 § 7, 2012; Ord. 5347 § 7, 2003; Ord. 5110 § 12, 1996; prior code § 21-02)

## Glendale Historic Districts

Glendale Municipal Code, Chapter 30.25.020 allows for the establishment of historic district overlay zones, which provide for the development of historic districts that would be subject to a special design review procedure in order to safeguard historic architecture and characteristics.

A geographic area may be designated as a historic district overlay zone by city council upon the recommendation of the historic preservation commission and planning commission if the district meets one or more of the following criteria:

- (A) Exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;
- (B) Is identified with persons or events significant in local, state, or national history;
- (C) Embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
- (D) Represents the work of notable builders, designers, or architects;
- (E) Has a unique location or is a view or vista representing an established and familiar visual feature of a neighborhood community or of the city;
- (F) Embodies a collection of elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation;
- (G) Reflects significant geographical patterns, including those associated with different eras of settlement and growth, transportation modes, or distinctive examples of park or community planning;
- (H) Conveys a sense of historic and architectural cohesiveness through its design, setting, materials, workmanship, or association; and/or
- (I) Has been designated a historic district in the National Register of Historic Places or the California Register of Historical Resources. (Ord. 5949 § 30, 2020; Ord. 5399 Attach. A, 2004)

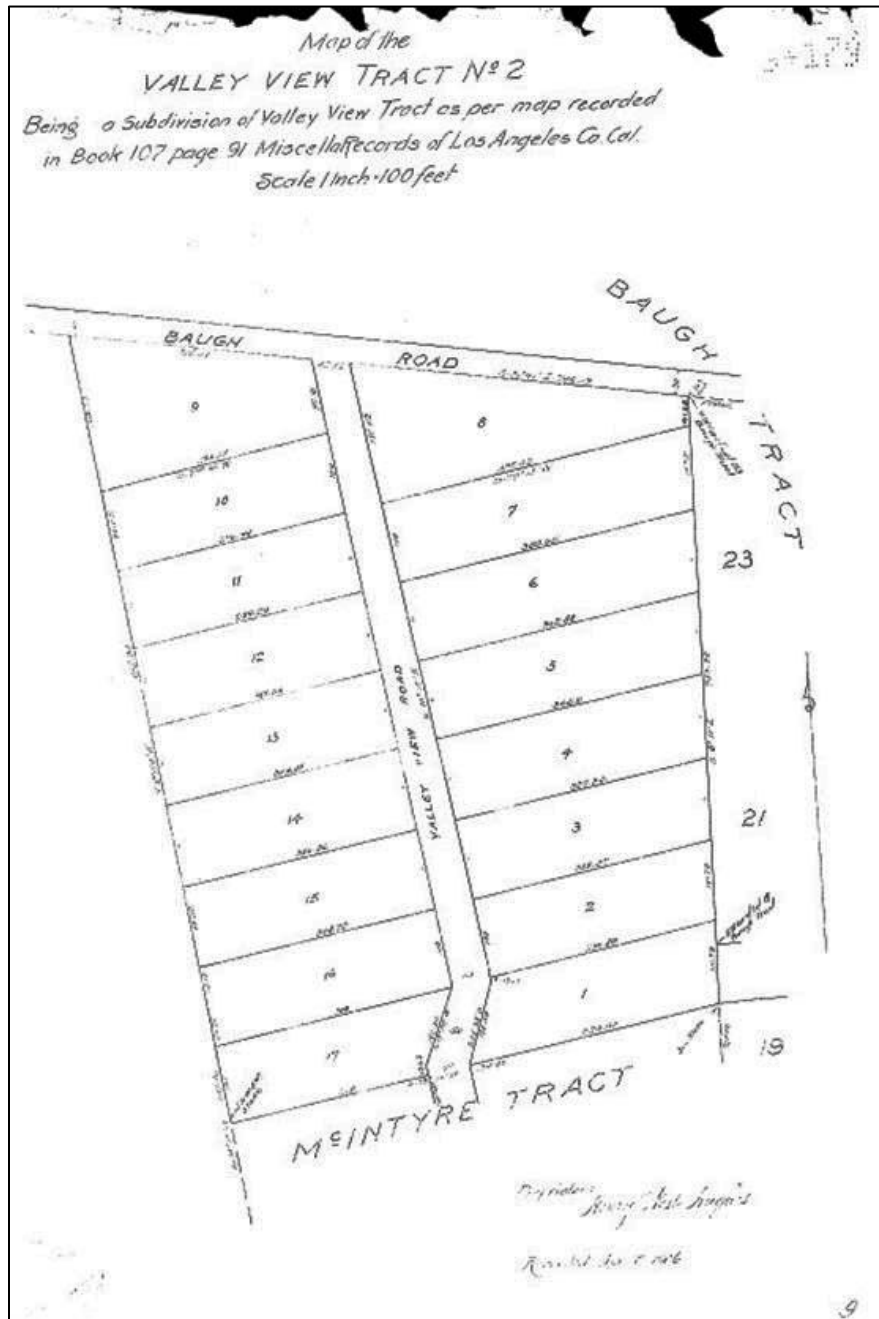
## 3.2.2 Environmental Setting

The Project vicinity is highly urbanized and largely built out with single- and multi-family residences within an established residential neighborhood known as Verdugo Viejo. The existing setting in the Project vicinity is representative of established residential neighborhoods within the City. The following sections discusses the historic context for the proposed Project.

### Valley View Tract No. 2

In April 1906, proprietor H.W. Hughes subdivided the property that encompasses 1420 Valley View Road as part of Valley View Tract No. 2. The tract is just south of the former 140-acre estate of philanthropist and businessman John C. Brockman, who resided on the estate from 1909 until his land was subdivided in the 1920s. The original tract maps depict the tract as trapezoidal with 17 total subdivided lots on either side of Valley View Road from Baugh Road (now W. Kenneth Road) to the north and the McIntyre Tract to the south. Developers heavily advertised the tract in local publications from 1906 to 1908. In 1910, Pacific Electric built a Red Car stop at Brand Boulevard and Randolph Street, about 1/3 mile from the subject property. While lot size varied slightly, no lot

consisted of more than one quarter of an acre, as seen on Figure 3.2-1 (*Los Angeles Evening Post-Record* 1907:6; Los Angeles Public Works Department 1906).



Source: Los Angeles Public Works Department 1906

**Figure 3.2-1. A Cropped Section of the Valley View Tract No. 2 (Map Recorded in 1906)**

The 1925 Sanborn map depicts a developing but sparsely populated neighborhood, comprising mostly single-family dwellings (Sanborn Fire Insurance Company 1925). The subject dwelling appears in its current configuration with a detached garage at the southeastern end of Valley Tract No. 2, and the rest of the tract is almost completely developed with single-family housing by 1925. However, only about half of the lots on adjacent tracts to the north were developed at this time. In

1926, the Brockmont Park subdivision (now a City of Glendale historic district) was developed just across Kenneth Road and featured more curvilinear streets than streetscapes to the south. The 1950 Sanborn map shows most of Valley Tract No. 2 remaining unchanged since 1925 (Sanborn Fire Insurance Company 1950). However, formerly vacant parcels to the north of the tract show complete buildout with single-family dwellings. While properties to the north of the subject parcel have retained the single-family character established with 1920s-era development, including the Brockmont Park historic district, parcels directly to the west along Valley View Road saw multi-family apartment infill projects replacing formerly single-family parcels in the 1970s (see Figure 7 in Appendix B of this Draft EIR for photo of neighboring four-story apartment). The growth of adjacent multi-family dwellings reflects a 1960s-era zoning change that allowed for high-density residential development on the west side of Valley View Road (R1250 – High Density Residential), directly across the street from the subject property, while the east side of the street retained single-family zoning (R1 – Low Density Residential). The neighborhood now consists of single-family houses north of the subject property and an increasingly dense cluster of multi-family apartments and condominiums to the west. Currently, all properties directly adjacent to 1420 Valley View Road have a built date of 1953 or later. Since approximately the 1970s, the neighborhood has been referred to as Verdugo Viejo (Sanborn Fire Insurance Company 1925, 1950:299A; City of Glendale 2013:1–2, 8–13; Nationwide Environmental Title Research 1972, 1977, 1989, 2010).

## 1420 Valley View Road

1420 Valley View Road was a one-story, single-family, Craftsman bungalow-style dwelling with an irregular plan, as shown on Figure 3.2-2. A moderately pitched, cross-gabled roof with overhanging eaves, triangular knee bracing, and modest stickwork tops the residence. Wood shingle siding clad all elevations, and wood frame, transomed windows provide fenestration, including a large picture window on the primary elevation. Five concrete steps lead to a partial-width front porch supported by square-shaped wood piers. The porch shelters a non-original, flat-panel door main entrance on the west elevation. A brick chimney rises from the north elevation. A detached, one-car garage with carport extension sits just southeast of the primary dwelling. A gable vent and horizontal wood board siding distinguish the front-gabled, single-car garage. Landscaping includes a grass front lawn with mature trees surrounding the house. Located in a neighborhood mixed with single- and multi-family residences, the property exhibited a high level of architectural integrity prior to demolition.



**Figure 3.2-2. 1420 Valley View Road, View of Primary (west) Elevation of the Residence**

### **History of Craftsman Style Architecture (1905–1930)**

Pasadena architects Charles Sumner Greene and Henry Mather Greene, who practiced from 1893 to 1914, helped inspire the Craftsman style with their early 20<sup>th</sup> century residential designs. They began with modest Craftsman bungalow homes around 1903 and with more elaborate designs by 1909. The Gamble House in Pasadena is one of their most well-known and well-preserved examples. Several factors appear to have motivated the Greene brothers to design and build these houses, including the English Arts and Crafts movement, an interest in Asian wooden architecture, and their early training in the manual arts. The Craftsman style demonstrated an honest use of building materials by making the structural components of their works visible rather than hiding them behind superfluous adornment. National magazines like *House Beautiful*, *Good Housekeeping*, *The Architect*, and *Western Architect* promoted and popularized the style in America. This resulted in several “pattern book” publications with pages of Craftsman home designs to select. The Craftsman style not only represents one of the most iconic architectural forms in Southern California, but it also became a dominant style for smaller houses across the country from roughly 1905 to 1920 (Galvin Preservation Associates, Inc. 2007:19–20; McAlester 1984:453–454).

Craftsman architectural features include low-pitched gabled roofs with wide, unenclosed overhanging eaves; exposed roof rafters; decorative beams or braces under the gables; full or partial-width porches supported by tapered square columns; and columns or pedestals that frequently extend to ground level. Although Craftsman pattern books offer numerous design options, the four basic roof subtypes came to characterize the style: front-gabled, cross-gabled, side-gabled, and the less common, hipped roof style. Within these subtypes, the modest Bungalow Craftsman is the most common type both nationally and in Glendale, while more eclectic versions



include Cottage, Colonial, Clipped-Gable Colonial, Multi-Family, Transitional, Eclectic, and Aeroplane styles (Galvin Preservation Associates, Inc. 2007:19–20; McAlester 1984:453–454).

When the fast-growing community of Glendale incorporated in 1906, developers and citizens found the emerging Craftsman residential architecture perfectly suited for a newly forming suburban middle class. When Henry Huntington's Pacific Electric Red Car line linked Glendale to downtown Los Angeles in 1904, Glendale grew due in part to this new connectivity, and residential construction boomed. Builders often used pre-existing plans and specifications for Craftsman home construction, but also proved flexible enough to create new designs to meet client desires. Local architects like Charles W. Kent & Son, Charlton & Sumner, and C. W. Spickerman & Son designed or sold plans for the bulk of Craftsman bungalows produced in Glendale from 1910 onward. Famed local architect Charles E. Shattuck produced more high style examples, like the Toll House in 1912 (1521 N. Columbus Avenue), and Alfred F. Priest produced an elaborate Craftsman design for a home at 915 Mountain Street, in the hills of north Glendale. While the bulk of Craftsman houses built in Glendale were near the downtown core around Brand Boulevard, examples of the style spread throughout the City, including examples in the northern part of the City near the subject property (Galvin Preservation Associates, Inc. 2007:19–20).

### 3.2.3 Impact Analysis

The following section discusses the methodology for identifying and evaluating properties for NRHP, CRHR, and GRHR eligibility.

The evaluation of historical resources associated with the proposed Project included a review of existing sources of information. This review, combined with information collected during the field visit, is used to determine the historical significance of the property and evaluate potential effects on historic architectural resources.

#### Methods for Analysis

As part of the analysis completed in the 1420 Valley View Road Project Historic Resources Report (Appendix B of this Draft EIR), previous evaluations performed on the Project site were reviewed. The property was identified in an initial review (Arroyo Resources 2015), historic resource evaluation (Kaplan Chen Kaplan 2016a), and memo (Kaplan Chen Kaplan 2016b), and DPR forms (TGHS 2016). While the Arroyo Resources report was inconclusive, the author notes that it is a "rare example of an intact Craftsman" residence and among a few pre-World War I examples in northern Glendale. Both Kaplan Chen Kaplan documents found the property ineligible for NRHP, CRHR, and local designation, but did not assign a status code. The Glendale Historical Society (TGHS) found the property eligible for listing in the CRHR under Criterion 2 and to Glendale under Criterion 2 for its direct association with Levi Chubbuck, under CRHR Criterion 3 and GRHR Criterion 3 for its exhibition of high-style bungalow carpentry features, and under GRHR Criterion 5 (since removed) for its exemplification of early heritage of the City. The TGHS evaluation assigned a 3Cs/5S3 status code.

The subject property at 1420 Valley View Road was identified as a significant historical resource in prior evaluations. ICF prepared a re-evaluation of the property and conducted a historic resources assessment. In accordance with established professional methods, ICF surveyed the parcel and researched its construction history. Research included extensive investigation of historic and current aerial maps, Sanborn maps, building permits, library indexes, online resources, and

anecdotal information. The Project site was evaluated using the NRHP criteria, CRHR criteria, and City of Glendale criteria.

## Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would be considered to have a significant effect if it would result in any of the conditions listed below.

- A substantial adverse change in the significance of a historical resource pursuant to Section 15064.5

As stated in State CEQA Guidelines Section 15064.5(b):

- (b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.
  - (1) Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.
  - (2) The significance of an historical resource is materially impaired when a project:
    - (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources.

The following environmental thresholds were determined to be less than significant, and are discussed in Section 3.5, *Effects Not Found Significant*, of this Draft EIR:

- A substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5
- Disturbance of any human remains, including those interred outside of formal cemeteries

All the criteria for eligibility require that the contribution of the subject property be *significant* or that it be associated with “important” events. Understanding what *significance* means is vital to accurately assessing whether a property is in fact historic and therefore potentially eligible for listing on a national, state or local historic registry. There are many definitions of historical significance. For example, United Nations Educational, Scientific and Cultural Organization (UNESCO) includes any site as a world heritage site, provided it “bear[s] a unique or at least exceptional testimony to a cultural tradition or to a civilization.” The Historical Thinking Project includes significance as one of its six key concepts of historical thinking: “A historical person or event can acquire significance if we, the historians, can link it to larger trends and stories that reveal something important for us today.” *Significant* is defined by the Oxford Language Dictionary as sufficiently great or important to be worthy of attention; noteworthy. Synonyms include “remarkable, outstanding, meaningful, expressive, eloquent, consequential, weighty, material, momentous, unforgettable, pronounced, considerable, striking, impressive, uncommon, unusual, rare, extraordinary, exceptional, particular and special.”<sup>1</sup>

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<sup>1</sup> For a thorough discussion of significance, see *Debating Historical Significance*. Edge Hill University. Archived from the original on March 15, 2019. Retrieved from <https://web.archive.org/web/20190315052714/https://www.edgehill.ac.uk/histlearn/files/2015/01/DebatingHistoricalSignificance.pdf>.

## Criteria for Assessing Historical Significance

Historical significance is typically assessed by judging an event against pre-defined criteria, and numerous criteria for assessing historical significance have been proposed. However, criteria are always subjective, and therefore debatable. There can also be important differences between what is seen as significant in terms of the dominant national, state, or local narratives about what is important. Thus, describing any event, person, or building as historically significant or non-significant requires careful evaluation, and conclusions must be based on a factually accurate record.

## Impacts and Mitigation Measures

### **Impact CUL-1: Result in substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 (Significant and Unavoidable)**

With respect to the NRHP's seven aspects of integrity, the dwelling was never moved and therefore retained integrity of location. In addition, the property experienced few alterations and exhibited a high level of physical integrity, resulting in a house that retains integrity of design, workmanship, materials, and feeling. Because physical features continue to convey the property's historic character, integrity of association is maintained. Due to the 1970s development of multi-family complexes directly to the west, including a four-story complex directly across the street, the setting no longer has the exclusively single-family character found during the period of significance. Therefore, prior to demolition, the structure on the property retained six of the seven aspects of integrity.

### **Criteria Related to Association with Significant Persons**

Los Angeles County Assessor records list a year-built date of 1908 for the property, but no original building permits were located for this property. The development of the property is associated with the general trend of housing stock expansion in Glendale in the first quarter of the 20<sup>th</sup> century. The connection of Henry Huntington's Pacific Electric Red Car line from downtown Los Angeles to Glendale, which ran along Brand Boulevard and eventually near the subject house, helped spark population growth and widespread single-family residential development. A study of residences dating from 1900 to 1908 reveals that among the 24 extant Craftsman single-family residences in the City, only 13 appear to retain good physical integrity (County of Los Angeles Tax Assessor 2022; Google Street View 2021). As one of the earliest examples in the City, this bungalow is an increasingly rare example of residential development representing the City's early development, a context which ends in 1918. Consistent with the registration requirements under the theme of Early Single-family Residential Development, 1420 Valley View Road is identified with important events in City history and retains historic integrity. Consistent with the methodology for the application of status codes for the theme of Early Single-family Residential Development, this property meets GRHR Criterion 1. It lacks quality of significance to be eligible for listing under NRHP Criterion A and CRHR Criterion 1.

### **Criteria Related to Association with Significant Persons**

Glendale City directories did not uncover former residents of the property who were significant to the past. Early residents include brothers Harley and Rush Sill (1915, civil engineer and mining engineer), Levi and Josephine Chubbuck (1923, no occupation listed), and Charles S. and Eleanor Young (1933 and 1951, physician and spouse). However, TGHS's evaluation of 1420 Valley View Road found Levi Chubbuck's association with the property as one

reason for the group finding the property to be significant and eligible under CRHR Criterion 2 and Glendale Criterion 2. Per the TGHS DPR form, Levi Chubbuck was a published expert in agriculture, active agricultural professional, advocate for Native American rights, and art collector. Chubbuck had novel ideas in 1906 about hiring Paiutes as forest rangers and game wardens to formally administer public land that had been in their territory. These conclusions, however, are derived from scant evidence in the historical record and there is no evidence that Chubbuck's ideas were implemented or directly influenced governmental hiring practices affairs or that he made any significant historical contributions, including during the period in which he lived at this property (TGHS 2016; Knack 2004). Although he had work published, there is no evidence such publications reached broad historical prominence or were recognized for their significance in their own right. In addition, research did not indicate that the Sill brothers were important in the field of engineering, that Charles S. Young was a prominent physician, or that any subsequent owners or residents were historically noteworthy. Therefore, research does not indicate that the property ever had an association with the lives of persons who significantly contributed to the history of the nation, state, region, or the City. The structure on the property does not meet NRHP Criterion B, CRHR Criterion 2, or GRHR Criterion 2.

