



Prepared for:

City of Glendale
Planning and Neighborhood Services Division
633 E. Broadway, Room 103
Glendale, CA 91206

Environmental Impact Report
for San Fernando Soundstage Campus Project



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MARCH 2023

Draft

ENVIRONMENTAL IMPACT REPORT

SAN FERNANDO SOUNDSTAGE CAMPUS EIR

CITY OF GLENDALE

(SCH No. 2022090166)

Prepared for:

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MARCH 2023

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1.0 INTRODUCTION

This section provides information on the background of the Project, as described in **Section 3.0: Project Description** and assessed in this Draft environmental impact report (EIR), information on the environmental review process being conducted by the City of Glendale for this Project, as well as the organization and content of this Draft EIR.

1.1 ENVIRONMENTAL REVIEW PROCESS

1.1.1 Proposed Project

Located at 5426 San Fernando Road and 753 W. California Avenue, the 9.74-acre Project site contains 10 existing buildings, as well as existing surface parking and loading areas. The existing buildings are currently used for storage and as entertainment production studios. The proposed San Fernando Soundstage Campus Project (Project) would include demolition of the existing buildings and site improvements, and development of three new buildings containing 10 soundstage-production studio stages, flex spaces, production offices, a parking garage, and surface parking. The Project, as described further in **Section 3.0: Project Description** of this Draft EIR, is being proposed by Griffith Studio Owner, LLC, otherwise known as the applicant (Applicant).

1.1.2 Purpose of an EIR

The California Environmental Quality Act (CEQA) states the purpose of an environmental impact report (EIR) is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code [PRC], Section 21002.1). This Draft EIR evaluates the potential environmental effects resulting from implementation of the proposed Project.

The Project requires approval of certain discretionary actions by the City of Glendale (City). Therefore, in accordance with PRC Section 21080, the Project is subject to environmental review under CEQA. For purposes of complying with CEQA, the City is identified as the Lead Agency for the Project.

In accordance with Section 15121(a) of the State CEQA Guidelines, this EIR is an “informational document that will: (1) inform public agency decision makers and the public of the significant environmental effects of the Project; (2) identify possible ways to minimize the significant effects; and (3) describe reasonable alternatives to the Project.” Thus, the EIR is an important document that ultimately is used by decision makers when considering whether or not to approve, deny, or modify a proposed project.

This Draft EIR has been prepared in conformance with CEQA and the State CEQA Guidelines. Section 15151 of the State CEQA Guidelines defines the standards for EIR adequacy as follows:

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. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

This Draft EIR is intended to serve as a Project EIR under CEQA. Section 15161 of the State CEQA Guidelines states a Project EIR should focus primarily on changes in the environment that would result from the development of a project and examine all phases of a project, including planning, construction, and operation. This Project EIR is intended to provide the environmental information necessary for the City to make a final decision on the requested entitlements for this Project. This Draft EIR is also intended to support necessary approvals by other public agencies.

1.1.3 Initial Study and Notice of Preparation

In accordance with Section 15063(a) of the CEQA Guidelines, the City conducted preliminary analysis of the potential environmental effects of the Project by preparing an Initial Study.

The Initial Study determined that preparation of an EIR was required to evaluate the potential for significant impacts related to the following environmental topics:

- Aesthetics
- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Land Use & Planning
- Noise
- Transportation

The City determined through the preliminary analysis in the Initial Study that the Project does not have the potential to result in significant impacts related to the following environmental topics: Agricultural and Forestry Resources, Biological Resources, Energy, Geology and Soils, Hydrology and Water Quality, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. For this reason, these topics are not evaluated in detail in this Draft EIR.

After determining that an EIR should be prepared, the City prepared and circulated a Notice of Preparation on September 12, 2022, for review by other public agencies and interested parties. The Initial Study and Notice of Preparation are contained in **Appendix F** of this Draft EIR.

1.1.4 Lead Agency and Project Application Contact Persons

This Draft EIR was prepared under the direction and supervision of the City of Glendale Community Development Department - Planning Division. The Draft EIR was circulated for a 32-day public review period on Day, March 30, 2023.

Written comments on the Draft EIR may be submitted to:

City of Glendale
Community Development Department - Planning Division
633 E. Broadway, Room 103
Glendale, California 91206
Attention: Aileen Babakhani, Planner

Comments may also be sent by facsimile to (818) 548-2115 or by e-mail to ABabakhani@Glendaleca.gov and include “San Fernando Soundstage Campus Project EIR” in the subject line.

Agency responses should include the name of a contact person within the commenting agency.

After the public review and comment period, written responses to all written comments pertaining to environmental issues will be prepared as part of the Final EIR. As required by CEQA, responses to comments submitted by responsible public agencies will be distributed to those agencies for review 10 days prior to consideration of the Final EIR by the appropriate decision-making body. Upon completion of the Final EIR and other required documentation, the appropriate decision-making body will consider certification of the EIR and approval of the Project.

1.2 ORGANIZATION OF THE EIR

A description of the organization of this EIR and the content of each section is provided below. The Draft EIR is organized as follows:

Section 1.0: Introduction provides information on the background of the Project, the environmental review process, and organization of the Draft EIR.

Section 2.0: Summary presents a concise summary of the environmental information, analysis, and conclusions in this EIR.

Section 3.0: Project Description presents a description of the Project, which addresses the location of the Project site, the objectives of the Project, the characteristics of the proposed residential apartment building and parking structure, and the approvals being requested from the City, including a conditional use permit to develop residential land uses within the Industrial/Commercial-Residential Mixed Use zone.

Section 4.0: Environmental Impact Analysis contains information and analysis of the potential for the Project to result in significant environmental effects for each of the topics evaluated in this EIR.

Section 5.0: Alternatives discusses alternatives to the proposed Project that have been developed and analyzed to provide additional information on ways to avoid or lessen the impacts of the proposed Project. The alternatives include the “No Project Alternative,” as required by the CEQA Guidelines, along with other alternatives, including an “Alternative Use (Office/Retail) Alternative” and a “Reduced Intensity Alternative.”

Section 6.0: Effects Not Found to Be Significant presents information used by the City to determine why certain environmental effects of the Project were found not to be significant and are not evaluated in detail in this EIR.

Section 7.0: Consideration and Discussion of Significant Impacts contains a discussion of other topics required by the CEQA Guidelines to be included in an EIR, including the potential for the Project to induce additional growth; discussion of any significant environmental effects which can be mitigated, but not reduced to a less than significant level, and cannot be avoided for this reason; and a discussion of any potential, significant irreversible environmental changes that could result from the Project.

Section 8.0: Organizations and Persons Consulted lists persons involved in the preparation of this Draft EIR or who contributed information incorporated into this Draft EIR.

Section 9.0: References lists the principal documents, reports, maps, and other information sources referenced in this EIR.

Appendices to this EIR include technical information and other materials prepared for this EIR, as well as the City’s environmental review of this Project.

2.0 SUMMARY

This section provides information on the background of the Project, as described in **Section 3.0: Project Description**, assessed in this Draft EIR, and a summary of the information in this Draft EIR identifying the potential environmental impacts of the Project, the measures identified to mitigate these impacts, and the alternatives evaluated to provide additional information on ways to avoid or lessen these impacts.

2.1 BACKGROUND

The Glendale General Plan outlines an order of progress through which the City can grow and maintain economic and environmental integrity. As a policy, the Glendale General Plan serves as a guide to the adoption of laws necessary to execute its intent. The Project site is located in and subject to the General Plan. The General Plan designates the site as Mixed Use. The General Plan encourages flexibility for areas with the IMU designation in the range and type of services such facilities provide.¹ The General Plan also states that light industrial uses may be compatible with residential uses in mixed use areas along San Fernando Road.²

The regulation of land use through zoning is governed by the City's Zoning Ordinance.³ The Project site is located within the IMU zone (Industrial/commercial Mixed Use), which is consistent with the Project site's General Plan designation. The purpose of the IMU zone is to allow for a mix of industrial and commercial activities and provide for a full range of services to be located along industrial/commercial thoroughfares.⁴

In 1992, the Glendale Redevelopment Agency⁵ prepared and adopted the Redevelopment Plan for the San Fernando Road Corridor Redevelopment Project Area (the "Redevelopment Plan"). The Project site is located within the boundaries of the Redevelopment Plan, which includes 750 acres generally extending along the length of the San Fernando Road corridor and bounded by the I-5 Freeway and the Union Pacific Railroad/Metro Transportation Authority (UPRR/MTA) right-of-way to the west. The primary objective of the Redevelopment Plan is to eliminate and prevent the spread of blight and deterioration in the Redevelopment Plan.

ABx126 and AB1484 (collectively "The Dissolution Act") eliminated redevelopment agencies in California effective February 1, 2012. The City elected to assume the power, duties, and obligations of the former Glendale Redevelopment Agency as the Glendale Successor Agency pursuant to the Dissolution Act. The

1 Glendale General Plan Amendment, No. 2004-01, Section 2.

2 Glendale General Plan Amendment, No. 2004-01, Section 3.

3 City of Glendale Municipal Code, Title 30.

4 Glendale Municipal Code, Section 30.14.010.A.

5 The Glendale Redevelopment Agency was created in 1972 for the purpose of improving, upgrading, and revitalizing areas within the City that had become blighted because of deterioration, disuse, and unproductive economic conditions. It was a legal and separate public body, with separate powers and a separate budget from the City.

Successor Agency⁶ is responsible for winding down the activities of the former Glendale Redevelopment Agency.

According to the CEQA Guidelines, an Environmental Impact Report (EIR) “*should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation*” (Section 15161). Accordingly, this EIR has been prepared to evaluate environmental impacts resulting from the proposed San Fernando Studio Soundstage Project (the “Project”).

2.2 OVERVIEW OF PROPOSED PROJECT

The Project site is located within the city of Glendale (City) in Los Angeles County, as shown in **Figure 2.0-1: Regional and Local Vicinity**. The Project proposes to demolish all existing structures and the existing surface parking for the construction of four new structures containing: (1) ten production sound stage studios (individually, a Stage and, collectively, the Stages), (2) three flex spaces (individually, a Flex Space), production office uses and commissaries (located in two structures, the Production Office), (3) various support spaces (both Flex Space support and Stage support), (4) an above-grade parking garage that is utilized as a podium for some of the Production Office uses (Parking Garage), and (4) related surface parking lot (Surface Parking), as shown in **Figure 2.0-2: Project Site Plan**. The Project’s various components are separated by an “H” shaped fire lane that is approximately 26 feet in width and roughly bisects the property on two sides from north to south, and also transects the Property from east to west. The fire lane also provides vehicular access to the Project’s multiple components.

The Project’s four structures will contain approximately 406,318 square feet of gross floor area. The first building (Building 1) fronts West San Fernando Road and West Milford Street and contains a total of approximately 130,535 square feet of gross floor area comprised of 113,075 square feet of Production Office uses (including a ground floor entry lobby), 8,390 square feet of commissary, and 9,070 square feet of Stage support uses. Building 1 also contains the Parking Garage. The second building (Building 2) is located to the east of the Building 1, fronts Milford Street, and contains approximately 97,905 square feet of gross floor area with Stage, Stage support, and Flex Space uses. The third building (Building 3) is located to the south of Building 2, separated by part of the fire lane, and contains approximately 93,528 square feet of gross floor area with Stage and Stage support uses. The fourth building (Building 4) abuts Building 3 on the south with frontage on South Fernando Road and is adjacent to the southern legal non-conforming residential properties. Building 4 contains 84,350 square feet of gross floor area with Production Office, Flex Spaces, Flex Space support, stage support, and commissary uses.

⁶ The Successor Agency undertakes enforceable obligations and performs duties pursuant to the enforceable obligations in compliance with the Dissolution Act. The Successor Agency staff also serves as staff to the Oversight Board.

2.3 PROJECT OBJECTIVES

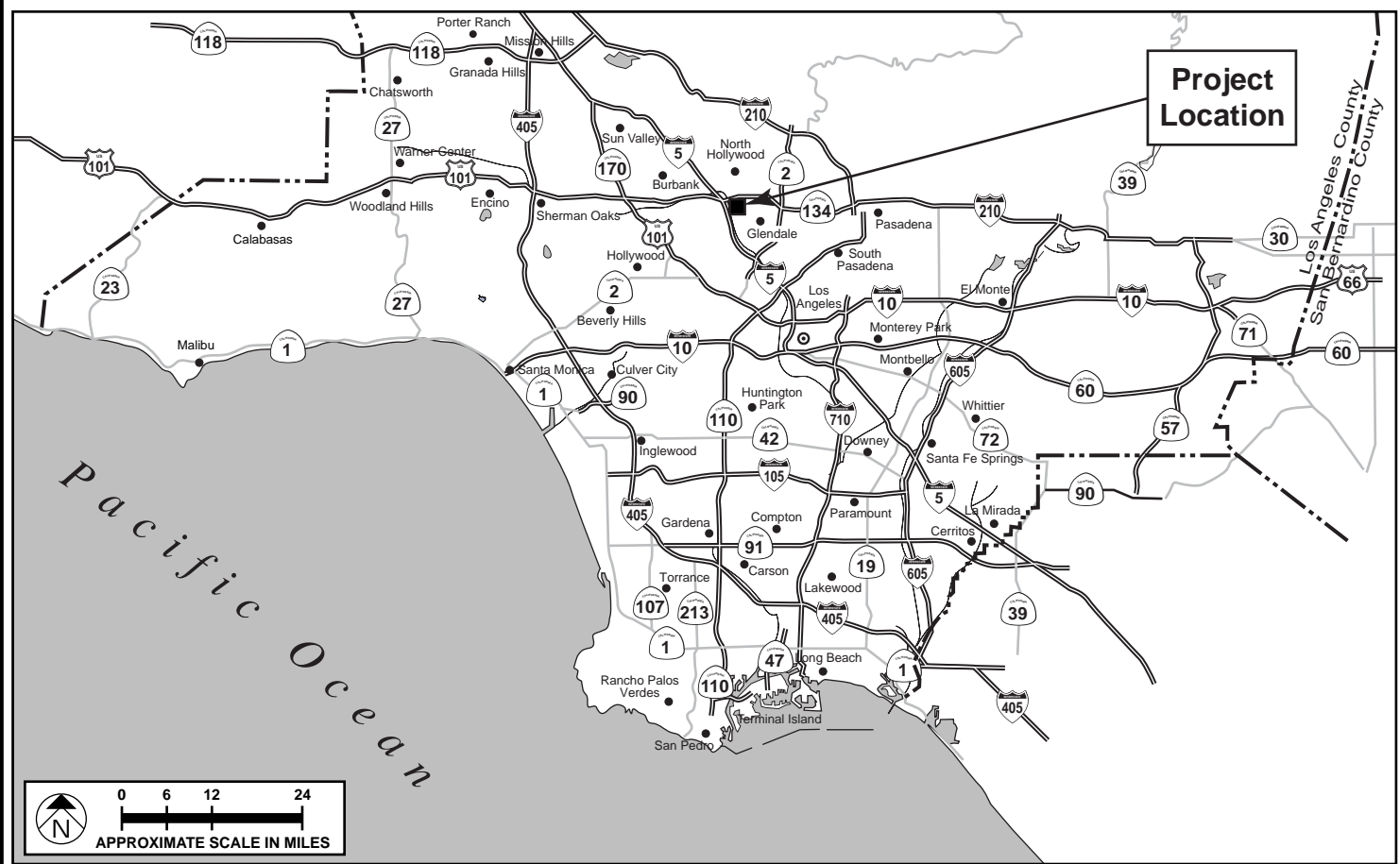
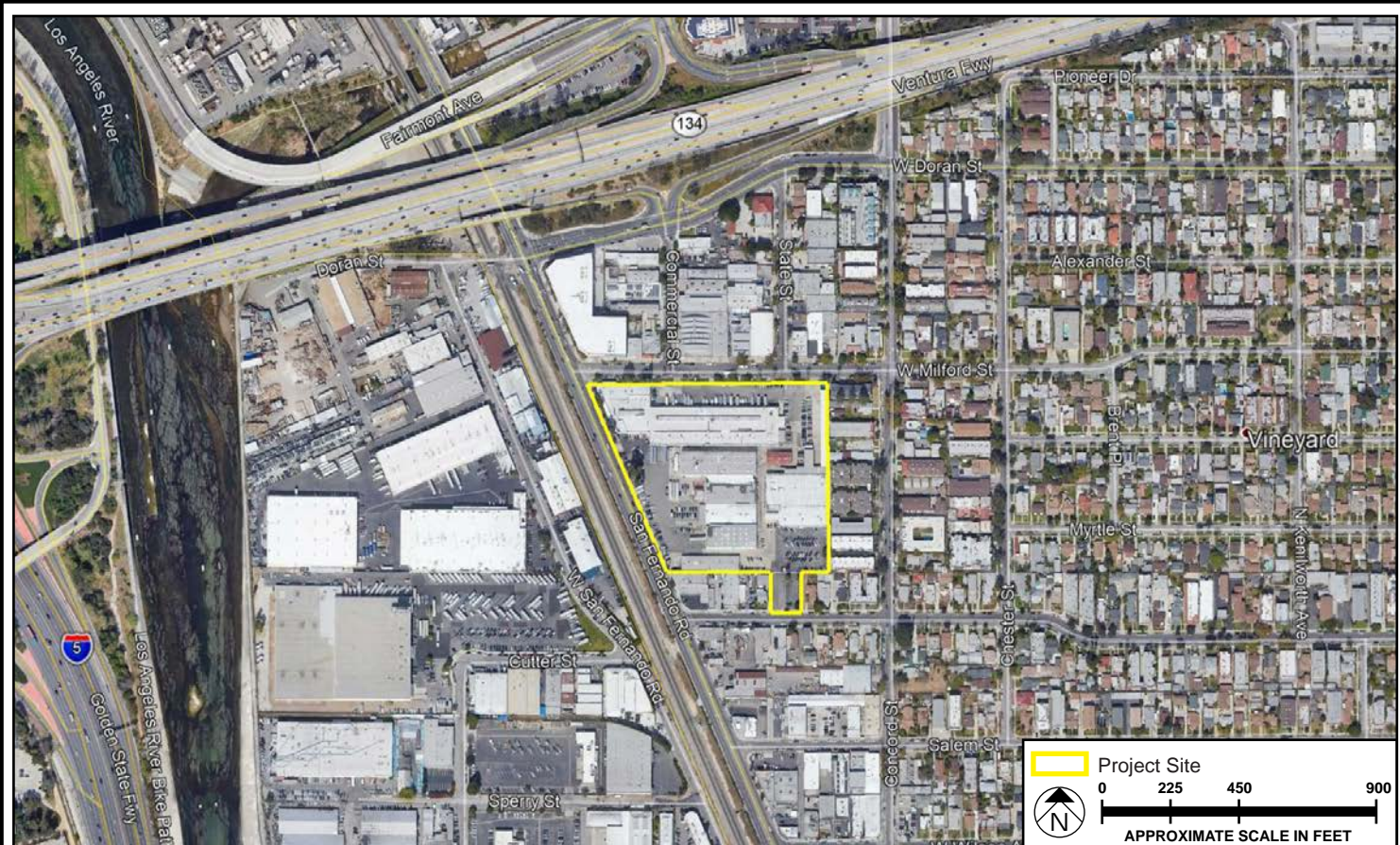
The CEQA Guidelines require an EIR to include a statement of the objectives of the Project that address the underlying purpose. The Applicant is proposing to develop brand new production sound stage studios, flex spaces, offices, and associated parking on the Project site. The objectives of the Project are to:

1. Provide production space to assist the City of Glendale, the greater Los Angeles region and the state of California to retain entertainment jobs.
2. Contribute to the retention and revitalization of manufacturing and processing uses, along the San Fernando Road Corridor, a high-quality transit corridor, which will encourage public transit use.
3. Optimize development potential of a designated industrial mixed-use site.
4. Provide production office, soundstage and other production support uses on a single site which consolidation of related uses will reduce traffic.
5. Locate higher intensity production office uses away from residentially zoned land east of the site which separate prevent divisions in established communities.
6. Provide adequate surface parking opportunities which will minimize soil disturbance of soils containing residual contamination.
7. Maximize solar power production capacity of the site.

