



**CITY OF GLENDALE, CALIFORNIA**

Community Development  
Planning

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January 23, 2024

EAH Housing  
Attn: Wanjiku Gachiri  
18801 Venture Blvd., Ste. 300  
Los Angeles, CA  
Glendale, CA 91356

**RE: DENSITY BONUS HOUSING PLAN  
CASE NO. PDBP 002709-2023  
426 PIEDMONT AVENUE and 507 NARANJA DRIVE**

Dear Applicant:

Pursuant to the provisions of the Glendale Municipal Code, Title 30, Chapter 30.36 and California Government Code Sections 65915, *et seq.* ("Density Bonus Law"), the Community Development Department has processed your application for a Density Bonus Housing Plan for the adaptive reuse of an existing 47,493-square-foot, three-story Assisted Living Facility into a 100% affordable senior housing development. The Project consists of 68 affordable senior dwelling units, one manager's unit, and 45 on-site vehicular parking spaces. The 39,178 square foot project site is located at **426 Piedmont Avenue and 507 Naranja Drive**, in the R-1650 (Medium High Density Residential) zone described as Portion of Lot 15 and Lots 16 and 17 of Tract No. 1026, in the City of Glendale, County of Los Angeles.

**ENVIRONMENTAL DETERMINATION** The Project has undergone environmental review required by the California Environmental Quality Act ("CEQA") and has been determined to be exempt from further CEQA review under a Class 1 "Existing Facilities" and Class 32 "In-fill Development Project" exemption pursuant to State CEQA Guidelines Sections 15301 and 15332, because the project includes the adaptive reuse of an existing building and after review and consideration of all required technical reports and/or studies, staff determined the Project meets all the conditions for an infill development project, as follows:

- a) The Project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations;
- b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban areas;

- c) The Project site has no value as a habitat for endangered, rare or threatened species;
- d) Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and
- e) The site can be adequately served by all required utilities and public services.

### **DENSITY BONUS REQUEST**

The Applicant is requesting the approval of a Density Bonus Application to allow for a 123% increase in density for a 100% affordable senior housing development project with 67 residential dwelling units for low-income seniors and one manager's unit (total of 68 units) with two incentives/concessions.

The proposed project ("Project") is located within the R-1650 (Medium High Density Residential) zone, where both multiple residential dwelling units as well as senior housing are permitted. Sites zoned R-1650 on lots having a width greater than 90 feet are permitted one dwelling unit per 1,320 square feet. Consequently, a maximum of 30 units are permitted by right on the 39,178-square-foot (0.9-acre) project site. The site is currently developed with a 47,493 square-foot, three-story constructed in 1973 and 1975. The existing building and addition are considered legal non-conforming pursuant to GMC Chapter 30.60, Section 30.60.040.

Pursuant to California's Density Bonus Law (Government Code Sections 65915 through 65918), housing developments with 100% of all units in the development (including total units and density bonus units, but exclusive of a manager unit or units), that are reserved for lower income households per Section 50079.5 of the California Health and Safety Code (HSC), are entitled to four (4) incentives/concessions and an unlimited density bonus if located within one-half mile of a Major Transit Stop, as defined by Subsection (b) of Section 21155 and Section 21064.3 of the California Public Resources Code (PRC). The PRC defines Major Transit Stops as existing rail or bus rapid transit stations, ferry terminals served by either a bus or rail transit service, and the intersection of two or more bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods, as well as "major transit stops" that are included in the applicable regional transportation plan. The Property is located in both a Transit Priority Area (TPA) as well as a High Quality Transit Area (HQTA) as Routes, 3, 8, and 31 of the Glendale Beeline Bus, as well as Metro 90 Bus, run along Glendale Avenue with stops meeting the required frequency located at both Doran Street and Lexington Drive, bordering the north and south boundaries of the Property, respectively.

One hundred percent of the units of the Project (exclusive of the one manager's unit) are reserved for lower income households. All units except the one manager's unit will be restricted to and occupied by lower income households at affordable rents for at least 55 years. This satisfies the 100% lower income requirement of Gov. Code section 65915(b)(1)(G). Moreover, in accordance with 65915(c)(1)(B)(ii), at least 20% of the units will be available to low-income households at State law affordable rents.

The Project involves the adaptive reuse of the existing 47,493-square-foot, three-story assisted living facility into a 100% affordable senior housing development. The Project consists of 67 affordable senior dwelling units, one manager's unit, and 45 on-site vehicular parking spaces.

Pursuant to Chapter 30.35 of the GMC, all rental development projects of eight or more dwelling units must reserve 15% of the maximum residential density or number of units proposed, as units affordable to low-income households (defined as households whose gross income does not exceed 80% percent of the area median income for Los Angeles County, as defined by HSC 50079.5). The Project meets the Inclusionary Housing Requirement by reserving 100% of all units in the development (including total units and density bonus units, but exclusive of the one manager's unit), to lower income households under Government Code Section 65915 (67 of the 68 units will be made available as rental units for seniors earning between 30% and 80% of area median income for a minimum period of 55 years). Thus, no additional affordable units are required under the Inclusionary Zoning Ordinance (GMC 30.35).

The Applicant is requesting two (2) incentives pursuant to Gov. Code Section 65915(d)(1)(D) as follows:

1. Reduction in street front setback: In accordance with GMC Section 30.11.030 Table 30.11-B, the minimum street front setback is 20 feet and an average of 23 feet for the first residential floor and a minimum of 23 feet and average of 26 feet for the seconded and third residential floors. The Project is proposing a zero (0) street front setback on both Piedmont Avenue and Naranja Drive although the existing building is currently setback from 20 feet with an average of 31 feet from Piedmont and 20 feet with an average of 21 feet from Naranja Drive. The intent of the zero (0) setback is to allow this area to count towards open space.
2. Reduction in minimum unit sizes: In accordance with GMC Section 30.11.050 the minimum unit size for efficiency and one-bedroom units is 600 square feet (SF) and 800 SF for two-bedroom units. As proposed, the Project includes 21 efficiency/studio units range from 360 SF to 350 SF with an average unit size of 350 SF, 46 one-bedroom units range from 470 SF to 400 SF with an average of 450 SF and one 715 SF two-bedroom unit (manager's unit).

Street Front Yard Setback Reduction: The Project includes an incentive request for a decrease in the required street front setback along both Piedmont Avenue and Naranja Drive to permit a 20-foot reduction in the required front yard in lieu of the required 20 feet at the first floor, and a 23-foot reduction in the required front yard in lieu of the required 23 feet at the second floor and above, to permit zero-foot front yard setbacks for all floors. Granting the subject request for a decrease in this front yard will allow for the Project to meet outdoor open space requirements required to produce dwelling units on site within the constraints of the existing, legal, non-conforming use.

The Property is legally non-conforming with regard to yards, area, open space, parking, and lot coverage, as the building was originally permitted as a residential home for the aging/assisted living facility. In order for suitable adaptive reuse of the building into restricted affordable housing units, incentives are required to enable reasonable, feasible and equitable livable dwelling units.

As such, in order to ensure that the project provides the maximum amount of usable open space and recreational amenities on site necessary to support seniors, a yard reduction is required to enable all of the existing open space area within each of the two street front setbacks areas to be utilized as outdoor open space. Since the building is an existing structure, this request for a yard reduction is only a numerical deviation in a zoning standard, which does not result in the building actually having substandard yards.

The decrease in the required front yard will allow for a more outdoor open space along the street, which activates the Piedmont Avenue and Naranja Drive frontages to accommodate pedestrian-friendly uses that ensure the Project will be compatible with community goals and future development in the area, making the Project economically feasible in the long-term. Without such deviation, the project would not be able to provide 68 equitable dwelling units that also meets required open space provisions.

Dwelling Unit Size Reduction: A 250-square-foot reduction in the required dwelling unit size for efficiency units, a 200-square-foot reduction in the required dwelling unit size for 1-bedroom units, and a 100-square-foot reduction in the required dwelling unit size for 2-bedroom units, to permit an average efficiency unit size of 350 square feet, an average 1-bedroom unit size of 400 square feet, and an average 2-bedroom unit size of 700 square feet.

The adaptive reuse Project is designed to maximize unit yield within an existing building while providing functional community space to serve its residents in an urban setting. The dimensions of the existing structure make compliance with the city's minimum dwelling unit sizes infeasible since the structural system of the existing building dictates demising wall locations. As such, the reduction in unit sizes will allow a greater number of affordable units to be constructed in the same amount of building floor area.

In addition to the concessions detailed above, the Project qualifies for the mandatory Parking Concession. Pursuant to California Government Code section 65915(p)(3)(A), the city (Glendale) shall not impose any parking standards because the Project meets the criteria of subparagraph (G) of paragraph (1) of subdivisions (b) of Government Code 65915. Furthermore, the Project is eligible pursuant to AB 2097 from providing any parking. AB 2097 prohibits the city from imposing minimum parking requirements when a project is located within one-half mile of a major transit stop. As such, no minimum parking is required as part of the Project. However, because the Project is adaptively reusing an existing building on the site, 45 parking spaces will be provided in the existing subterranean garage.