### **Criteria Related to Architectural Quality**

With respect to NRHP Criterion C, CRHR Criterion 3, and Glendale Criterion 3, the house at 1420 Valley View Road exhibits a high level of architectural integrity with typical Craftsman features like triangular knee bracing, a partial-width porch, and wood-shingle siding and is considered a rare example of the Craftsman style from the early 1900s. Although an original building permit could not be located, the modest bungalow design suggests the dwelling is not the work of a master architect and likely reflects a standard Craftsman plan. Consistent with the registration requirements under the theme of Early Single-family Residential Development, the house located at 1420 Valley View Road is a rare example of Craftsman architecture from this early period, and its primary façade is largely intact. While the detached garage dates to at least 1925 and has good integrity, it is a modest, utilitarian building. Consistent with the methodology for the application of status codes for the theme of Early Single-family Residential Development, this property meets GRHR Criterion 3. While significant at the local level as an expression of the City's early 20<sup>th</sup> century developmental history and its residents' aesthetic expression, it does not appear to be meaningful in the broader context of the state or nation, and is therefore not eligible for listing under NRHP Criterion C and CRHR Criterion 3.

### **Criteria Related to Information Potential**

Under NRHP Criterion D, CRHR Criterion 4, and Glendale Criterion D4, 1420 Valley View Road does not appear to be significant as a source, or likely source, of important historical information, nor does it appear likely to yield important information about historic construction methods, materials, or technologies. Prehistoric and historic archaeological sites are not known to exist within the Project area. The City's Open Space and Conservation Element indicates that no significant archaeological sites have been identified in this area of Glendale. Nonetheless, construction activities associated with proposed Project implementation would have the potential to unearthen undocumented resources. In the event that archaeological resources are unearthed during Project subsurface activities, the proposed Project will comply with regulations outlined by PRC Section 21083.2(i) and will require that all earth-disturbing work within a 100-meter radius be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find.

### **Glendale Historic District Eligibility**

With respect to whether this property contributes to a potential historic district, the neighborhood context necessary to support formation of a historic district in this area has changed significantly since the house was built, meaning that other structures that would have contributed to the formation of such a district no longer exist. Therefore, there is no potential historic district in the immediate vicinity to which the property might contribute. For example, since the 1970s the area surrounding the property has no longer been zoned exclusively for single-family development. Consequently, there are multi-family residential complexes directly to the south and west of the property that have substantially changed the property's setting. This change of setting since the 1908 period of significance, along with alteration to neighboring single-family houses to the north, results in a neighborhood that lacks the continuity and integrity necessary for a potential historic district of Craftsman or early 20<sup>th</sup> century homes. Currently, all properties directly adjacent to 1420 Valley View Road have a build date of 1953 or later. For these reasons, the subject property does not contribute to a historic district.

### **Summary**

As stated previously and following re-evaluation of the Project site and completion of a historic resources assessment (Appendix B of this Draft EIR), the residential building previously located at 1420 Valley View Road was evaluated using the NRHP criteria, CRHR criteria, and City of Glendale criteria. Through this re-evaluation, it has been determined that the structure formally at 1420 Valley View Road does not meet the criteria for eligibility for:

- NRHP Criteria A, B, C, and D
- CRHR Criteria 1, 2, 3, and 4
- City of Glendale Criteria 2, and 4
- Glendale historic district overlay zone designation Criteria A through I

1420 Valley View Road does meet the criteria for eligibility for:

- GRHR Criteria 1 and 3

In conclusion, the resource appears to individually meet criteria for listing to the GRHR. The property has been assigned a California Historical Resource Status Code of 5S3, which is assigned to properties that are found eligible for local listing or designation through survey evaluation. As such, this analysis concludes that prior to the unauthorized and illegal demolition, a historical resource (meeting GRHR Criteria 1 and 3) existed within the Project site and study area for the purposes of CEQA. Therefore, a substantial adverse change to a historical resource is expected as a result of the proposed Project involving the 2018 demolition of the house and garage at the Project site, which involves the demolition of the house and detached garage at the site, and division of the existing single-family lot into two lots upon which construction of two new single-family residences is proposed. The proposed Project would therefore have a significant and unavoidable impact on the environment for which feasible mitigation is unavailable.

### **Mitigation Measures**

No mitigation is available, and impacts remain significant and unavoidable.

### 3.3 Greenhouse Gas Emissions

This section describes the environmental and regulatory setting for climate change, discusses local and regional GHG emissions impacts that resulted from the Project and its elements, and determines significance of impacts.

Prior to the illegal demolition of the onsite structures, the subject property at 1420 Valley View Road (Project site) was developed with one single-family residence and detached garage. To calculate the GHG impact of this demolition, this analysis considers impacts as they may have occurred in 2018. As there are no reasonably foreseeable direct or indirect GHG impacts associated with the now-vacant lot, long-term GHG emissions were not evaluated. Furthermore, GHG emissions from the proposed future development within this two-lot subdivision were not analyzed, as detailed Project-specific information is not known at this time.

#### 3.3.1 Existing Conditions

##### Environmental Setting

##### Global Climate Change

The phenomenon known as the greenhouse effect keeps the atmosphere near Earth's surface warm enough for the successful habitation of humans and other life forms. The greenhouse effect is created by sunlight that passes through the atmosphere. Some of the sunlight striking Earth is absorbed and converted to heat, which warms the surface. The surface emits a portion of this heat as infrared radiation, some of which is re-emitted toward the surface by GHGs. Human activities that generate GHGs increase the amount of infrared radiation absorbed by the atmosphere, thus enhancing the greenhouse effect and amplifying the warming of Earth.

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution (IPCC 2007). Rising atmospheric concentrations of GHGs in excess of natural levels result in increasing global surface temperatures—a phenomenon commonly referred to as *global warming*. Higher global surface temperatures, in turn, result in changes to Earth's climate system, including increased ocean temperature and acidity, reduced sea ice, variable precipitation, and increased frequency and intensity of extreme weather events (IPCC 2018). Large-scale changes to Earth's system are collectively referred to as *climate change*.

The Intergovernmental Panel on Climate Change (IPCC) was established by the World Meteorological Organization and United Nations Environment Programme to assess scientific, technical, and socioeconomic information relevant to the understanding of climate change, its potential impacts, and options for adaptation and mitigation. The IPCC estimates that human-induced warming reached approximately 1 degree Celsius (°C) above pre-industrial levels in 2017, increasing at 0.2°C per decade. Under the current nationally determined contributions of mitigation from each country until 2030, global warming is expected to rise to 3°C by 2100, with warming to continue afterward (IPCC 2018). Large increases in global temperatures could have substantial adverse effects on the natural and human environments worldwide and in California.

## Principal Greenhouse Gases

The principle anthropogenic (human-made) GHGs listed by IPCC that contribute to global warming are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), and fluorinated compounds, including sulfur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons, and perfluorocarbons. Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic sources.

The primary GHGs of concern associated with the Project are CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. Principal characteristics of these pollutants are discussed below.

### Carbon Dioxide

CO<sub>2</sub> enters the atmosphere through fossil fuels (oil, natural gas, and coal) combustion, solid waste decomposition, plant and animal respiration, and chemical reactions (e.g., manufacture of cement). CO<sub>2</sub> is also removed from the atmosphere (or *sequestered*) when it is absorbed by plants as part of the biological carbon cycle.

### Methane

CH<sub>4</sub> is emitted during the production and transport of coal, natural gas, and oil. CH<sub>4</sub> emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal solid waste landfills.

### Nitrous Oxide

N<sub>2</sub>O is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.

## GHG Reporting

Methods have been set forth to describe emissions of GHGs in terms of a single gas to simplify reporting and analysis. The most commonly accepted method to compare GHG emissions is the global warming potential (GWP) methodology defined in IPCC reference documents. IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalent (CO<sub>2</sub>e), which compares the gas in question to that of the same mass of CO<sub>2</sub> (CO<sub>2</sub> has a GWP potential of 1 by definition). The GWP values used in this report are based on the IPCC Fourth Assessment Report (AR4) and United Nations Framework Convention on Climate Change reporting guidelines (IPCC 2007). The AR4 GWP values are consistent with those used in CARB's most recent GHG inventory and the 2017 Scoping Plan Update.

Table 3.3-1 lists the GWPs of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O and their lifetimes in the atmosphere.

**Table 3.3-1. Lifetimes and Global Warming Potentials of Key Greenhouse Gases**

Greenhouse Gas	Global Warming Potential (100 years)	Lifetime(years) <sup>1</sup>
CO <sub>2</sub>	1	50–200
CH <sub>4</sub>	25	9–15
N <sub>2</sub> O	298	121

Source: CARB 2021a.

<sup>1</sup> Defined as the half-life of the gas.



GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants. Criteria air pollutants and toxic air contaminants occur locally or regionally, and local concentrations respond to locally implemented control measures. However, the long atmospheric lifetimes of GHGs allow them to be transported great distances from sources and become well mixed, unlike criteria air pollutants, which typically exhibit strong concentration gradients away from point sources. GHGs and global climate change represent cumulative impacts; that is, GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change.

## Statewide Greenhouse Gas Emissions Trends

A GHG inventory is a quantification of all GHG emissions and sinks<sup>1</sup> within a selected physical and/or economic boundary. GHG inventories can be performed on a large scale (e.g., for global and national entities) or on a small scale (e.g., for a building or person). Although many processes are difficult to evaluate, several agencies have developed tools to quantify emissions from certain sources.

CARB has prepared a statewide emissions inventory covering 2000 to 2019, which demonstrates that per-capita GHG emissions have decreased by approximately 25 percent since 2001 (CARB 2021b). The largest reductions in GHG emissions have come from the electricity sector, which continues to decrease as a result of the state's climate policies that have led to a growth in wind generation and solar power. Emissions in 2019 from the transportation sector, which represents California's largest source of GHG emissions, contributed 40 percent of total annual emissions. The industrial sector is the second largest contributor to GHG emissions in California, at 21 percent. Table 3.3-2 shows statewide GHG emission estimates from 2009 to 2019 in California. Note that the 2020 target (1990 levels) is 431 million metric tons of CO<sub>2</sub>e (MMTCO<sub>2</sub>e) while the 2030 target (40 percent below 1990 levels) is currently set at 260 MMTCO<sub>2</sub>e.

**Table 3.3-2. California Greenhouse Gas Emissions Inventory 2009–2019**

Sector	Annual CO <sub>2</sub> e Emissions (million metric tons)										
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Transportation	168	165	162	161	161	163	166	170	171	170	166
Industrial	87	91	89	89	92	92	90	89	89	89	59
Electric Power	101	90	89	98	91	89	85	69	62	63	88
Commercial/Residential	44	46	46	44	44	38	39	41	41	41	44
Agriculture	33	34	34	35	34	35	33	33	32	33	32
High Global Warming Potential	12	14	15	16	17	18	19	19	20	20	21
Recycling and Waste	9	9	9	9	9	9	9	9	9	9	9
<b>Emissions Total</b>	<b>455</b>	<b>448</b>	<b>444</b>	<b>452</b>	<b>448</b>	<b>443</b>	<b>441</b>	<b>429</b>	<b>425</b>	<b>425</b>	<b>418</b>

Source: CARB 2021b.

Totals may not sum exactly due to rounding.

<sup>1</sup> A GHG sink is a process, activity, or mechanism that removes a GHG from the atmosphere.

### 3.3.2 Regulatory Setting

#### Federal

Historically, GHGs were not directly regulated under the federal CAA. However, the 2007 ruling by the U.S. Supreme Court in *Massachusetts v. EPA* found that EPA may regulate GHGs if they are determined to be a danger to human health. In response, President George W. Bush ordered EPA to use its existing authority under the CAA to regulate GHGs from mobile sources.

EPA issued its so-called Endangerment Finding in December 2009, which found that six GHGs threaten the health and welfare of current and future generations. For mobile sources, the Endangerment Finding led to development of the Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards Rule by EPA and the National Highway Traffic Safety Administration in May 2010. The rule first applied to model years 2012–2017 but was later extended to the 2025 model year. It requires light-duty vehicles to comply with progressively more stringent GHG emission standards for the 2012–2025 model years. For stationary sources, the Endangerment Finding led to the so-called Tailoring Rule in May 2010, which tailored permit trigger levels to the largest sources.

EPA phased in GHG permitting requirements for stationary sources for the period from 2010 to 2014. However, the U.S. Supreme Court decision on June 23, 2014, in *Utility Air Regulatory Group v. EPA*, limited the applicability of GHG requirements to large sources that are already subject to major-source permitting under the CAA because of other pollutants. EPA also developed New Source Performance Standards, which cover GHGs associated with power plants and certain oil and gas sources. In addition, the agency maintains an annual GHG reporting program that covers multiple industrial sectors. However, none of the current CAA requirements for GHGs are expected to directly affect the proposed Project.

EPA adopted a Mandatory Reporting Rule and Clean Power Plan, which issued regulations to control CO<sub>2</sub> emissions from new and existing coal-fired power plants. However, on February 9, 2016, the Supreme Court issued a stay for these regulations pending litigation. Former EPA Administrator Scott Pruitt also signed a measure to repeal the Clean Power Plan. The fate of the proposed regulations is uncertain, pending deliberation in federal courts. Therefore, there is currently no overarching federal law related specifically to climate change or a reduction in GHG emissions.

#### State

California has adopted statewide legislation addressing various aspects of climate change, GHG mitigation, and energy efficiency. Much of this establishes a broad framework for the state's long-term GHG and energy reduction goals and climate change adaptation program. The former and current governor(s) of California have also issued several executive orders (EOs) related to the state's evolving climate change policy. Summaries of key policies, EOs, regulations, and legislation at the state level that are relevant to the Project are provided below in chronological order.

##### Executive Order S-03-05 (2005)

EO S-3-05 stated that California is vulnerable to the effects of climate change. To combat this concern, the order established the following GHG emissions reduction targets:

- By 2010, reduce GHG emissions to 2000 levels

- By 2020, reduce GHG emissions to 1990 levels
- By 2050, reduce GHG emissions to 80 percent below 1990 levels

EOs are legally binding only on state agencies. Accordingly, EO S-3-05 guides state agencies' efforts to control and regulate GHG emissions but has no direct, binding effect on local government or private actions. The secretary of the California Environmental Protection Agency is required to report to the governor and state legislature biannually regarding the impacts of global warming on California, mitigation and adaptation plans, and progress made toward reducing GHG emissions and meeting the targets established in EO S-3-05.

### **Assembly Bill 32: California Global Warming Solutions Act (2006)**

Assembly Bill (AB) 32 codified the state's GHG emissions target by requiring California's global warming emissions to be reduced to 1990 levels by 2020. Since being adopted, CARB, the California Energy Commission, the California Public Utilities Commission, and the California Building Standards Commission have been developing regulations that will help the state meet the goals of AB 32 and EO S-03-05. The scoping plan for AB 32 identifies specific measures to reduce GHG emissions to 1990 levels by 2020 and requires CARB and other state agencies to develop and enforce regulations and other initiatives to reduce GHG emissions. The AB 32 Scoping Plan, first adopted in 2008, comprises the state's roadmap for meeting AB 32's reduction target. Specifically, the scoping plan articulates a key role for local governments by recommending that they establish GHG emissions reduction goals for both their municipal operations and the community that are consistent with those of the state (i.e., approximately 15 percent below 2005 levels by 2020) (CARB 2008).

CARB re-evaluated its emissions forecast in light of the economic downturn and updated the projected 2020 emissions to 545 MMTCO<sub>2e</sub>. Two reduction measures (Pavley I and RPS [12–20 percent]) that were not previously included in the 2008 scoping plan baseline were incorporated into the updated baseline, further reducing the 2020 statewide emissions projection to 507 MMTCO<sub>2e</sub>. The updated forecast of 507 MMTCO<sub>2e</sub> is referred to as the AB 32 2020 baseline. An estimated reduction of 80 MMTCO<sub>2e</sub> is necessary to lower statewide emissions to the AB 32 target of 431 MMTCO<sub>2e</sub> by 2020 (CARB 2014).

CARB approved the *First Update to the Scoping Plan* (First Update) on May 22, 2014 (CARB 2014). The First Update includes both a 2020 element and a post-2020 element. The 2020 element focuses on the state, regional, and local initiatives that are being implemented now to help the state meet the 2020 goal.

On December 14, 2017, CARB approved the *2017 Climate Change Scoping Plan Update* (referred to as 2017 Scoping Plan herein), which is the proposed strategy for achieving California's 2030 GHG emissions target. In addition to building on established programs, such as cap-and-trade regulation and the low-carbon fuel standard, the update addresses, for the first time, GHG emissions related to agriculture and forestry in California (CARB 2017).

### **Executive Order B-30-15 (2015)**

Governor Jerry Brown signed EO B-30-15 on April 29, 2015. EO B-30-15 established a medium-term goal for 2030 of reducing GHG emissions by 40 percent below 1990 levels and requires CARB to update its current AB 32 Scoping Plan to identify measures to meet the 2030 target. EO B-30-15 supports EO S-3-05 but is only binding on state agencies.

## Regional

### South Coast Air Quality Management District

SCAQMD has primary responsibility for development and implementation of rules and regulations to attain the NAAQS and CAAQS as well as permitting new or modified sources, developing air quality management plans, and adopting and enforcing air pollution regulations within the South Coast Air Basin. CARB's scoping plans do not provide an explicit role for local air districts with respect to implementing the reduction goals of Senate Bill 32 and AB 32, but CARB does state that it will work actively with air districts in coordinating emissions reporting, encouraging and coordinating GHG reductions, and providing technical assistance in quantifying reductions. The ability of air districts to control emissions (both criteria pollutants and GHGs) is provided primarily through permitting but also through their role as a CEQA lead or commenting agency, the establishment of CEQA thresholds, and the development of analytical requirements for CEQA documents.

On December 5, 2008, the SCAQMD Governing Board considered draft GHG guidance, and adopted a staff proposal for an interim GHG significance threshold of 10,000 metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e) per year for industrial permitting projects where SCAQMD is the lead agency. The board letter, resolution, interim GHG significance threshold, draft guidance document, and attachments can be found under Board Agenda Item 31 of the December 5, 2008, Governing Board Meeting Agenda (SCAQMD 2008). In its draft guidance document, SCAQMD included evidence and rationale for developing thresholds, specifically citing State CEQA Guidelines Section 15064.7(a) ("each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects") and Subsection (b) ("Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule or regulation, and developed through a public review process and be supported by substantial evidence"). SCAQMD developed thresholds for both stationary sources and land use development projects. SCAQMD's recommended GHG significance threshold underwent a public review process as part of stakeholder working group meetings that were open to the public. The draft guidance document provides the supporting analysis and methodology for developing the GHG significance thresholds for both stationary sources and land use development projects to help meet the AB 32 2020 GHG limit. After completion of the public process, the proposed interim thresholds for land use development projects were brought to SCAQMD's Governing Board but were not formally adopted, while the threshold involving industrial permitting projects where SCAQMD is lead agency was adopted.

For industrial process, SCAQMD has formally adopted a 10,000 MTCO<sub>2</sub>e threshold for industrial (permitted) facilities where SCAQMD is the lead agency. This industrial source threshold is not appropriate for use on residential, commercial, or mixed-use projects such as the Project, because it is not associated with industrial processes.

SCAQMD noted that the proposed interim GHG significance thresholds for evaluation of land use development projects was only a recommendation for lead agencies and not a mandatory requirement. The GHG significance threshold may be used at the discretion of the local lead agency. The draft GHG guidance identified a tiered approach for determining the significance of GHG emissions, one of which included the use of numerical screening thresholds. These numerical screening thresholds were drafted to help the state meet its AB 32 GHG emission goals. With respect

to numerical GHG significance thresholds, SCAQMD proposed two different approaches to be taken by lead agencies when analyzing GHG emissions:

- Option #1 includes using separate numerical thresholds for residential projects (3,500 MTCO<sub>2</sub>e/year), commercial projects (1,400 MTCO<sub>2</sub>e/year), and mixed-use projects (3,000 MTCO<sub>2</sub>e/year).
- Option #2 is the use of a single numerical threshold for all non-industrial projects of 3,000 MTCO<sub>2</sub>e/year.

SCAQMD's most recent recommendation per its September 2010 meeting minutes is to use option #2. However, these numerical thresholds have not been adopted by SCAQMD.