2.4 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A summary of the potential environmental impacts of the Project and the measures identified to mitigate these impacts is provided in **Table 2.0-1: Summary of Project Impacts** below for each topic addressed in this Draft EIR. **Table 2.0-1** has been arranged in four columns: the identified impact under each EIR issue area; the level of significance prior to implementation of mitigation; mitigation measures that would avoid or reduce the level of impacts; and the level of significance after implementation of mitigation measures, if applicable. Compliance with existing City programs, practices, and procedures are assumed for purposes of determining the level of significance prior to mitigation.

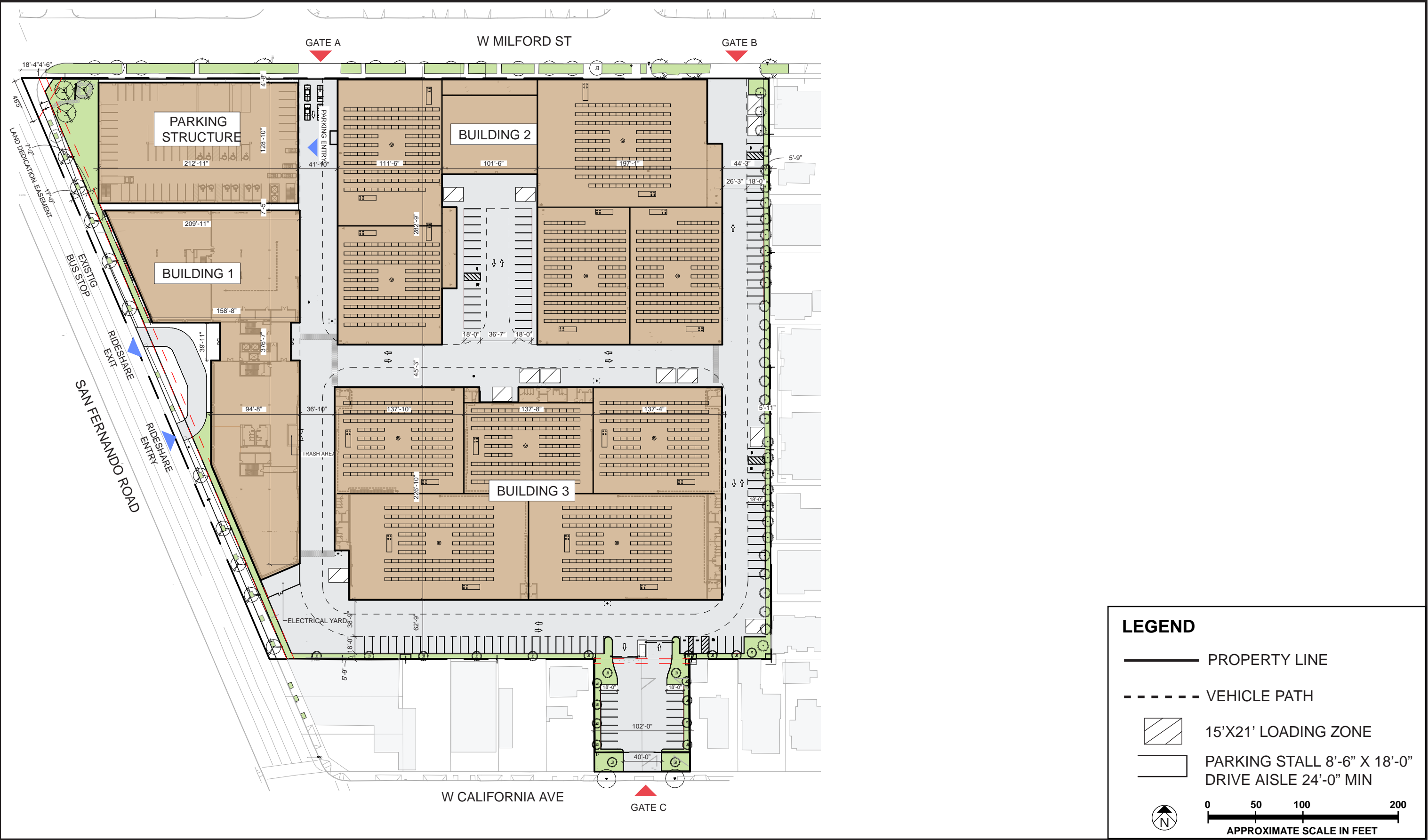
A summary of the alternatives to the Project to promote informed decision-making are provided after **Table 2.0-1**.



SOURCE: Google Earth - 2021; Meridian Consultants, LLC - 2021

FIGURE 2.1

Regional and Local Vicinity



SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 2.0-2

Project Site Plan

TABLE 2.0-1
SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<i>Aesthetics</i>			
Existing views across the site would be modified with Project development. The proposed Project would result in taller buildings being located on the western portion of the site along San Fernando Road than currently exist. However, while the proposed buildings would be taller than the existing buildings on the site, views of the Verdugo Mountains and Griffith Park are already partially obstructed by the existing buildings along San Fernando Road and Milford Street, the proposed Project would have a minimal effect on available views.	Less than significant.	No mitigation measures are required.	Less than significant.
SB 743 provides that the aesthetic impacts of a residential, mixed-use residential, or employment center project, as defined, on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment. The Project site is located within a TPA and meets the requirements for an employment center project under SB 743 (PRC Section 21099). While the proposed buildings will be taller than the existing buildings located around the site, the architectural design will result in the massing of the buildings being visually compatible with the existing industrial and commercial development along San Fernando Road and the existing residential neighborhood to the east of the site. Furthermore, The Project site does not contain scenic resources, including, trees, rock outcroppings, or other locally recognized scenic natural features.	Less than significant.	No mitigation measures are required.	Less than significant.
The Project is proposed in an existing developed industrial corridor along San Fernando Road, and it would not substantially degrade the existing visual character or quality of public views of the site and its surroundings as aesthetic impacts shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA. The need to maintain this geosynthetic clay liner (GCL) cap prevents subterranean construction on the site. As such, the approval of a height variance is requested as part of the Project to allow Building	Less than significant.	No mitigation measures are required.	Less than significant.

TABLE 2.0-1
SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<p>1 and the Parking Garage to exceed the 50-foot allowed height in the IMU Zone. The proposed use is consistent with the Glendale General Plan and IMU Zone, and the proposed variances and deviations from GMC standards are justified by the existing physical characteristics of the site, which include continued maintenance of the GCL cap on-site and groundwater restrictions, and would not result in any significant impact on the visual character of the site or the surrounding area. Further, the proposed Project would comply with and be consistent with the intent of the Glendale Comprehensive Design Guidelines, as required by permit applicants in the City.</p>			
<p>All outdoor lighting would be directed onto the driveway, walkways, and public areas and away from adjacent properties and public rights-of-way to avoid any light or glare impacts from lighting fixtures included in the Project. Therefore, the new on-site lighting would not result in substantial increases in light or glare that would affect any light-sensitive uses on or near the site.</p>	Less than significant.	No mitigation measures are required.	Less than significant.
<i>Air Quality</i>			
<p>The Project would not result in a net increase of residents to the City as no housing would be constructed as part of the Project. Project construction would occur over several phases with the Building Construction Phase having a peak number of 220 construction workers. There would be fewer workers in other phases of Project construction. During operation, the Project would accommodate approximately 1,713 employees. The Project would be consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based and would not result in significant impacts for this reason</p> <p>The Project would be consistent with applicable policies of the Air Quality Element which calls for complying with SCAQMD's</p>	Less than significant.	No mitigation measures are required.	Less than significant.

TABLE 2.0-1
SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
AQMP, minimizing emissions within the City, and reducing VMT's.			
<p>The emissions of criteria air pollutants from construction and operation of the Project would not generate levels of emissions that would exceed the South Coast Air Quality Management District significance thresholds for these pollutants. Construction of the Project would result in maximum daily emissions of approximately 33 pounds/day of VOC, 39 pounds/day of NOX, 42 pounds/day of CO, <1 pounds/day of SO2, 6 pounds/day of PM10, and 2 pounds/day of PM2.5, which do not exceed SCAQMD thresholds for criteria pollutants.</p> <p>Operational emissions would be generated by both stationary and mobile sources as a result of normal day-to-day activities associated with the Project. Operation of the Project would result in maximum unmitigated daily emissions of approximately 14 pounds/day of VOC, <1 pounds/day of NOX, 30 pounds/day of CO, <1 pounds/day of SO2, <1 pounds/day of PM10, and <1 pounds/day of PM2.5, which do not exceed SCAQMD thresholds for criteria pollutants</p>	Less than significant.	No mitigation measures are required.	Less than significant.
<i>Cultural Resources</i>			
Based on the evaluations in the May 2021 Historic Preservation Memo and the August 2021 Historical Resources Assessment, the existing warehouse structures on the Project site are not eligible for listing in the NRHP, CRHR, or Glendale Register of Historic Resources. Because the buildings on the Project site are not historical resources, the proposed demolition the existing structures and the existing surface parking for the construction of the proposed Project would not result in a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.	Less than significant.	No mitigation measures are required.	Less than significant.
The Project site is not identified by the City of Glendale General Plan Open Space and Conservation Element as containing any archaeological resources. Should	Less than significant.	No mitigation measures are required.	Less than significant.

TABLE 2.0-1
SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
archaeological resources be unearthed during construction of the Project, the Project would be required to comply with PRC Section 21083.2(i), which states a lead agency may make provisions for archaeological sites accidentally discovered during construction. With compliance with PRC Section 21083.2(i), impacts related to a substantial adverse change in the significance of an archaeological resource would be less than significant.			
It is highly unlikely that any intact buried human remains would be present in the Project area. In the event of inadvertent discovery of any human remains during construction of the Project, Section 7050.5 of the California Health and Safety Code would be in effect. Compliance with Section 7050.5 of the California Health and Safety Code and PRC Section 5097.98 would ensure the potential to disturb human remains would be less than significant.	Less than significant.	No mitigation measures are required.	Less than significant.
<i>Greenhouse Gases</i>			
Total GHG emissions from the construction activities are estimated to be 1,665 MTCO ₂ e. When these construction emissions are amortized over a 30-year project lifetime, the annual contribution would be 56 MTCO ₂ e per year. The estimated GHG emissions for the Project including the amortized construction emissions would be 1,571 MTCO ₂ e per year.	Less than significant.	No mitigation measures are required.	Less than significant.
The Project would adhere to regulatory compliance measures that would reduce the Project's GHG emissions profile during operation. The Project site is also within proximity to mass transit that would further reduce estimated operational emissions.			
Compliance of the Project with applicable GHG emission reduction plans as shown Table 4.4-12 and Table 4.4-13 would result in a less than significant impact at the project level.	Less than significant.	No mitigation measures are required.	Less than significant.

TABLE 2.0-1
SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<i>Hazards and Hazardous Materials</i>			
Past uses of the Project site resulted in chemical releases (specifically volatile organic compounds [VOCs] and hexavalent chromium [CrVI]) affecting subsurface soil, soil vapor, and groundwater. The Project site is mapped within the boundaries of the San Fernando Valley Superfund (Areas 1 and 2). Remediation of this contamination was completed to reduce CrVI concentrations levels suitable for regulatory case closure under a continued commercial/industrial land use scenario, as well as continued maintenance of the geosynthetic clay liner (GCL) cap on-site and groundwater restrictions. Maintenance of this GCL cap would reduce potential impacts associated with the residual remaining contamination in soil on the site during construction and operation of the Project to less than significant.	Potentially significant.	<p>MM HAZ-1: Vapor Intrusion Mitigation System (VIMS). A Vapor Intrusion Mitigation System (VIMS) will be designed and installed under all Project structures that meets LARWQCB design criteria.</p> <ul style="list-style-type: none"> The VIMS will include an engineered membrane installed beneath all structural slabs that will incorporate a perforated pipe system installed in a bed of stone beneath the membrane to allow for the capture and venting of any residual VOCs present in soil vapor beneath the future buildings. The VIMS will provide for a preferential pathway to exhaust such vapors above the roof and away from any receptors such as windows, doors, or HVAC equipment serving to mitigate/prevent any risk of residual VOC vapor intrusion into indoor air within the buildings. Indoor air sampling will be conducted prior to building occupancy to demonstrate VIMS effectiveness. A Land Use Covenant will also be recorded at a future date that will restrict the use of the property to commercial/industrial uses and require the installation, operation, and maintenance of the VIMS. 	Less than significant.
There are no schools located within 0.25 miles of the Project site. Any transport of hazardous substances or materials to-and-from the Project site that may occur during construction and operation of the Project would be required to comply with	Less than significant.	No mitigation measures required.	Less than significant.

TABLE 2.0-1
SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
applicable federal, State, and local regulations intended to reduce public safety hazards.			
The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would also not be affected by contamination identified in the surrounding vicinity of the proposed Project site. For these reasons, the Project would not create a significant hazard to the public or the environment.	Less than significant.	No mitigation measures required.	Less than significant.
The Project site is not within an airport land use plan or within two miles of a public airport. Therefore, the Project would not expose workers to safety hazards or excessive noise associated with airport or private air strip operations.	Less than significant.	No mitigation measures required.	Less than significant.
During construction and long-term operation of the proposed Project, adequate emergency access for emergency vehicles would be maintained along public streets that abut the Project site. In the event of an emergency, all lanes would be opened to allow for traffic flow to move in one direction and traffic would be controlled by the appropriate agencies, such as the City of Glendale Police Department. Further, during construction the applicant would be required to obtain any necessary permits from the City of Glendale Public Works Department for all work occurring within the public right-of-way.	Less than significant.	No mitigation measures required.	Less than significant.
<i>Land Use and Planning</i>			
The Project would redevelop an existing industrial property with uses allowed in the IMU zone and would not introduce new infrastructure that would physically divide the established community. The Project would replace existing studio production spaces, offices, and warehouse facilities on the Project site with new studio production facilities. The Project applicant asks for a Parking Exception to allow the Project to eliminate the minimum landscaped setback area on the Parking Structure's southern, eastern, and northern sides	Less than significant.	No mitigation measures required.	Less than significant.

TABLE 2.0-1 SUMMARY OF PROJECT IMPACTS			
Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
in lieu of the five-foot landscaped setback GMC requirement. Applicant requests to provide landscaping along the perimeter and throughout the Property. This includes the landscape buffer along the eastern boundary of the Project site, which abuts residential properties. The southern boundary would include a setback of over 15 feet, a portion of which would be landscaped.			
The Project would be consistent with applicable goals within the SCAG 2020-2045 RTP/SCS, the Land Use, Housing Element, Circulation, Safety, Open Space and Conservation, Recreation, Air Quality, and Noise Elements of the General Plan.	Less than significant.	No mitigation measures required.	Less than significant.
Noise			
The Project would not result in any substantial increase in roadway noise levels and, for this reason, land uses located along roadways in the area, would not be affected by increases in traffic noise levels. Construction noise levels would range from a low of 49.0 dBA (Leq-8hour) during the final phases of construction east of the Project site along Concord Street between Milford Street and California Avenue (Site 4) to a high of 84.7 dBA (Leq-8hour) during demolition activities on the northeast corner of the Project site along Milford Street between State Street and Concord Street. All Project mechanical equipment would be required to have appropriate noise control devices.	Potentially significant.	MM NOI-1: The project applicant shall require that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels below the established thresholds: <ul style="list-style-type: none">Construction equipment shall be equipped with exhaust muffler systems consistent with FHWA guidance.All equipment shall be properly maintained in accordance with manufacturers' specifications to assure that no additional noise due to worn or improperly maintained parts is generated consistent with FHWA guidance.Construction equipment shall have features that dampen metal surfaces and minimize metal-to-metal contact consistent with FHWA guidance.When construction operations occur adjacent to off-site occupied residential areas, construction equipment staging	Less than significant.