## CONCESSIONS/INCENTIVES FINDINGS

After considering the evidence presented with respect to this application, the Director of Community Development was unable to make the necessary findings to deny any of the requested concessions for approval of the Density Bonus Housing Plan. The requested concessions are required in this case to allow the density bonus requested, while reducing costs to the developer. The additional density and the resulting savings that the developer realizes will be significant and will allow the affordable housing costs and rents to be reduced. The City's General Plan Housing Element encourages the production of affordable housing and provides for flexibility in creating such units. As a result, the Director of Community Development has **GRANTED** the requested concessions pursuant to California Government Code Sections 65915, *et seq.* because the Project is providing 100 percent of the total base density units of the housing development as affordable units, which will be restricted to very low-income households, as defined in Section 50105 of the Health and Safety Code. Pursuant to GMC Section 30.36.080(A), the Director of Community Development shall grant the requested incentives or concessions, unless he or she makes written findings, based upon substantial evidence, of any one (1) or more of the following:

- 1. The concessions (incentives) must be granted *unless* the Director finds, based on substantial evidence, that the concessions do not result in identifiable and actual cost reductions to provide for affordable housing costs or to provide affordable rents.**

This denial finding cannot be made, as there is no evidence that the concessions will not result in actual cost reductions to provide for affordable rents. To the contrary, there is substantial evidence that the concessions will result in identifiable and actual cost reductions to provide affordable rents. The requested concessions, taken as a whole, are required to allow for the additional density requested and a greater number of units to be constructed on the same amount of lot area utilizing the existing buildings onsite. The concessions, together, will reduce costs to the applicant for providing affordable units by creating construction efficiencies and inherent reductions in costs by allowing the construction of a greater number of units within the existing building. The additional units will result in actual and identifiable cost reductions because the additional units will take advantage of construction efficiencies when being built and will generate rental income to offset the cost of providing the units at an affordable rent. If the Project were to comply with the Zoning Code regulations associated with providing the required street front setback and minimum unit sizes, the number of units provided would be significantly impacted and would subsequently affect the viability of the Project. With the requested concessions, the applicant will realize cost reductions that will allow it to provide the 68 housing units at an affordable rent.

- 2. The concessions (incentives) must be granted *unless* the Director finds, based on substantial evidence, that they will have a "specific adverse impact upon**

**public health and safety,” as defined in paragraph (2) of subdivision (d) of California Government Code Section 65589.5, or the physical environment or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the housing development unaffordable to low-income and moderate-income households. Specific, adverse impact is defined as “a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.” (Government Code section 65589.5(d)(2).) Inconsistency with the zoning ordinance or the land use designation in the General Plan shall not constitute a specific, adverse impact upon public health or safety.**

The applicant is seeking approval of two concessions pursuant to Government Code Section 65915, et seq. and GMC Chapter 30.36 (Density Bonus Incentives), discussed in detail above, in exchange for providing two (2) affordable units for lower income households. This denial finding cannot be made as there is no evidence that the incentives will have any adverse impacts. To the contrary, no specific adverse impacts upon public health or safety or on the physical environment or on any real property that is listed in the California Register of Historical Resources would occur by granting the requested concessions for reduced street front setback and reduce unit sizes. The Project Site has not been listed on the National Register of Historic Places, California Register of Historical Resources, or Glendale Register of Historic Resources, and has not been identified as a historic resource in any survey. Moreover, an individualized analysis by Planning staff was conducted and staff concluded there is no evidence the Project Site or the structure on the Project Site are historic. Accordingly, this denial finding cannot be met.

The concessions do not include or necessitate reductions in standards to any state or local Building and Safety Division (Community Development Department), Fire department or Engineering Division (Public Works Department) requirements or any other objective, identifiable written requirements pertaining to health and safety. The existing residential buildings on the Project site which are proposed to be adaptively reused, are not historically or culturally significant. Moreover, the proposed Project is exempt from further CEQA review based on the fact that it meets the requirements to qualify for a Class 1 “Existing Facilities” and Class 32 “In-fill Development Project” and thus, does not exceed thresholds for noise, traffic, air quality and water and will not result in significant cumulative impacts. (See Attachment 2, “Class 32 Infill Exemption Analysis”). Furthermore, the existing building is considered legal non-conforming compliance with the Zoning Code and provides light, air and ventilation for adjacent buildings, which consist of similar multi-family residential buildings to the south, east and west of the subject site.

Furthermore, the concessions allow for the adaptive reuse of the existing building on the site, which will then accommodate additional dwelling units. The additional

density will, in fact, promote the City's health and safety in that there will be greater housing opportunities for lower income households. Moreover, the Project will advance the goals and policies of the General Plan, Housing Element (2021-2029), including, but not limited to, Goal 1 ("A City with a Wide Range of Housing Types to Meet the Needs of Current and Future Residents"), Goal 3 ("A City with Increased Opportunities for Affordable and Special Needs Housing Development") and Policies 3.1 and 3.2 ("Encourage both the private and public sectors to produce or assist in the production of affordable housing for special needs groups such as: persons with disabilities, the elderly, large families, single-parent households, and formerly homeless") and ("Promote the development of extremely low, very low, low and moderate income housing by allowing developers density bonuses or other financial incentives for providing units for low and moderate income residents. The unit mix and location of affordable housing units in density bonus projects must be approved by the City and included in an affordable housing agreement.").

**3. The concessions (incentives) must be granted *unless* the Director finds, based on substantial evidence, that the concessions will be contrary to state or federal law.**

The requested concessions will not be contrary to state or federal law and do not require any other discretionary entitlement. The Project is designed to comply with Building and Safety codes and the proposed 68-unit affordable housing residential project is consistent with the General Plan. The Project meets the goals and policies in the Housing Element to provide affordable housing. There is no evidence of state or federal laws being violated. Accordingly, this denial finding cannot be met. Since there is no substantial evidence to support any of the three findings for denial, the Director of Community Development must grant, and does hereby grant, the requested concessions.

#### **CONDITIONS OF APPROVAL**

**APPROVAL** of this Density Bonus Housing Plan shall be subject to the following conditions:

1. That the development shall be in substantial accord with the plans submitted with the application except for any modifications as may be required to meet specific Code standards or other conditions stipulated herein as approved by the Director of Community Development.
2. That all necessary permits shall be obtained from the Permit Services Center and all construction shall be in compliance with the Glendale Building Code and all other applicable regulations.
3. That the premises be maintained in a clean and orderly condition, free of weeds, trash, and graffiti.
4. That any expansion or modification of the structure or use shall require a new

Density Bonus application. The phrase “modification of the structure or use” includes, but is not limited to, proposing a different percentage of the units as affordable or altering the affordability of the units (i.e., proposing the affordable units be restricted to low- or moderate-income households when the approval is originally for very low-income households). Expansion shall constitute adding of new floor area, reduction of parking and open spaces, or any physical changes as determined by the Director of Community Development.

5. That the applicant shall work with the Community Development Department and the City Attorney’s Office to make any permissible or required additions, deletions and/or amendments to the Density Bonus Housing Plan and to execute and record a Density Bonus Housing Agreement pursuant to GMC Section 30.36.140, to the satisfaction of the Director of Community Development or his/her designee and subject to approval as to form and content by the City Attorney. Such Density Bonus Housing Agreement shall restrict the rentals of the required percentage of dwelling units in the housing development to persons or families of very low-income households, as specifically identified in this approval. The applicant shall be required to execute and record such Density Bonus Housing Agreement prior to issuance of any and all required building permits.
6. That approval of the Design Review Board shall be obtained prior to applying for or obtaining building permits.

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#### **APPEAL PERIOD, TIME LIMITS, LAPSE OF PRIVILEGES, TIME EXTENSIONS**

The applicant’s attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper City and public agency.

Under the provisions of the Glendale Municipal Code, Title 30, Chapter 30.62, any person affected by the above decision has the right to appeal said decision to the Planning Commission if it is believed that the decision is in error or that procedural errors have occurred, or if there is substantial new evidence which could not have been reasonably presented. It is strongly advised that appeals be filed early during the appeal period so that imperfections/incompleteness may be corrected before the appeal period expires.

***All appeals must be filed using the City’s online permit portal: [www.glendaleca.gov/Permits](http://www.glendaleca.gov/Permits). Create an account, click “Apply,” type “appeal” in the search bar, and apply for “Appeal of Planning Decision.” Any appeal must be filed within fifteen (15) days following the actual date of the decision with the prescribed fee prior to the expiration of the 15-days following the actual date of the decision with the prescribed fee prior to the expiration of the 15-day appeal period, on or before February 7, 2024. Information regarding appeals and appeals fees may be obtained by calling the Community Development Department staff at***



**818-548-2140, or contacting the case planner, Erik Krause, at [ekrause@glendaleca.gov](mailto:ekrause@glendaleca.gov) or 818-937-8156**

## **GMC CHAPTER 30.41 PROVIDES FOR**

### Termination

Every right or privilege authorized by a Density Bonus Housing plan shall terminate two (2) years after the granting of such, unless the exercise of such right or privilege has commenced in good faith prior to such time, except as otherwise provided for.

### Cessation

A Density Bonus Housing Plan may be terminated by the review authority upon any interruption or cessation of the use permitted by the Density Bonus Housing Plan for one year or more in the continuous exercise in good faith of such right and privilege.

### Extension

Permits granted by such right or privilege may be requested one time and extended for up to a maximum of one (1) additional year upon receipt of a written request from the applicant and demonstration that a reasonable effort to act on such right and privilege has commenced within the two (2) years of the approval date. In granting such extension the applicable review authority shall make a written finding that neighborhood conditions have not substantially changed since the granting of the Density Bonus Housing Plan.