### 3.3.3 Impact Analysis

This section describes the impact analysis related to GHG emissions for the Project. It describes the methods used to determine impacts of the Project and the thresholds used to conclude whether an impact was significant.

Prior to the illegal demolition in 2018, the Project site was developed with one single-family residence and detached garage. Therefore, this analysis considers impacts as they may have occurred during the illegal demolition of all structures previously on the subject site. Although demolition activities have already occurred, this EIR analyzes if the demolition activities at the Project site resulted in any significant impacts related to GHG emissions.

#### Methods for Analysis

Project-related activities would result in short-term generation of GHG emissions during construction that included demolition of all onsite structures. The GHGs that were quantitatively estimated for the Project are CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. Emissions of CO<sub>2</sub>e were then calculated using the GWP of each of these pollutants based on the IPCC AR4 (Table 3.3-1).

#### Short-Term Construction-Generated Emissions

During demolition, GHG emissions were generated by off-road heavy-duty construction equipment at the Project site and worker and haul truck vehicle trips traveling to and from the Project site. As was conducted for the criteria pollutant analysis, the Project's construction-related GHG emissions resulting from off-road equipment and on-road vehicles have been estimated using the California Emissions Estimator Model (CalEEMod, version 2020.4.0), developed by the California Air Pollution Control Officers Association. The construction analysis was based on a combination of Project-specific information provided by the applicant as well as conservative default assumptions generated by CalEEMod. Modeling details for the Project are provided in Appendix C of this Draft EIR.

#### Consistency with Greenhouse Gas Reduction Plan, Policies, and Actions

The Project's GHG emissions are also evaluated by assessing the Project's consistency with the state's AB 32 GHG limit and reduction goals, as the demolition of the single-family dwelling unit occurred prior to 2020. It should be noted that these demolition activities only occurred for one day and were short term.

## Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would be considered to have a significant effect if it would result in any of the conditions listed below.

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

With respect to GHG emissions, State CEQA Guidelines Section 15064.4 provides guidance to lead agencies for determining the significance of impacts from GHG emissions. Section 15064.4(a) provides that a lead agency shall make a good-faith effort based, to the extent possible, on scientific and factual data to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Section 15064.4(a) further provides that a lead agency shall have the discretion to determine, in the context of a particular project, whether to: (1) quantify GHG emissions resulting from a project and/or (2) to rely on qualitative analysis or performance-based standards.

Pursuant to State CEQA Guidelines Section 15064.4(a), the analysis presented herein quantifies GHG emissions resulting from the Project and provides a good-faith effort to describe, calculate, and estimate GHG emissions resulting from the Project and compares those emissions with the chosen threshold level.

State CEQA Guidelines Section 15064.4(b) also provides that, when assessing the significance of impacts from GHG emissions, a lead agency should focus the analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change and consider a timeframe that is appropriate for the project. The lead agency's analysis should reasonably reflect evolving scientific knowledge and state regulatory schemes, and consider (1) the extent to which the project may increase or reduce GHG emissions compared with existing conditions, (2) whether the project's GHG emissions exceed a threshold of significance that the lead agency determines applies to the project, and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The analysis of the potential impacts from the Project's GHG emissions follows this approach.

## Threshold Approach

In the absence of quantitative GHG thresholds and/or a qualified GHG reduction plan for use by a project to tier or streamline its environmental analysis, CEQA provides that a lead agency could rely on regulatory compliance to show a less-than-significant GHG impact if the project complies with or exceeds those programs adopted by CARB or other state agencies. As discussed previously, the demolition of the single-family home happened in 2018. Therefore, demolition occurred while the SCAQMD GHG thresholds were still applicable to CEQA projects, as this was prior to 2020 and the AB 32 GHG limit. As such, the SCAQMD Option #2 3,000 MTCO<sub>2</sub>e/year GHG threshold was adopted for the Project.

## Cumulative Impacts

GHGs and climate change are exclusively cumulative impacts; there are no non-cumulative GHG emissions impacts from a climate change perspective (CAPCOA 2008). Therefore, in accordance with

the scientific consensus regarding the cumulative nature of GHGs, the analysis herein analyzes the cumulative contribution of Project-related GHG emissions.

## Impacts and Mitigation Measures

### **Impact GHG-1: Potential to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (Less Than Significant)**

#### **Short-Term Construction**

Demolition of the single-family residential structure resulted in temporary generation of GHG emissions related to off-road equipment use and on-road vehicle operations. As mentioned previously, GHG emissions are measured exclusively as cumulative impacts; therefore, the Project's construction emissions are considered the total GHG emissions for the Project's lifecycle. Table 3.3-3 shows GHG emissions related to construction of the Project. As shown, demolition of the single-family residence and associated garage is estimated to have generated a total of 0.83 MTCO<sub>2e</sub>.

**Table 3.3-3. Estimated Short-Term Construction-Related GHG Emissions**

Construction Year	Estimated GHG Emissions (MTCO <sub>2e</sub> ) <sup>a</sup>
2018: One day of demolition	0.83
<i>SCAQMD Threshold</i>	<i>3,000 MTCO<sub>2e</sub></i>
<i>Exceed Threshold?</i>	<i>No</i>

Source: Emissions modeling by ICF using CalEEMod version 2020.4.2 (Appendix C of this Draft EIR).

#### **Long-Term Operation**

As discussed in Chapter 2, *Project Description*, the Project site is currently vacant and does not have any operational emissions. This analysis does not include the potential future onsite GHG emissions, as Project specifics are not known and these proposed uses would have to undergo their own environmental review.

#### **Conclusion**

As shown in Table 3.3-3, the single day of demolition that occurred in 2018 generated approximately 0.83 MTCO<sub>2e</sub>. This is substantially below the SCAQMD threshold of 3,000 MTCO<sub>2e</sub>. Therefore, demolition of the single-family structure in 2018 resulted in a less-than-significant impact.

#### **Mitigation Measures**

No mitigation is required.

### **Impact GHG-2: Potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (Less Than Significant)**

Each year CARB releases a statewide GHG inventory that summarizes and highlights the major annual changes and notable longer-term GHG trends. Specifically, this statewide GHG inventory is a critical piece in demonstrating the state's progress in achieving the statewide GHG targets. The most recent version of this GHG inventory is the 2021 edition, which summarizes the GHG emissions trend for the years 2000 to 2019 (CARB 2021b).

According to this 2021 edition of the CARB GHG inventory, the statewide GHG emissions dropped below the AB 32 2020 GHG limit in 2016 and has remained below since. In 2019, emissions from GHG-emitting activities statewide were 418.2 MMTCO<sub>2</sub>e, which is 7.2 MMTCO<sub>2</sub>e lower than the 2018 level and almost 13 MMTCO<sub>2</sub>e below the 2020 AB 32 limit of 431 MMTCO<sub>2</sub>e. Therefore, the single day of demolition that occurred in 2018 did not impede the state from achieving the AB 32 GHG goal in 2020, as the total statewide emissions in 2018 were 5.6 MMTCO<sub>2</sub>e below the 431 MMTCO<sub>2</sub>e 2020 GHG limit. Consequently, demolition of the single-family dwelling unit did not conflict with an applicable GHG reduction plan, and impacts are less than significant.

**Mitigation Measures**

No mitigation is required.



## 3.4 Noise

This section describes the geographic and regulatory setting for noise and vibration, discusses noise and vibration impacts that would have occurred as result of construction (specifically demolition) of the existing structure, determines the significance of impacts (where applicable), and identifies mitigation measures (where applicable) that would have reduced or avoided significant impacts (where feasible). As noted, subject property at 1420 Valley View Road (Project site) is a residential land use that, prior to February 2018, was developed with a single-family residence. However, the Project site has since been cleared. Therefore, this analysis considers impacts that may have occurred during the illegal demolition of structures that were previously on the Project site. Noise impacts associated with future development of the proposed two-lot subdivision were not analyzed, as detailed project-specific information is not known at this time.

### 3.4.1 Noise Fundamentals

Noise is commonly defined as unwanted sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is often defined as sound that is objectionable because it is disturbing or annoying.

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receptor, and the propagation path between the two. The loudness of the noise source and the obstructions or atmospheric factors that affect the propagation path to the receptor determine the sound level and the characteristics of the noise perceived by the receptor.

### Decibels and Frequency

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low-frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz, or thousands of Hz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

The amplitude of pressure waves generated by a sound source determines the loudness of that source. The amplitude of a sound is typically described in terms of the sound pressure level, which refers to the root-mean-square pressure of a sound wave, measured in units called micropascals ( $\mu\text{Pa}$ ). One  $\mu\text{Pa}$  is approximately one hundred-billionth (0.0000000001) of normal atmospheric pressure. Sound pressure levels for different kinds of noise environments can range from less than 100 to more than 100,000,000  $\mu\text{Pa}$ . Because of this large range of values, sound is rarely expressed in terms of  $\mu\text{Pa}$ . Instead, a logarithmic scale is used to describe the sound pressure level, referred to as simply the sound level, in terms of decibels, abbreviated dB. Specifically, dB describes the ratio of the actual sound pressure to a reference pressure, which is calculated as follows:

$$SPL = 20 \times \log_{10} \left( \frac{X}{20 \mu Pa} \right)$$

where  $X$  is the actual sound pressure and  $20 \mu\text{Pa}$  is the standard reference pressure level for acoustical measurements in air. The threshold of hearing for young people is about 0 dB, which corresponds to  $20 \mu\text{Pa}$ .

## Decibel Addition

Because the dB scale is logarithmic, sound pressure levels cannot be added or subtracted through ordinary arithmetic. On the dB scale, a doubling of sound energy corresponds to a 3 dB increase. In other words, when two identical sources are each producing sound of the same loudness, their combined sound level at a given distance would be 3 dB higher than one source under the same conditions. For example, if one excavator produces a sound pressure level of 80 dB, two excavators would not produce 160 dB. Rather, they would combine to produce 83 dB. The cumulative sound level of any number of sources can be determined using decibel addition. The same decibel addition is used for A-weighted decibels, or dBA, as described below.

## Perception of Noise and A-Weighting

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Although the intensity (i.e., energy per unit area) of a sound is a purely physical quantity, the loudness or human response is determined by the characteristics of the human ear.

Human hearing is limited in the range of audible frequencies as well as in the way it perceives the sound pressure level in that range. In general, people are most sensitive to the frequency range of 1,000 to 8,000 Hz and perceive sounds within that range better than sounds of the same amplitude at higher or lower frequencies. To approximate the response of the human ear, sound levels in various frequency bands are adjusted, or “weighted,” depending on human sensitivity to those frequencies. The resulting sound pressure level is expressed in dBA. When people make judgments regarding the relative loudness or annoyance of a sound, their judgments correlate well with the A-weighted sound levels of those sounds. Table 3.4-1 describes typical A-weighted sound levels for various noise sources.

## Human Response to Noise

Noise-sensitive receptors, also called “receivers,” are locations where people reside or where the presence of unwanted sound may adversely affect use of the land. The effects of noise on people fall into three general categories.

- Subjective effects, such as annoyance, nuisance effects, or dissatisfaction.
- Interference with activities such as speech, sleep, learning, or working.
- Physiological effects, such as startling effects, and hearing loss.

In most cases, effects from sounds typically found in the natural environment, compared to an industrial or occupational setting, are limited to the first two categories (i.e., creating an annoyance or interfering with activities). (Further discussion of health-related effects is provided below.) No completely satisfactory method exists to measure the subjective effects of sound or the corresponding reactions of annoyance and dissatisfaction. This lack of a common standard arises primarily from the wide variation in individual thresholds of annoyance and habituation to sound. Therefore, an important way of determining a person’s subjective reaction to a new sound is by

comparing it to the existing baseline, or “ambient,” environment to which that person has adapted. In general, the more the level or tonal (frequency) variations of a sound exceed the previously existing ambient sound level or tonal quality, the less acceptable the new sound will be, as judged by the exposed individual.

**Table 3.4-1. Typical Noise Levels in the Environment**Error! Bookmark not defined.

Common Outdoor Noise Source	Sound Level (dBA)	Common Indoor Noise Source
	— 110 —	Rock band
Jet flying at 1,000 feet	— 100 —	
Gas lawn mower at 3 feet	— 90 —	
Diesel truck at 50 feet at 50 mph	— 80 —	Food blender at 3 feet Garbage disposal at 3 feet
Noisy urban area, daytime	— 70 —	Vacuum cleaner at 10 feet Normal speech at 3 feet
Gas lawn mower at 100 feet	— 60 —	
Commercial area	— 50 —	Large business office Dishwasher in next room
Heavy traffic at 300 feet	— 40 —	Theater, large conference room (background)
Quiet urban daytime	— 30 —	Library
Quiet urban nighttime	— 20 —	Bedroom at night
Quiet suburban nighttime	— 10 —	Broadcast/recording studio
Quiet rural nighttime	— 0 —	
Lowest threshold of human hearing	— 0 —	Lowest threshold of human hearing

Source: Caltrans 2013.

Studies have shown that, under controlled conditions in an acoustics laboratory, a healthy human ear is able to discern changes in sound levels of 1 dBA. In the normal environment, the healthy human ear can detect changes of about 2 dBA; however, it is widely accepted that a doubling of sound energy, which results in a change of 3 dBA in the normal environment, is considered just noticeable to most people. A change of 5 dBA is readily perceptible, and a change of 10 dBA is perceived as being twice as loud. Accordingly, a doubling of sound energy (e.g., doubling the volume of traffic on a highway), resulting in a 3 dBA increase in sound, would generally be barely detectable.

## Noise Descriptors

Because sound levels can vary markedly over a short period of time, various descriptors, or noise “metrics,” have been developed to quantify environmental and community noise. These metrics generally describe either the average character of the noise or the statistical behavior of the variations in the noise level. The most common of these metrics are described below.

**Equivalent Sound Level ( $L_{eq}$ )** is the most common metric used to describe short-term average noise levels. Many noise sources produce levels that fluctuate over time; examples include mechanical equipment that cycles on and off or construction work, which can vary sporadically. The  $L_{eq}$  describes the average acoustical energy content of noise for an identified period of time, commonly 1 hour. Therefore, the  $L_{eq}$  of a time-varying noise and that of a steady noise are the same if they deliver the same acoustical energy over the duration of the exposure. For many noise sources, the  $L_{eq}$  will vary, depending on the time of day. A prime example is traffic noise, which rises and falls, depending on the amount of traffic on a given street or freeway.

**Maximum Sound Level ( $L_{max}$ )** and **Minimum Sound Level ( $L_{min}$ )** refer to the maximum and minimum sound levels, respectively, that occur during the noise measurement period. More specifically, they describe the root-mean-square sound levels that correspond to the loudest and quietest 1-second intervals that occur during the measurement.

**Percentile-Exceeded Sound Level ( $L_{xx}$ )** describes the sound level exceeded for a given percentage of a specified period (e.g.,  $L_{10}$  is the sound level exceeded 10 percent of the time, and  $L_{90}$  is the sound level exceeded 90 percent of the time).

**Community Noise Equivalent Level (CNEL)** is a measure of the cumulative 24-hour noise level that considers not only the variation of the A-weighted noise level but also the duration and the time of day of the disturbance. The CNEL is derived from the 24 A-weighted 1-hour  $L_{eq}$  that occur in a day, with “penalties” applied to levels occurring during evening hours (7:00 p.m. to 10:00 p.m.) and nighttime hours (10:00 p.m. to 7:00 a.m.) to account for increased noise sensitivity during those times. Specifically, the CNEL is calculated by adding 5 dBA to the evening  $L_{eq}$ , adding 10 dBA to the nighttime  $L_{eq}$ , and then taking the average value for all 24 hours.

**Day-Night Average Sound Level ( $L_{dn}$ )** is a measure of the cumulative 24-hour noise, which is very similar to CNEL (described above); the only difference is that  $L_{dn}$  does not apply a “penalty” to evening noise levels. The  $L_{dn}$  is derived from the 24 A-weighted 1-hour  $L_{eq}$  that occur in a day. A 5 dBA “penalty” is added to levels occurring during the nighttime hours (10:00 p.m. to 7:00 a.m.). The average is calculated for all 24 hours.

## Sound Propagation

When sound propagates over a distance, it changes in both level and frequency content. The manner in which noise is reduced with distance depends on the factors listed below.

**Geometric Spreading.** Sound from a single source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. Highway noise is not a single stationary source of sound. The movement of vehicles on a highway makes the sound appear to be emanating from a line (i.e., a line source) rather than a point. This results in cylindrical spreading rather than the spherical spreading that results from a point source. The change in sound level (i.e., attenuation) from a line source is 3 dBA per doubling of distance.

**Ground Absorption.** The noise path between a source and an observer is usually very close to the ground. Excess noise attenuation from ground absorption is due to acoustic energy losses with sound wave reflection. Traditionally, excess attenuation has been expressed in terms of attenuation per doubling of distance. This approximation is done for simplification only; for distances of less than 200 feet, basing prediction results on this scheme is sufficiently accurate. For acoustically

“hard” sites (i.e., sites with a reflective surface, such as a parking lot or a smooth body of water, between the source and the receptor), no excess ground attenuation is assumed because the sound wave is reflected without energy losses. For acoustically absorptive, or “soft,” sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dBA per doubling of distance is normally assumed. When added to geometric spreading, excess ground attenuation results in an overall drop-off rate of 4.5 dBA per doubling of distance for a line source and 7.5 dBA per doubling of distance for a point source.

**Atmospheric Effects.** Research by the California Department of Transportation (Caltrans) (2013) and others has shown that atmospheric conditions can have a major effect on noise levels. Wind has been shown to be the single most important meteorological factor within approximately 500 feet, whereas vertical air temperature gradients are more important over longer distances. Other factors, such as air temperature, humidity, and turbulence, also have major effects. Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lower noise levels. Increased sound levels can also occur because of temperature inversion conditions (i.e., increasing temperatures with elevation, with cooler air near the surface where the sound source tends to be and warmer air above that acts as a cap, causing a reflection of ground level-generated sound).

**Shielding by Natural or Human-Made Features.** A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receptor, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor, with the specific purpose of reducing noise. A barrier that breaks the line of sight between a source and a receptor will typically result in at least 5 dB of noise reduction. A higher barrier may provide as much as 20 dB of noise reduction.

### 3.4.2 Environmental Vibration Fundamentals

Groundborne vibration is an oscillatory motion of the soil with respect to the equilibrium position. It can be quantified in terms of velocity or acceleration. Velocity describes the instantaneous speed of the motion; acceleration is the instantaneous rate of change in the speed. Each of these measures can be further described in terms of frequency and amplitude.

In contrast to airborne sound, groundborne vibration is not a phenomenon that most people experience every day. The background vibration velocity level in residential areas is usually much lower than the threshold of human perception. Most perceptible indoor vibration is caused by sources within buildings, such as mechanical equipment while in operation, people moving, or doors slamming. Typical outdoor sources of perceptible groundborne vibration are heavy construction equipment and construction activities (such as blasting and pile driving), railroad operations, and heavy trucks on rough roads. If a roadway is smooth, groundborne vibration from traffic is rarely perceptible. Groundborne vibration can be a serious concern for neighbors when it causes buildings to shake and rumbling sounds to be heard. If a person is engaged in physical activity, vibration tolerance increases considerably. Vibration can result in effects that range from annoyance to structural damage. Variations in geology and distance result in different vibration levels, with different frequencies and amplitudes.

## Vibration Descriptors

Various descriptors, or “metrics,” can be used to quantify groundborne vibration. The metrics used in the assessment of environmental impacts generally focus on the short-term maximum vibration levels. The two metrics considered in this study are described below.

**Peak particle velocity (PPV)** is defined as the maximum instantaneous positive or negative peak amplitude of the vibration velocity. The unit of measurement for PPV is inches per second (in/s).