TABLE 2.0-1
SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
		<p>areas and stationary noise sources shall be located as far from those nearby receptors as possible, prohibit idling equipment, notify adjacent residences in advance of construction work, and install temporary acoustic barriers or noise blankets achieving a minimum reduction of 5 dBA around stationary construction noise sources. These barriers shall be made featuring weather-protected, sound-absorptive material on the construction-activity side of the noise barrier and must be installed in a location that completely blocks line-of-sight between the construction noise source and adjacent sensitive receptors.</p> <ul style="list-style-type: none"> • Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses whenever physically possible during all phases of project construction. • Use electric air compressors and similar power tools rather than diesel equipment shall be used, whenever such equipment is available. • Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes. • Construction hours, allowable workdays, and the phone number of the job superintendent must be clearly posted at all construction entrances to allow for surrounding owners and residents to 	

TABLE 2.0-1
SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
There are no adopted City standards or thresholds of significance for vibration. However, Section 8.36.210 of the City's Municipal Code prohibits vibration to exceed the perception threshold at or beyond the property boundary of the source or at 150 feet from the source if on a public space or public right of way. The forecasted vibration levels due to on-site construction activities would not exceed the human annoyance threshold of 80 VdB for all sites surrounding the Project area during construction.	Less than significant.	contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent must investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications must be included in the proposed Project construction documents, which must be reviewed by the City prior to issuance of grading permits. No mitigation measures required.	Less than significant.
<i>Transportation</i>			
The Project would result in an increase of 3,012 net daily trips, including 254 new morning peak hour trips (208 inbound, 46 outbound) and 300 new afternoon peak hour trips (72 inbound, 228 outbound). After accounting for the removal of the existing uses on site, the Project would generate a net increase of 2,668 daily trips, including 207 net new morning peak hour trips (172 inbound, 35 outbound) and 251 net new afternoon peak hour trips (59 inbound, 192 outbound), as summarized in Section 4.8, Table 4.8-6 . The Project is located within a High Quality Transit Area (HQTa). The City's Transportation Impact Analysis Guidelines, in accordance with <i>OPR Technical Advisory on Evaluating Transportation Impacts in CEQA</i> , states that all development projects within an HQTa	Less than significant.	No mitigation measures required.	Less than significant.

TABLE 2.0-1
SUMMARY OF PROJECT IMPACTS

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
are considered to have less than significant transportation impacts.			
The Project would provide a total of 533 parking spaces (in both the Parking Garage and the Surface Parking) and 12 loading spaces. Access to the Project site would be provided by four separate entrances, Gates A through D with a “u” shaped rideshare entry and exit off San Fernando Road near Building 1. Gates A and B would be located on West Milford Street, abutting the east and west of Building 2. Gate C would be located on West California Avenue, which is the Property’s current main access point. Gate D would be located on San Fernando Road. All gates would provide ingress and egress to the fire lane within the Project site, which would allow for vehicular circulation to all Buildings, including the Parking Garage. Operation of the proposed Project would be similar to the existing site and no major changes to the existing geometric design would be included.	Less than significant.	No mitigation measures required.	Less than significant.
<i>Glendale General Plan Safety Element Goal 8, Policy 8-1, Program 8-1.1</i> is directly related to emergency services; Program 8-1.1 encourages the update of disaster preparedness and recovery plans, as necessary. Adherence to <i>Goal 8</i> , and related policies and programs, in the <i>Safety Element</i> of the <i>Glendale General Plan</i> would result in impacts associated with an emergency response plan or emergency evacuation plan being less than significant. Construction and operation of the Project would also not conflict with the City’s established emergency response plan and future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents.	Less than significant.	No mitigation measures required.	Less than significant.

2.5 SUMMARY OF ALTERNATIVES

This Draft EIR considers a range of Alternatives to the Project in accordance with CEQA Guidelines Section 15126.6. This section of the Guidelines requires that an EIR describe and evaluate a range of reasonable alternatives to a project to promote informed decision-making. The identification and analysis of alternatives to a proposed project is a fundamental aspect of the environmental review process under CEQA.

CEQA Guidelines Section 15126.6(b) emphasizes the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts attributable to a proposed project, “even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” CEQA Guidelines Section 15126.6(f) further directs that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed.

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed Project. As such, the focus of the evaluation is on those environmental resources for which the proposed Project may have potential impacts.

The Alternatives to the Project evaluated in this Draft EIR include:

1. No Project/No Development
2. Commercial Use Alternative
3. Reduced Intensity

A brief description of each of these Alternatives is provided below with a summary of the evaluation of each.

2.5.1 Alternative 1 — No Project / No Development

Consideration of the No Project/No Development Alternative is required by Section 15126(2)(4) of the CEQA Guidelines. As required by the CEQA Guidelines, the analysis must examine the impacts which could occur if the site is left in its present condition, as well as what may 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.

Under the No Project/No Development Alternative, the Project site would not be developed with the new proposed studio facilities and would remain as currently developed. The existing buildings on the site are currently used for storage and as entertainment production studios.

2.5.2 Alternative 2 — Commercial Use Alternative

The Commercial Use Alternative would include demolition of the existing buildings and site improvements, as well as the development of four new 3-story buildings with a height of 45 feet containing 588,100 square feet of space and a parking structure. Each of these buildings would contain 2 levels of office space over ground floor retail commercial space. The total amount of office area would be 393,070 square feet and the total amount of retail area would be 196,030 square feet. Parking would be provided in a parking structure located centrally between the buildings with a height of 50 feet containing 5 levels of above grade parking and 1 level of subterranean parking. Access to the site would be provided by two driveways on W. Milford Street and one driveway on California Avenue.

2.5.3 Alternative 3 — Reduced Intensity

The Reduced Intensity Alternative considers development of the entire 9.74-acre site with a reduced intensity. This alternative would include demolition of existing buildings, site improvements, and the development of new studio facilities with a parking structure on the site. This alternative presents another configuration for the proposed studio and flex and space and maintains the studios in the center of the site for efficiency. The flex space would be located along the eastern edge of the site. This alternative does not include the production office space included in the proposed Project. This alternative provides the parking in separate 3 level parking structure on San Fernando Road with the support and mill space on the corner of San Fernando Road and Milford. This alternative would include 30,100 square feet of support and mill uses and 225,060 square feet of studio uses, for a total of 255,160 square feet. The office/support uses include 22,008 square feet of support/storage and mill space on the northwest corner of the site, 8,092 square feet of support space located along the eastern portion of the site. The studio uses include eight 24,008 square foot stages located in the central portions of the site and three 15,628 square foot flex stages. Parking would be provided in a three-level above ground parking structure along San Fernando Road and would include 10,000 square feet on the first floor of the parking structure for a Base Camp, totaling 104,586 square feet. The buildings containing the flex stage space and support space uses located along the eastern portion of the site would have a height of 50 feet.

2.5.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e) (2) requires an EIR to identify an environmentally superior alternative among those evaluated in an EIR. Of the alternatives considered in this section, the No Project/No Development Alternative is environmentally superior to the other alternatives because this alternative would avoid the significant and unavoidable impacts identified for the Project.

According to the CEQA Guidelines, if the No Project/No Development Alternative is identified as the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Of the other alternatives considered, the No Project/No Development Alternative would be considered environmentally superior, as it would avoid all impacts of the Project as proposed. However, no significant impacts would be avoided as all of the impacts of the Project are less

than significant. For this reason, no significant impacts would be avoided or substantially lessened by the No Project Alternative.

Of the other alternatives evaluated, the Commercial Use Alternative would include the development of four-story buildings on the site, as compared to the Project, which would include the development of a six-story building on the site. This change in the configuration of new buildings on the site would reduce the duration of construction and associated temporary noise during construction when compared to the Project, but not to a less than significant level. Temporary noise during construction is the only significant impact identified for the Project without mitigation. Measures identified to reduce temporary noise impacts during construction would reduce these impacts to less than significant for both the Project and this alternative. Because this alternative would include a greater total amount of development and this development would be for commercial uses, other impacts, such as air quality, greenhouse gas, and transportation impacts, would be greater with this alternative than with the Project.

The Reduced Intensity Alternative would incrementally reduce air quality, greenhouse gas, and transportation impacts when compared to the proposed Project but would not include the production office space included in the proposed Project. This alternative also would involve less development on the site, which would reduce the duration of construction and associated temporary noise during construction when compared to the Project, but not to a less-than-significant level. Temporary noise during construction is the only significant impact identified for the Project without mitigation. Measures identified to reduce temporary noise impacts during construction would reduce these impacts to less than significant for both the Project and this alternative. Because the Reduced Intensity Alternative would reduce some impacts, it is considered the environmentally superior alternative. The Reduced Intensity Alternative would not include the amount of soundstage and production space, or any of the production office space included in the proposed Project and for this reason, would not meet the project objectives to the same degree as the proposed Project. The Reduced Intensity Alternative would not optimize the development potential of a designated industrial mixed-use site and also would not consolidate production office, soundstage and other production support uses on a single site. Consolidating these complementary studio uses on a single site will reduce traffic that would be generated if these studio uses are on separate sites.

2.6 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

Comments received in response to the Notice of Preparation (NOP) identified the following potential impacts that are evaluated in the Draft EIR: the potential for the obstruction of existing views of surrounding mountains due to the height of the proposed buildings, the potential for contamination of the site with hazardous materials from past uses to affect the proposed Project and surrounding properties, potential noise impacts from construction and operation of the proposed Project, and the potential for impacts during construction and operation of the proposed Project on pedestrian and vehicular movement and transit service on streets near the Project site.

3.0 PROJECT DESCRIPTION

3.1 INTRODUCTION

Consistent with CEQA Guidelines Section 15124, this section of the EIR provides the following information for the proposed San Fernando Soundstage Campus (Project):

- Project location and boundaries,
- Statement of objectives sought by the proposed project,
- **General description of the project's** technical, economic, and environmental characteristics, and
- Intended uses of this EIR.

“Project,” as defined by CEQA Guidelines Section 15378(a), means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and includes various government-related activities, such as the issuance of a lease, permit, license, certificate, or other entitlement.

3.2 PROJECT LOCATION

At approximately 424,453 square feet (SF) (9.74 acres), the Project site occupies Assessor's Parcel Numbers (APN) 5638-018-023 and 5638-018-032 along San Fernando Road in the City of Glendale (City) as shown in **Figure 3.0-1: Regional and Local Vicinity**. The Project site is located approximately 500 feet south of State Route (SR) 134 (Ventura) Freeway in the industrial corridor of the west area of the City. The Project site is generally bounded by West Milford Street to the north, medium density residential uses to the east, mixed-use structures to the south, and San Fernando Road to the west. **Figure 3.0-2: Project Site Location**, illustrates the Project site and nearby uses. The Project site fronts San Fernando Road and Milford Avenue and has approximately 102 feet of frontage on West California Avenue, which is primarily used as vehicular access. The Project site is served by multiple bus and shuttle lines operated by the Los Angeles County Metropolitan Transportation Authority (LA Metro), Los Angeles Department of Transportation (LADOT), and the City of Glendale Beeline along San Fernando Road and SR-134. Existing bicycle routes are provided on Doran Street and Broadway in the vicinity of the Project site.

The Project site is occupied by ten existing warehouse related structures and related surface parking and loading areas. **Table 3.0-1: Existing Structures**, summarizes the square footages, heights, and the approximate year of construction for the existing structures.

As discussed in **Section 4.5: Hazards and Hazardous Materials**, the Project site has been previously subject to environmental cleanup measures to remediate below grade volatile organic chemicals below grade. One of the required cleanup measures included the installation and continued maintenance of an underground geosynthetic clay liner (GCL) cap, located on the west side of the Project site. The GCL cap is approximately six feet below ground surface (bgs) and directly beneath a portion of Building 1. The GCL cap was installed to contain soil vapors beneath the property's surface. The GCL cap was required

to achieve regulatory oversight closure of the property's environmental cleanup. While there is little threat of vapors escaping while the GCL cap remains,¹ the GCL cap cannot be removed or penetrated.

TABLE 3.0-1
EXISTING STRUCTURES

Existing Structure	Square Footage	Height (feet)	Year Built
Buildings 1A and 1B	72,949	25	1A constructed in 1947. 1B constructed in 1946, addition in 1974.
Building 2	18,367	33	Constructed in 1967.
Building 3	11,603	28	Constructed in 1967.
Building 4	10,394	20	Constructed between 1953-1964.
Building 5	12,401	28	Constructed in 1975.
Building 6	9,466	20	Constructed in 1950.
Building 7	32,615	20	Constructed between 1953-1964.
Building 8	3,955	20	Constructed by 1967.
Building 9	5,125	17	Unknown, TBD.
Building 10	837	20	Unknown, TBD.

3.2.1 Land Use and Zoning

The Project site is located in and subject to the City of Glendale General Plan (General Plan). The General Plan designates the entire Project site as Industrial/Commercial Mixed Use (IMU). The General Plan encourages flexibility for areas with the IMU designation in the range and type of services such facilities provide.² The General Plan also states that light industrial uses may be compatible with residential uses in mixed use areas along San Fernando Road.³

The property is also located in the IMU zone, which is consistent with the Project site's General Plan designation. The purpose of the IMU zone is to allow for a mix of industrial and commercial activities and provide for a full range of services to be located along industrial/commercial thoroughfares.⁴ Surrounding zoning for the Project site is shown on **Figure 3.0-3: Project Site Zoning Map**.

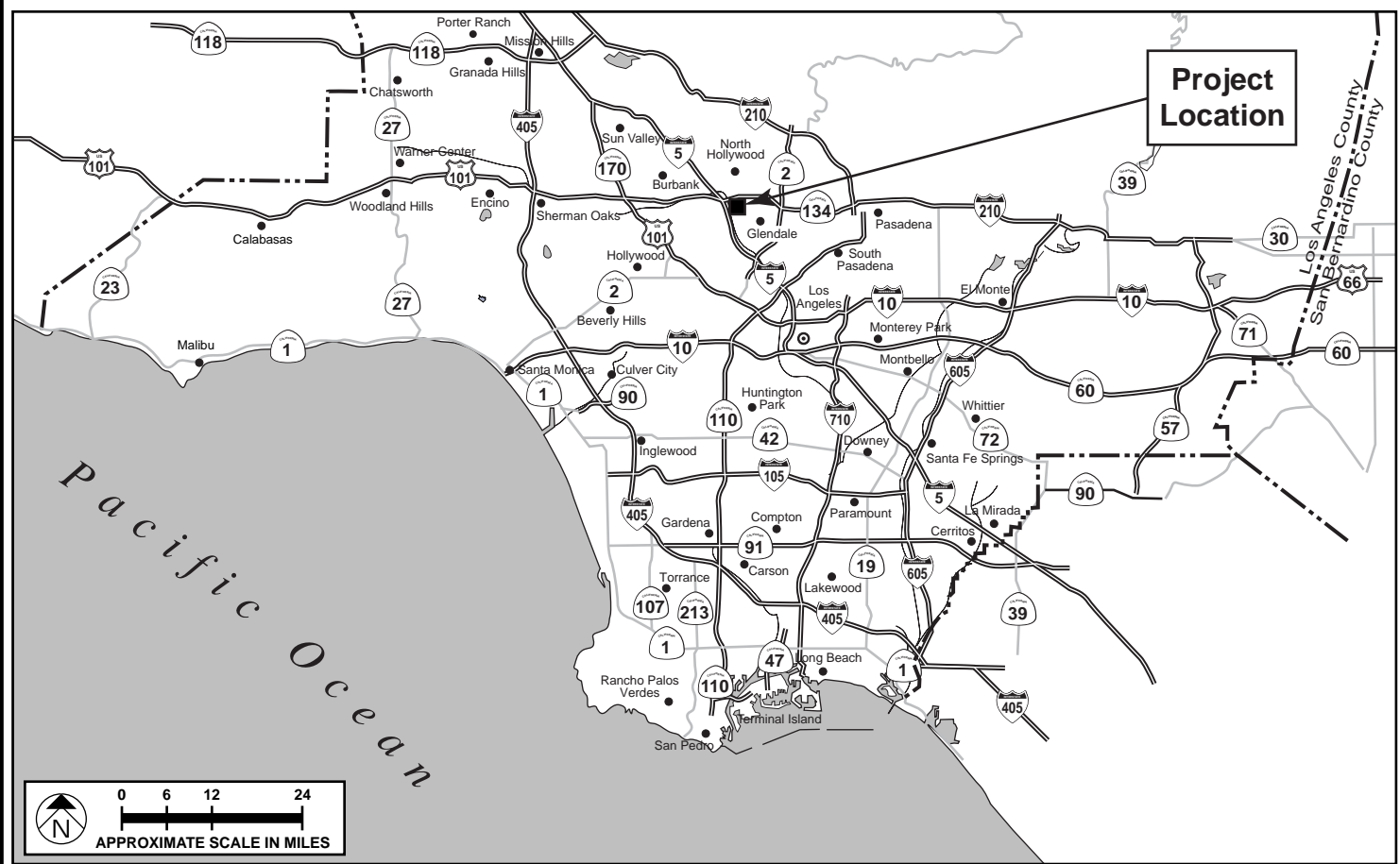
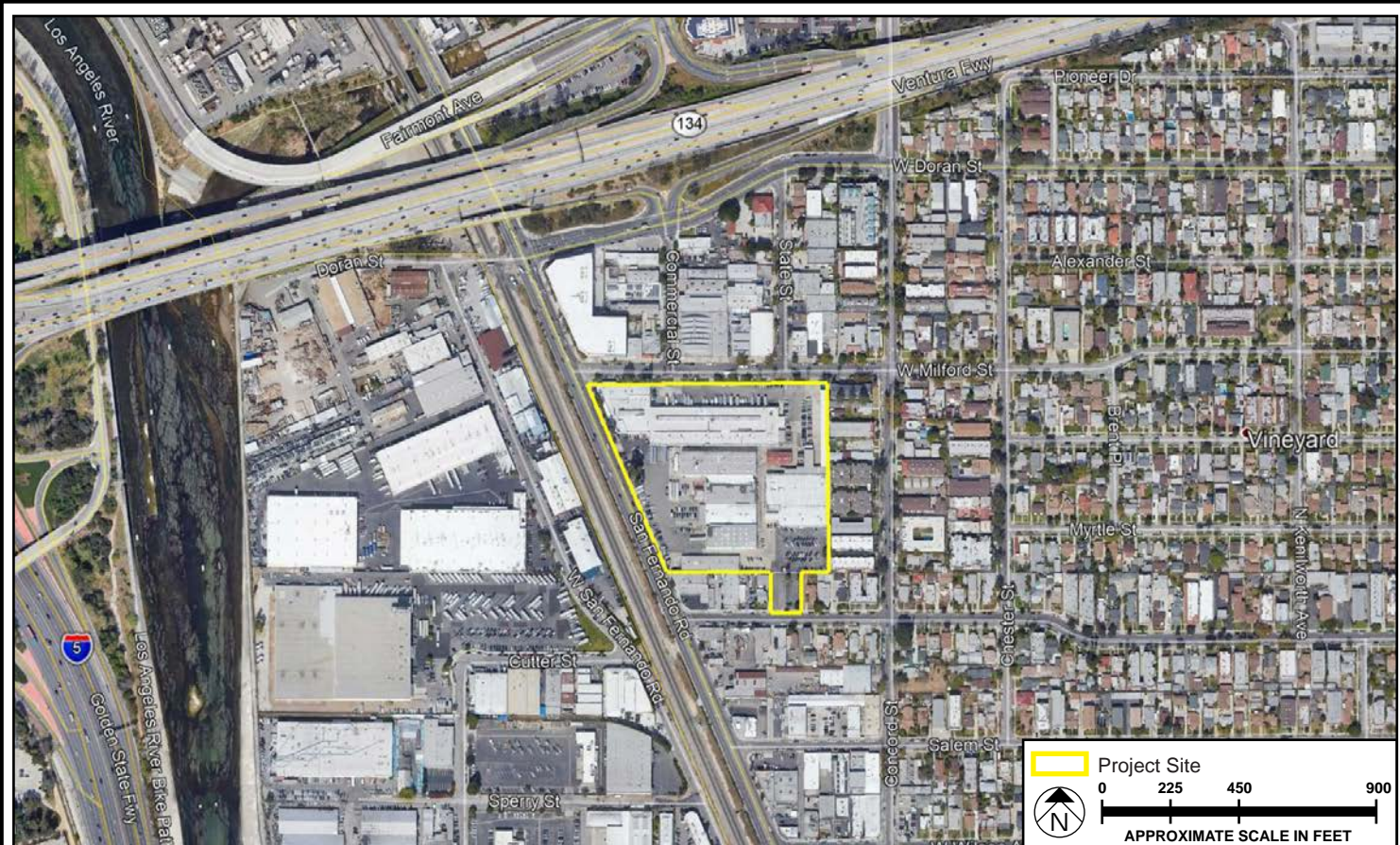
The IMU zone allows soundstage-production and supporting office uses by right and does not impose a floor area ratio (FAR) restriction. The IMU zone does, however, restrict height to a maximum of 50 feet.