## **TRANSFERABILITY**

This authorization runs with the land or the use for which it was intended for and approved. In the event the property is to be leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions and/or limitations of this grant.

## **VIOLATIONS OF THESE CONDITIONS**

Violations of conditions required by this determination may constitute a misdemeanor or infraction under Section 1.20.010 of the Glendale Municipal Code (GMC) and/or a violation of other local, State or Federal laws or regulations. Unless a specific penalty is provided, any person convicted of a misdemeanor shall be punished by a fine not to exceed one thousand dollars (\$1,000.00), or imprisonment for a term not to exceed six (6) months, or by both fine and imprisonment. Infractions are punishable by a fine not exceeding the sum of five hundred dollars (\$500.00) for each violation. Violations of conditions required by this determination may be grounds for a revocation. of conditions required by this determination may be grounds for a revocation.

**NOTICE – subsequent contacts with this office**

The applicant is further advised that all subsequent contacts with this office regarding this determination must be with the case planner, Milca Toledo, who acted on this case. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished **BY APPOINTMENT ONLY**, in order to assure that you receive service with a minimum amount of waiting. You should advise any consultant representing you of this requirement as well.

You may contact the case planner, Erik Krause, during normal business hours at (818) 937-8156 or via e-mail at [ekrause@glendaleca.gov](mailto:ekrause@glendaleca.gov).

Sincerely,

Bradley Calvert  
Director of Community Development



Attachments:

1. Density Bonus Housing Plan
  2. Class 32 Infill Exemption Analysis
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Cc: City Attorney's Office (Yvette Neukian)  
Community Development – Housing Division (Peter Zovak/Mike Fortney/Michelle Shahnazarians)

**Density Bonus and Inclusionary Housing Plan**

**426 Piedmont Avenue and 507 Naranja Drive  
Glendale, CA 91206**

**EAH INC.  
c/o Dana Sayles  
three6ixty  
11287 West Washington Boulevard  
Culver City, CA 90230**

**City of Glendale  
Community Development Department  
Housing Division  
141 North Glendale Avenue, Room 202  
Glendale, CA 91206**

Applicant, EAH INC. ("Applicant") proposes the development of a sixty-eight (68)-unit, 100% affordable housing development for seniors located at 426 Piedmont Avenue and 507 Naranja Drive (the "Project").

**Maximum Number of Units Permitted per Glendale Municipal Code ("GMC"):**

The Project is located within the R-1650 (Medium High Density Residential) zone, where both multiple residential dwelling units as well as senior housing are permitted. Sites zoned R-1650 with a frontage width greater than 90 feet are permitted one (1) dwelling unit per 1,320 square feet. Consequently, a maximum of thirty (30) units are permitted by right within the 39,178-square-foot (0.9-acre) lot area.

**Number of Affordable Units Meeting California Density Bonus Law Requirement per California Government Code ("Gov. Code") Sections 65915, et seq.:**

Per California's Density Bonus Law (Gov. Code Sections 65915-65918), housing developments with 100% of all units in the development (including total units and density bonus units, but exclusive of a manager unit or units), that are reserved for lower income households per section 50079.5 of the California Health and Safety Code ("HSC"), are entitled to an unlimited density bonus if located within one-half mile of a major transit stop, as defined by Section 21155(b) and Section 21064.3 of the California Public Resources Code ("PRC").

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100% of the units of the Project (exclusive of the one (1) manager's unit) are reserved for lower income households per Section 50079.5 of HSC. All units except the one (1) manager's unit will be restricted to and occupied by lower income households pursuant to the California Tax Credit Allocation Committee ("CTCAC"), at affordable rents for at least fifty-five (55) years. All the units will be restricted to and occupied by lower income households pursuant to CTCAC, 80% of Los Angeles County area median income or lower), at affordable rents for at least fifty-five (55) years. This satisfies the 100% lower income requirement of Gov. Code Section 65915(b)(1)(G). Moreover, in accordance with 65915(c)(1)(B)(ii), at least 20% of the units will be available to low income households at State law affordable rents.

**Amount of Density Bonus Requested per Gov. Code Sections 65915, et seq.:**

Applicant is requesting thirty-eight (38) units above the maximum allowable density by right (thirty (30) units per GMC) on the Project site. This amounts to a 126.6% density bonus. Under State Density Bonus Law, the Project qualifies as 100% affordable per Section 50079.5 of HSC and is located within one-half mile of a major transit stop per Sections 21064.3 and 21155(b) of PRC.

Gov. Code section 65915 defines major transit stop as it is defined in PRC Section 21155, which also references PRC Section 21064.3. Collectively, PRC Sections 21064.3 and 21155(b) define major transit stops as existing rail or bus rapid transit stations, ferry terminals served by either a bus or rail transit service, and the intersection of two or more bus routes with a frequency of service interval of fifteen (15) minutes or less during the morning and afternoon peak commute



periods, as well as “major transit stops that are included in the applicable regional transportation plan.” Per PRC Section 21060.2, bus rapid transit (“BRT”) is an enhanced public mass transit service with features that are distinguishable from typical bus operations.

The Property is located in both a Transit Priority Area (“TPA”) as well as a High Quality Transit Area (“HQTA”) as Routes 3, 8, and 31 of the Glendale Beeline Bus, as well as the Metro 90 Bus, run along Glendale Avenue with frequent stops located at both Doran Street and Lexington Drive, bordering the north and south boundaries of the Property, respectively. Additionally, the Project is within a within an eligible Southern California Association Governments (“SCAG”) identified HQTA 2045 Community. This qualifies the Project as being located within one-half mile of a major transit stop per Gov. Code Section 65915.

Additionally, Metro has completed its environmental analysis on the North Hollywood to Pasadena Transit Corridor which will extend the G Line (Orange Line) east to connect with the L Line (Gold Line). The Metro Board of Directors have proposed a BRT station along East Broadway at Glendale Avenue and North Verdugo Road. The Final Environmental Impact Report (“FEIR”) for the proposed BRT station at Glendale Avenue and North Verdugo Road was certified and approved on April 28, 2022. According to [www.metro.net/projects/noho-pasadena-corridor/#status](http://www.metro.net/projects/noho-pasadena-corridor/#status), the transit project is now in the preliminary design stage before it enters the start of final design and construction.

Consistent with Sections 21064.3 and 21155(b) of PRC, the BRT station at Glendale Avenue and North Verdugo Road is a planned major transit stop included in the Regional Transportation Plan. The Project is also consistent with the characteristics of transit priority projects under Section 21155(b) of PRC. The Project is therefore entitled to an unlimited density bonus per Gov. Code Section 65915(b)(1)(G).

**Number and Description of Incentives Requested:**

If a project meets the criteria of Gov. Code Section 65915(b)(1)(G), the project is entitled to four (4) incentives and is additionally entitled to a height increase of up to three (3) additional stories, or thirty-three (33) feet. The Project meets the above criteria and is therefore entitled to four (4) incentives or concessions and a height increase of up to three (3) additional stories, or thirty-three (33) feet.

**Incentives**

The Project is entitled to **four (4)** incentives pursuant to Gov. Code Section 65915(d)(1)(D), however is utilizing only two (2) incentives:

1. A 20-foot reduction in the required front yard in lieu of the required 20 feet at the first floor, and a 23-foot reduction in the required front yard in lieu of the required 23 feet at the second floor and above, to permit zero-foot front yard setbacks for all floors.
2. A 250-square-foot reduction in the required dwelling unit size for efficiency units, a 200-square-foot reduction in the required dwelling unit size for 1-bedroom units, and a 100-

square-foot reduction in the required dwelling unit size for 2-bedroom units, to permit an average efficiency unit size of 350 square feet, an average 1-bedroom unit size of 400 square feet, and an average 2-bedroom unit size of 700 square feet.

**Amount of Vehicular Parking Concessions Requested per Gov. Code Section 65915:**

If a project is both 100% affordable to lower income households per Section 50079.5 of HSC and has unobstructed access to a major transit stop located within one-half mile of the housing development, then a local jurisdiction shall not impose a parking ratio per Gov. Code Section 65915(p)(3)(A). A housing development has unobstructed access to a major transit stop if a resident is able to access the major transit stop without encountering natural or constructed impediments. Natural or constructed impediments include, but are not limited to, freeways, rivers, mountains, and bodies of water, but do not include residential structures, shopping centers, parking lots, or rails used for transit.

The Project has unobstructed access to a major transit stop located within one-half mile of the development. Additionally, the Project is eligible to provide parking pursuant to AB 2097, which allows zero parking for qualifying sites within a Transit Priority Area. As such, the City of Glendale may not impose any parking ratio for the development. Despite the parking allowance under Gov. Code Section 65915(p)(3)(A) and AB 2097, the Project, as designed, will provide a total of forty-five (45) parking stalls.

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**Child Care Space:**

Not applicable.

**Inclusionary Housing Requirement:**

On May 7, 2019, the City adopted a Citywide Inclusionary Zoning Ordinance, Ordinance No. 5928, codified at GMC 30.35 (collectively, the "IZO"). The IZO became effective after a 30-day period on June 7, 2019. The IZO requires a housing development (a rental development project of eight (8) or more dwelling units proposed to be constructed in the City) to provide fifteen (15) percent of the units as affordable to low income households. The project is subject to the IZO.