**Vibration velocity level ( $L_v$ )** describes the root-mean-square velocity amplitude of the vibration. This root-mean-square value may be thought of as a “smoothed” or “magnitude-averaged” amplitude. The maximum  $L_v$  describes the maximum root-mean-square velocity amplitude that occurs over a 1-second period during a vibration measurement (in this way,  $L_v$  is analogous to the  $L_{max}$  metric used to describe maximum noise levels).  $L_v$  can be measured using in/s but is typically expressed on a logarithmic scale using dB. To avoid confusion with the dB used to describe sound levels, the abbreviation “VdB” is used to denote dB for the vibration velocity level. Specifically, a vibration velocity level ( $L_v$ ), in decibels (VdB), is calculated as follows:

$$L_v = 20 \log_{10} \left( \frac{V}{1 \times 10^{-6} \text{ in/s}} \right)$$

where  $V$  is the actual 1-second root-mean-square velocity amplitude and  $1 \times 10^{-6}$  in/s is the standard reference velocity amplitude.

### 3.4.3 Existing Conditions

#### Regulatory Setting

##### State

California requires each local government entity to perform noise studies and implement a noise element as part of its general plan. The purpose of the noise element is to limit the exposure of the community to excessive noise levels; the noise element must be used to guide decisions concerning land use. The City of Glendale General Plan is discussed below.

##### Local

##### City of Glendale

The City maintains applicable noise and vibration impact guidance for determining impact significance in its municipal code and general plan.

##### City of Glendale General Plan

The City of Glendale General Plan Noise Element includes goals and policies to reduce noise to the greatest extent practical.

**Goal 4:** Enhance measures to control construction noise impacts.

**Policy 4.1:** Amend the Noise Ordinance to address construction noise problems. Change the permitted hours of construction to Monday through Friday, 7 a.m. to 7 p.m. and on Saturday from 9 a.m. to 5 p.m. Maintain the ban on construction on Sundays and holidays. Continue to allow

emergency repair work, and work to correct safety hazards, at any time. Responsibility: Public Works Department.

### City of Glendale Municipal Code

#### ***Presumed Noise Standards***

The Glendale Municipal Code (GMC), Chapter 8.36, establishes the following noise standard for land uses within the City's jurisdiction:

#### *GMC Section 8.36.040*

The exterior noise standards below, unless otherwise specifically indicated, apply to all property within a designated zone.

**Table 3.4-2. Assumed Exterior Ambient Noise Levels**

Zone	Level	Time
Cemetery and residences (single-family and duplex)	45 dBA	Nighttime
Cemetery and residences (single-family and duplex)	55 dBA	Daytime
Residences (multi-family, hotels, motels, and transient lodgings)	60 dBA	Anytime
Central business district and commercial areas	65 dBA	Anytime
Industrial	70 dBA	Anytime

The interior noise standards below, unless otherwise specially indicated, apply to all residential property within a designated zone.

**Table 3.4-3. Assumed Interior Noise Levels**

Zone	Level	Time
Residential	45 dBA	Nighttime
Residential	55 dBA	All other times

In overlay zones, the underlying zone determines the presumed ambient noise level (Ordinance 4973 Section 4, 1991; prior code Section 11-53).

#### *GMC Section 8.36.050*

Where the actual ambient is less than the presumed ambient, the actual ambient shall control, and any noise in excess of the actual ambient, plus 5 dBA, shall be a violation.

Where the actual ambient is equal to or more than the presumed ambient, the actual ambient shall control, and any noise may not exceed the actual ambient by more than 5 dBA; however, in no event may the actual ambient exceed the presumed noise standards by 5 dBA.

At the boundary line between two zones, the arithmetic average of the presumed ambient noise levels shall be used.

### **Construction Noise**

The City Municipal Code states that it “is unlawful for any person within a residential zone, or within a radius of 500 feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures or projects within the city between the hours of 7 p.m. on one day and 7 a.m. of the next day or from 7 p.m. on Saturday to 7 a.m. on Monday or from 7 p.m. preceding a holiday, as designated in Chapter 3.08 of this code, to 7 a.m. following such holiday unless beforehand a permit therefor has been duly obtained from the building official.”

### **Vibration**

City Municipal Code Section 8.36.020 sets the “vibration perception threshold” as 0.01 in/s. Section 8.36.210 states that “[o]perating or permitting the operation of any device that creates a vibration which is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property or at 150 feet from the source if on a public space or public right-of-way shall be a violation.”

## **Environmental Setting**

The property at 1420 Valley View Road was developed with a house and garage on a 15,000-square-foot lot. The property is currently undeveloped because the residence was demolished without the owner securing permits. The existing noise-sensitive receivers in the vicinity of the Project site consist of single- and multi-family residential uses on all sides.

The existing noise environment in the vicinity of the Project is most likely representative of other residential neighborhoods in the City. The primary source of noise is traffic on Valley View Road. Other noise sources in the area are birds and landscaping activities. No ambient noise measurements were prepared as part of this analysis; therefore, the assumed ambient would be 57 dBA  $L_{eq}$  (i.e., the daytime arithmetic mean of the single- and multi-family zones in Table 3.4-2) at the multi-family residences to the west and south and 55 dBA  $L_{eq}$  at the residences to the north and east.

## **3.4.4 Impact Analysis**

The sections below provide the methodology for determining impacts from the Project, thresholds for determining their significance, and a discussion related to the significance of the potential impacts.

### **Methods for Analysis**

#### **Construction Noise and Vibration**

The evaluation of potential noise and vibration impacts associated with Project construction was based on the list of construction equipment provided by the City Planning Division, along with the methods described below.

#### **Noise**

Construction-related noise associated with the demolition of all structures on site was analyzed using data and modeling methodologies from the Federal Highway Administration’s (FHWA’s) Roadway Construction Noise Model (RCNM) (FHWA 2008), which predicts noise levels at nearby



receptors by analyzing the type of equipment, the distance from source to receptor, the usage factor, and the presence or absence of intervening shielding between source and receptor. The RCNM is a comprehensive construction noise model developed and published by the federal government. Although the Project is not specifically a roadway construction project, the model is broad enough to be applicable and provide noise data for all equipment types typically required during conventional construction. Therefore, it is considered appropriate for use in analyzing the Project.

Project construction was assumed to take no more than one day to complete and require the use of a backhoe and a bobcat. (Because the RCNM model does not include a bobcat, a front-end loader was conservatively substituted.) To reflect the assumed distribution of equipment across the site, the source-to-receptor distances used in the analysis were the acoustical average distances between the construction site and each receptor.<sup>1</sup> It should be noted that the RCNM program uses a “hard site” ground type, which conservatively applies a decrease in noise at a rate of 6 dB per doubling of distance, the default amount in the RCNM program.

### Vibration

Construction-related vibration was analyzed using data and modeling methodologies provided by the Federal Transit Administration guidance manual (2018). Although the Project is not a transit project, the model provides vibration data for the equipment types typically required during conventional construction as well as methods for estimating the propagation of groundborne vibration over distance. Therefore, it is considered appropriate for use in analyzing the Project. Because vibration is of concern at structures, as opposed to areas of outdoor use, the distances used in the analysis are the distances from the construction areas to the nearest buildings.

The following equation from the guidance manual was used to estimate PPV for the assessment of potential building damage impacts:

$$PPV_{rec} = PPV_{ref} \times (25/D)^{1.5}$$

where  $PPV_{rec}$  is the PPV at a receptor;  $PPV_{ref}$  is the reference PPV at 25 feet from the equipment; D is the distance from the equipment to the receiver, in feet; and 1.5 is a default value related to the vibration attenuation rate through the ground.

Demolition does not require high-impact construction methods, such as pile driving or blasting. Therefore, the highest groundborne vibration levels would be associated with conventional types of small construction equipment, such as a backhoe. Caltrans provides vibration source data for this type of equipment (i.e., PPV of 0.003 in/s at a reference distance of 25 feet) (Caltrans 2020). As discussed above, the City sets the vibration perception threshold at a PPV of 0.01 in/s.

### Operational

Operational impacts are not applicable to the Project and are not evaluated in this environmental impact report because no new development is proposed at this time.

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<sup>1</sup> Acoustical average distance is used to represent noise sources that are mobile or distributed over an area, such as the Project site; it is calculated by multiplying the shortest distance between the receiver and the noise source area by the farthest distance and then taking the square root of the product.

## Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant effect if it would result in any of the conditions listed below.

- Generation of increased ambient noise levels in the Project vicinity in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies.
  - Therefore, a significant noise impact would occur if noise generated by construction activities related to the Project occur outside the hours in the City Municipal Code.
- Generation of excessive groundborne vibration or groundborne noise levels.
  - Therefore, a significant vibration impact would occur if vibration from construction equipment would exceed the City's vibration perception threshold (i.e., PPV of 0.01 in/s).
- Placement of Project-related activities in the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, resulting in exposure of people residing or working in the Project area to excessive noise levels

## Impacts and Mitigation Measures

### **Impact NOI-1: Generation of increased ambient noise levels in the Project vicinity in excess of applicable standards (Less Than Significant)**

Two types of short-term noise impacts would have occurred during Project construction associated with the demolition of all structures on site. First, construction vehicles would have incrementally increased noise levels on access roads. This would have included construction workers' vehicles as well as haul trucks traveling to and from the Project site. Based on the direction from the City, eight haul trucks would have accessed the site, resulting in 16 total trips. Although this would have resulted in a relatively high single-event noise level and caused an intermittent nuisance (e.g., passing trucks at 50 feet could generate up to 77 dBA), the effect on longer-term ambient noise levels would have been small. Therefore, impacts related to the short-term noise associated with commuting construction workers and the transport of equipment and construction debris from the Project site would have been minimal.

The second category of construction noise would have been noise generated during onsite demolition. It is assumed that demolition activities occurred only during the periods permitted by the City Municipal Code (7:00 a.m. to 7:00 p.m. Monday through Saturday). RCNM output tables with detailed construction noise analysis are provided in Appendix D of this Draft EIR.

The list of construction equipment is included in Table 3.4-4, with a reference distance of 50 feet. Normalized results for demolition are summarized in Table 3.4-5.

The equipment used during demolition of the house and garage would have generated noise that ranged from 69 to 77 dBA  $L_{eq}$ . The predicted construction noise level would have been 77 dBA  $L_{eq}$  at noise-sensitive land uses to the north and south, 69 dBA  $L_{eq}$  at land uses to the west, and 75 dBA  $L_{eq}$  at land uses to the east. Based on an assumed ambient noise level of 55 to 57 dBA  $L_{eq}$ , demolition noise levels would have dominated the environment immediately surrounding the Project site. However, as discussed above, the City would not have considered construction noise within the

prescribed times (i.e., 7:00 a.m. to 7:00 p.m.) an impact. Therefore, impacts from demolition were considered less than significant.

**Table 3.4-4. Construction Equipment and Noise at 50 Feet**

Phase	Equipment Type	Number of Pieces of Equipment	Noise Level at 50 Feet (dBA $L_{eq}$ ) <sup>1,2</sup>	Absolute Noise Level by Phase at 50 Feet (dBA $L_{eq}$ ) <sup>1,3</sup>
Demolition	Backhoe	1	74	77
	Front-end loader <sup>4</sup>	1	75	

<sup>1</sup> Values rounded to the nearest whole number.

<sup>2</sup> Values represent noise level for each piece of equipment.

<sup>3</sup> Represents the logarithmic total of all pieces of equipment.

<sup>4</sup> As discussed above, a conservative (with respect to noise) piece of equipment was substituted to account for the referenced piece of equipment not being included in the RCNM.

**Table 3.4-5. Predicted Demolition Noise at the Closest Noise-Sensitive Land Uses**

Analysis Location	Combined Construction 1-hour Average Noise Level for the Loudest Phase of Construction (dBA $L_{eq}$ ) <sup>1</sup>
Closest noise-sensitive land uses (residences) north of Project site (50 feet)	77
Closest noise-sensitive land uses (residences) west of Project site, across Valley View Road from Project site (140 feet)	69
Closest noise-sensitive land uses (residences) south of Project site (50 feet)	77
Closest noise-sensitive land uses (residences) east of Project site, across Valley View Road from Project site (70 feet)	75

<sup>1</sup> Values rounded to the nearest whole number.

### Mitigation Measures

No mitigation is required.

### Impact NOI-2: Generation of excessive groundborne vibration or groundborne noise levels (Less Than Significant)

Vibration-intensive pieces of construction equipment, such as pile drivers and vibratory rollers, were not used as part of the Project. Based on the list of construction equipment provided by the City (Table 3.4-4), vibration from construction equipment would have had a PPV of 0.003 in/s at a distance of 25 feet. Based on the City's vibration perception threshold, that level of vibration would have been below the threshold of perception. No vibration-sensitive receptors were within 25 feet of areas where demolition activities occurred. Impacts were considered less than significant.

### Mitigation Measures

No mitigation is required.

**Impact NOI-3: Placement of Project-related activities in the vicinity of a private airstrip or an airport land use plan, or within 2 miles of a public airport or public use airport, resulting in exposure of people residing or working in the Project area to excessive noise levels  
(No Impact)**

The closest airport to the Project site is Hollywood Burbank Airport, approximately 6 miles to the northwest. Therefore, the Project is not within the jurisdiction of an airport land use plan. Furthermore, the Project did not result in people residing or working in the area being exposed to noise from an airport. No impact occurred.

**Mitigation Measures**

No mitigation is required.

## 3.5 Effects Not Found to Be Significant

As previously discussed in Chapter 1, *Introduction and Scope of Environmental Impact Report*, the City), acting as lead agency for planning and environmental review of the proposed Project, has decided to prepare this Draft EIR in compliance with CEQA, including the State CEQA Guidelines. Section 15128 of the State CEQA Guidelines requires a brief description of any possible significant effects that were determined not to be significant and were not analyzed in detail within the environmental analysis. Therefore, this section has been included in this Draft EIR, as required by CEQA.

The discussion below presents the analysis of the effects related to aesthetics, agriculture and forestry resources, biological resources, cultural resources (archaeological resources), energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire that were not found to be significant. Any items not addressed in this section are addressed in Chapter 3, *Impact Analysis*, of this Draft EIR.

It should be noted that the subject property is a residential land use that, prior to February 2018, was developed with a single-family residence. However, the site has since been cleared; therefore, this analysis considers impacts that may have occurred during illegal demolition of the structures previously on the Project site.

### 3.5.1 Aesthetics

#### Thresholds of Significance

##### *a. Have a substantial adverse effect on a scenic vista? (Less Than Significant)*

A scenic vista, as defined by Caltrans, is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. A significant impact would occur if the Project were to introduce incompatible visual elements within a field of view containing a scenic vista or substantially alter a view of a scenic vista through removal of important visual elements. A focal-point view would consist of a view of a notable object, building, or setting. Diminishment of a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view so that the quality of the view would be permanently affected.

The Verdugo Mountains, north of the Project site, are a northwest/southwest-trending, lens-shaped series of ridges, approximately 9 miles long and varying from 3 to 4 miles wide. The Project vicinity is highly urbanized within an established residential neighborhood known as Verdugo Viejo. The existing visual character of the surrounding area is that of a built-out neighborhood with single- and multi-family residences. The topography of the site and surrounding area is generally flat but with a moderate slope. Because of the surrounding residential development, the Project site is not within or near any scenic vistas that would be impeded, and no development is proposed with the Project. The Project site lies vacant after the 2018 demolition of the one-story single-family dwelling unit and detached garage. Therefore, the Project would result in less-than-significant impacts on scenic vistas.

***b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway? (No Impact)***

No state scenic highway is adjacent to or within view of the Project site. The nearest eligible state scenic highway is State Route 210 north of the Verdugo Mountains (Caltrans 2021). Because no substantial adverse change to a scenic resource would occur and no scenic highways are near the Project site, the Project would not result in substantial damage to scenic resources. As such, no impact would occur.

***c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality? (Less Than Significant)***

The Project site is in an established area of the City that is urbanized and largely built out with single- and multi-family residences. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality. The Project site is zoned R1-I Residential – Height District I Zone (City of Glendale 2021a). The Project involves the prior demolition of the one-story single-family dwelling unit and detached garage. After the structures on the Project site were demolished in February 2018, the site was secured in accordance with acceptable City practices (i.e., fenced, which is the site's current condition). The Project would be consistent with Glendale Municipal Code (GMC) regulations related to demolition and lot subdivision.

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality because the site is vacant following the demolition of the one-story single-family dwelling unit and detached garage, and is fenced off from the public. Therefore, the Project would result in less-than-significant impacts on scenic quality.

***d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area? (No Impact)***

A significant impact would occur if light or glare were to substantially alter the character of offsite areas surrounding the site or interfere with the performance of an offsite activity. Light impacts are typically associated with the use of artificial light during evening and nighttime hours. The Project site is in an established area of the City that is urbanized and largely built out with single- and multi-family residences; the area is characterized by medium to high ambient nighttime light levels. Current lighting associated with the residential uses in the Project vicinity include lighting from buildings, vehicle lights, and streetlights. The Project addresses the 2018 demolition of the one-story single-family dwelling unit and detached garage; there are no plans to develop the site as a part of this Project. Demolition, which occurred in 2018, did not take place during evening or nighttime hours, and was estimated to have taken one day to complete. The Project would not include any elements or features that would create substantial new sources of glare because the site is vacant post-demolition. Therefore, no impact would occur.

## 3.5.2 Agricultural and Forestry Resources

### Thresholds of Significance

***a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (No Impact)***

The Project site was improved with a one-story single-family dwelling unit and detached garage in an established residential neighborhood. No farmland or farming activity occurs on or near the Project site. According to the California Department of Conservation Farmland Map (2018), the site is designated as Urban and Built-Up Land, which is typically occupied by structures such as residential uses. Because the site is not currently designated or used for agricultural purposes, no impacts on Prime Farmland, Unique, or Farmland of Statewide Importance would occur with the implementation of the Project.

***b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract? (No Impact)***

The Project site is currently zoned R1-I Residential – Height District I Zone (City of Glendale 2021a). It is not zoned for agricultural use or used for agricultural operations. Furthermore, there are no designated agricultural land uses adjacent to or near the Project site. A Williamson Act contract is not applicable to the Project site. Accordingly, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impacts would occur.

***c. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220[g]), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])? (No Impact)***

The Project site is zoned R1-I Residential – Height District I Zone (City of Glendale 2021a). It is not designated or zoned for forestland or timberland. The Project site is in an urbanized area of the City. Surrounding land uses consist of single- and multi-family residential uses. There are no designated forestlands or timberlands, as identified in the City of Glendale General Plan. Therefore, the Project would not conflict with existing, zoned for, or cause rezoning of, forestland or timberland. No impacts would occur.

***d. Result in the loss of forestland or conversion of forestland to non-forest use? (No Impact)***

The Project site would not include or be near any forestland. The Project addresses the 2018 demolition of the one-story single-family dwelling unit and detached garage in an established residential neighborhood. Thus, the Project would not result in the loss of forestland or conversion of forestland to non-forest use and no impacts would occur.

***e. Involve other changes in the existing environment that, because of their location or nature, could result in the conversion of Farmland to non-agricultural use or the conversion of forestland to non-forest use? (No Impact)***

As previously noted, the Project site is in an established residential neighborhood that does not contain Farmland or forestland; therefore, such lands would not be converted. Neither the Project site nor nearby properties are currently used for agricultural or forestry operations. Therefore, the

Project would not involve other changes in the existing environment or convert Farmland to non-agricultural use or non-forest use, and no impacts would occur.

### 3.5.3 Biological Resources

#### Thresholds of Significance

***a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? (No Impact)***

The Project site is in an established residential neighborhood of the City that is urbanized and largely built out with single- and multi-family residences. The Project addresses the 2018 demolition of the one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. The Project site and surrounding area do not support habitat for candidate, sensitive, or special-status species. Therefore, no impacts on candidate, sensitive, or special-status species would occur.