1 SCS Engineers. *Phase I Environmental Site Assessment 5426 San Fernando Road, Glendale, California 91203 Assessor Parcel Numbers (APNs): 5638-018-032*. May 25, 2021.

2 Glendale General Plan Amendment No. 2004-01, Section 2.

3 Glendale General Plan Amendment No. 2004-01, Section 3.

4 Glendale Municipal Code, Section 30.14.010.A.



SOURCE: Google Earth - 2023; Meridian Consultants, LLC - 2023

FIGURE 3.0-1

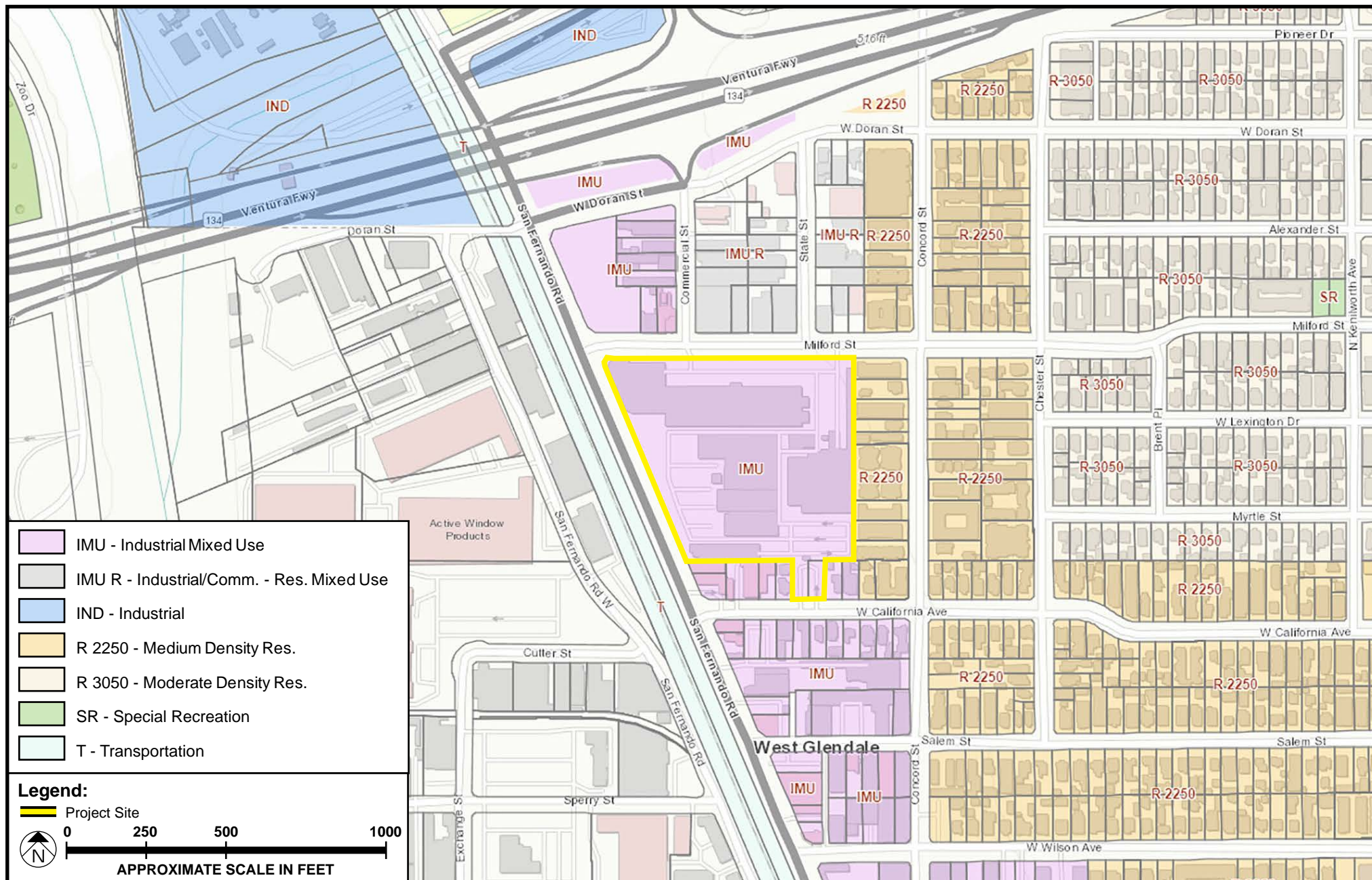
Regional and Local Vicinity



SOURCE: Google Earth - 2022; Meridian Consultants - 2023

FIGURE 3.0.2

Project Site Location



SOURCE: Genslar - 2023; Meridian Consultants - 2023

FIGURE 3.0-3

Project Site Zoning Map

The IMU zone requires 10-foot minimum corner cutoffs at the intersection of two streets (the Glendale Municipal Code [GMC] also requires an entrance to buildings at such intersections).⁵ The IMU zone also requires one tree for every six parking spaces (for surface parking only) to be planted and dispersed throughout surface parking areas. The IMU zone does not require any interior setbacks for properties that abut multi-family residentially zoned properties. However, the GMC requires a minimum five-foot wide landscaped buffer on properties adjacent to residentially zoned properties regardless of required setbacks (as mentioned, in IMU zones there are no required interior setbacks).⁶

The Property is also located in the former San Fernando Corridor Redevelopment Agency Project Area (the Redevelopment Area).⁷ As such, upon making the required findings, the Director of Community Development has the authority to allow exceptions to the parking standards with the approval of a Parking Exception.⁸

3.2.2 Surrounding Uses

Parcels within the vicinity of the Project site are zoned IMU, Industrial/Commercial Residential Mixed-Use (IMU-R), and Medium Density Residential (R-2250) as shown in **Figure 3.0-3**. Directly to the west of the Project site, separated by San Fernando Road, is the City of Los Angeles. The properties to the west are zoned for industrial uses in the City of Los Angeles.

IMU and IMU-R zoned properties line the north side of Milford Street to the north of the Project site. The IMU zoned parcels to the northwest across Milford Street contain a four-story, 50-foot-high Public Storage building that abuts a one-story structure. The IMU-R parcels to the north of the Project site across Milford are characterized by one-story structures that contain auto-related uses and a church.

Abutting the Project site to the east along Concord Street are R-2250 zoned parcels that are improved with one- and two- story residential multi-family buildings. As discussed previously, the IMU zone does not require any interior setbacks from multi-family residentially zoned parcels.⁹ A 26-foot fire lane is, nevertheless, provided between the eastern R-2250 properties and the Project site, which acts as a setback from the residential uses to the east. The fire lane runs north to south from Milford Street to California Street. The Project also includes landscaping abutting the R-2250 properties to the east.

Directly abutting (to the east and west) of this southern portion of the Project site fronting West California Avenue are IMU zoned parcels that contain multi-family, commercial, and auto-related uses. The multi-family uses located in the two IMU zoned parcels to the east of the Project site are legal nonconforming uses because the IMU zone does not allow residential uses. However, the two parcels to the east of the IMU multi-family parcels are zoned R-2250 and contain a single-family residence (abutting

5 GMC Section 30.14.030, Table 30.14-B.

6 GMC Section 30.14.030, Table 30.14-B Note (4).

7 Pursuant to Assembly Bill x 126, the Dissolution Act, the Redevelopment Area is scheduled to sunset in 2034.

8 GMC Section 30.32.030 and GMC Section 30.32.070.A, Table 30.32-B.

9 GMC Section 30.14.030, Table 30.14-B.

the IMU zone) and a two-story multi-family structure (on the corner of California Avenue and Concord Street). Across California Avenue are similarly zoned IMU parcels with legal nonconforming multi-family and single-family residences, and one story commercial and auto related uses. The properties located across West San Fernando Road and the railroad tracks in the City of Los Angeles are light industrial zoned properties that contain one- to two- story buildings with industrial uses. Golden Road Brewing and Trans Gas Propane are among some of the businesses located across the Property in the City of Los Angeles.

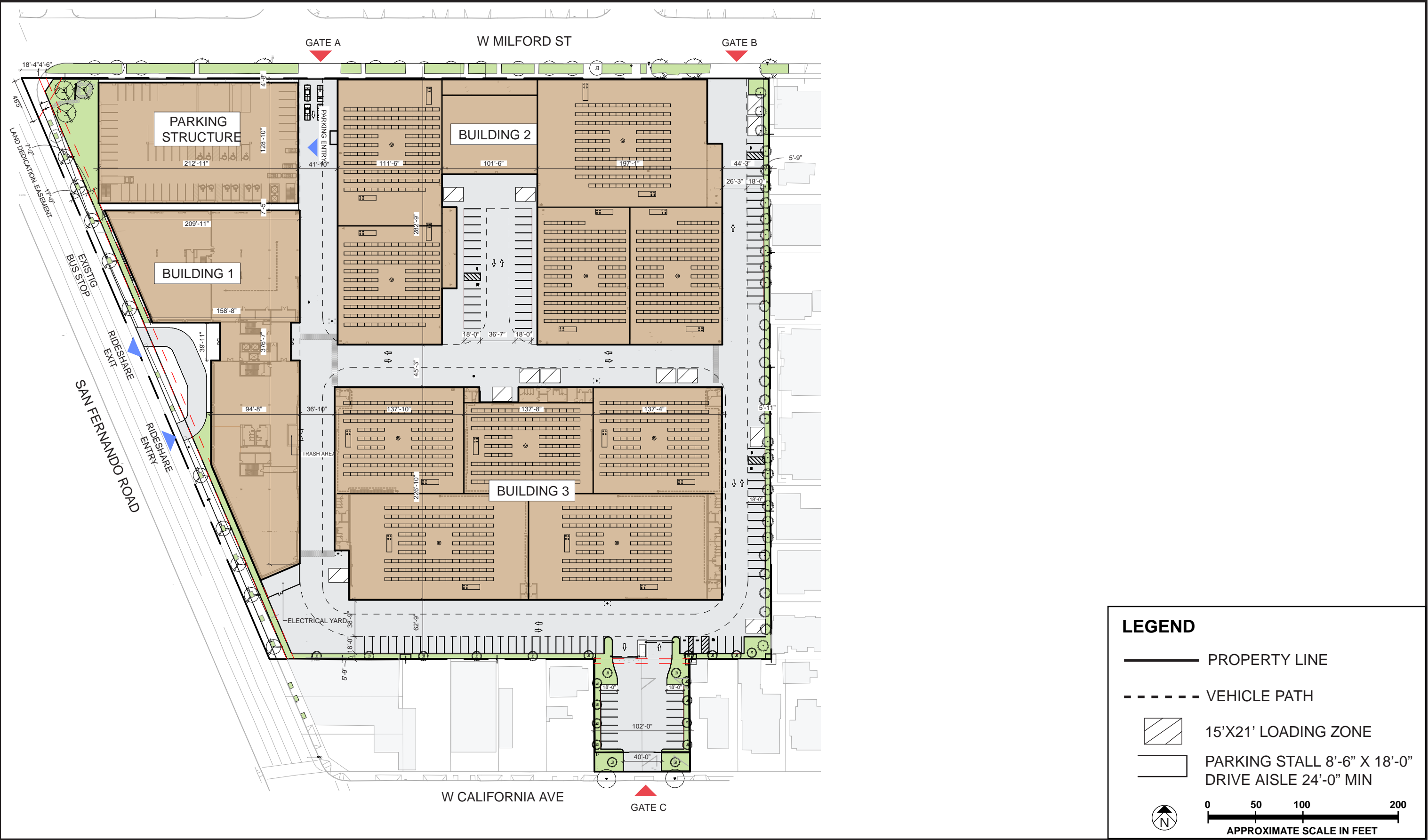
3.3 PROJECT OBJECTIVES

The objectives for the San Fernando Soundstage Campus Project (Project) are as follows:

1. Provide production space to assist the City of Glendale, the greater Los Angeles region and the state of California to retain entertainment jobs.
2. Contribute to the retention and revitalization of manufacturing and processing uses, along the San Fernando Road Corridor, a high quality transit corridor, which will encourage public transit use.
3. Optimize development potential of a designated industrial mixed-use site.
4. Provide production office, soundstage and other production support uses on a single site to consolidate related uses to reduce traffic.
5. Locate higher intensity production office uses away from residentially zoned land east of the site which separate prevent divisions in established communities.
6. Provide adequate surface parking opportunities which will minimize soil disturbance of soils containing residual contamination.
7. Maximize solar power production capacity of the site.

3.4 PROJECT CHARACTERISTICS

The Project proposes to demolish all existing structures and the existing surface parking for the construction of four new structures containing: (1) ten production sound stage studios (individually, a Stage and, collectively, the Stages), (2) three flex spaces (individually, a Flex Space), production office uses and commissaries (located in one structure, the Production Office), (3) various support spaces (both Flex Space support and Stage support), (4) an above-grade parking garage that contains most of the Project's required parking (Parking Garage) and (5) related surface parking lots (Surface Parking) as shown in **Figure 3.0-4: Proposed Site Plan**. The Project's various components are separated by a fire lane that ranges from approximately 26-45 feet in width and roughly bisects the property on two sides from north to south and also transects the Property twice east to west. The fire lane also provides vehicular access to the Project's multiple components.



SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-4

Proposed Site Plan

The Project's four (4) structures will contain approximately 406,318 SF of gross floor area. The first building (Building 1) fronts West San Fernando Road and contains a total of approximately 214,885SF of gross floor area comprised of production office uses, commissary space, 2 flex spaces on the ground floor and 1 mill space on the ground floor.

The second building (Building 2) is located to the east of the Building 1, fronts Milford Street and contains approximately 97,905 SF of gross floor area with Stage, Stage support and Flex Space uses. The third building (Building 3) is located to the south of Building 2 separated by part of the fire lane and contains approximately 93,528 SF of gross floor area with Stage and Stage support uses. The fourth building, the Parking Garage, fronts West San Fernando Road and West Milford Street and contains 419 parking spaces. Buildings 1 through 3 and the Parking Garage will collectively be referred to as the Buildings. A summary of the development proposed within the Buildings is provided in **Table 3.0-2: Project Development Summary**. **Figures 3.0-5 through 3.0-10** show the cross-sections of the Buildings.