The Project is required to provide five (5) affordable units to very low income households (15 percent of 30 base density units (4.5 rounded up to 5)). Under the IZO (GMC 30.35.050(C)), "[t]o the extent required by State law, all affordable units required pursuant to the grant of a density bonus shall count toward the inclusionary unit requirement contained in this chapter. Very low income density bonus units shall be equivalent to low income inclusionary units."

Therefore, the Project meets the IZO requirement by reserving 100% of all units in the development (including total units and density bonus units, but exclusive of the one (1) manager's unit), to lower income households under Gov. Code Section 65915. Thus, no additional affordable units are required under the IZO.

**Affordable Housing Commercial Development Impact Fee:**

On May 7, 2019, the City adopted a Citywide Affordable Housing Commercial Development Impact Fee, Ordinance No. 5929, codified at GMC 4.11 (collectively, the "Commercial DIF"). The Commercial DIF became effective after a 60-day period on July 7, 2019.

With the exception of hotels, auto dealerships, community land uses which serve the public, and the reconstruction of any building destroyed by fire, flood, earthquake or other act of nature (so long as the square footage does not exceed the square footage before the loss), the Commercial DIF imposes a \$4 per square foot fee (per the FY 2022-2023 Citywide Fee Schedule) on all commercial development projects with a gross floor area exceeding 1,250 square feet. The Project is not subject to the Commercial DIF as the Project does not encompass a permitted commercial component.





**CLASS 32 CATEGORICAL EXEMPTION FINDINGS  
PREPARED FOR  
CASE NO. PDBP 002709-2023  
426 PIEDMONT AVENUE and 507 NARANJA DRIVE**

“Class 32 consists of Projects characterized as in-fill development meeting the conditions described in this section. (a) The Project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. (b) The proposed development occurs within city limits on a Project site of no more than five acres substantially surrounded by urban uses. (c) The Project site has no value, as habitat for endangered, rare or threatened species. (d) Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality. (e) The site can be adequately served by all required utilities and public services.” (14 Cal. Code Regs. § 15332) (“CEQA Guidelines”).

The Project includes a Density Bonus Housing Plan for the adaptive reuse of an existing 47,493-square-foot, three-story Assisted Living Facility into a 100% affordable senior housing development. The Project consists of 68 affordable senior dwelling units, one manager’s unit, and 45 on-site vehicular parking spaces. The 39,178 square foot project site is located at 426 Piedmont Avenue and 507 Naranja Drive, in the R-1650 (Medium High Density Residential) zone.

The Class 32 exemption (Section 15332 of the State CEQA Guidelines) is intended to promote infill development within urbanized areas. Class 32 consists of projects characterized as in-fill development meeting the following conditions:

- a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations:**

The Property has a zoning designation of R-1650 and General Plan land use designation of Medium High Density Residential. Located within the Citrus Grove residential neighborhood, the Property is primarily surrounded by Medium High Density Residential uses to the north, south, and west, and Low and Medium Density Residential to the east. The proposed development will provide 67 affordable dwelling units for seniors and one market-rate manager’s unit, offering housing opportunities for the community that will be conveniently located near both transit and a variety of community services.

As a 100% affordable project, the Project addresses the majority of the goals identified in the 2021-2029 Housing Element of the Glendale General Plan. Because the Project provides a mix of efficiency/studio and one-bedroom units that are all affordable and set aside for seniors, with one market-rate, two-bedroom unit for the on-site manager, the Project addresses Goal 1 of the Housing Element to provide “a wide range of housing

types to meet the needs of current and future residents” and specifically fulfills Policies 1.2, 1.3, 1.4, 1.5, and 1.10.

The Project meets Goal 2 of the Housing Element to provide “high quality residential neighborhoods that are attractive and well designed” and fulfills Policies 2.8, 2.9, and 2.10 by providing a visually appealing development that respects the scale, historic continuity, and sense of community for the surrounding residential area. Further, the Project meets Goal 3 of the Housing Element by establishing “increased opportunities for affordable and special needs housing development” and fulfills Policies 3.1, 3.2, 3.3, and 3.8 by encouraging the production of affordable housing and housing for special needs groups such as the elderly.

Finally, the Project achieves Goal 6 of the Housing Element, because it will provide “housing that is livable and sustainable” and promotes Policies 6.10 and 6.11 by implementing sustainable building practices and fostering design that encourages transit, pedestrian, bicycle, and other mobility options.

The Land Use Element of the Glendale General Plan includes a goal to “Support the creation of higher density residential development and alternative forms of medium and high-density housing in those areas best suited from the standpoint of accessibility, current development, community organization, transportation and circulation facilities and economic feasibility” in addition to “Providing opportunities for a diversity in housing styles for all economic segments of the community.” The Project is consistent with and helps achieve these goals through the adaptive reuse of an existing Assisted Living Facility into a 47,493-square-foot, three-story, 100% affordable senior housing development. The Project will yield a total of 68 dwelling units (67 affordable units and one manager’s unit) in a high-density development located in a Transit Priority Area and a High Quality Transit Area, surrounded by other residential and urban uses. Residents will have access to public transportation that encourages utilizing neighborhood services on a daily basis.

As demonstrated above, the proposed Project is consistent with all applicable land use and zoning designation, policies, and regulations of the General Plan and the GMC.

**b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses:**

The Project site is entirely within the City of Glendale. The site is comprised of two legal parcels approximately 39,178 square feet of surface land area, or 0.9 acres, which is less than five acres in size. The Property is substantially surrounded by urban uses, with multifamily residential buildings to the north (adjacent to the alley), multifamily residential buildings to the south (along Lexington Drive), both single family and multifamily residential to the east (across Naranja Drive), and Piedmont Park, along with more multifamily residential, to the west. The Public Resources Code (PRC) defines qualified urban use as “any residential, commercial, public institutional, transit or

transportation passenger facility, or retail use, or any combination of those uses." The Project Site is substantially surrounded by urban uses.

**c) The project site has no value as habitat for endangered, rare, or threatened species:**

The Project site is in a residential area, fully developed with two existing buildings, and is surrounded by urban uses. The Project site is not currently identified as, and does not provide a habitat for, endangered, rare, or threatened species. Additionally, there are no protected trees on the Project site. Therefore, the site does not contain or have value as a habitat for endangered, rare, or threatened species.

**d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality:**

The Project involves the adaptive reuse of an existing 47,493-square-foot, three-story building occupied by a 112-bed senior assisted living facility since 1973. The proposed Project would not result in any significant effects to traffic, noise, air quality, or water quality as discussed below.

Noise

The Project scope involves the adaptive reuse of an existing structure with no change to the building envelope are proposed. Construction activity is limited to a tenant improvement of the existing structure and limited exterior work. Thus, the short-term construction and long-term operational activities associated with the Project would not constitute a significant noise impact.

Air Quality

The proposed Project for 68 residential dwelling units is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainable under an applicable federal or state ambient air quality standard. The operational emissions would be derived from the net increase of zero square feet, as the proposed Project is an adaptive reuse of a senior assisted living facility that has been in operation since 1973.

Operational emissions for the Project-related traffic will be less than significant with a reduction the unit count from 112 Assisted Living units to 68 total residential dwelling units. In addition to mobile sources from vehicles, general development causes smaller amounts of "area source" air pollution to be generated from on-site energy consumption (natural gas combustion) and from off-site electrical generation. These sources represent a small percentage of the total pollutants. The inclusion of such emissions adds negligibly to the total significant Project-related emissions burden generated by the proposed Project. The Project will not cause recommended threshold levels to be exceeded. Operational emission impacts will be at a less-than-significant level.

Construction impacts will also be at less-than-significant levels; therefore, the Project would comply with local regulatory measures and neither the construction nor the operation of the Project would result in significant air quality or greenhouse gas impacts.

### Water Quality

Because the proposed Project is an adaptive reuse of an existing structure in an area that is already fully developed with urban uses, including impervious surfaces, any construction would not impact water flows or water quality. There is no change to the footprint of the proposed structure. Additionally, as part of the proposed renovation, the Project will comply with the City's Low Impact Development (LID) Guidelines set forth in Chapter 13.43 of the GMC and with applicable state and federal regulations, which is an improvement of drainage and water quality provisions on-site from the existing structure which was constructed prior to the adoption of LID guidelines. Such LID standards are designed to minimize the impervious area footprint, prevent pollutants of concern from leaving the development site. The overall imperviousness of the Project site will be reduced from existing conditions through the addition of on grade and on structure planters. Additionally, a drywell and storage tank will be installed to comply with LID guidelines which will further reduce the overall storm water runoff and improve water quality. Compliance with those regulations will ensure that the Project would not result in a significant impact to water quality. Existing utilities would provide water supplies and wastewater treatment services to the subject property. The Project is not adjacent to any water sources and the construction of said Project, where it is surrounded by very similar and more dense projects, will not create any impact to water quality.