***b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? (No Impact)***

The Project site and surrounding area are in an urban environment. The Project site does not contain any riparian habitat and/or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community, and no impacts would occur.

***c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means? (No Impact)***

The Project site and surrounding area are in an urban environment. The Project site does not contain wetland habitat or a blueline stream. It is also not in proximity to such features. Therefore, the Project would not have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act, through direct removal, filling, hydrological interruption, or other means. The Project would not have an adverse effect on federally protected wetlands, and no impact would occur.

***d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (No Impact)***

The Project site is in a developed, urbanized area where there are constraints on wildlife movement under existing conditions. Because of the urban nature of the Project site and surrounding area, the lack of water bodies and natural habitat in the area, and the limited number of trees, the Project site does not contain substantial habitat for native resident or migratory species or native nursery sites. Existing development in the area limits wildlife movement. Consequently, wildlife movement on the Project site is limited to only the local movement of wildlife within the immediate vicinity. The



Project, which addresses the 2018 demolition of the one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot, would not result in a significant barrier to wildlife moving throughout the area. No impacts would occur.

***e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (No Impact)***

GMC, Section 12.44, protects six different native or “indigenous” species of trees (i.e., coast live oak, valley oak, mesa oak, scrub oak, California sycamore, and California bay). There are no locally protected biological resources, including trees, within the Project site. No impacts would occur.

***f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan? (No Impact)***

As discussed previously, the Project site is within an established urbanized environment and does not provide habitat for any sensitive biological resources. No habitat conservation plan, natural community conservation plan, or other approved habitat conservation plan has been adopted to include the Project site. Therefore, the Project would not conflict with the provisions of any adopted conservation plans. No impact would occur.

## **3.5.4 Cultural Resources**

### **Thresholds of Significance**

***b. A substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. (Less Than Significant)***

As Project construction is limited to demolition of existing structures on the Project site and no ground disturbance or excavation is required for demolition activities, no disturbance of any known or unknown archaeological resources would occur. Also, no evidence of archaeological resources was encountered during demolition of existing residential structures on the Project site. Furthermore, the Project site is vacant after the 2018 demolition of the residential structures (residence and detached garage), and subdivision of the lot into two parcels would not require ground disturbance of areas within or outside of the Project site. Therefore, Project impacts on archaeological resources would be less than significant.

***c. Disturbance of any human remains, including those interred outside of formal cemeteries. (Less Than Significant)***

The Project site is in an established area of the City that is urbanized, highly disturbed, and largely built out with single- and multi-family residences. As construction on the Project site was limited to the 2018 demolition of the structures (a residence and detached garage) on the Project site and no ground disturbance or excavation was required for demolition activities, no disturbance of any human remains would occur. Also, no evidence of human remains was encountered during the demolition of existing structures on the Project site. Further, subdivision of the lot into two parcels would not require ground disturbance of areas within or outside of the Project site. Therefore, Project impacts relating to disturbance of human remains would be less than significant.

### 3.5.5 Energy

#### Thresholds of Significance

- a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation? (No Impact)***

The Project addresses the 2018 demolition of the one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. Demolition required the consumption of nonrenewable energy resources, primarily in the form of fossil fuels, including fuel oil, natural gas, and gasoline, for automobiles and construction equipment. Demolition also required energy to manufacture equipment, materials, and supplies and transport them to the Project site. Maintenance activities required energy for day-to-day upkeep of equipment and systems. Furthermore, energy consumption was embedded in replacement equipment, materials, and supplies. It is expected that nonrenewable energy resources would be used efficiently during demolition and maintenance activities, given the financial implications of inefficient use of such resources. Therefore, the rate of consumption of such resources during demolition and maintenance activities did not represent wasteful, inefficient, or unnecessary consumption of energy resources. Also, demolition of the structures on site is estimated to have taken one day to complete. Therefore, the Project's consumption of energy resources had no impact because it did not represent wasteful, inefficient, or unnecessary consumption of energy resources.

- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (No Impact)***

As described above, the Project addresses the 2018 demolition of the one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. Energy consumption from demolition activities did not result in wasteful, inefficient, or unnecessary use of energy resources because demolition is estimated to have taken one day to complete. As such, the Project did not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and no impact occurred.

### 3.5.6 Geology and Soils

#### Thresholds of Significance

- a.1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (Less Than Significant)***

According to the California Geological Survey (CGS) (CGS 1998a, 1998b), Glendale is primarily in the Verdugo Mountains. Portions of the City are on the Verdugo Wash fan and the San Rafael Hills. The eastern edge of the San Fernando Valley lies adjacent to the City. The San Gabriel Mountains are immediately to the northwest.

This seismically active region of Southern California is traversed by numerous Holocene-active and other faults and underlain by several blind thrust faults. Based on criteria established by CGS, faults

can be classified as Holocene-active (having evidence of movement within the past 11,700 years) pre-Holocene (having evidence of movement before the past 11,700 years), or age-undetermined (CGS 2018). Several faults that have been active in historical time and the Holocene are near the Project site (CGS 2010). The Holocene-active Sierra Madre fault, near the base of the San Gabriel Mountains in the extreme northern part of the City, is the eastward extension of the fault on which the 1971 San Fernando earthquake originated. Other faults near Glendale are as follows: the Verdugo fault, near the southwest edge of the Verdugo Mountains, and its branches to the east (Holocene-active, 0.2 mile from the Project site), Lakeview fault (historically active, 7.7 miles from the Project site), and the Tujunga fault (historical, 9.5 miles from the Project site).

Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. According to regulatory mapping completed by CGS (CGS 1998a, 1998b, 1999), the Project site is not in an Alquist-Priolo Earthquake Fault Zone or within a Holocene-active fault not zoned by CGS, and the potential for fault rupture is considered low. Therefore, impacts from rupture of a fault are considered to be less than significant.

***a.2. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking? (No Impact)***

The Project site could be subject to strong ground shaking in the event of an earthquake originating along one of the faults listed as active in the Southern California area, although the site is not exposed to a greater seismic risk than other properties in the City. This hazard exists throughout Southern California and could pose a risk to public safety and property by exposing people, property, or infrastructure to potentially adverse effects, including strong seismic ground shaking. The Project addresses the 2018 demolition of the one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. No new structures are proposed at this time. Therefore, there would be no impact related to strong seismic ground shaking.

***A.3. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismically related ground failure, including liquefaction? (No Impact)***

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in shallow, loose, granular water-saturated soils. Liquefaction typically results in horizontal and vertical movement from lateral spreading of liquified materials when these soil types lose their inherent shear strength because of the excess water pressure that builds up during repeated movement from seismic activity. According to the CGS mapping (CGS 1998a, 1998b, 1999), the Project site is not within a mapped liquefaction hazard zone, and there is a low potential for liquefaction beneath the Project site. Furthermore, no new structures are proposed at this time. No impact related to liquefaction would occur.

***A.4. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides? (No Impact)***

According to the CGS mapping (CGS 1998a, 1998b, 1999), the Project site is not within a mapped landslide zone. In addition, the Project site and surrounding area are relatively flat, and the risk of landslides is relatively low. No impact related to landslides would occur.

***d. Result in substantial soil erosion or the loss of topsoil? (No Impact)***

Demolition associated with the Project may have resulted in wind- and water-driven erosion if soil was stockpiled or exposed during construction. However, this impact is considered short term in nature. In addition, only small amounts of soil were exposed during demolition. However, it is estimated that only a minimal change in onsite drainage patterns occurred; and soil erosion is not likely to have occurred. Therefore, no impacts related to soil erosion occurred.

***d. 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 an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse? (No Impact)***

As discussed previously, no impacts are anticipated with respect to liquefaction and landslides. Because the site is relatively flat, slope stability is not considered an issue with respect to Project activities. Subsidence occurs when fluids such as groundwater are withdrawn. Because the Project site is not in an area where groundwater or oil is extracted, subsidence associated with extraction activities is not anticipated. Excavation of up to 5 feet could cause the removal of near-surface fill material and soil (sand and gravel), which could result in caving. Therefore, surface activities associated with the 2018 demolition of the one-story single-family dwelling unit and detached garage are not expected to have resulted in onsite or offsite hazards such as landslides, lateral spreading, subsidence, liquefaction, or collapse. No impacts occurred.

***d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? (No Impact)***

Expansive soils are generally associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Project addresses the 2018 demolition of the one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. No new structures are proposed at this time that would result in a risk to life or property. As such, no impacts related to expansive soil would occur.

***e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater? (No Impact)***

The Project site is in an established urbanized environment where wastewater infrastructure is in place. Septic tanks or alternative wastewater disposal systems would not be used by the Project or any future development on the site. The Project does not propose connecting to and using the existing sewage conveyance system. Therefore, no impact would occur.

***f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (No Impact)***

The Project involves demolition of a one-story single-family dwelling unit and detached garage. The Project does not propose any excavation. Furthermore, the potential to encounter buried resources is low because excavation below the surface is not anticipated, and original construction of the residential structure most likely displaced paleontological resources that may have existed within the Project site. As such, no impacts related to paleontological resources would occur.

### 3.5.7 Hazards and Hazardous Materials

#### Thresholds of Significance

***a. Create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials? (Less Than Significant)***

The removal of demolished materials was completed by a licensed contractor with the professional qualifications to perform such work. The use of construction materials at the Project site, including concrete, hydraulic fluids, paints, and cleaning materials, is not assumed because the site is vacant after the 2018 demolition of the one-story single-family dwelling unit and detached garage. No operational activities are anticipated. Further, subdivision of the lot into two parcels would not create a significant hazard for the public or environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

***b. Create a significant hazard for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Less Than Significant)***

As stated previously, Project demolition activities resulted in a temporary increase in the use of typical construction equipment. However, the applicant previously followed existing regulations in 2018 related to lead-based paint and asbestos abatement, materials that are common inside older residences. The removal of demolished materials was completed by a licensed contractor with the professional qualifications to perform such work, and all required precautionary measures were taken in the demolition. Because Project activities were short term and ceased with Project completion, construction activities associated with demolition activities did not create a significant hazard for the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts were less than significant.

***c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school? (No Impact)***

Any emissions from the use of typical construction equipment, including vehicle fuels for the equipment, were minimal and localized at the Project site. No operational emissions are anticipated. The nearest school is Herbert Hoover High School, approximately 0.5 mile southwest of the Project site. Therefore, no impacts would occur.

***d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard for the public or the environment? (No Impact)***

Government Code Section 65962.5 requires the California Environmental Protection Agency to develop and annually maintain the Cortese List, which is a list of hazardous waste sites and other contaminated sites. Information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control, the State Water Resources Control Board, and the California Environmental Protection Agency. The Project site is not identified on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

***e. Be located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and result in a safety hazard or excessive noise for people residing or working in the Project area? (No Impact)***

The closest airport to the Project site is Hollywood Burbank Airport, approximately 6 miles to the northwest. As such, the Project is not within an airport land use plan. Furthermore, the Project would not result in people residing or working in the area being exposed to noise from airports. No impact would occur.

***f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Less Than Significant)***

State Responsibility Areas (SRAs) are areas where the State of California has primary financial responsibility for the prevention and suppression of wildland fires. The California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services. Fire protection in Local Responsibility Areas (LRAs) is typically provided by city fire departments, fire protection districts, counties, or CAL FIRE (under contract to a local government). For the City, fire protection is provided by the Glendale Fire Department. CAL FIRE uses an extension of the SRA Fire Hazard Severity Zone (FHSZ) model as the basis for evaluating fire hazards in LRAs. FHSZs are identified as Moderate, High, or Very High in an SRA and Very High in an LRA.

The major undeveloped regions in the City are the Verdugo Mountains, the San Rafael Hills, and the foothills of the San Gabriel Mountains. These mountainous regions present a substantial safety problem in the form of fire hazards to the many areas developed nearby (City of Glendale n.d.). The Project site is not in an SRA or LRA or lands that have been classified as FHSZs (CAL FIRE 2021). The nearest designated City Disaster Response Route is approximately 475 feet to the northwest at Kenneth Road, which is south of a designated FHSZ in the Verdugo Mountains north of the Project site. According to the City of Glendale Emergency Plan, the Brand Park Library is the location for evaluation within Brush Fire Zone 3 – Southern Verdugo Mountains. The Project addresses the 2018 demolition of residential structures and would not exacerbate existing conditions or create a new fire hazard especially in nearby FHSZs. Also, the Project would not impede implementation of the Glendale Water and Power (GWP) Wildfire Mitigation Plan that is intended to mitigate wildfires by reducing ignition (a source of the initial fire) and spread of the fire (City of Glendale 2019). Furthermore, the Project would not impede implementation of the City of Glendale Fire Department's Vegetation Management Program developed to ensure there is adequate defensible space in the wildland-urban interface areas between the open space and homes in its hillside and canyon communities. Activities include annual inspections and review and permitting of landscape and fuel modification plans for properties in the High Fire Hazard Area (City of Glendale 2019). Also, the Verdugo Fire Communications Center, a multi-jurisdictional regional dispatch center including the City, was established to provide emergency fire services in the vicinity of the Verdugo Mountains (City of Glendale 2021d). Therefore, the Project would not affect use of or access along Kenneth Road as an emergency access route or impair implementation of an adopted emergency response plan or evacuation plan. As such, a less-than-significant impact would occur.

***g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? (Less Than Significant)***

The Project site is in an area of the City that is urbanized and largely built out with single- and multi-family residences. The Project site is not within an SRA or LRA or land that has been classified as

a FHSZ; however, the Project site is south of a designated FHSZ north of nearby Kenneth Road in the Verdugo Mountains (CAL FIRE 2021). The 2018 demolition of the one-story single-family dwelling unit with detached garage on the Project site did not expose people or structures to significant risk involving wildland fire. As the Project only addresses the 2018 demolition of the single-family residence and the Project site would remain vacant, the Project would not expose people or structures to significant fire risks and a less-than-significant impact would occur.

### 3.5.8 Hydrology and Water Quality

#### Thresholds of Significance

***a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? (Less Than Significant)***

The Project site is generally flat but slopes toward Valley View Road, an area where any discharge would flow to existing storm drains. The Project involves demolition of a one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. The site would remain vacant as demolition is complete. Construction of the Project previously required structure demolition but minimal earthwork, including site disturbance that exposed soils and could allow erosion. However, all demolition activities required a demolition permit from the City, which included requirements and standards to limit potential impacts associated with erosion to permitted levels. Furthermore, Project activities were short term (demolition took one day to complete) and ceased with demolition completion. Impacts associated with water quality standards or waste discharge requirements would be less than significant.

***b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin? (No Impact)***

The sandy, porous soils of Glendale's unlined flood control basins act as aquifers to replenish the groundwater table. The largest flood control basin and aquifer is the Verdugo Basin, adjacent to the Oakmont Country Club in the northern portion of Glendale. Some of the more important basins include Verdugo, Dunsmuir, Golf Club Drive, Linda Vista Drive, Beaudry, Hillcrest, Cooks, Child's, Brand, and Greenbriar (City of Glendale 1993, amended 2005). The City currently utilizes water from GWP, which relies on primarily imported water from the Metropolitan Water District of Southern California (MWD), local groundwater basins, and the San Fernando Basin. The Project would not result in development that could require the use of groundwater. The Project addresses the 2018 demolition of a one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. Although the Project site includes some impervious surface area for the existing residential structures, the small size of the Project site limits its potential to contribute to recharge of groundwater sources in any meaningful way. Also, the Project site remained vacant after demolition was completed, which would not increase the amount of impervious surface area on the Project site and would not substantially modify groundwater infiltration and recharge in the basin. As such, the Project would have no impact with regard to substantially depleting groundwater supplies.

***c.1. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on or off site? (Less Than Significant)***

The north- and east-facing slopes of the Verdugo Mountains drain into the Arroyo Verdugo drainage basin and feed aquifers, underground water basins, and wells reserved exclusively for the City. The south-facing slopes of the mountains drain into the Los Angeles River Basin, which feeds aquifers, groundwater basins, and wells shared by Glendale, Burbank, and Los Angeles (City of Glendale 1993, amended 2005).

Because the Project site is relatively flat and the amount of pervious surface area would be similar to the amount under existing conditions, there would be no substantial alteration of on- or offsite drainage patterns. Under existing conditions, most stormwater runoff flows off the Project site and into the local storm drain system. This condition would not change as a result of the Project.

The Project is not expected to have materially increased the quantity of urban runoff from the Project site. There was no potential for downstream erosion because the street is paved and therefore stabilized. Impacts associated with the 2018 demolition activities were less than significant.

***c.2. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site? (No Impact)***

As stated previously, the Project did not alter the existing drainage pattern of the site or area, and demolition impacts were short term. Also, the Project did not alter the course of a stream or river because the site and surrounding area are developed for residential uses in a highly urbanized area. Flood hazards due to heavy precipitation can result in inundation in developed areas. Such inundation can be due to nearby stream courses that overflow or inadequate storm drain facilities that have not been sized to accommodate large storm events. However, the City has developed a flood control system that provides protection for its residents. The amount of surface runoff would not change as a result of the Project. In addition, no designated Federal Emergency Management Agency (FEMA) flood zones are within the Project site, as indicated in the FEMA National Flood Hazard Map (September 26, 2008). Therefore, the Project would not result in on- or offsite flooding, and no impacts related to flooding would occur.

***c.3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (Less Than Significant)***

As stated previously, the Project did not alter the existing drainage pattern of the site or area. Stormwater runoff currently flows into Glendale's storm drain system, as described previously. Because there are no known deficiencies in the existing storm drain system, the Project would result in a less-than-significant impact, and impacts related to water quality would not change compared to existing conditions.



***c.4. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would impede or redirect floodflows? (Less Than Significant)***

As stated previously, the Project did not alter the existing drainage pattern of the site or area, because demolition only required one day to complete. Also, the Project did not alter the course of a stream or river because the site and surrounding area are developed for residential uses in a highly urbanized area. According to the California Department of Water Resources Division of Safety of Dams, Diederich Reservoir, No. 5–6 has an extremely high downstream hazard potential, but the Project site is within a low dam inundation boundary for this facility northeast of the Project site in North Glendale (California Department of Water Resources Division of Safety of Dams 2021). However, FEMA flood maps do not identify the Project site as being within a 100-year flood zone. The Project site is within flood Zone X, which indicates an area with minimal flood hazard. As no development is proposed that would alter the existing drainage pattern or add impervious surfaces, a less-than-significant impact related to flooding would occur.

***d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation? (Less Than Significant)***

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank, that causes the water to oscillate back and forth for hours or even days. The Project site is not downslope of any large body of water that would produce a seiche. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. Tsunamis are large ocean waves generated by a sudden water displacement caused by submarine earthquakes, landslides, or volcanic eruptions. A review of the County of Los Angeles Flood and Inundation Hazards Map indicates that the site is not within a mapped tsunami inundation boundary. As stated previously, the Project site is within a low dam inundation boundary for Diederich Reservoir, No. 5–6 (California Department of Water Resources Division of Safety of Dams 2021). However, impacts would be less than significant for dam inundation related to Diederich Reservoir due to the low potential for dam inundation and because no development is proposed that would put occupants at risk from the release of pollutants. Furthermore, no impacts would occur with respect to seiches, tsunamis, and mudflows.

***e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (No Impact)***

The GWP currently provides water to the Project area, which relies on local groundwater supplies. The Project addresses the 2018 demolition of a one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. The site is vacant post-demolition, and there are no plans to develop the site as a part of this Project. Consequently, impacts related to groundwater extraction and recharge would not change compared with existing conditions, and no impacts would occur.