TABLE 3.0-2 PROJECT DEVELOPMENT SUMMARY		
Floor	Component	Gross Floor Area/Square Footage (sq. ft.)
Building 1		
1	Mill and Storage	8,420
1	Entry Lobby and Admin	1,965
1	Support	1,459
1	Flex Space 1	13,704
1	Flex Space 2	10,397
2	Offices	21,724
2	Commissary	14,064
3	Offices	35,788
4	Offices	35,788
5	Offices	35,788
6	Offices	35,788
2 to 6	Outdoor Decks and Balconies	Not counted towards floor area
Subtotal Building 1		214,885
Building 2		
1	Stage 1-XR	21,710
1	Stage 2	13,265
1	Stage 3	12,815
1	Stage 4	17,695
1	Stage 5	21,195
1	Stage Support	3,570
1	Flex Space 3	7,055
Subtotal Building 2		97,905

**TABLE 3.0-2
PROJECT DEVELOPMENT SUMMARY**

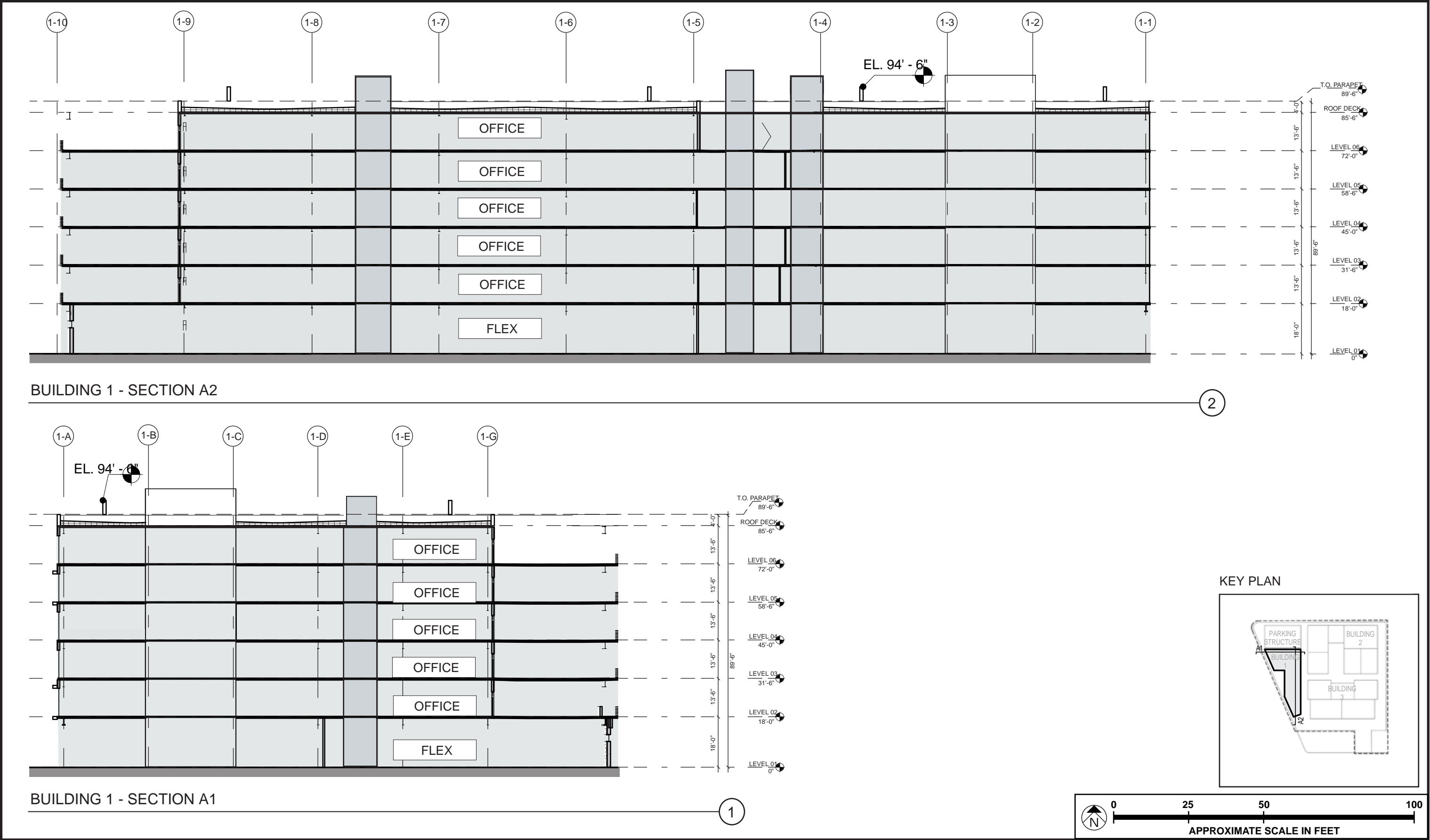
Floor	Component	Gross Floor Area/Square Footage (sq. ft.)
Building 3		
1	Stage 6	15,485
1	Stage 7	15,302
1	Stage 8	15,506
1	Stage 9-XR	22,040
1	Stage 10	22,635
1	Stage Support	2,560
<i>Subtotal Building 3</i>		93,528
Parking Garage		
1	Parking	Not counted towards floor area
2	Parking	Not counted towards floor area
3	Parking	Not counted towards floor area
4	Parking	Not counted towards floor area
5	Parking	Not counted towards floor area
6	Parking	Not counted towards floor area
TOTAL ALL BUILDINGS		406,318

3.4.1 Building 1

Building 1 would be a six-story structure containing approximately 214,885 SF of gross floor area and is proposed to reach up to 89 feet 6 inches in height measured from the ground to the top of the parapet. Rooftop equipment and required mechanical screening will reach a height of up to 100 feet 9 inches for portions of Building 1. Building 1's first level would contain Flex Spaces, support spaces, an entry lobby area, Stage support uses (a mill/storage area). Flex Space 1 and Flex Space 2 would contain similar layouts to Flex Space 3 in Building 2; however, the ceiling height would be up to 17 feet and 6 inches. The second through sixth floor would also contain Production Office uses, and each floor contain outdoor decks facing towards San Fernando and smaller outdoor decks facing east. The commissary is also located on the sixth floor, which also includes an outdoor deck. Multiple pedestrian entrances into Building 1 would be located adjacent to the fire lane and adjacent to the San Fernando Road right of way. Building 1 also offers a U-shaped driveway for drop offs that can be accessed directly from San Fernando Road. Floor plans of the six (6) stories and the roof of Building 1 are shown in **Figures 3.0-11 through 3.0-17**.

3.4.2 Building 2

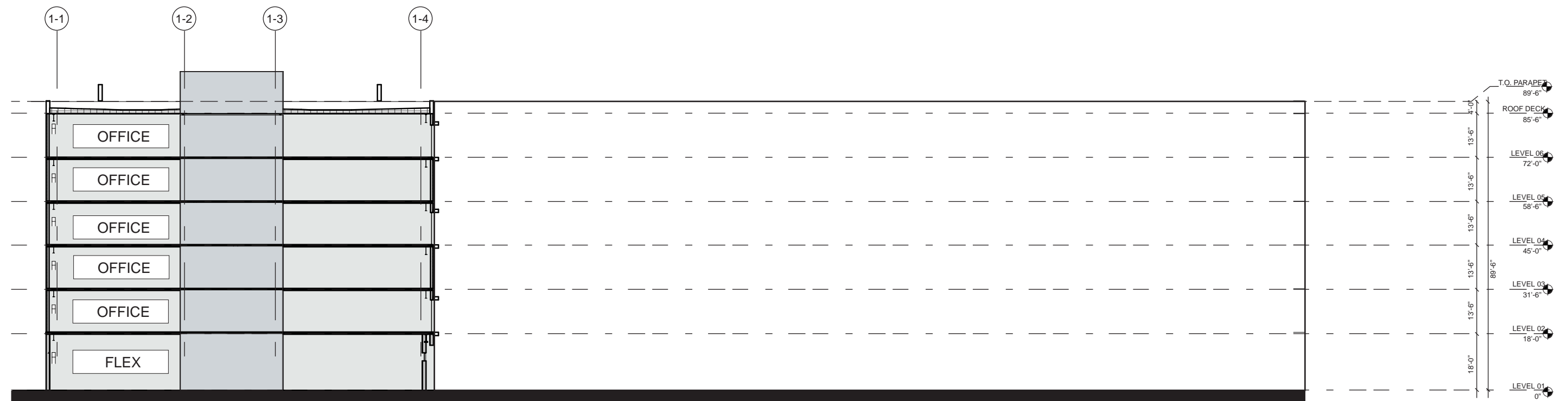
Building 2 would be a one story, upside-down "U" shaped structure with 97,905 SF of gross floor area and would reach up to 48 feet 4 inches to the top of the roof and 50 feet to the top of the parapet. Building 2 would contain five Stages, Stage support uses and a Flex Space.



SOURCE: Gensler - February 2023, Meridian Consultants - 2023

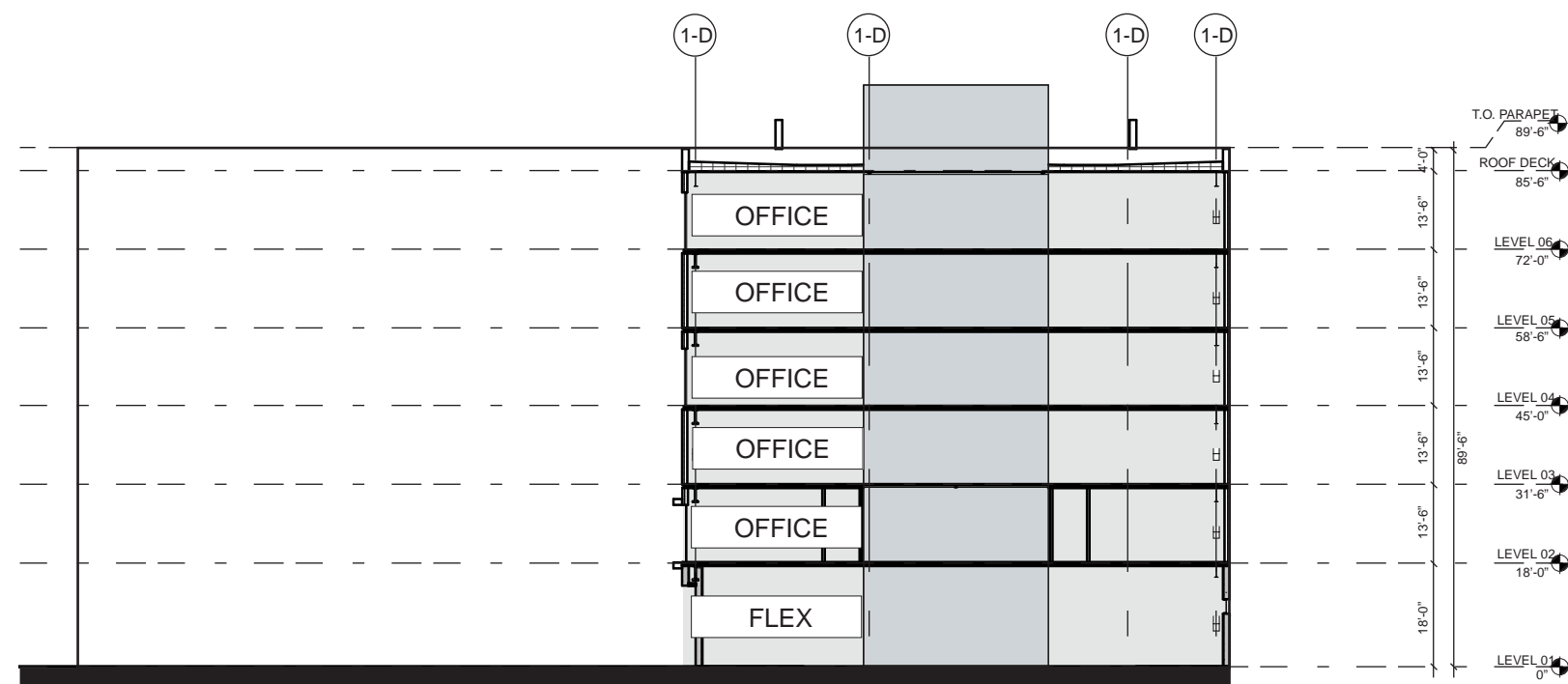
FIGURE 3.0-5

Building 1 – Sections



BUILDING 1 - SECTION A4

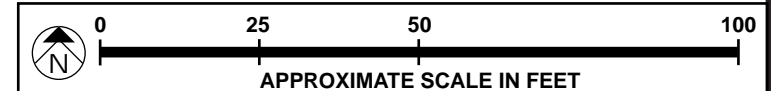
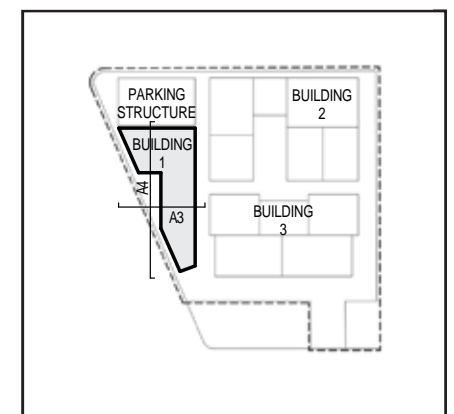
2



BUILDING 1 - SECTION A3

1

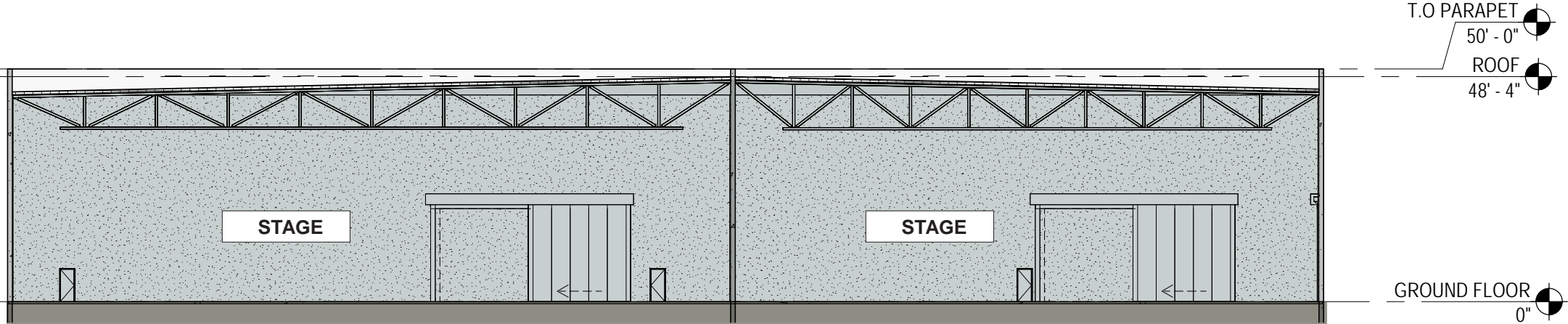
KEY PLAN



SOURCE: Gensler - February 2023, Meridian Consultants - 2023

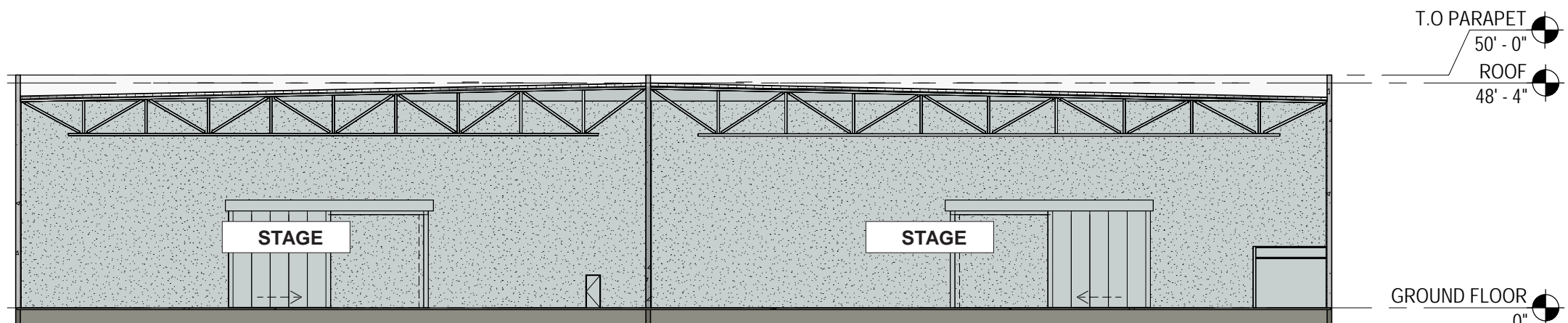
FIGURE 3.0-6

Building 1 – Sections Continued



BUILDING 2 - SECTION D

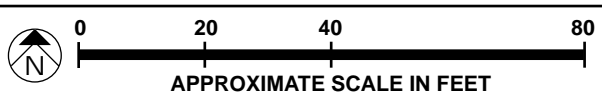
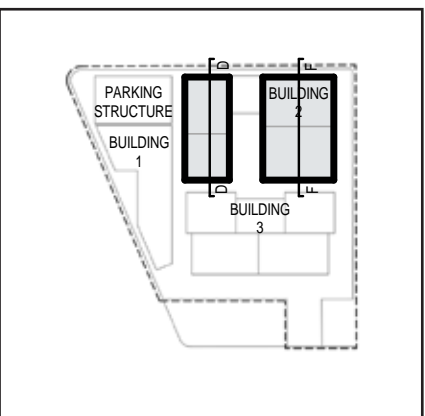
2