### Vehicle Miles Traveled

The Vehicle Miles Traveled (VMT) screening analysis, based on the City of Glendale Transportation Impact Analysis (TIA) Guidelines dated October 30, 2020, was prepared by Overland Traffic Consultants, Inc. dated December 21, 2023. The City of Glendale TIA provides a vehicle miles traveled methodology based on the passage of Senate Bill 743 (SB 743), which replaces automobile delay and level of service as a basis for determining CEQA impacts. The Affordable Housing Section of the City of Glendale TIA Guidelines indicates that "residential projects with 100% deed restricted affordable housing can be presumed to have a less-than-significant impact and would not require a detailed VMT analysis." This is further supported through the Land Use Projects Screening Criteria Flowchart of the City of Glendale TIA Guidelines. This flowchart indicates that if a project is within one half mile of non-residential uses and is 100% affordable, through provisions in Code Section 2.1.2.2, the VMT analysis is complete and there are no VMT impacts. Because this Project is 100% affordable, across the street from Piedmont Park, and within one half mile of commercial properties along North Glendale Avenue and Doran Street with pharmacy, grocery, restaurant, bank, and healthcare uses, Overland Traffic Consultants, Inc. concluded that the proposed adaptive reuse Project does not create a significant VMT impact based on the City of Glendale TIA guidelines, thus no further transportation analysis would be required.



The proposed Project will leverage access to the abundant public services surrounding the site. The existing mobility and circulation options available within close proximity to the proposed Project will result in no significant traffic impacts as a result of the street front yard setback and dwelling unit size reductions. Therefore, the proposed development project will have no transportation and circulation impacts relating to traffic.

**e) The site can be adequately served by all required utilities and public services:**

The Project is located in an existing urban area with existing buildings that are adequately served by existing public utilities and services. The adaptive reuse of the existing building will be served by the same existing public utilities and services. These services include water, electricity, solid waste collection, and sewer services provided by the City of Glendale. City utilities and services have capacity for any increased usage associated with the Project, and relevant fees for utility and service usage would be paid by the Project and tenants as appropriate. Accordingly, the Project will be adequately served by all required utilities and public services.

Additionally, the California Green Code requires new construction to meet stringent efficiency standards for both water and power, such as high-efficiency toilets, dual-flush water closets, minimum irrigation standards, LED lighting, etc. The Project can be characterized as in-fill development within urban areas for the purpose of qualifying for Class 32 Categorical Exemption as a result of meeting the five conditions listed above.

**ATTACHMENTS:**

1. HQTA & Major Transit Stop Analysis
2. Vehicle Miles Traveled (VMT) Screening Analysis



January 12, 2024

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

RE: Project Proximity to Major Transit Stop– The Residences at Citrus Grove -  
426 Piedmont Avenue & 507 Naranja Drive, City of Glendale

Overland Traffic Consultants has conducted an evaluation of the proposed Residences at Citrus Grove Project located at 426 Piedmont Avenue and 507 Naranja Drive proximity to Major Transit Stop. The Project site is located between Piedmont Avenue and Naranja Drive north of East Lexington Drive. The Project has frontage on Piedmont Avenue and Naranja Drive in the City of Glendale. The Project will adaptively reuse an existing building on the site which was previously used for a 112-bed Assisted Living Facility to provide 67 housing units that are 100% affordable senior housing and one manager's unit. The Project is within an eligible Southern California Association Governments (SCAG) identified High Quality Transit Area (HQTA) 2045 Community as shown on the maps in Attachment 1. The Project's location in a HQTA and proximity to a Major Transit Stop at East Broadway and North Verdugo Road future Bus Rapid Transit (BRT) stop one-half mile southeast of the site as detailed below.

#### High Quality Transit Area

SCAG has identified HQTAs within one half mile of a well serviced transit stops or transit corridor with 15 minute or less service frequency during peak commute hours. The HQTA in the SCAG region for plan year 2045 was developed for the Final Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The areas identified by SCAG are within one half mile of a major transit stop and a high-quality transit corridor. The Project location within a HQTA is identified in the overall and focused maps in Attachment 1.

#### Definition of Major Transit Stop

Section 21064.3 of the Public Resources Code states that a Major Transit Stop is a site containing an existing rail transit station, a ferry terminal served by either a bus or

rail transit service, or the intersection of two or more bus routes with a frequency of 15 minutes or less during the morning and afternoon peak commute periods. It also includes major transit stops that are included in the applicable regional plan. California Government Code 65915 indicates that benefits for 100% affordable projects apply to sites within one-half mile (2,640 feet) of a major transit stop without encountering natural or constructed impediments. Natural or constructed impediments include, but are not limited to, freeways, rivers, mountains, and bodies of water. It does not include residential structures, shopping centers, parking lots or rail used for transit.

Definition of High-Quality Transit Corridor

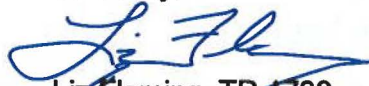
This is a corridor with a fixed route bus service with service intervals no longer than 15 minutes during peak commute periods.

Qualifying Transit Stops in Project Area

The future North Hollywood to Pasadena Metro BRT is an enhanced public mass transit service with features that are distinguishable from typical bus operations. A Final Environmental Impact Report (FEIR) was certified, and the transit project was approved by the Metro Board of Directors on April 28, 2022. According to [www.metro.net/projects/noho-pasadena-corridor/#status](http://www.metro.net/projects/noho-pasadena-corridor/#status), the transit project is now in the preliminary design stage before it enters the start of final design and construction. The North Hollywood to Pasadena Route is provided in Attachment 2. The BRT will operate along East Broadway in the Project area. A map of the BRT is provided in Attachment 3. There is a stop proposed on East Broadway at Glendale Avenue and at North Verdugo Road. The closest BRT stop to the site is the one located at East Broadway and North Verdugo Road. This stop is one half mile southeast of the site as shown in Attachment 3.

Please contact me if you have questions regarding the details of this submission.

Sincerely,



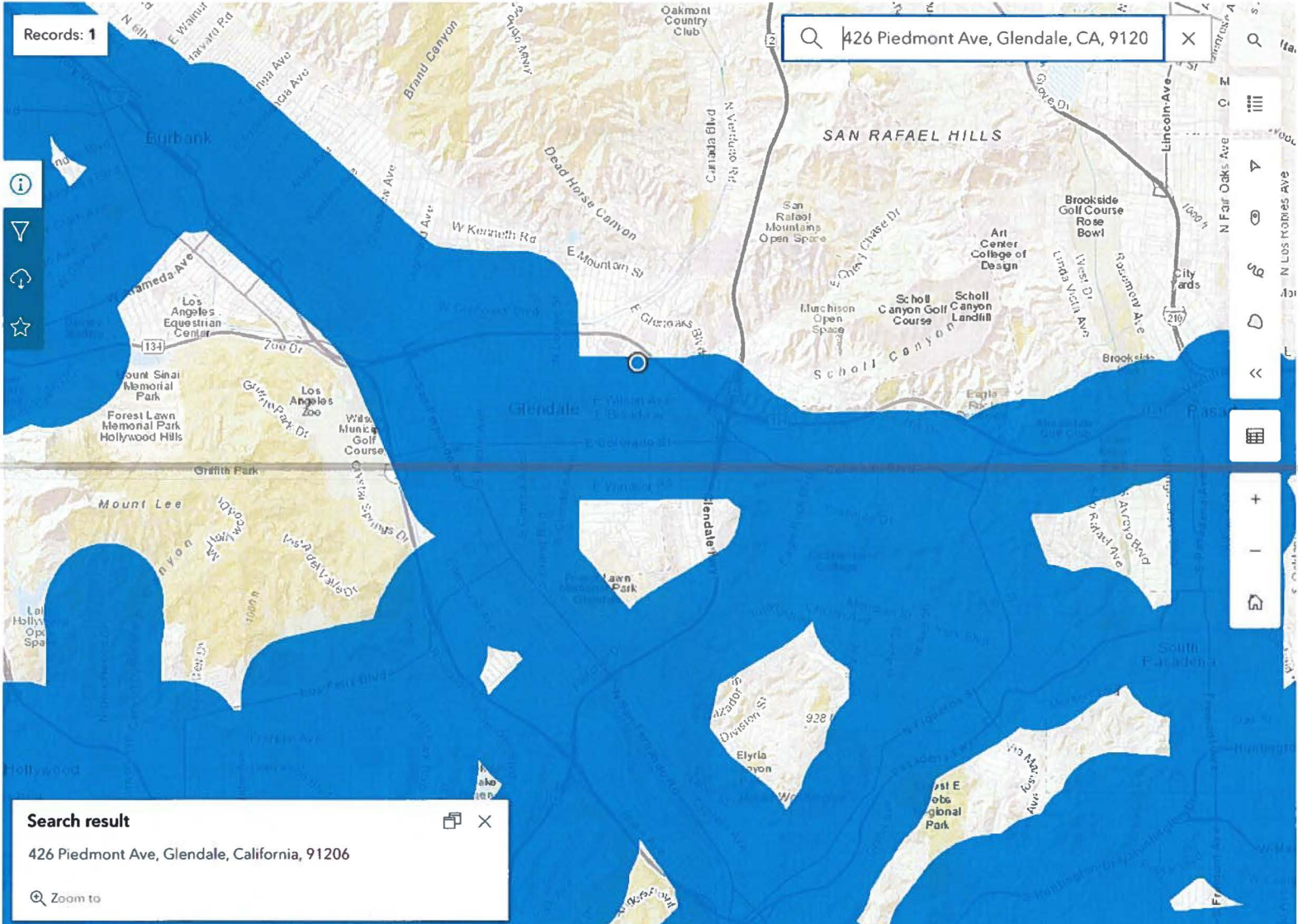
Liz Fleming, TR 1788  
Vice President



**Attachment 1**

**SCAG HQT A 2040 MAP**





Records: 1

426 Piedmont Ave, Glendale, CA, 91206

**Search result**

426 Piedmont Ave, Glendale, California, 91206

Zoom to



Records: 1

426 Piedmont Ave, Glendale, CA, 91206



**Search result**

426 Piedmont Ave, Glendale, California, 91206

Zoom to



## Attachment 2

### North Hollywood to Pasadena Route Map

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**Overland Traffic Consultants, Inc.**