### 3.5.9 Land Use and Planning

#### Thresholds of Significance

***a. Physically divide an established community? (No Impact)***

The Project site is in an established area of the City that is urbanized and largely built out with single- and multi-family residences. According to the City's Zoning Map, the Project site is in the R1-I Residential – Height District I Zone (City of Glendale 2021a). Prior to 2018, there was a one-story single-family dwelling unit and detached garage on the Project site. The Project addresses demolition of the one-story single-family dwelling unit and detached garage and subdivision of the lot into two parcels. No development is proposed with the Project. The site remains vacant after the 2018 demolition of the two structures. The Project site is in conformance with underlying zoning and land use designations and would be similar to adjacent and nearby residential land uses. Because the Project would be compatible with adjacent residential uses and the Project site is relatively small, the Project would not physically divide an established community, and no impact would occur.

***b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Less Than Significant)***

The current City General Plan designation for the Project site is Low-Density Residential (City of Glendale 2018). The site is currently zoned R1-I. The Project site is not in a specific plan, habitat conservation plan, or community plan area, although the site will be included in the future West Community Plan (City of Glendale 2021b). The Project addresses the 2018 demolition of the one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. No development is proposed with the Project. As such, the vacant Project site would not substantially conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

### 3.5.10 Mineral Resources

#### Thresholds of Significance

***a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (No Impact)***

The Project site is in an established area of the City that is urbanized and largely built out with single- and multi-family residences. The Project area is designated Mineral Resource Zone (MRZ) 3, an area where there are mineral deposits; however, their significance cannot be evaluated from available data (City of Glendale 1993, amended 2005). Even though the State Geologist has mapped Glendale as an area with aggregate resources (i.e., rock, sand, gravel), adequate information has not been developed for use in determining the significance of the deposits in the majority of the City. Although data on mineral deposits are unavailable, the Project is on land that has been developed for more than 100 years. Furthermore, the residential land use designation does not currently permit the extraction of mineral resources. Because the Project site is not designated as a mineral extraction land use, the chance of uncovering mineral resources during construction and demolition

of the structures on the site was minimal. As such, the Project would not result in the loss of availability of known mineral resources. No impacts would occur.

***b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? (No Impact)***

Areas designated as MRZ-2 and MRZ-3 by the California Geological Survey, Department of Conservation, are locations where mineral resources are known to be present. As stated previously, the Project has an MRZ-3 classification. That land use designation does not currently permit the extraction of mineral resources. The Project site is in a built-out area with very few undeveloped lots. Furthermore, the goals of the City General Plan Open Space and Conservation Element preclude mineral extraction within the City. As such, the Project would not result in the loss of availability of a locally important mineral resource recovery site. No impacts would occur.

### **3.5.11 Population and Housing**

#### **Thresholds of Significance**

***a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? (No Impact)***

A significant impact could occur if new developments, such as homes, businesses, or infrastructure projects, would induce substantial growth in the area, growth that would not have occurred as rapidly or with as great a magnitude otherwise. The Project addresses the 2018 demolition of the one-story single-family dwelling unit and a detached garage along with a parcel map revision to create one additional lot. The site is currently vacant post-demolition. The Project would not have indirect effects on growth through mechanisms such as the extension of roads and infrastructure. The Project does not involve new development, and the site would be served by existing roads and infrastructure. As such, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly. No impacts would occur.

***b. Displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere? (No Impact)***

A significant impact would occur if the Project were to displace a substantial number of residences or people. The Project addresses the 2018 demolition of the one-story single-family dwelling unit and a detached garage along with a parcel map revision to create one additional lot. Prior to the 2018 demolition, the residence was unused. Therefore, the Project would not result in the displacement of people or housing, and no impacts would occur.

## 3.5.12 Public Services

### Thresholds of Significance

***a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a 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 any of the following public services:***

#### ***Fire protection? (Less Than Significant)***

The Glendale Fire Department provides comprehensive emergency services for the City, including fire, rescue, and emergency medical (i.e., paramedic) services, as well as fire prevention and code enforcement functions. The Project site is between two fire stations: Fire Station No. 26, at 1145 North Brand Boulevard, approximately 0.4 mile southeast of the project site; and Fire Station No. 27, at 1127 Western Avenue, approximately 1.7 miles northwest of the Project site. In the event that units at Fire Station No. 26 or No. 27 are not available, other units would be available for dispatch from other Glendale Fire Department fire stations or adjacent jurisdictions.

The Project addresses the demolition of the one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. Demolition (which occurred in 2018) would not substantially affect the provision of fire protection because construction activities associated with demolition were temporary in nature, lasting one day, and the Project site is now vacant post-demolition. Furthermore, the Project site is close to existing fire stations. As a result, the Project would be adequately served by existing fire stations and would not require the provision of any new fire stations or the expansion of existing fire stations. Therefore, the overall need for fire protection services is not expected to increase substantially. Project construction would result in a less-than-significant impact with respect to fire protection services.

#### ***Police protection? (Less Than Significant)***

The Glendale Police Department (GPD) provides police protection services for the Project site from the station at 131 North Isabel Street, approximately 2.2 miles to the southeast. Demolition activities were estimated to have taken one day and did not require GPD services. To prevent incidences of theft or vandalism after demolition of the single-family dwelling unit and detached garage, the Project site was fenced and has a protected entry (consistent with existing conditions). Also, construction activities did not impede access to other nearby uses, and no roadway closures were anticipated with the limited construction schedule. As such, the Project would be adequately served by existing police protection services, and the overall need for police protection services is not expected to increase substantially as a result of the Project. Therefore, the Project had a temporary less-than-significant impact on police services during construction. No operational impacts would occur.

#### ***Schools? (No Impact)***

Section 65995 of the Government Code provides that school districts can collect a fee from new residential units or additions to existing units on a per-square-foot basis to assist in the construction of schools, including additions to schools. The Project addresses the demolition of a one-story single-family dwelling unit with detached garage along with a parcel map revision to create one additional

lot. It is not proposing any new construction at this time. Because no new residential development is proposed for the site, which is now vacant, the Project would not have a notable effect on available capacity at local schools. Future development on the new lots would be subject to payment of appropriate school district fees. As such, no impact would occur.

***Parks? (No Impact)***

The Project would not involve the development of new or physically altered park facilities. The Project addresses the 2018 demolition of the one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. It is not proposing any new construction at this time. Also, because no new residential development is proposed for the site, which is vacant, the Project would not have a notable effect on the demand for local parks, such as Casa Adobe de San Rafael and Park at 1330 Dorothy Drive, or affect performance objectives related to parks. Future development of new lots would be subject to payment of appropriate development impact fees. Therefore, no impacts on parks would occur.

***Other public facilities? (No Impact)***

The Project would not involve the development of new or physically altered government or public facilities such as roads, senior centers, or libraries. The Project addresses the 2018 demolition of the one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. No new construction is proposed at this time. Also, because new residential development is not proposed on the site, which is vacant, the Project would not have a notable effect on the demand for local public facilities, such as Casa Verdugo Library at 1151 North Brand Boulevard, or affect performance objectives related to public facilities. Future development of the new lots would be subject to payment of appropriate development impact fees. Therefore, no impacts on public facilities would occur.

### **3.5.13 Recreation**

#### **Thresholds of Significance**

***a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (No Impact)***

The Project addresses the 2018 demolition of a the one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. Demolition activities did not result in the use of existing nearby neighborhood and regional parks, such as Casa Adobe de San Rafael and Park, or contribute to substantial physical deterioration of such facilities. Because the Project would not result in the construction of new residential uses on the site at this time, no substantial or accelerated deterioration of park facilities would occur. Future development on the new lots would be subject to payment of appropriate development impact fees. Therefore, there would be no impact.

***b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment? (No Impact)***

The Project would not generate new residents at this time who would use existing parks or other recreational facilities. As such, there would be no increase in the use of the parks with the Project,

and no recreational facilities are proposed as part of the Project. Because no construction or expansion of recreational facilities would be required, there would be no impact.

### 3.5.14 Transportation

#### Thresholds of Significance

***a. Conflict with a program, plan, ordinance, or policy concerning the circulation system, including transit, roadway, bicycle, and pedestrian facilities? (Less Than Significant)***

Demolition activities that occurred in 2018 generated additional vehicle trips or vehicle miles traveled (VMT) as a result of employee trips and truck trips involving the transport of equipment and building materials during the construction period. It is estimated that up to 16 vehicle trips were required for demolition and the removal of materials from the Project site. The increase in daytime traffic is not considered substantial because the construction phase involved demolition during a single day of a one-story single-family dwelling unit and detached garage. It did not exceed the capacity of the existing circulation system. Therefore, construction traffic resulted in no impact. Also, no changes to the existing roadway network are proposed as a result of the Project. The Project would not conflict with any program, plan, ordinance, or policy concerning the circulation system, including transit, roadway, bicycle and pedestrian facilities. A slight increase in the number of vehicle trips using area streets resulting from Project demolition and site subdivision is not considered a substantial impact. Access to the Project site continued to be served by Valley View Road, which is classified as a Local Street and was able to accommodate vehicle trips generated from construction activities. Therefore, impacts are considered less than significant. Furthermore, the comment letter from the California Department of Transportation, District 7, stated that no new VMT would be generated by the Project, and no operational impacts are anticipated.

***b. Conflict or be inconsistent with State CEQA Guidelines Section 15064.3, Subdivision (b)? (No Impact)***

As discussed above, the Project would not result in a significant increase in vehicle trips or VMT on the area roadway network, and no conflicts or inconsistencies regarding VMT would result from the Project. No impact would occur.

***c. Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (No Impact)***

As discussed above, the Project would not result in a significant increase in VMT on the area roadway network. The general public did not access the construction site, and the disposal of demolition materials or export of soil/other material did not interfere with circulation on public streets. There are no existing hazardous design features such as sharp curves or dangerous intersections on site and/or in the Project vicinity, and the Project does not propose any hazardous or incompatible uses because the site is vacant post-demolition. In addition, the Project would not create a hazard because of a design feature or result in any changes to the existing roadway network. No impact would occur.

***d. Result in inadequate emergency access? (No Impact)***

Demolition activities occurred over a period of one day; and activities are not expected to have affected access to the site or surrounding area. Long-term emergency access would not be affected

by the proposed two-lot subdivision, and no changes to the existing roadway network are proposed as a result of the Project. Direct access to the property would continue to be served by Valley View Road, which is designated a Local Street in the City General Plan Circulation Element. As a result, no impacts on emergency access would occur.

### 3.5.15 Tribal Cultural Resources

#### Thresholds of Significance

***a. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k)? (Less Than Significant)***

A tribal cultural resource (TCR) is a site, feature, place, cultural landscape, sacred place, or object that is of cultural value to a recognized Native American tribe. The resource may be listed in or eligible for listing in the CRHR or a local historic register, or a lead agency may choose to treat the resource as a TCR. The property at 1420 Valley View Road was not identified as a significant historical resource, and it does not appear to meet any of the criteria for listing in the CRHR, NRHP, or GRHR, either individually or as a contributor to a previously identified or potential historic district.

The comment letter from the Fernandeano Tataviam Band of Mission Indians (FTBMI) states that the Project area is within the traditional Tataviam ancestral territory. It encompasses lineage villages from which members of the FTBMI descended. FTBMI records indicate the presence of significant cultural area within distance of the Project location (Appendix A). However, the tribe has neither knowledge of cultural resources within the vicinity of the Project nor concerns with the Project. Also, the Project site is in an established area of the City that is urbanized and largely built out with single- and multi-family residences. The Project involved the 2018 demolition of a one-story single-family dwelling unit and detached garage and did not require excavation. Because the Project site was previously an active residence in a highly disturbed, urbanized area, minimal ground disturbance occurred. The Project has low potential with respect to encountering TCRs. Therefore, the Project would not cause a substantial adverse change in the significance of a TCR, as defined in Public Resources Code Section 5020.1(k), and a less-than-significant impact related to TCRs would occur. Refer to Section 3.2, *Cultural Resources*, for additional information regarding cultural resources.

***b. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1? (Less Than Significant)***

As stated in Section 3.2, the property at 1420 Valley View Road was identified as a significant historical resource, and it meets the criteria for eligibility for GRHR Criteria 1 and 3. Therefore,

a substantial adverse change to a historical resource is expected as a result of the proposed Project, which involves the demolition of the house and detached garage at the site, and division of the existing single-family lot into two lots upon which construction of two new single-family residences is proposed. However, the Project site was previously in a highly disturbed, urbanized area, and minimal ground disturbance is anticipated. The Project has low potential with respect to encountering TCRs. Therefore, the Project would not cause a substantial adverse change in the significance of a TCR, pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1, and a less-than-significant impact related to TCRs would occur. Refer to Section 3.2 for additional information regarding cultural resources.

### 3.5.16 Utilities and Service Systems

#### Thresholds of Significance

***a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (No Impact)***

The Project would not require new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities or relocation of such facilities because no development would occur as a result of the Project. The Project does not involve development of the site, which is currently vacant post-demolition. A need for the aforementioned services or a change to associated facilities would not occur. The Project would not cause significant environmental effects related to construction or relocation of such facilities. Therefore, no impact related to such services or facilities would occur.

***b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years? (No Impact)***

Construction activities associated with the Project required the use of water for dust control and cleanup purposes. The use of water during construction was short term, requiring one day, and therefore did not result in a significant impact on the existing water system or available water supplies. The determination of future water demand in the City is based on development projections in the General Plan and Urban Water Management Plan. The City has identified an adequate supply of water that will meet future demands under normal conditions (City of Glendale 2020). In addition to local water supplies, imported water from MWD can provide reliable supplies during both single dry years and multiple dry years. With the demand generated by the Project, there would be an ample supply of water for remaining City demands under normal conditions.

MWD projections show that potable local supplies will remain constant over a 20-year planning horizon with a single dry year or even increase as the use of recycled water increases. Demand will decrease slightly through 2035 because of projected increases in conservation measures, which will outpace population increases.

The Project would be required to comply with the provisions of Glendale's Mandatory Water Conservation Ordinance as well as the 2019 California Green Building Standards of the Glendale Green Building Code and the water-conserving requirements regarding fixtures and fittings of the current California Plumbing Code. As indicated above, the City would continue to have an adequate supply of water and would be able to meet citywide demand under normal and drought conditions,



even with the Project. As a result, neither the 2018 demolition nor the proposed two-lot subdivision associated with the Project under both normal and drought conditions would have an impact on the water supply.

***c. Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments? (No Impact)***

Sewage from the City is treated by the City of Los Angeles Hyperion System, which includes the Los Angeles/Glendale Water Reclamation Plant, outside the City limits in Los Angeles, and the Hyperion Treatment Plant, in Playa del Rey. As the Project did not generate wastewater for demolition of a one-story single-family dwelling unit with detached garage and adequate capacity exists at the Hyperion Treatment Plant, the Project would not require the expansion or construction of sewage treatment facilities. No impact would result with regard to impacts on available sewage treatment capacity.

***d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair attainment of solid waste reduction goals? (Less Than Significant)***

The Project addresses the 2018 demolition of a one-story single-family dwelling unit and detached garage along with a parcel map revision to create one additional lot. Solid waste generated on the Project site during demolition likely was deposited at the Scholl Canyon Landfill, which is owned by the City, or one of the landfills within the County of Los Angeles. Combined with compliance with the City's Construction and Demolition Debris Recycling Ordinance, the increase in solid waste generated by the Project would have been accommodated by available capacity at the Scholl Canyon facility. The applicant would have paid applicable fees and submitted a Waste Reduction and Recycling Plan with any Project plans to the Building and Safety Division for approval (City of Glendale 2021c) to legalize the prior demolition. In addition, the Project would have been required to implement a waste-diversion program, aimed at reducing the amount of solid waste disposed of in the landfill. As a result, less-than-significant impacts would occur.

***e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (No Impact)***

All construction debris was likely disposed of at the Scholl Canyon facility, in accordance with applicable federal, state, and local statutes, including GMC Chapter 8.58. No impacts would occur.

### **3.5.17 Wildfire**

#### **Thresholds of Significance**

***a. Substantially impair an adopted emergency response plan or emergency evacuation plan? (Less Than Significant)***

SRAs are areas where the State of California has primary financial responsibility for the prevention and suppression of wildland fires. CAL FIRE provides a basic level of wildland fire prevention and protection services. Fire protection in LRAs is typically provided by City fire departments, fire protection districts, counties, or CAL FIRE (under contract to a local government). For the City, fire protection is provided by the Glendale Fire Department. CAL FIRE uses an extension of the SRA

FHSZ model as the basis for evaluating fire hazards in LRAs. FHSZs are identified as Moderate, High, or Very High in an SRA and Very High in an LRA.

The major undeveloped regions in the City are the Verdugo Mountains, the San Rafael Hills, and the foothills of the San Gabriel Mountains. These mountainous regions present a substantial safety problem in the form of fire hazards to the many areas developed nearby (City of Glendale n.d.). The Project site is not in an SRA or LRA, or lands that have been classified as FHSZs (CAL FIRE 2021).

The nearest designated City Disaster Response Route is approximately 475 feet to the northwest at Kenneth Road, which is south of a designated FHSZ in the Verdugo Mountains north of the Project site. According to the City of Glendale Emergency Plan, the Brand Park Library is the location for evaluation within Brush Fire Zone 3 – Southern Verdugo Mountains. The Project involved the 2018 demolition of residential structures and did not exacerbate existing conditions or create a new fire hazard especially in nearby FHSZs. Also, the Project would not impede implementation of GWP's Wildfire Mitigation Plan that is intended to mitigate wildfires by reducing ignition (a source of the initial fire) and spread of the fire (City of Glendale 2019). Furthermore, the Project would not impede implementation of the City of Glendale Fire Department's Vegetation Management Program developed to ensure there is adequate defensible space in the wildland-urban interface areas between the open space and homes in its hillside and canyon communities. Activities include annual inspections and review and permitting of landscape and fuel modification plans for properties in the High Fire Hazard Area (City of Glendale 2019). Also, the Verdugo Fire Communications Center, a multi-jurisdictional regional dispatch center including the City, was established to provide emergency fire services in the vicinity of the Verdugo Mountains (City of Glendale 2021d). Therefore, the Project would not affect use of or access along Kenneth Road as an emergency access route or impair implementation of an adopted emergency response plan or evacuation plan. As such, a less-than-significant impact would occur.

***b. Because of slope, prevailing winds, or other factors, exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (Less Than Significant)***

The Project site is in an area of the City that is urbanized and largely built out with single- and multi-family residences. As stated previously, the Project site is not in an SRA or LRA or lands that have been classified as High FHSZs; however, the Project site is south of a designated FHSZ north of nearby Kenneth Road in the Verdugo Mountains. The demolition activities associated with the Project did not change or exacerbate current risks associated with wildfire or expose occupants to pollutant concentrations from a wildfire and there would be no occupants of the Project site. The Project would also not impede implementation of GWP's Wildfire Mitigation Plan and Vegetation Management Program, as noted above. The goal of the Vegetation Management Program is to reduce the risk of buildings being ignited by a nearby wildfire; however, the Project does not propose construction of new buildings that would house occupants. Therefore, the demolition of a single-family residence did not expose new occupants to pollutant concentrations, and a less-than-significant impact would occur.

***c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment? (Less Than Significant)***

As stated previously, the Project site is not in an SRA or LRA or lands that have been classified as High FHSZs; however, the Project site is south of a designated FHSZ north of nearby Kenneth Road in the Verdugo Mountains. The demolition activities associated with the Project did not change or exacerbate fire risk or require the installation or maintenance of any infrastructure or utility improvements or additions. The Project would not impede implementation of GWP's Wildfire Mitigation Plan and Vegetation Management Program for vegetation maintenance, system inspections, and equipment maintenance to reduce fire risk. As the Project only involved the 2018 demolition of a single-family residence along with a parcel map revision to create one additional lot, there would be a less-than-significant impact, and no infrastructure modifications would be required that may exacerbate fire risk.