BUILDING 2 - SECTION F

1

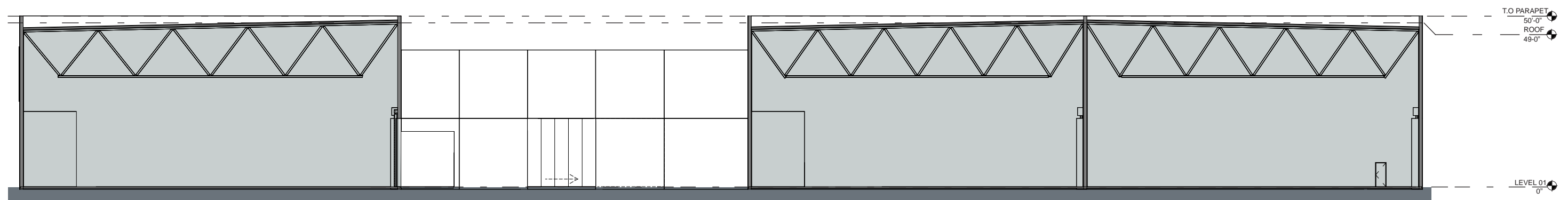
KEY PLAN



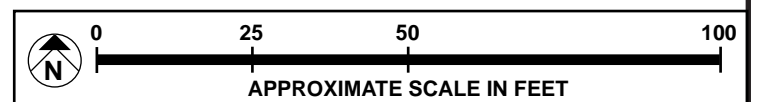
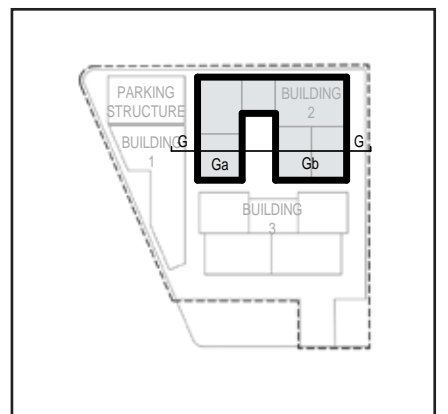
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-7

Building 2 – Sections



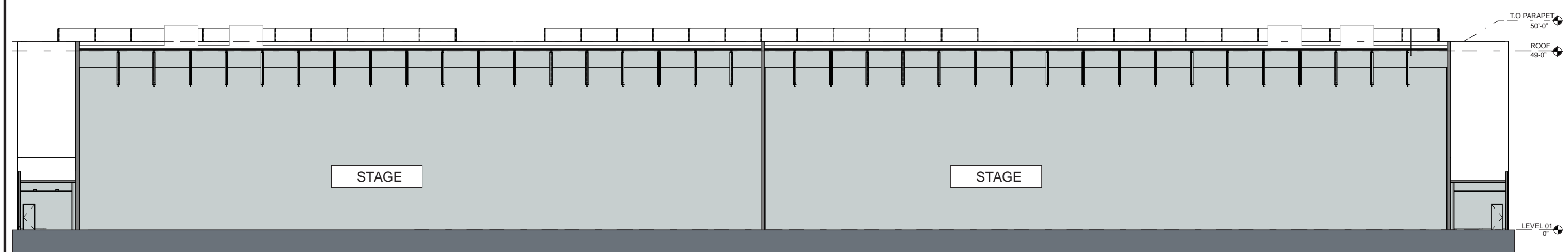
KEY PLAN



SOURCE: Gensler - February 2023, Meridian Consultants - 2023

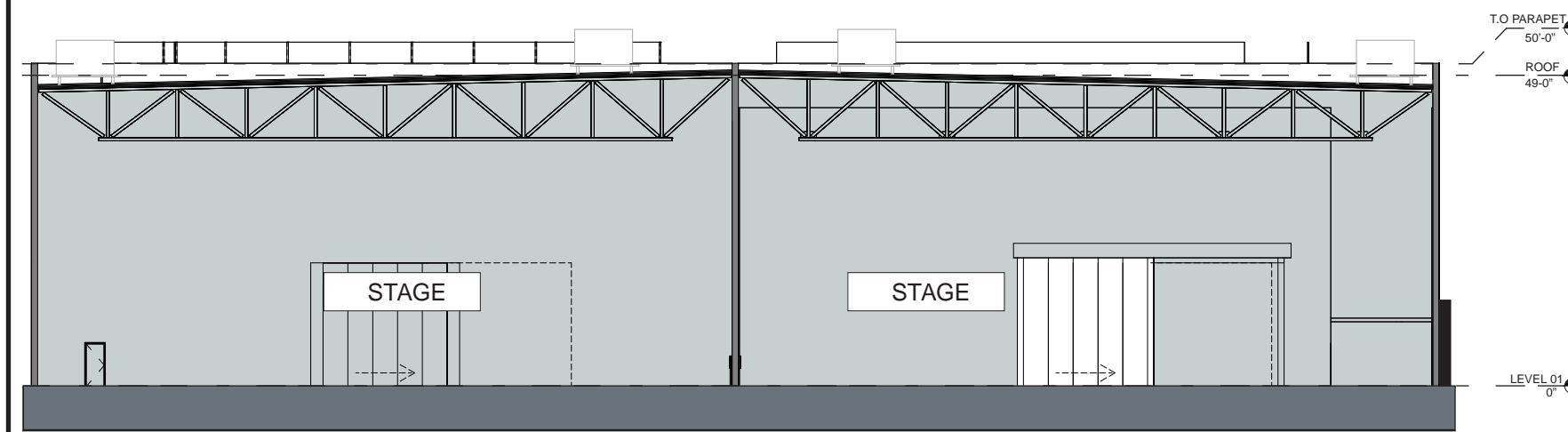
FIGURE 3.0-8

Building 2 – Sections Continued



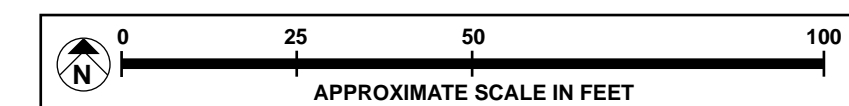
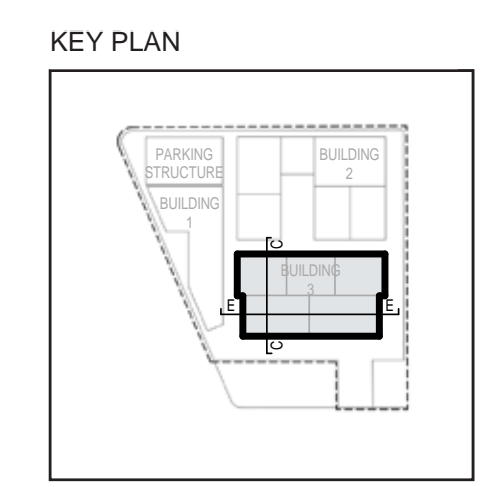
BUILDING 3 - SECTION E

2



BUILDING 3 - SECTION C

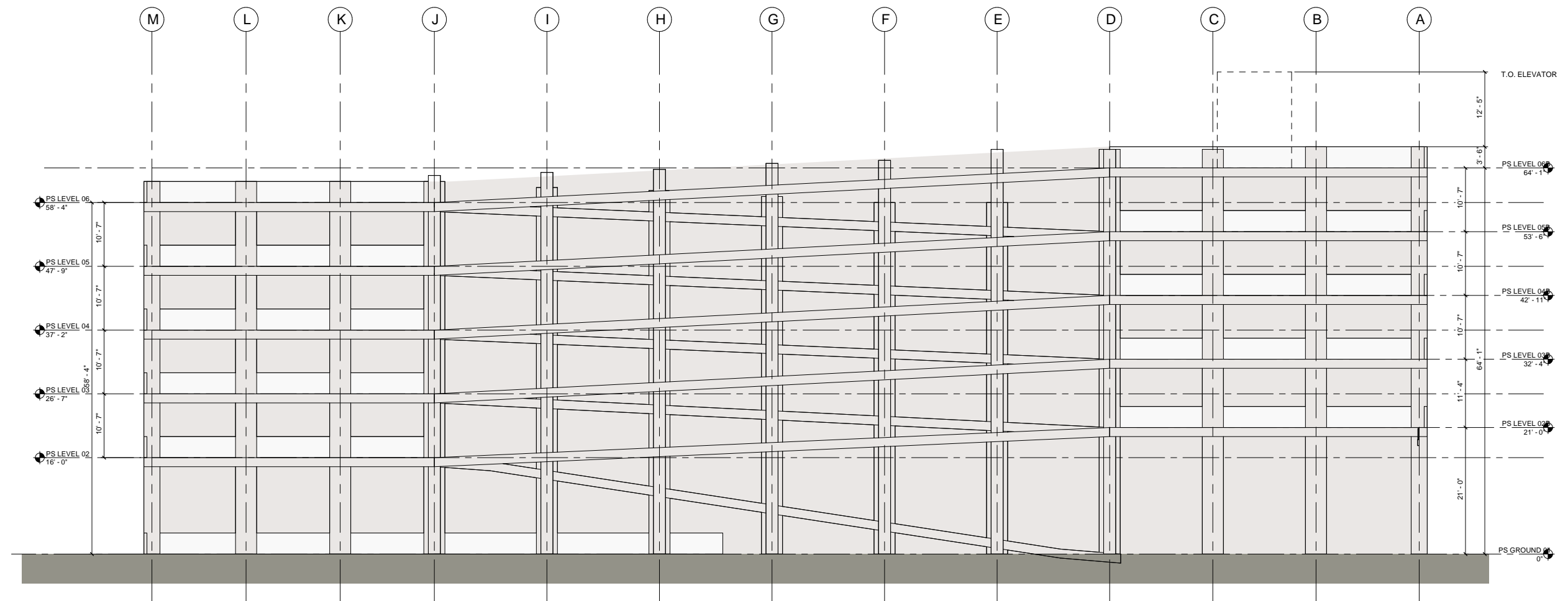
2



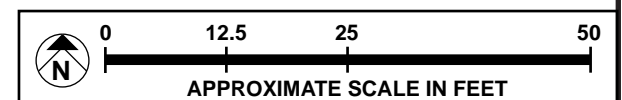
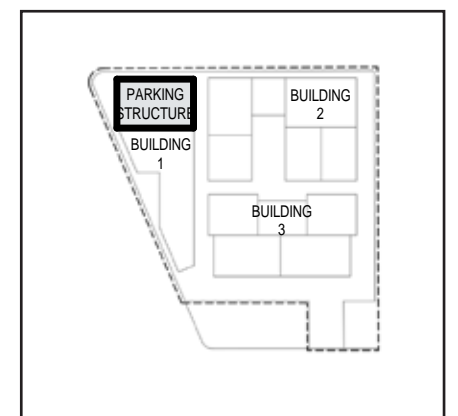
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-9

Building 3 – Sections



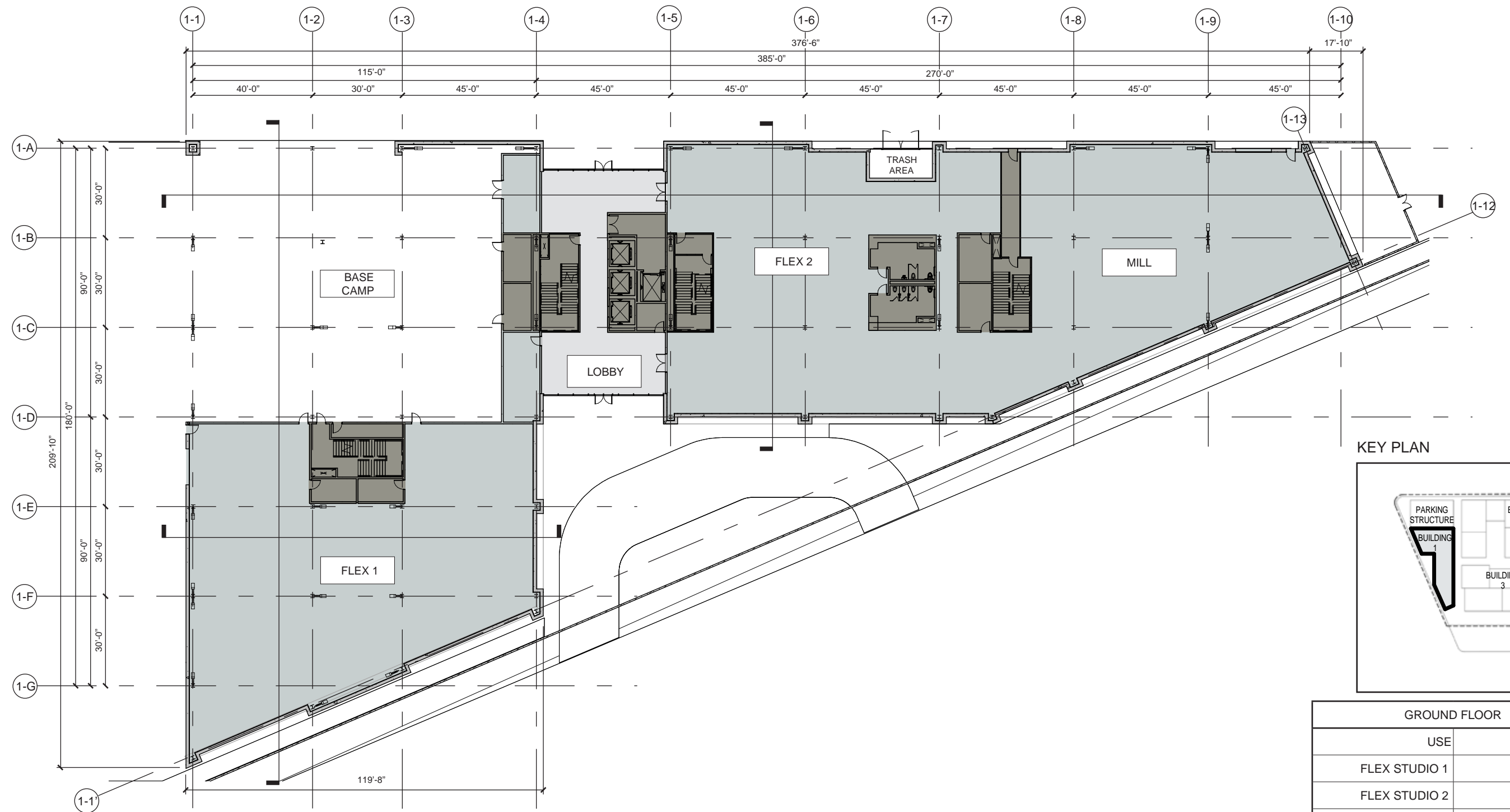
KEY PLAN



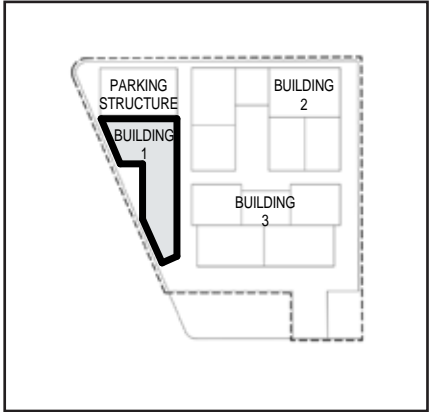
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-10

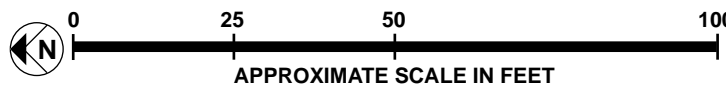
Parking Garage – Sections



KEY PLAN



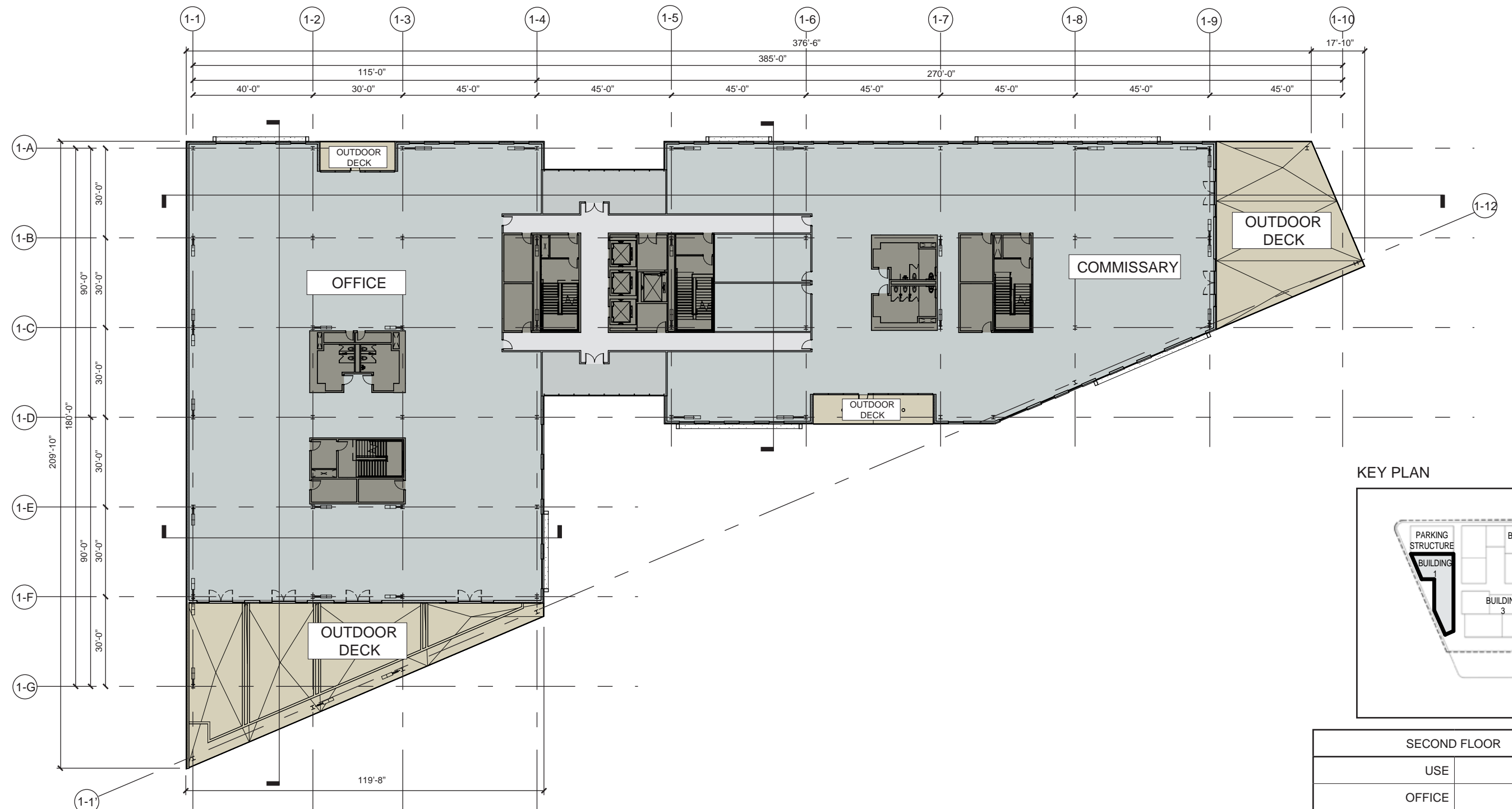
GROUND FLOOR	
USE	AREA (GSF)
FLEX STUDIO 1	13,704
FLEX STUDIO 2	10,397
MILL	8,420
LOBBY	1,965
SUPPORT	1,459
TOTAL	35,945