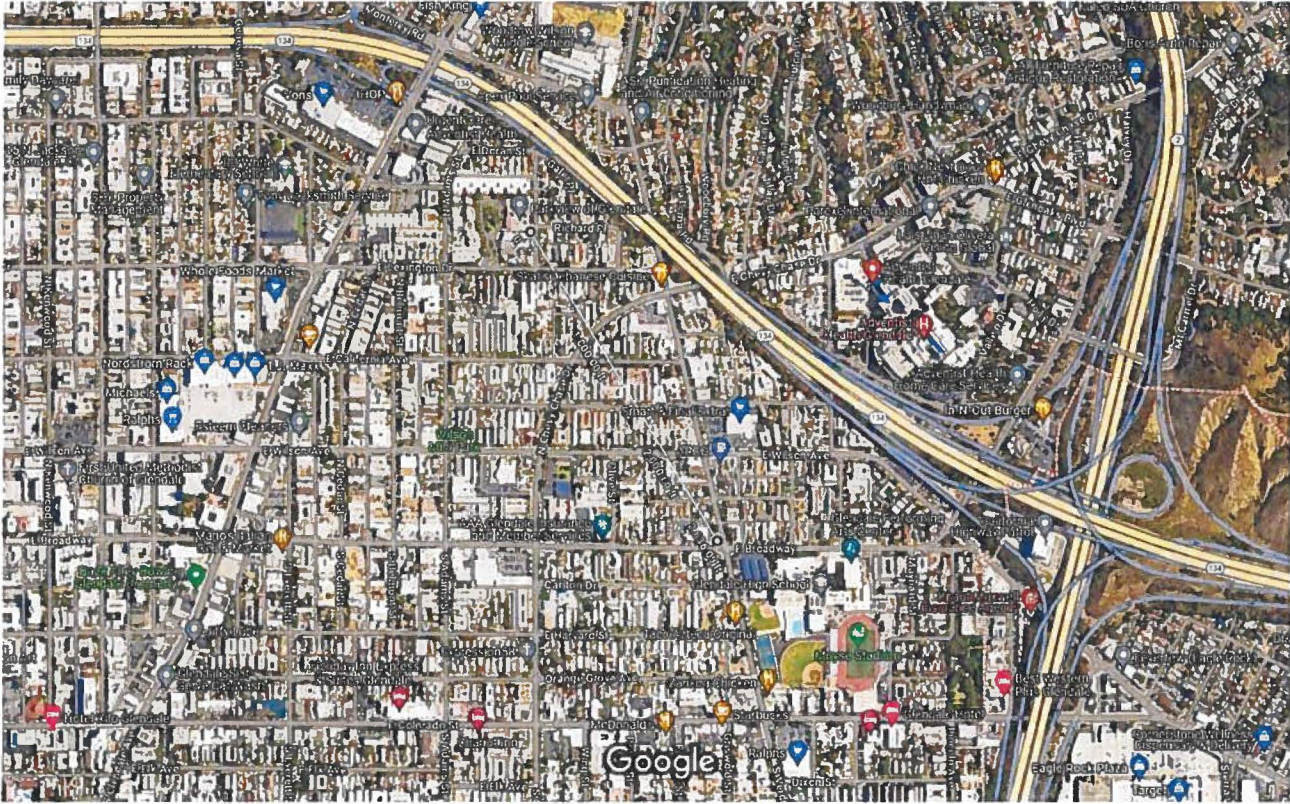
## **Attachment 3**

### **Google Map of Project Site to East Broadway/North Verdugo Road BRT Stop**

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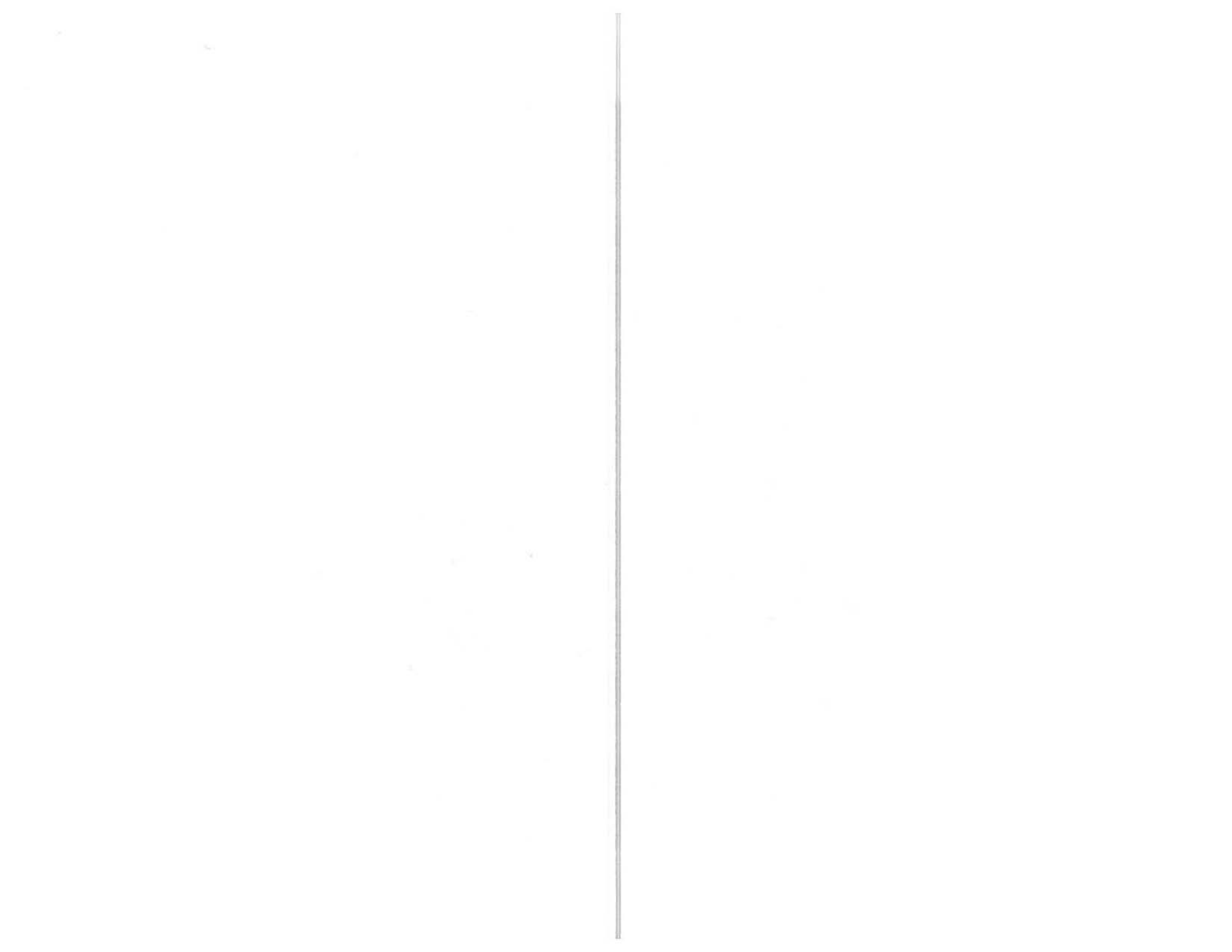
Google Maps Glendale



Imagery ©2024 Airbus, CNES / Airbus, City of Glendale, Maxar Technologies, U.S. Geological Survey, USDA/FPAC/GEO, Map data ©2024 500 ft Google

Measure distance  
Total distance: 2,636.09 ft (803.48 m)







Overland Traffic Consultants  
South Office  
952 Manhattan Beach Bl, #100  
Manhattan Beach, CA 90266  
Phone (310) 545-1235  
E-mail: liz@overlandtraffic.com

December 21, 2023

City of Glendale, Public Works  
Traffic & Land Development Section  
613 E. Broadway  
Glendale, CA 91026

**RE: Vehicle Miles Traveled Screening – The Residences at Citrus Grove - 426  
Piedmont Avenue & 507 Naranja Drive, City of Glendale**

The following provides a Vehicle Miles Traveled (VMT) screening analysis based on the City of Glendale Transportation Impact Analysis (TIA) Guidelines dated October 30, 2020, for the proposed Residences at Citrus Grove Project. This Project is located at 426 Piedmont Avenue and 507 Naranja Drive.

#### Project Description

The proposed Residences at Citrus Grove Project is located between Piedmont Avenue and Naranja Drive north of East Lexington Drive. The Project has frontage on Piedmont Avenue and Naranja Drive in the City of Glendale. The Project will adaptively reuse an existing building on the site which was previously used for a 112-bed Assisted Living Facility. The Project will rehabilitate and reconfigure the interior of the building to provide 67 housing units that are 100% affordable senior housing and one manager's unit. Although no parking is required per AB2097, 45 vehicle parking spaces will be provided in the existing subterranean garage. The existing single driveway on Piedmont Avenue and single driveway on Naranja Drive will remain for vehicular access to parking. A site plan and garage level plan are provided in Attachment A.