***D. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? (Less Than Significant)***

As stated previously, the Project site is not in an SRA or LRA or lands that have been classified as High FHSZs; however, the Project site is south of a designated FHSZ north of nearby Kenneth Road in the Verdugo Mountains. Demolition of the one-story single-family dwelling unit with detached garage on the Project site did not exacerbate wildfire hazards on site or change the existing drainage pattern or slope of the Project site. The Project site is on relatively flat land in an urban setting with a low likelihood of potential issues concerning flooding or landslides. Furthermore, the Project would not impede implementation of GWP's Wildfire Mitigation Plan and Vegetation Management Program for fire risk. The goal of the Vegetation Management Program is to reduce the risk of buildings being ignited by a nearby wildfire; however, the Project does not propose construction of new buildings. As the Project only involved the demolition of a single-family residence and parcel map revision to create one additional lot, the Project would not expose people or structures to significant fire risks or downstream flooding or landslides, and a less-than-significant impact would occur.

## Chapter 4

# Alternatives Analysis

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The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) examine a reasonable range of feasible alternatives to a project or project location that could substantially reduce one or more of the project's significant environmental impacts while meeting most or all of its objectives. The EIR is required to analyze the potential environmental impacts of each alternative, though not at the same level of detail as the project. However, there must be sufficient detail to enable comparison of the merits of the respective alternatives.

The key provisions of State CEQA Guidelines Section 15126.6 that relate to alternatives analyses are summarized below.

- The discussion of alternatives shall focus on alternatives to the project or project location that are feasible, would meet most or all of the project objectives, and would substantially reduce one or more of its significant impacts.
- The range of alternatives must include the No Project Alternative. The no project analysis will discuss the existing conditions at the time the Notice of Preparation was published, as well as conditions that would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. The No Project Alternative is not required to be feasible, meet any of the project objectives, or reduce the project's expected impacts to any degree.
- The range of alternatives required is governed by a "rule of reason." The EIR must evaluate only those alternatives necessary to permit a reasoned choice. An EIR is not required to analyze every conceivable alternative to a project.
- An EIR does not need to consider an alternative that would not achieve the basic project objectives, for which effects cannot be reasonably ascertained, or for which implementation is remote and speculative.

## 4.1 Project Alternatives Summary

According to the State CEQA Guidelines, an EIR must describe a reasonable range of alternatives to a project that could feasibly attain most of the basic project objectives, and would avoid or substantially lessen the project's significant environmental effects. This alternatives analysis summarizes the alternatives screening process conducted to identify feasible alternatives that meet Project objectives. As required by CEQA, this analysis first considers which alternatives can meet most of the basic Project objectives, and then to what extent those remaining alternatives can avoid or reduce the environmental impacts associated with the Project.

The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those potentially feasible alternatives necessary to foster informed public participation and an informed and reasoned choice by the decision-making body (State CEQA Guidelines Section 15126.6(f)). Therefore, an EIR does not need to address every conceivable alternative or consider infeasible alternatives. CEQA generally defines "feasible" to mean the ability to be accomplished in a successful manner within a reasonable period of time, taking into account

economic, environmental, social, technological, and legal factors. The following factors may also be considered: site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (State CEQA Guidelines Section 15126.6(f)(1)). An EIR does not need to consider an alternative whose impact cannot be reasonably ascertained and whose implementation is remote and speculative.

Two alternatives were selected for alternatives analysis.

- No Project/No Build Alternative
- No Subdivision Alternative: the site is not subdivided and only one residence and potentially an accessory dwelling unit can be built on the site in the future, consistent with its previous use

The goal for evaluating these alternatives is to identify those that would avoid or lessen the significant environmental effects of the Project, while attaining most of the Project objectives, listed below. The following sections provide a general description of each alternative, its ability to meet the Project objectives, and a qualitative discussion of its comparative environmental impacts. As provided in Section 15126.6(d) of the State CEQA Guidelines, the significant effects of these alternatives are identified in less detail than in the analysis of the Project.

#### **4.1.1 Project Objectives for Analysis**

The underlying purpose of the Project is to provide high-quality residential use that is consistent with the City of Glendale's (City's) Low-Density Residential – Height District I General Plan land use and zoning designation. The objectives of the Project are as follows:

- Develop and revitalize an infill site with residential uses that is consistent with other residential uses and with the City's Low-Density Residential land use and zoning designation.
- Incorporate a comprehensive development site plan and layout that incorporates a more enhanced environment and architectural style that is reflective of the City.
- Maximize the value of a currently underutilized site through the subdivision of the Project site to facilitate an additional residential unit in the future, consistent with the General Plan's housing goals to increase the City's housing stock.
- Comply with the Glendale City Council requirements to evaluate the potential historic significance of the buildings previously on the site and complete an EIR for the Project.

#### **4.1.2 Project Alternatives Selected for Analysis**

As stated previously, two alternatives—including the no project alternative and one build alternative—were selected for detailed analysis. These are described below.

##### **No Project/No Build Alternative**

An analysis of the No Project Alternative is required under State CEQA Guidelines Section 15126.6(e). According to Section 15126.6(e)(2), the “no project” analysis must discuss “what is reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

The No Project Alternative represents a “no build” scenario in which the Project would not be constructed or operated. Similar to the Project, the existing residential structures would be demolished at 1420 Valley View Road (Project site). The No Project Alternative would not change the condition of the current Project site, as the structures on the site have previously been demolished; however, this alternative would not allow the Project site to be subdivided into two parcels. It would assume that the proposed subdivision would not be approved and no other Project activity would occur. Under the No Project Alternative, the Project site would be vacant and would remain as one single-family residential parcel with no structures proposed on the site.

This alternative would comply with the Glendale City Council requirements to evaluate the potential historic significance of the buildings previously on the site and complete an EIR for the Project through preparation of this EIR and the associated historical resources report. This alternative would not meet the Project objectives to develop and revitalize an infill site with residential uses, as the site would be vacant. As such, no comprehensive development site plan would be incorporated, and the site would continue to be underutilized and would not expand the City’s housing stock or assist the City in implementing the General Plan’s housing goals by increasing the City’s single-family housing stock. Also, the alternative would not provide for upgraded housing without causing the involuntary displacement of existing residents.

## **No Subdivision Alternative**

This alternative would be similar to the No Project/No Build Alternative, as the Project site would not be subdivided into two parcels for single-family residential uses. However, implementation of the No Subdivision Alternative could result in the future construction and occupation of one newly constructed residence on the Project site of similar size and scale, consistent with the Project site’s previous residential use consistent with the existing General Plan land use and zoning designation for the Project site as Low-Density Residential – Height District I (R-1-1). Similar to the Project, the existing residential structures on the Project site would be demolished, but only one residence would be proposed on the Project site in the future. Another structure could be considered as an accessory dwelling unit (ADU) allowed under Senate Bill (SB) 9 Ordinance, or the California Housing Opportunity and More Efficiency (HOME) Act, a state bill that requires cities to allow one additional residential unit onto parcels zoned for single-dwelling units. This alternative would allow an 800-square-foot ADU upon a ministerial lot split.

This alternative would comply with the Glendale City Council requirements to evaluate the potential historic significance of the buildings previously on the site and complete an EIR for the Project through preparation of this EIR and the associated historic resources report. This alternative would meet the Project objectives to develop and revitalize an infill site with residential uses as the site would be developed with one single-family residence with the potential for an ADU. A comprehensive development site plan could be incorporated, and the site could expand the City’s housing stock and assist the City in implementing the General Plan’s housing goals by increasing the City’s single-family housing stock by up to two dwelling units. However, the Project site would not be fully utilized as intended by the applicant, as the site would be developed with one single-family residence and an ADU rather than subdivided into two residential lots, and the ADU would have restrictions including developable area (i.e., development would be restricted to an 800-square-foot ADU upon a ministerial lot split). Also, the alternative could provide for upgraded housing without causing the involuntary displacement of existing residents.

### **4.1.3 Alternatives Considered but Rejected at this Time**

According to CEQA, “among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (State CEQA Guidelines Section 15126.6(c)). In addition to the Project alternatives listed above, several alternatives were considered but rejected from further analysis in the EIR because they did not accomplish most of the basic Project objectives, they would be infeasible to construct, and/or they did not avoid significant impacts.

#### **No Project Alternative (Maintain 2018 Site Conditions)**

The No Project Alternative would maintain the Project site’s 2018 site conditions with the former Craftsman dwelling unit and detached garage at 1420 Valley View Road remaining on the site and their demolition would not have occurred. However, as the structures on the Project site have previously been demolished without permits, they cannot be reconstructed in the same format using the same materials or having the same character-defining features. Also, no subdivision would be proposed or any future activities, as the Project site would assume the existing residence would be maintained on the Project site and this use would be maintained indefinitely. Consideration of this No Project Alternative for the Project is not feasible because the residential structures have already been demolished and cannot be recreated in their previous form. As such, this alternative was considered but rejected from further consideration.

#### **Alternative Locations**

The Project consists of demolition of a 1908 single-family dwelling unit and garage structure and potential subdivision of one lot into two lots in this existing Verdugo Viejo neighborhood that consists of single-family houses and an increasingly dense cluster of multi-family apartments and condominiums. Consideration of an alternative location for the Project is not feasible because the applicant owns this Project site and the residential structures on it were demolished in 2018; no other site in the city would involve the same circumstances. As such, an alternative location to the Project site was considered but rejected from further consideration.

#### **Relocation Alternative**

The relocation alternative is not feasible because the structures on the Project site have been illegally demolished so there are no longer any structures to relocate. As such, a relocation alternative was considered but rejected from further consideration as infeasible.

#### **Replicating Structure and Design of Previous Residence Alternative**

Pursuant to a comment received from the public during the Notice of Preparation (NOP) public review period, the commenter recommended evaluation of an alternative requiring the property owner to rebuild a Craftsman style residence and garage on the site designed to the exact specifications as the structures previously demolished. However, this alternative would be inconsistent with Secretary of the Interior (SOI) Standards for Rehabilitation (Standards) #3:

Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

Therefore, this alternative was considered but rejected from further consideration because of its potential to create a false sense of history.

## **4.1.4 Alternatives Impact Analysis**

### **No Project/No Build Alternative**

As stated previously, the No Project/No Build Alternative would not change the condition of the current Project site, as the structures on the site have previously been demolished; however, this alternative would not allow the Project site to be subdivided into two parcels. It would assume that the proposed subdivision would not be approved and no other Project activity would occur. Under the No Project/No Build Alternative, the Project site would be vacant and would remain as a vacant single-family residential parcel with no structures proposed on the site.

#### **Air Quality**

The No Project/No Build Alternative would result in temporary construction-related emissions from demolition activities and use of construction vehicles and equipment and no operational emissions would occur. Similar to the Project, construction-related emissions from demolition would result in less-than-significant impacts. There would be no operational emissions under this alternative, as the Project site would remain vacant after demolition, and future construction of new dwellings would not occur, as the subdivision of the Project site would not be approved. As such, air quality impacts associated with this alternative would be less than significant, and this alternative would have fewer impacts on air quality compared to the Project, although impacts would be less than significant for both the Project and the No Project/No Build Alternative.

#### **Cultural Resources**

The one-story house and detached garage previously situated on the lot were built in 1908 in the Craftsman Bungalow style. As with the Project, the No Project/No Build Alternative would result in impacts on historic architectural resources during construction activities associated with the demolition of residential structures on the Project site as demolition impacts were determined to be significant and the historical resources analysis concluded that historical resources existed within the Project site. Therefore, an adverse change to a historical resource would occur as a result of the No Project/No Build Alternative. This alternative would be similar to the Project due to the fact that the historic resource was demolished in 2018. Therefore, this alternative would similarly have a significant and unavoidable impact on the environment, for which feasible mitigation is unavailable.

No additional ground disturbance that would affect any known or unknown archaeological resources would occur with this alternative. There would be no operational emissions under the alternative, as the Project site would remain vacant post-demolition, and future construction of new dwellings would not occur, as the subdivision of the Project site would not be approved. As such, archaeological resource impacts associated with this alternative would be less than significant, and this alternative would have fewer impacts on archaeological resources compared to the Project.



## **Greenhouse Gas Emissions**

The No Project/No Build Alternative would result in temporary construction-related greenhouse gas (GHG) emissions from demolition activities and use of construction vehicles and equipment; no operational emissions would occur, and less-than-significant impacts on GHG emissions would occur. As with the Project, construction-related emissions from demolition would result in less-than-significant impacts under this alternative. There would be no operational emissions under this alternative, as the Project site would remain vacant post-demolition, and future construction of new dwellings would not occur, as the subdivision of the Project site would not be approved. As such, GHG impacts associated with this alternative would be less than significant, and this alternative would have fewer impacts on GHG emissions compared to the Project, although impacts would be less than significant for both the Project and the No Project/No Build Alternative.

## **Noise and Vibration**

The No Project/No Build Alternative would result in temporary construction-related noise impacts from demolition activities and use of construction vehicles and equipment, no operational noise impacts would occur, and less-than-significant construction noise impacts would occur. Similar to the Project, construction-related noise from demolition would result in less-than-significant impacts. There would be no operational noise under this alternative, as the Project site would remain vacant post-demolition with no change to existing ambient noise levels, and future construction of new dwellings would not occur, as the subdivision of the Project site would not be approved. As such, noise impacts associated with this alternative would be less than significant, and this alternative would have fewer impacts on noise compared to the Project, although impacts would be less than significant for both the Project and the No Project/No Build Alternative.

## **No Subdivision Alternative**

As stated previously, similar to the Project and No Project/No Build Alternative, the No Subdivision Alternative would result in the demolition of existing residential structures that were previously on the Project site. However, implementation of this alternative would not allow the Project site to be subdivided into two parcels for single-family residential uses but would allow the future construction and occupation of one newly constructed residence and potentially an ADU on the Project site, consistent with the Project site's previous residential use and consistent with the R-1-I land use designation.

## **Air Quality**

The No Subdivision Alternative would result in temporary construction-related emissions from construction activities, vehicles, and equipment for demolition activities and construction of one new residence and potentially an ADU as well as operational and maintenance-related air quality emissions from potential long-term occupation of the residence. Due to the small nature of these activities and similarity to the Project, regional and localized emissions from this alternative would not exceed the South Coast Air Quality Management District–recommended localized thresholds for construction and operational activities. As such, air quality impacts associated with this alternative would be less than significant, and this alternative would have similar impacts on air quality compared to the Project for the new residence, although impacts would also be less than significant for both the Project and the No Subdivision Alternative.

## **Cultural Resources**

Demolition impacts associated with the Project were determined to be significant, and the historical resources analysis concluded that historical resources existed within the Project site. This alternative would be similar to the Project due to the fact that the historic resource was demolished in 2018. Therefore, this alternative would similarly have a significant and unavoidable impact on the environment, for which feasible mitigation is unavailable.

As with the Project, the No Subdivision Alternative has the potential to encounter archaeological resources during construction of one new residence and potentially an ADU on the Project site. Under this alternative, the potential for ground-disturbing activities could result in impacts on any unknown archaeological resources, although the site has been previously occupied by residential uses, and this change would be no different than any other construction activity on the Project site or elsewhere in the existing neighborhood so the potential to encounter resources would be considered low. Therefore, this alternative would have similar impacts on cultural resources compared to the Project, and impacts would be significant and unavoidable for historic resources.

## **Greenhouse Gas Emissions**

The No Subdivision Alternative would result in temporary construction-related GHG emissions from construction activities, vehicles, and equipment for demolition activities and construction of one new residence and potentially an ADU as well as operational and maintenance-related GHG emissions from potential long-term occupation of the residence. Due to the small nature of these activities and similarity to the Project, regional and localized emissions from this alternative would not exceed the South Coast Air Quality Management District–recommended localized thresholds for construction and operational activities. As such, GHG emissions impacts associated with this alternative would be less than significant, and this alternative would have similar impacts on GHG emissions compared to the Project for the new residence and potentially an ADU, although impacts would be less than significant for both the Project and the No Subdivision Alternative.

## **Noise and Vibration**

The No Subdivision Alternative would result in temporary construction-related noise from construction activities, vehicles, and equipment for demolition activities and construction of one new residence and potentially an ADU as well as operational and maintenance-related noise from potential long-term occupation of the residence. Due to the small nature of these activities and similarity to the Project, noise from this alternative would not exceed localized thresholds for construction and operational activities, and less change to existing ambient noise levels would occur. As such, noise impacts associated with this alternative would be less than significant, and this alternative would have similar impacts on noise compared to the Project for the new residences, although impacts would be less than significant for both the Project and the No Subdivision Alternative.

## **4.2 Environmentally Superior Alternative**

CEQA requires the identification of an environmentally superior alternative (State CEQA Guidelines Sections 15126.6(a) and (e)(2)). The environmentally superior alternative is the alternative that

results in the fewest significant environmental impacts from among the other alternatives evaluated if the Project has significant impacts that cannot be mitigated to a less-than-significant level.

Based on the analysis presented in Chapter 3, *Impact Analysis*, and in this chapter, the environmentally superior alternative is the No Project/No Build Alternative, as it would result in no change to existing environmental conditions and would not allow subdivision of the site into two residential parcels for future development. Consequently, no new significant environmental impacts would result with the No Project/No Build Alternative, and some impacts would be reduced compared to the Project and the No Subdivision Alternative although the No Project/No Build Alternative would result in significant and unavoidable impacts for historic resources. However, pursuant to Section 15126.6(e)(2) of the State CEQA Guidelines, if the environmentally superior alternative is the “no project” alternative, then the EIR must also identify another environmentally superior alternative among the list of alternatives. Impacts would be less than significant for both the Project and the No Subdivision Alternative for all resources except for historic resources. As such, the environmentally superior alternative is the Project, as the No Subdivision Alternative would result in similar impacts compared to the Project, while only partially meeting the project objectives.

Only the Project would meet all Project objectives whereas the No Project/No Build Alternative would not meet any of the objectives and the No Subdivision Alternative would only partially meet the objectives (refer to Section 4.1.2, *Project Alternatives Selected for Analysis*). Table 4-1 includes a summary comparison of the Project and its alternatives.

**Table 4-1. Summary of Comparison of Alternatives Impacts**

Environmental Issue Area	Project	No Project/No Build	No Subdivision Alternative
Air Quality	Less than Significant	Less than Significant, Reduced Impact Compared to Project	Less than Significant, Similar Impact Compared to Project
Cultural Resources (Historic)	Significant and Unavoidable	Significant and Unavoidable, Similar Impact Compared to Project	Significant and Unavoidable, Similar Impact Compared to Project
Greenhouse Gas Emissions	Less than Significant	Less than Significant, Reduced Impact Compared to Project	Less than Significant, Similar Impact Compared to Project
Noise	Less than Significant	Less than Significant, Reduced Impact Compared to Project	Less than Significant, Similar Impact Compared to Project
Meets Project Objectives?	Yes	No	Partially

## Chapter 5

# Other CEQA Considerations

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This Draft Environmental Impact Report (EIR) evaluates the potential environmental impacts associated with demolition of a single-family dwelling unit and garage and subdivision of one lot into two lots. The 1420 Valley View Road Project (Project) would be implemented by the applicant in the City of Glendale (City) in Los Angeles County.

## 5.1 Overview

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires all phases of a project to be considered when evaluating the project's impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must also identify the (a) significant environmental effects of a proposed project, (b) significant environmental effects that cannot be avoided if the proposed project is implemented, (c) significant irreversible environmental changes that would occur should the proposed project be implemented, (d) growth-inducing impacts of the proposed project, (e) mitigation measures proposed to minimize significant effects, and (f) alternatives to the proposed project.

A discussion of cumulative impacts, growth-inducing impacts, significant and unavoidable impacts, and significant irreversible environmental changes is provided in the following sections. All potentially significant environmental effects and proposed mitigation measures are found in Chapter 3, *Impact Analysis*, Sections 3.1–3.5, and alternatives to the Project are found in Chapter 4, *Alternatives Analysis*, of this Draft EIR.