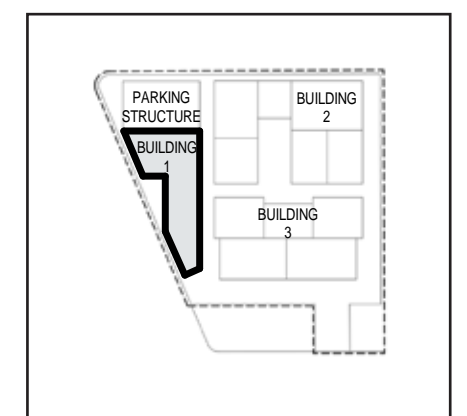
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-11

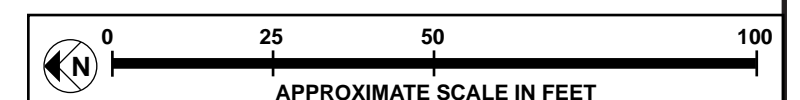
Building 1 – Ground Floor



KEY PLAN



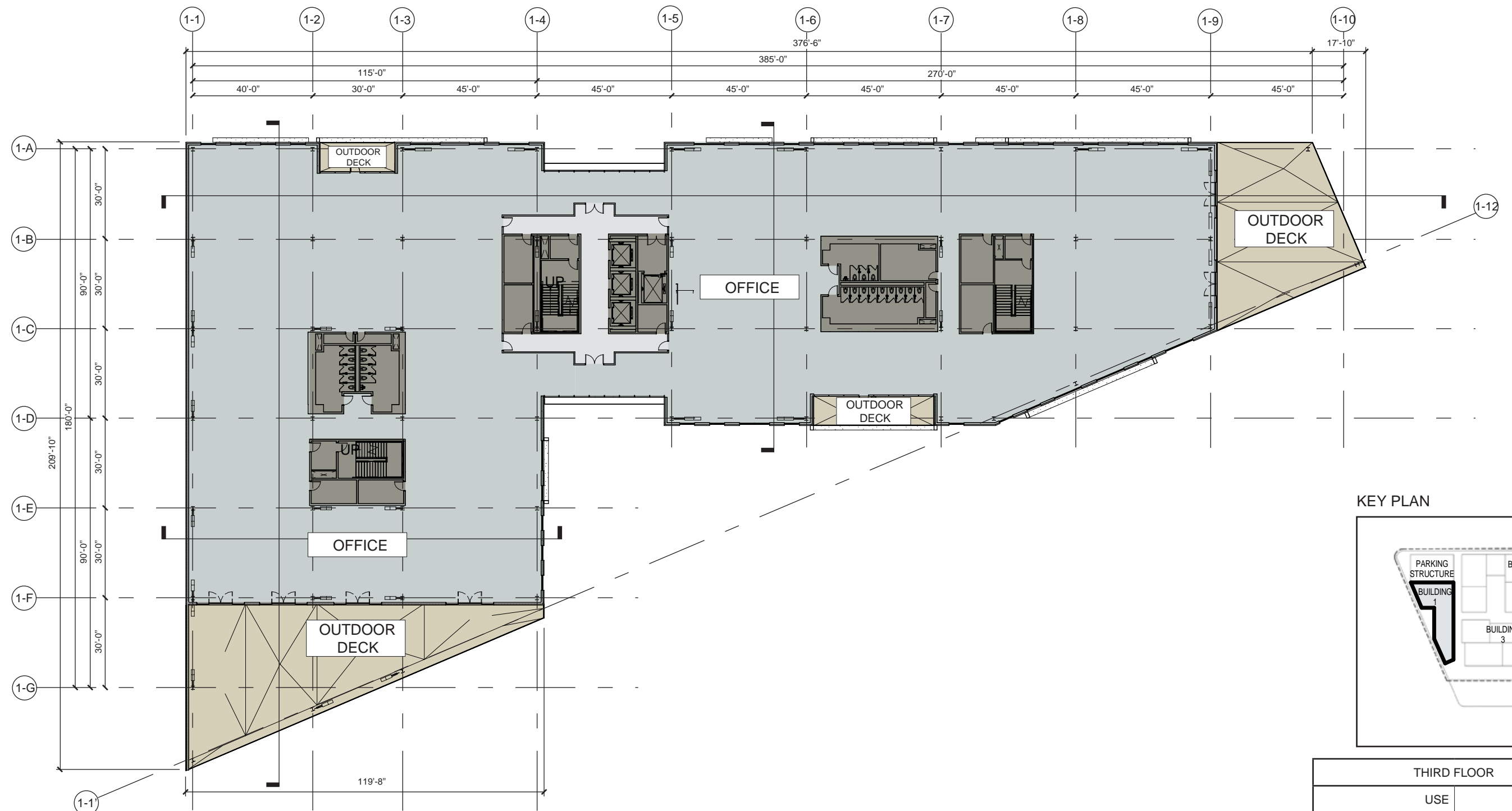
SECOND FLOOR	
USE	AREA (GSF)
OFFICE	21,724
COMMISSARY	14,064
TOTAL	35,788



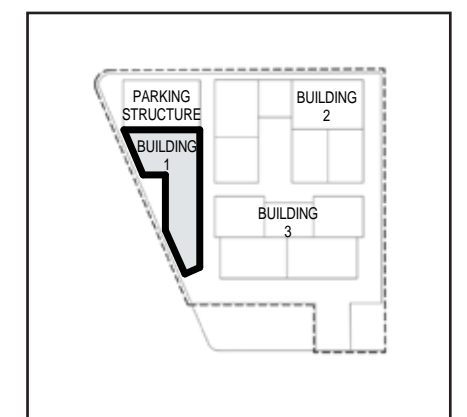
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-12

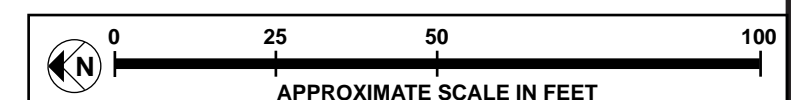
Building 1 – Second Floor



KEY PLAN



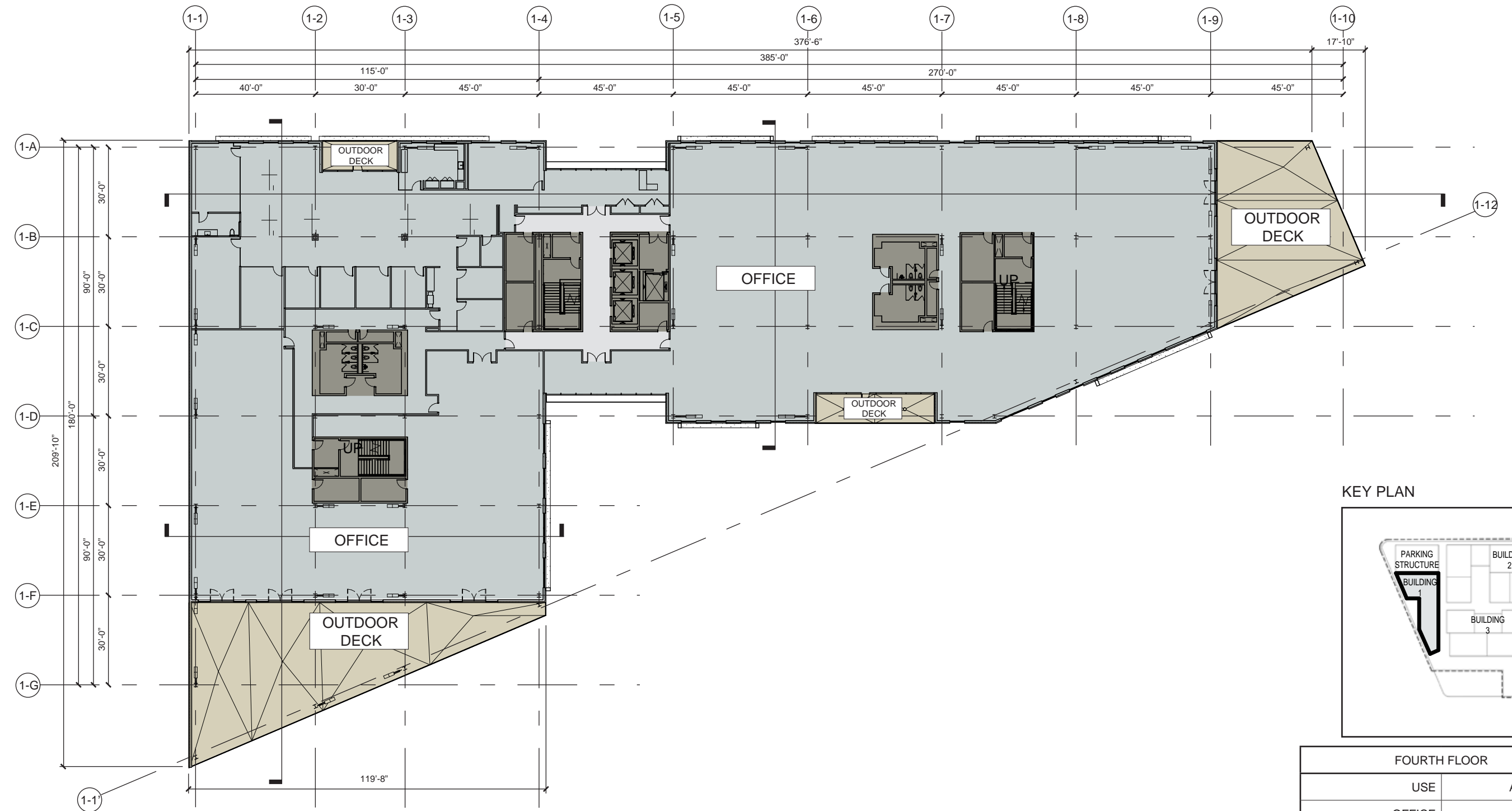
THIRD FLOOR	
USE	AREA (GSF)
OFFICE	35,788
TOTAL	35,788



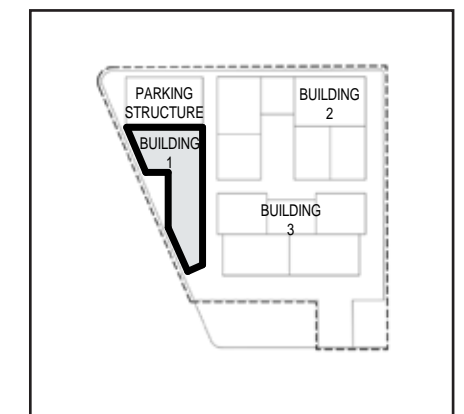
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-13

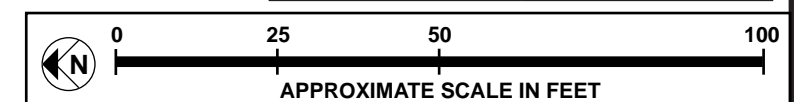
Building 1 – Third Floor



KEY PLAN



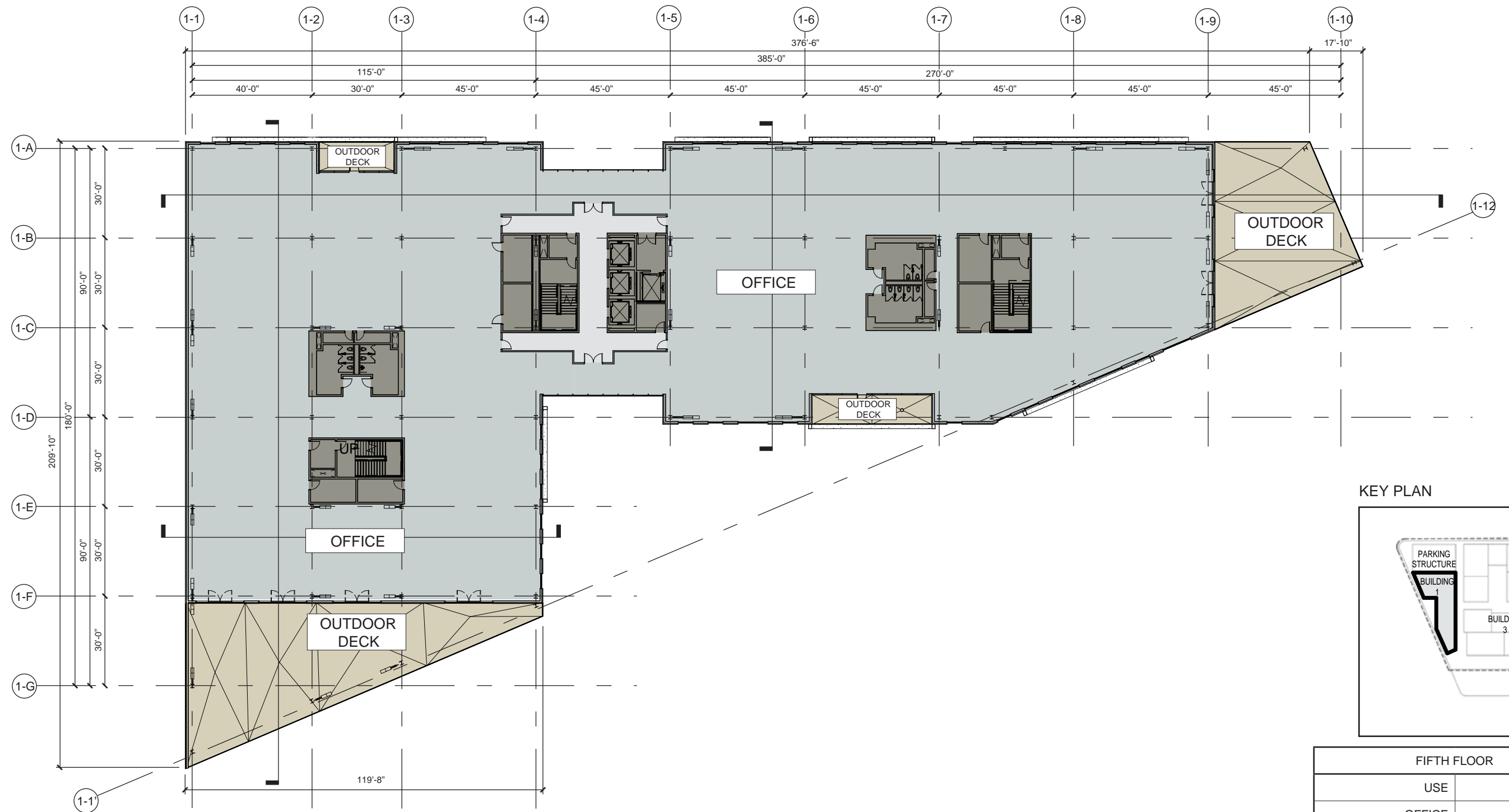
FOURTH FLOOR	
USE	AREA (GSF)
OFFICE	35,788
TOTAL	35,788



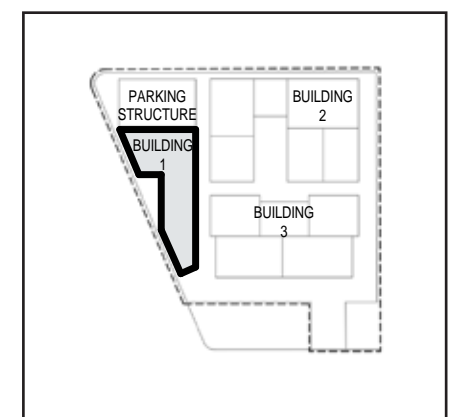
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-14