#### Vehicle Miles Traveled (VMT) Screening Analysis

The City of Glendale TIA provides a vehicle miles traveled methodology based on passage of Senate Bill 743 (SB 743). SB743 replaces automobile delay and level of service as a basis for determining California Environmental Quality Act (CEQA) impacts. The purpose of SB743 is to promote the reduction of greenhouse gas emissions, development of multimodal transportation networks and a diversity of land uses. Projects that have the potential to increase the average VMT per service

population compared to the City's baseline threshold will be evaluated for potential impacts.

Project screening has been conducted to determine if a detailed VMT analysis is needed. Page 7, Section 2.1.2.2 Affordable Housing of the City of Glendale TIA Guidelines indicates that "residential projects with 100% deed restricted affordable housing can be presumed to have a less-than-significant impact and would not require a detailed VMT analysis." It further states that "the screening criteria would screen out a project from both existing and cumulative VMT requirements." This Project is a 100% affordable development with one managers unit. A copy of page 7 of the TIA Guidelines is provided in Attachment 2.

This is further supported through Figure 2: Land Use Projects Screening Criteria Flowchart on page 5 of the City of Glendale TIA Guidelines. This flowchart indicates that if a project that is within ½ mile of non-residential uses and is 100% affordable through provisions in Code Section 2.1.2.2, the VMT analysis is complete and there are no VMT impacts. A copy of page 5 of the TIA Guidelines is provided in Attachment 2. This Project is 100% affordable, across the street from Piedmont Park and within ½ mile of commercial properties including pharmacy, grocery, restaurants, bank and healthcare. Many of these commercial properties are along North Glendale Avenue north and south of Doran Street approximately 1,100 feet northwest of the site as the bird flies and approximately 1,600 feet to 2,500 feet northwest of the site depending on the destination.

This transportation screening of the proposed adaptive reuse Project with 67 100% affordable senior housing units and one manager's unit does not create a significant VMT impact based on the City of Glendale TIA guidelines. No further transportation analysis would be required.

Please contact me if you have questions regarding the details of this submission.

Sincerely,



Liz Fleming

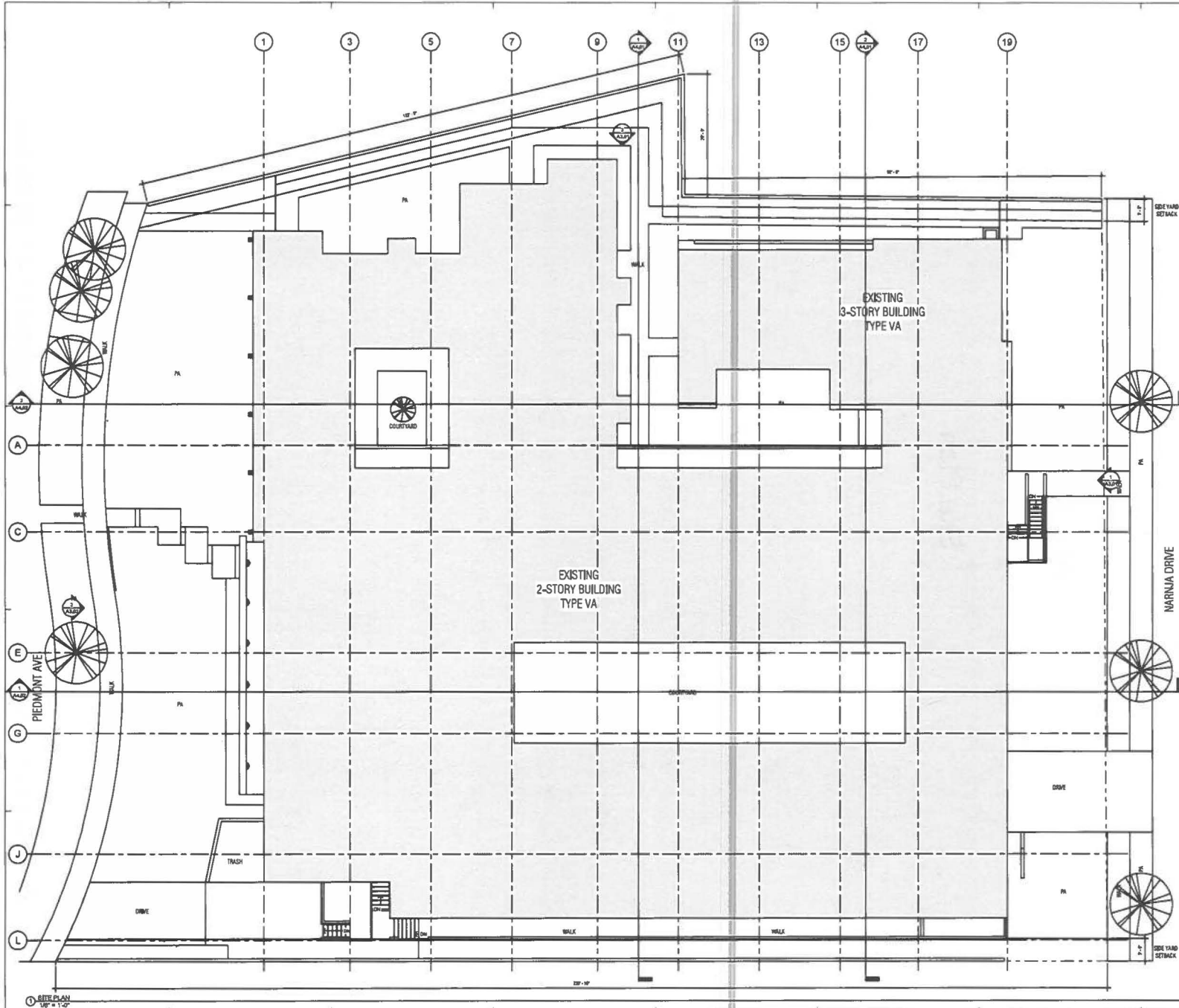


## Attachment 1

### Site Plan



3/16/2023 10:00 AM  
 4/2023 PREDMONT AVENUE



**EGAN | SIMON**  
 architecture  
 7740 WEST MANCHESTER AVE, SUITE 205  
 PLAYA DEL REY, CA 90283  
 TEL. 310.306.7804 FAX. 310.306.9072

**426 PIEDMONT AVE.**  
 OLENDALE, CA 91208

**EAH HOUSING**  
 18601 VENTURA BLVD., SUITE 300  
 LOS ANGELES, CA 91356

**LEGEND**

LEVEL 01	STUDIO UNITS	-05
	1 BEDROOM UNITS	-27
	2 BEDROOM UNITS	251
	SUBTOTAL	-31
LEVEL 02	STUDIO UNITS	-05
	1 BEDROOM UNITS	-24
	2 BEDROOM UNITS	252
	SUBTOTAL	-31
LEVEL 03	STUDIO UNITS	-05
	1 BEDROOM UNITS	-24
	2 BEDROOM UNITS	252
	SUBTOTAL	-31
	TOTAL	-93

**ENTITLEMENT SET**  
 (NOT FOR CONSTRUCTION)

Plot:  
 426 PIEDMONT AVE.

Sheet No:  
 SITE PLAN

Scale: As indicated  
 Date: Author  
 Drawn by: Checker  
 Date: 05/09/23  
 PLOT: Simon Date

Job # 7\_2023\_006

**A1.01**

1 SITE PLAN  
 1/8" = 1'-0"



**EGAN | SIMON**  
 architecture  
 7740 WEST MANCOSTER AVE. SUITE 200  
 WEST HOLLYWOOD, CA 90240  
 TEL. 310.360.7804 FAX. 310.360.6072

**426 PIEDMONT AVE.**  
 GLENDALE, CA 91208

**EAH HOUSING**  
 1800 VENTURA BLVD. SUITE 300  
 LOS ANGELES, CA 90030

NO.	DATE	DESCRIPTION
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**ENTITLEMENT SET**  
 (NOT FOR CONSTRUCTION)

Project: 426 PIEDMONT AVE.