## 5.2 Cumulative Analysis Requirements

A cumulative impact is created as a result of the combination of multiple projects that cause related impacts. The State CEQA Guidelines require EIRs to discuss the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, present, and probable future projects. According to State CEQA Guidelines Section 15130(a) and (b), the purpose of this section is to provide a discussion of significant cumulative impacts that reflects "the severity of the impacts and their likelihood of occurrence."

State CEQA Guidelines Section 15130(b) identifies the following elements as necessary for an adequate discussion of cumulative effects:

- Cumulative context in the form of a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or a summary of projections contained in an adopted general plan or related planning document or in a prior environmental document that has been adopted or certified and that described or evaluated regional or area-wide conditions contributing to the cumulative impact.

- The geographic scope of the area affected by the cumulative effect and a reasonable explanation for the geographic limitation used.
- A summary of the expected environmental effects to result from the projects, with specific reference to additional information stating where that information is available.
- A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding a project's contribution to any significant cumulative effects.

This analysis relies on a list of projects that have the potential to contribute to cumulative impacts in the Project area.

As stated in State CEQA Guidelines Section 15130(a)(1), the cumulative impacts discussion in an EIR need not discuss impacts that do not result in part from the Project evaluated in the EIR. Therefore, those resource areas for which there would be no impact from the Project are not discussed further in this section. These include:

- Aesthetics
- Agricultural and Forestry Resources
- Biological Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

For any potentially significant cumulative impacts to which the Project would contribute, the EIR must determine whether the Project contribution is considerable. If the Project contribution is not considerable, then neither further analysis of the issue nor identification of feasible mitigation measures is required. If, however, the Project's contribution to the significant cumulative effect is cumulatively considerable, then the EIR must describe potentially feasible mitigation measures, if available, that would avoid or reduce the magnitude of the contribution to a less-than-considerable level. If such measures are not available and the Project contribution remains considerable after application of all feasible mitigation measures, then the impact is deemed cumulatively significant and unavoidable.

## 5.3 Related Projects

This analysis considers the impacts of the Project in combination with potential environmental effects of other projects in the Project area. “Other projects,” also referred to as “cumulative projects,” include recently approved projects, projects that are currently under construction, and projects that were recently completed. The potential for projects to have a cumulative impact depends on both the geographic location and project schedule.

### 5.3.1 Geographic Scope and Project Timing

The geographic area affected by cumulative projects varies, depending on the environmental topic. For example, construction noise impacts would be limited to areas directly affected by construction noise, whereas the area affected by a project’s air emissions generally includes the entire air basin. This section generally considers the potential cumulative effects of the Project in combination with other local development and infrastructure projects occurring within a 600-foot radius of 1420 Valley View Road (Project site), considered the cumulative study area, which is the scale for the City Planning Projects Map (City of Glendale 2021a). In addition, cumulative air quality impacts were evaluated within the South Coast Air Basin, the area where the Project is located.

As noted, projects considered in this analysis include those that have recently been completed, are currently under construction, were recently approved, or are in the planning process. A project’s schedule is particularly relevant to the consideration of cumulative construction-related impacts because construction impacts tend to be relatively short term. However, for probable future projects, construction schedules are often broadly estimated and can be subject to change. Although the timing of the probable future projects described in Section 5.3.2 and Table 5-1 is likely to fluctuate because of schedule changes or other unknown factors, this analysis assumes several of these projects in Table 5-1 would be implemented concurrently with construction of the Project.

### 5.3.2 Description of Cumulative Projects

Table 5-1 lists current and proposed projects that could contribute to similar cumulative impacts within a one-block radius of the Project area, or approximately 600 feet from the Project site. In addition to the projects listed in Table 5-1, additional development and supporting infrastructure that has not been identified as of this time could occur within the Project area, as planned by the City. The related projects consist of a variety of land uses, including roadway improvements, residential development, commercial development, and recreational projects.

**Table 5-1. Cumulative Project List**

Project Name	Project Location	Project Description	Status	Distance
Two Single-family Residences	1420 Valley View Road	The Project site will be subdivided into two parcels. At some point in the future, the two parcels will each include a single-family residence. No application has been submitted.	Unknown	On site
Accessory Dwelling Unit (ADU)	1320 Valley View Road	This project proposes to convert a 450-square-foot garage to an ADU with no changes facing the street; application submitted in September 2020.	In process	Approximately 500 feet
Mills Act Contract Application	268 W. Kenneth Road	This project proposes a Mills Act contract application; application submitted in November 2019.	In process	Approximately 300 feet
ADU	327 Spencer Street	This project proposes a new detached ADU totaling 963 square feet at the rear of the property; application submitted in August 2021.	In process	Approximately 400 feet
ADU	341 Spencer Street	This project proposes a new detached ADU totaling 794 square feet at the rear of the property; application submitted in August 2021.	In process	Approximately 500 feet
West Glendale Community Plan	West Glendale, north of the Ventura Freeway	The City has future plans to prepare a community plan for the western portion of Glendale, for an area between the South and North Glendale Community Plans.	In planning	Within plan area

Sources: City of Glendale 2021a, 2021b.

## 5.4 Cumulative Impacts Analysis

The impacts analysis below considers whether the Project would make a considerable contribution to significant cumulative impacts on air quality, cultural resources, greenhouse gas (GHG) emissions, and noise.

### 5.4.1 Significance Criteria

Based on Appendix G of the State CEQA Guidelines, a project may be deemed to have a significant effect on the environment if its impacts are individually limited but cumulatively considerable, meaning that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. The potential cumulative contribution of the Project in conjunction with the other identified projects is discussed in this section by environmental topic area.

### 5.4.2 Resource Topics

#### Air Quality

The State CEQA Guidelines indicate that, where available, the significance criteria established by local air districts may be relied upon to make the impact determinations. South Coast Air Quality Management District (SCAQMD) guidance for addressing cumulative impacts related to air quality

states that “[p]rojects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant” (SCAQMD 2003). This corresponds with State CEQA Guidelines Section 15064(h)(4), which states that “the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the project’s incremental effects are cumulatively considerable.” SCAQMD cumulative significance thresholds are the same as project-specific significance thresholds.

Based on the analysis in Section 3.1, *Air Quality*, of this Draft EIR there would be no Project-specific significant air quality impacts. According to Section 3.1, the Project would be consistent with applicable SCAQMD and Southern California Association of Governments policies, and Impact AQ-1 would be less than significant. The criteria pollutant air quality significance thresholds in Table 3.1-6 would not be exceeded, and Impact AQ-2 would be less than significant. Project-specific impacts would not be cumulatively considerable, and Impact AQ-3 would be less than significant because the criteria pollutant air quality significance thresholds in Table 3.1-7 would not be exceeded. In addition, the Project would not expose sensitive receptors to substantial diesel particulate matter concentrations or health risks in excess of SCAQMD thresholds. The Project would not cause nuisance odors, and Impact AQ-4 would be less than significant.

Overall, the Project in combination with other projects in the cumulative study area, including the addition of small accessory dwelling units on nearby properties, would not result in air quality impacts. Therefore, the impacts of the Project would not be cumulatively considerable. This impact would be less than significant, and no mitigation is required.

**Significance Determination:** The Project’s air quality impacts would not result in a cumulatively considerable contribution to a cumulative air quality impact.

## Cultural Resources

Past projects have resulted in cumulatively significant impacts on historical resources throughout Los Angeles County as a result of physical demolition, destruction, relocation, or the alteration of historical resources. To proactively protect and consider potential impacts on historical resources, federal, state, and local regulations have been created, including Public Resources Code Section 5097; California Penal Code Section 622; the Mills Act; California Health and Safety Code, Sections 18950–18961; the Secretary of the Interior’s Standards for Rehabilitation and Standards for the Treatment of Historic Properties; and Glendale Municipal Code (GMC) Sections 15.20, Historic Preservation (ordinance), and 15.22, Demolition Permits. Future projects would be required to comply with the regulations, which would contribute to a reduction in cumulative impacts on historical resources.

The addition of multi-family complexes directly south and west of the subject property has resulted in a substantial change in the setting for the Project site and the neighborhood, which had been exclusively single-family residences until the 1970s. Because of the development of multi-family complexes in the 1970s, the setting no longer has the single-family character from the period of significance (Appendix B of this Draft EIR). This change in setting since the 1908 period of significance, along with alterations to neighboring single-family houses to the north, has resulted in a neighborhood that lacks the continuity and integrity necessary for a potential historic district of Craftsman or early 20<sup>th</sup>-century homes. Furthermore, all properties directly adjacent to 1420 Valley



View Road have a built date of 1953 or later. Nevertheless, because the Project would result in adverse impacts on historical resources, and cumulative projects in the study area would involve changes to existing properties in the form of accessory dwelling units or Mills Act applications, the Project would contribute to cumulative impacts on historical-period resources.

**Significance Determination:** The Project's cultural resource impacts would result in a cumulatively considerable contribution to a historical resource.

## Greenhouse Gas Emissions

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants (such as ozone precursors), which are primarily pollutants of regional and local concern. Given their long atmospheric lifetimes, GHGs emitted by sources worldwide accumulate in the atmosphere. However, no single emitter of GHGs is large enough to trigger global climate change on its own. Rather, climate change is the result of the individual contributions of countless past, present, and potential future sources. Therefore, GHG impacts are inherently cumulative, and the analysis is inclusive of cumulative impacts.

GHG and climate change impacts are cumulatively considerable, even though the contribution may be individually limited (SCAQMD 2008). SCAQMD methodologies and thresholds are therefore cumulative in nature. If annual emissions of GHGs do not exceed established thresholds, then the Project would not result in a cumulatively considerable contribution to GHG emissions or a cumulatively significant impact on global climate change.

Based on the analysis in Impact GHG-1 and Impact GHG-2 for the Project, there would be no Project-specific significant GHG impacts and the single day of demolition that occurred in 2018 generated approximately 0.83 metric ton of carbon dioxide equivalent (MTCO<sub>2</sub>e), which is substantially below the SCAQMD threshold of 3,000 MTCO<sub>2</sub>e. The Project would not generate direct or indirect GHG emissions in excess of SCAQMD's thresholds, and Impact GHG-1 would be less than significant. As discussed in Impact GHG-2, the Project did not impede the state from achieving the Assembly Bill 32 GHG goal in 2020 or conflict with implementation of an applicable GHG reduction plans. Impact GHG-2 would be less than significant. Therefore, the impacts of the Project would not be cumulatively considerable. This impact would be less than significant. No mitigation is required.

**Significance Determination:** The Project's GHG impacts would not result in a cumulatively considerable contribution to a cumulative impact.

## Noise

Cumulative noise or vibration impacts can occur when two or more projects are under construction simultaneously or generating operational noise or vibration at the same time. Multiple sources of noise may create a combined noise effect. Because noise and vibration are localized effects that decrease with distance from the source, significant cumulative impacts do not typically occur unless two or more projects are in proximity to a single receiver. The presence of natural or human-made barriers, such as hills, walls, or buildings, between a project site and a receiver will increase the rate of noise reduction over distance and reduce cumulative noise levels. Most construction equipment noise will attenuate to reasonable background levels at a distance of approximately 1,500 feet, or 0.3 mile. The majority of the projects listed in Table 5-1 are within that distance and therefore could combine to result in cumulative noise impacts.

Related projects in the vicinity of the noise- and vibration-sensitive receivers considered in this Draft EIR include construction activities that could occur simultaneously with construction of the Project, depending on timing. Construction noise and vibration levels at any single receiver are typically dominated by the closest construction activity. As a result, the chance of construction noise from more distant project sites making a substantial contribution to overall noise levels at the same receiver during construction of the Project is generally considered to be low, especially because the cumulative projects involve the addition of residential structures, such as single-family residences and accessory dwelling units. Nonetheless, incremental increases in total construction and/or maintenance noise levels could occur.

Because the assessment of vibration impacts is based on the instantaneous peak levels of peak particle velocity, worst-case ground-borne vibration levels from construction are generally determined by whichever individual piece of equipment generates the highest vibration levels. As a result, vibration from multiple construction sites, even those in proximity to one another, generally does not combine to raise the maximum peak particle velocity. The cumulative impact is no more severe than the impact from the largest individual contribution. When considered with the analyses included in this Draft EIR for Impact NOI-2 (i.e., no vibration-sensitive receptors within 25 feet of where construction would occur and vibration levels would be below the threshold of perception), this means that the Project would not contribute to any cumulatively considerable ground-borne vibration impact. The cumulative impact would be less than significant.

Based on the analysis in Impact NOI-1, impacts would be minimal, related to the short-term noise associated with commuting construction workers and the transport of equipment and materials to and from the Project site. All construction activities under the Project would be restricted to the hours permitted by the GMC (i.e., 7:00 a.m. to 7:00 p.m. Monday through Saturday) and, as a result, would be exempt from local noise limits. By definition, any simultaneous construction and/or maintenance activity associated with related projects would have to occur during the same hours and therefore would also be exempt. Consequently, there would be no significant construction noise impact from either individual or combined activities. The cumulative noise impact would be less than significant.

The construction (demolition) phase of the Project was short-term and did not result in a noticeable increase in traffic volumes during the single day of demolition activities. As such, the Project generated negligible traffic, and cumulative traffic noise impacts did not occur. The Project site has remained vacant since completion of demolition activities in 2018; thus, the Project would not be anticipated to generate any additional vehicular traffic. The number of vehicle miles traveled would not change levels of service noticeably compared with existing conditions because the site is vacant and, once developed, would only result in one additional single family zoned lot.

Many of the closest related projects in the vicinity of the noise- and vibration-sensitive receivers considered in this Draft EIR are small residential projects that would not include permanent operational noise sources. As a result, no cumulative operational noise impacts would be associated with the projects. Other related projects could include implementation of the West Glendale Community Plan, which would serve to guide development within neighborhoods in the West Glendale area of the City. The plan, which would be used to shape positive community change and sustainable land use patterns, would most likely maintain the residential characteristics of the Project's neighborhood. As with the Project, each of the future projects would be required to comply with noise standards and Chapter 8.36 of the GMC or mitigate potentially significant noise impacts on nearby sensitive receptors. Because there would be no noise impacts under the Project,

demolition activities would comply with local GMC noise limits, and no operational activities would occur beyond the future development of two new single-family properties, the Project's contribution to cumulative operational noise levels would not be substantial, and the cumulative impact would be less than significant.

**Significance Determination:** The Project's noise impacts would not result in a cumulatively considerable contribution to a cumulative impact.

## 5.5 Growth-Inducing Impact

According to Section 15126.2 (d) of the State CEQA Guidelines, growth-inducing impacts of a proposed project must be discussed in the EIR. Growth-inducing impacts are those effects of a proposed project that might foster economic or population growth or the construction of new housing, either directly or indirectly, in the surrounding environment. According to CEQA, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

Direct growth inducement would result if a project involved the construction of new housing. Indirect growth inducement would result if, for instance, implementation of a project would result in any of the following:

- Substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- A construction effort with substantial short-term employment opportunities that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; or
- Removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area) or adding development adjacent to undeveloped land.

Growth inducement itself is not an environmental effect, but it may lead to environmental effects. These environmental effects may include increased demand on other community and public services and infrastructure, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, or conversion of agricultural and open space land to urban uses.

The Project would not directly induce unplanned population growth in the City. In addition, it would not result in a substantial number of new housing units or employment opportunities that would lead to environmental effects. Furthermore, the Project would not be expected to increase the population of the City because the Project addresses the 2018 demolition of the vacant single-family dwelling unit and garage. Subsequent to demolition, the lot would be subdivided to create two lots. No residential development is proposed as part of the Project. The Project would be consistent with the residential land use designation for the Project site under the City's General Plan (Low-Density Residential [R1]) and, therefore, would not result in more development and residents than allowed under the City's General Plan. Even though not proposed as part of the Project, two separate residential units, as well as two accessory units, could be developed on the site in the future. However, this potential development would be consistent with the City's General Plan and would not result in induced unplanned growth because no more than two residential uses could be

developed on the Project site. Therefore, the estimated Project-related increase in population and housing is within the range specified in the City's General Plan for residential development under the R1 land use designation for the Project site.

The Project does not include commercial, office, or industrial land uses that would generate permanent employment opportunities. Project construction activities would generate temporary short-term employment. However, the construction jobs are anticipated to be filled from the local employment pool. If some non-local construction workers are employed for the Project, the temporary short-term nature of the work supports the conclusion that the workers would not relocate to the City while working at the Project site. Therefore, construction of the proposed Project would not indirectly result in a population increase or induce growth by creating permanent new jobs.

The Project site is an infill site and surrounded by existing development. Consequently, the proposed Project would not require extensions of Valley View Drive or other roadways in the vicinity of the Project site to access the site. In addition, the new stormwater facilities and onsite water and wastewater infrastructure required to serve the proposed Project would be sized to accommodate Project-related demands and would not be intended to serve development on lands other than the Project site. Because the infrastructure that would be provided for the proposed Project would serve only the projected demand of the Project, the proposed Project would not result in indirect growth-inducing effects by increasing infrastructure capacity that could serve additional development.

Overall, any minimal growth that the proposed Project could induce has been evaluated and provided for in the City's General Plan. The proposed Project would not result in permanent employment opportunities. In addition, the proposed Project would not induce substantial population growth indirectly through the extension of roads or other utility infrastructure. Therefore, the proposed Project would not induce substantial growth in the City of Glendale.

## 5.6 Significant and Unavoidable Impacts

As required by Section 15126.2 (b) of the State CEQA Guidelines, an EIR must identify any significant environmental effects that cannot be avoided if a project is implemented. After conducting environmental analyses for each of the environmental issues identified in Appendix G of the State CEQA Guidelines, it was determined that the Project would result in significant and unavoidable adverse environmental impacts with respect to historical resources.

## 5.7 Significant Irreversible Environmental Changes

Pursuant to Section 15126.2(d) of the State CEQA Guidelines, an EIR must consider any significant irreversible environmental changes that would be caused by a proposed project, should it be implemented. Section 15126.2(d) reads as follows:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project.

Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

A project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses.
- The project would involve a large commitment of nonrenewable resources.
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

The Project addresses the 2018 demolition of the single-family dwelling unit and garage and the subdivision of one lot into two. This change to site conditions would not involve a long-term commitment to new land uses. However, the Project would cause an irreversible loss of an historical resource. The Historical Resources Report (Appendix B of this Draft EIR) prepared for the Project concluded that historical resources exist within the Project site, and a substantial adverse change to a historical resource is expected as a result of the Project. The impact on historical resources would remain significant and unavoidable for which feasible mitigation is unavailable.

Nonrenewable resources used during demolition of the residence and garage and subdivision of the site into two parcels included the fuel to power construction equipment. For example, energy used during demolition was in the form of electricity, gasoline, and diesel fuel, which was used primarily by construction equipment, trucks delivering equipment and supplies to the site or hauling materials off the site, and construction workers driving to and from the site. However, as discussed in Section 3.5, *Effects Not Found to Be Significant*, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation. Furthermore, the use of nonrenewable resources would account for only a small portion of the region's resources and would not affect the availability of these resources for other needs in the region. Also, there are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy efficient than that used at comparable construction sites in other parts of the City. Therefore, it is not expected that construction fuel consumption associated with the Project would be more inefficient, wasteful, or unnecessary than that at other construction sites in the region. Nonetheless, the resources used during implementation of the Project would be permanently committed to the Project. Therefore, their use would be irreversible.

The State CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with a proposed project or an accidental release of hazardous materials. The Project would not result in irreversible damage from environmental accidents, such as an accidental spill or explosion involving a hazardous material. During demolition, equipment used various types of fuel as well as materials that have been classified as hazardous. In California, the storage and use of hazardous substances are strictly regulated and enforced by various local, regional, and state agencies to prevent impacts related to environmental accidents. Demolition of the two small structures did not involve unusual amounts or types of hazardous materials that could result in irreversible damage from an accidental release. The Project would not involve the use of hazardous materials that would result in significant environmental accidents.

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