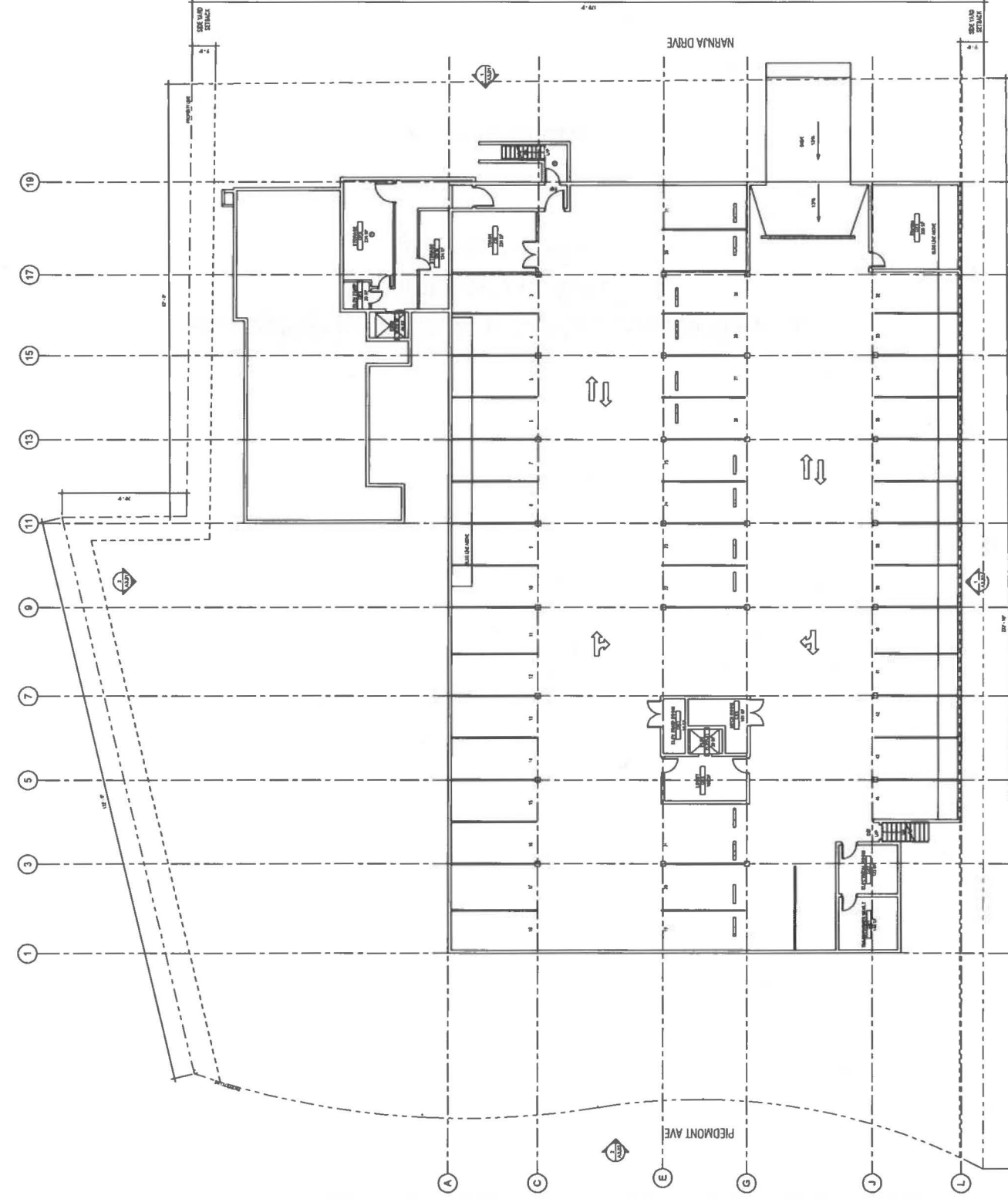
Sheet: BASEMENT PLAN

Date As Issued: 08/11/2010  
 Date Plotted: 08/11/2010  
 Scale: 1/8" = 1'-0"  
 Job No.: 7.2010.008  
 A2.00

FLOOR PLAN REVISIONS

LEGEND

- LEVEL 01
- LEVEL 02
- LEVEL 03
- LEVEL 04
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- LEVEL 06
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BASEMENT PLAN  
 1/8" = 1'-0"



Overland Traffic Consultants, Inc.

## Attachment 2

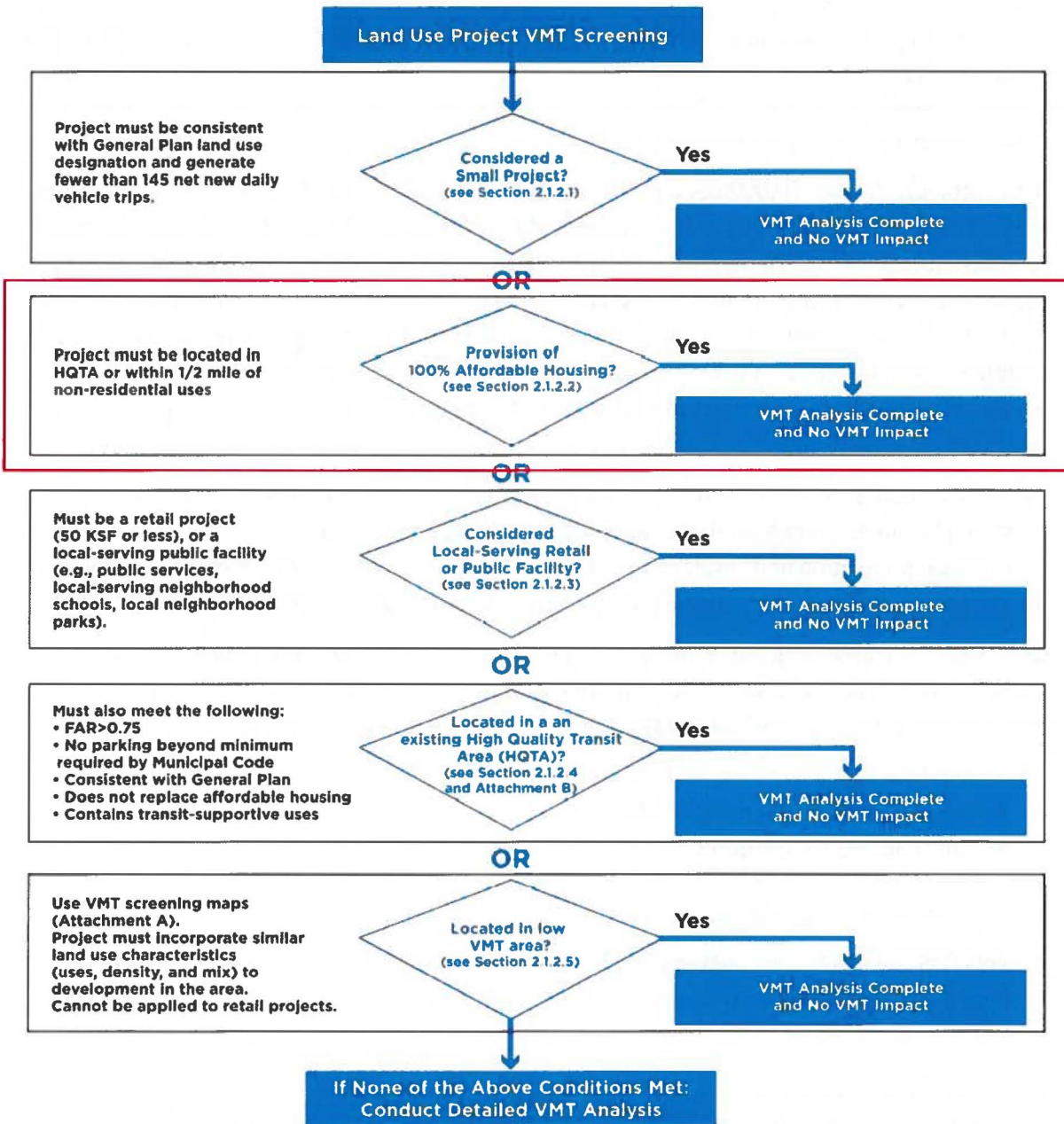
Page 5 & 7 of  
City of Glendale  
Transportation Impact Assessment Guidelines

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### 2.1.2. Project Screening

This subsection provides guidance on determining if a detailed VMT analysis is needed, including several screening approaches that can be used to quickly identify when a project should be expected to cause a less-than-significant impact related to VMT. Figure 2 presents a flowchart depicting how a land use project would be analyzed under the proposed screening criteria. A project that meets at least one of the screening criteria would be considered to have a less-than-significant VMT impact due to project or location characteristics.

**Figure 2: Land Use Projects Screening Criteria Flowchart**



#### *2.1.2.2. Affordable Housing*

Residential projects with 100 percent deed restricted affordable housing<sup>1</sup> can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis. If a project contains less than 100 percent affordable housing, the portion that is affordable should be screened out of needing a detailed VMT analysis. Projects can only be screened out if they are located in a high-quality transit area or within walking distance (a half-mile radius) of non-residential uses. For mixed-use projects, this screening criteria should be applied to the residential component separately to determine if that portion of the project screens out of a detailed VMT analysis.

This screening criteria would screen out a project from both existing and cumulative VMT analyses requirements.

#### *2.1.2.3. Local-Serving Retail and Public Facilities*

Retail projects that are 50,000 square feet gross floor area or less can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis. Examples of local-serving retail establishments can include markets, restaurants, and gas stations that are 50,000 square feet or less. This screening criteria applies to the entirety of a retail project; it would not be applied to multiple tenants at a retail site separately. For a mixed-use project, this screening criteria should be applied to the retail/commercial component separately to determine if that portion of the project screens out of a detailed VMT analysis. This screening criteria would screen out a retail project from both existing and cumulative analyses.

For specific retail projects, the City could consider the findings of a market study to provide substantial evidence that a retail project under a higher square footage threshold would primarily serve a local population and result in an overall reduction in citywide VMT. Based on the results of the market study and staff discretion, a higher square footage threshold may be considered.

Uses that are local-serving public facilities can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis, absent substantial evidence that they will generate significant VMT. These uses include, but are not limited to:

- ▶ Public services (e.g., police, fire stations, public utilities)
- ▶ Local-serving neighborhood schools
- ▶ Local neighborhood parks

#### *2.1.2.4. Adjacency to High-Quality Transit*

Projects that are located in a high-quality transit area can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis. A high-quality

---

<sup>1</sup> Defined as housing that is affordable to lower income (60% Area Median Income) individuals or families.