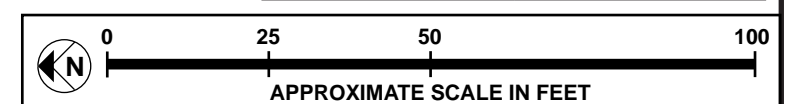
Building 1 – Fourth Floor



KEY PLAN



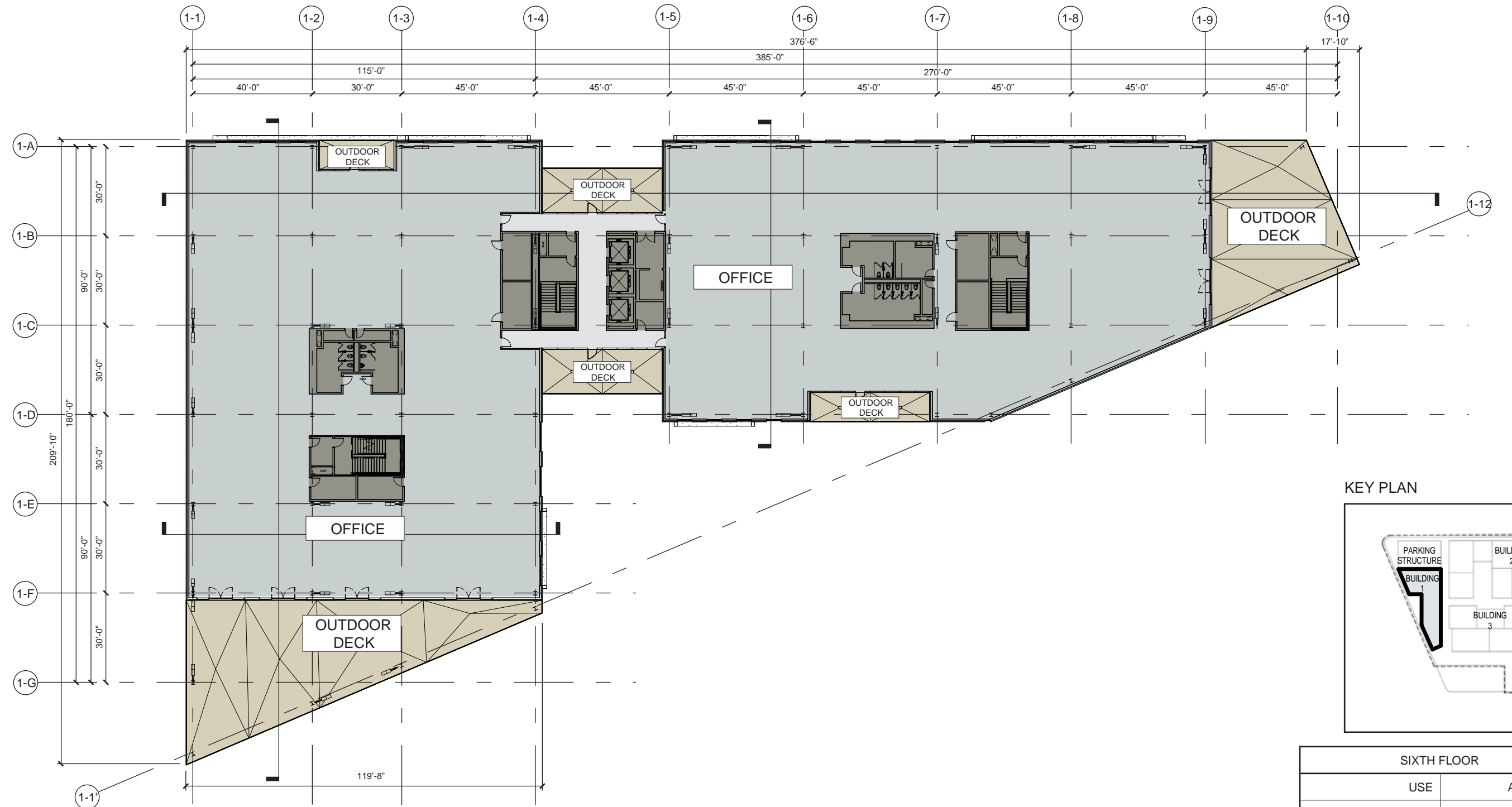
FIFTH FLOOR	
USE	AREA (GSF)
OFFICE	35,788
TOTAL	35,788



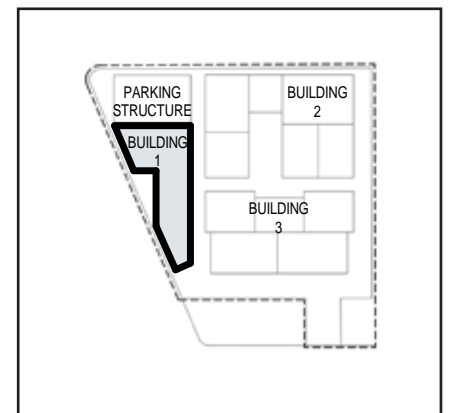
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-15

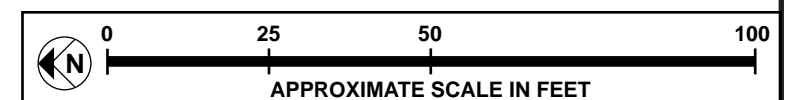
Building 1 – Fifth Floor



KEY PLAN



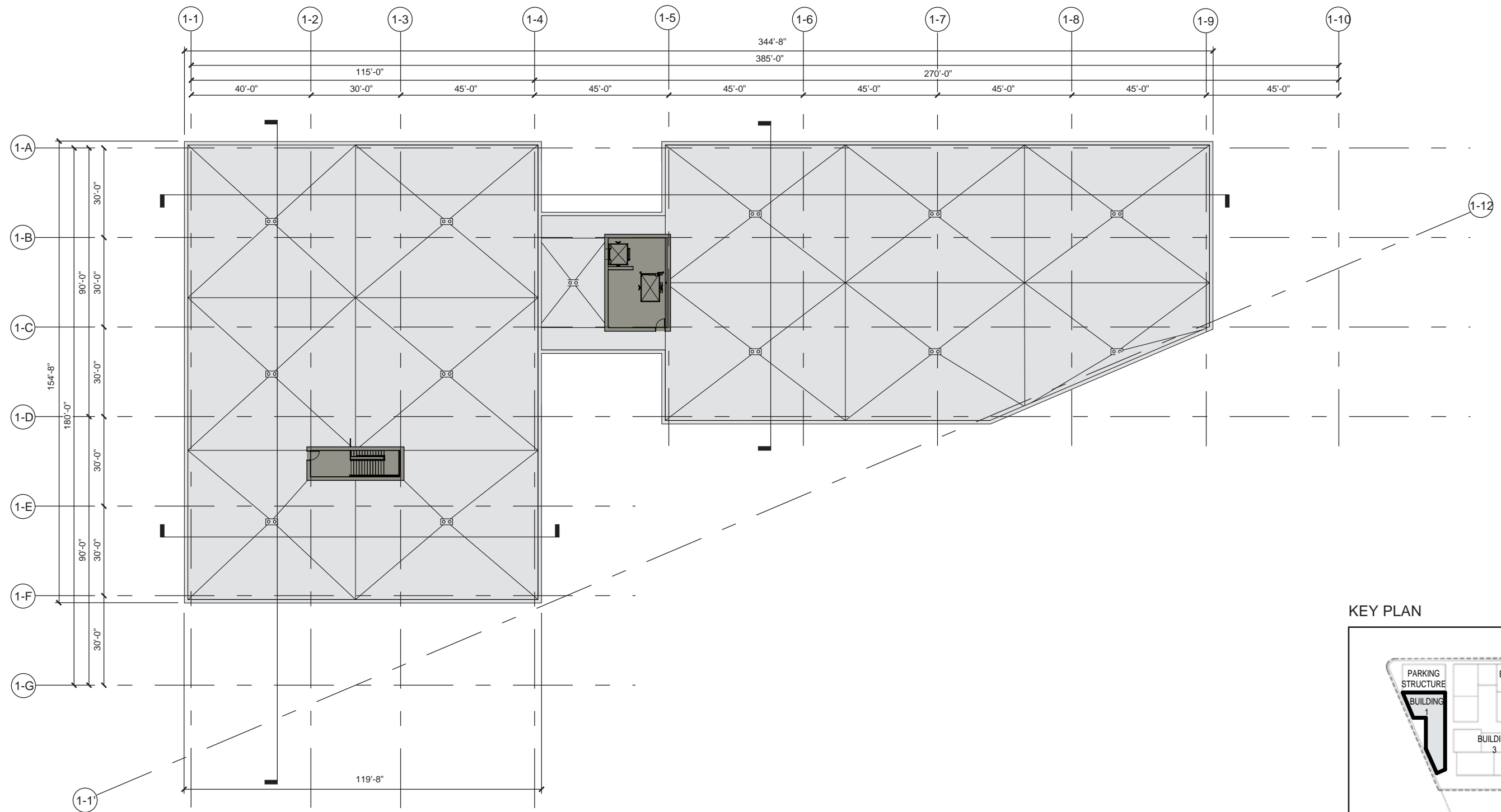
SIXTH FLOOR	
USE	AREA (GSF)
OFFICE	35,788
TOTAL	35,788



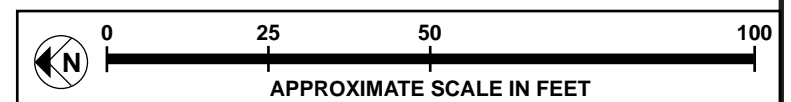
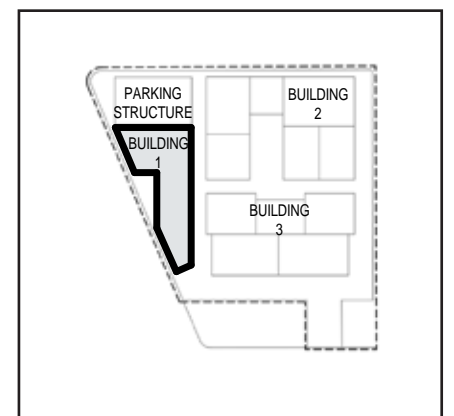
SOURCE: Gensler - January 2023, Meridian Consultants - 2023

FIGURE 3.0-16

Building 1 – Sixth Floor



KEY PLAN



SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-17

Building 1 – Roof

Three Stages would be located in the structure's eastern portion closest to the fire lane that abuts the R-2250 zoned land adjacent to the Property's eastern boundary. The remaining two Stages (including the XR Stage) are in the structure's western portion closest to Building 1. Stage support uses are scattered throughout Building 2 (e.g., sound locks, server rooms, control rooms, restrooms). The Stage interiors would be large open spaces with interior ceilings reaching up to 40 feet in height. Flex Space 3 would be located between Stages 1 and 2. Flex Space 3 will have a similar layout to the Stages, but with a smaller overall footprint. Flex Space 3's ceilings would reach up to 32 feet in height. All though Flex Space 3 would have a lower height than the Stages, rooftop equipment (exhaust and remote terminal unit) would reach a height of up to 48 feet and 6 inches and mechanical screening would reach a height of just over 50 feet. Surface parking would be located to the south of Flex Space 3. All Stages and Flex Space 3 would have various pedestrian points of entry that would lead to a sound lock room, which is an industry standard. Large elephant doors that will facilitate equipment and materials needed for set design are located at various points for all the Stages and Flex Space 3. Many of the pedestrian access points and elephant doors can be accessed from fire lane or from the surface parking located south of Flex Space 3. Some pedestrian entrances and elephant doors are internal to Building 1.

Solar panels are proposed to be installed atop the roof of Building 2. The solar equipment would require a remote terminal unit that would be screened. Screened exhaust fans, reaching up to 55 feet in height, would also be located at the top of the Stages. Floor plans of the five Stages, Flex Space 1, and rooftop of Building 2 are shown in **Figures 3.0-18 and 3.0-19**.

3.4.3 Building 3

Building 3 would be one story containing 93,528 SF of gross floor area and reaching up to 48 feet 4 inches to the top of the roof and 50 feet to the top of the parapet. The remaining five Stages would be located within Building 3, which would also include Stage support uses similar to those in Building 2. Building 3 would be bounded by Surface Parking to the north, fire lanes to the east and west, and Building 4 to the south. Similar to Building 2, the Stage interiors of Building 3 would be large, open spaces with interior ceilings reaching up to 40 feet in height. Stages 6, 7 and 8 are located in the northern portion of Building 3 adjacent to surface parking. The remaining three Stages (including XR-Stage 9) would be located in the southern portion of Building 3. Like Building 2, Building 3 will have pedestrian access points with sound locks at various locations off of the adjacent surface parking lot on the north, the fire lanes on the east and west. Elephant doors would also provide access from these areas. Some pedestrian entrances and elephant doors are internal to the stages.

Solar panels would also be installed on the roof of Building 3. The solar equipment would require a remote terminal unit that will be screened. Screened exhaust fans, reaching up to 55 feet in height, will also be located at the top of the Stages. Floor plans of the five Stages and rooftop are shown in **Figures 3.0-20 and 3.0-21**.

3.4.4 The Parking Garage

The Parking Garage is a six story structure located on the corner of San Fernando Road and Milford Street. The Parking Garage is proposed with a height of 65 feet 6 inches to the top of the roof and 69 feet to the top of the parapet. The Parking Garage will contain 419 parking spaces that can be accessed by a ramp abutting the fire lane to the east. The Parking Garage will not have any vehicular access points from Milford or San Fernando. The first floor provides 43 parking spaces, the second floor provides 82 parking spaces, the third floor provides 80 parking spaces the fourth floor provides 82 parking spaces, the fifth floor provides 79 spaces, and the sixth floor provides 54 space.

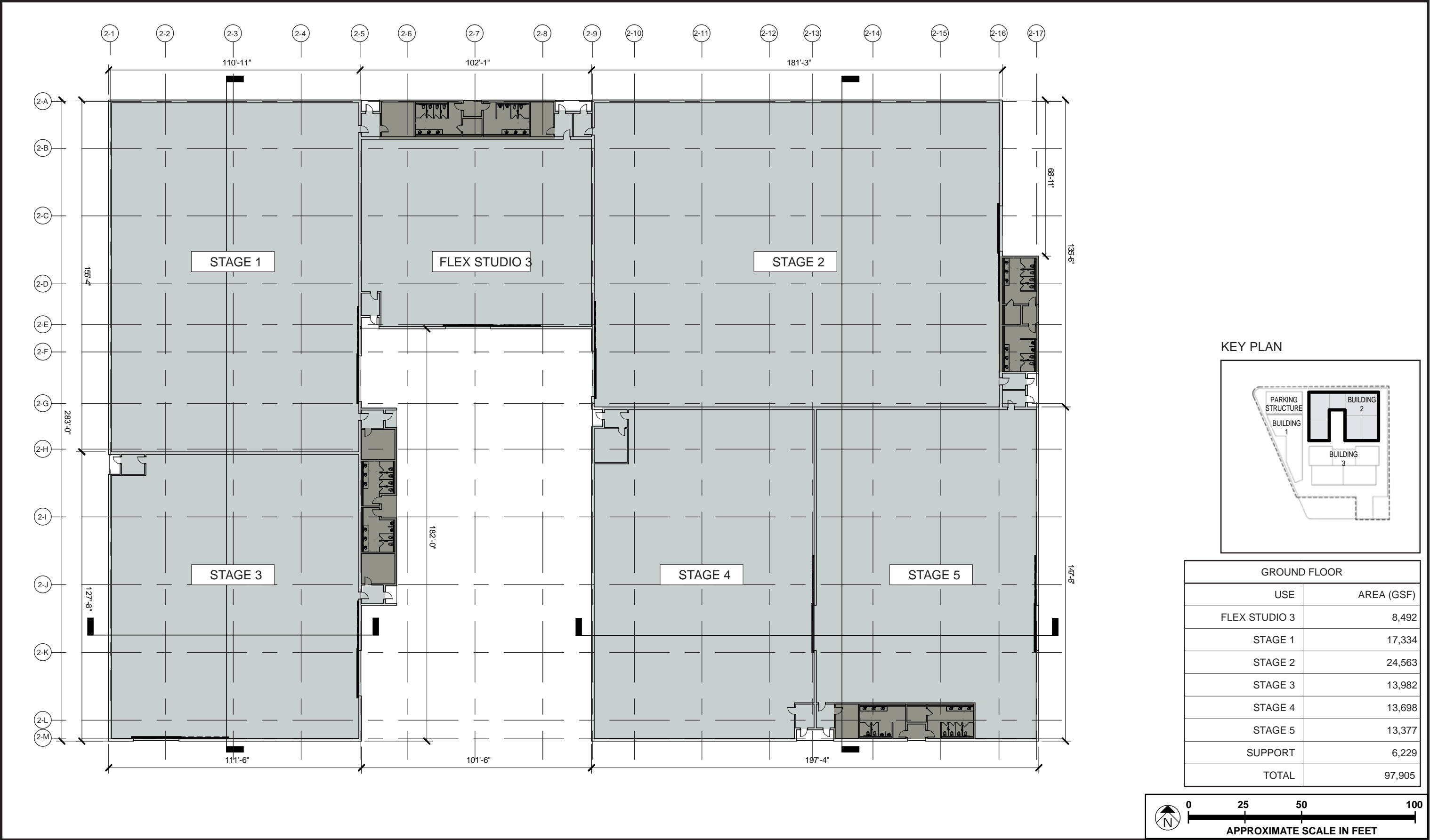
3.4.5 FAR, Setbacks, and Landscaping

The Project would contain a total gross floor area of approximately 406,318 SF, for a floor area ratio (FAR) of approximately 0.96 to 1. As noted above, the IMU zone allows soundstage-production and supporting office uses by right and does not impose an FAR restriction.

The IMU zone does, however, restrict height to a maximum of 50 feet. The Project's proposed Building 2 and 3 would conform to the GMC height requirement of 50 feet. Due to existing site soil conditions associated with the GCL cap discussed previously and the ongoing obligation to maintain the GCL cap and limit soil disturbance in the GCL cap's general vicinity, Building 1 is proposed to reach up to 89 feet and 6 inches in height to the top of the parapet (with mechanical screening height of up to 100 feet 3 inches) and the Parking Garage is proposed with a height of 65 feet 6 inches to the top of the roof and 69 feet to the top of the parapet. The Project Applicant is requesting a variance to allow the Project's proposed maximum heights for Building 1 and the Parking Garage.

The Project would provide a required 10-foot corner cutoff at the corner of West San Fernando Road and West Milford Avenue as well as a five-foot landscape buffer along the eastern boundary of the Project site, which abuts residential properties. The southern boundary would include a setback of 15'-7 7/8", a portion of which would be landscaped. These setbacks would comply with requirements in the GMC.

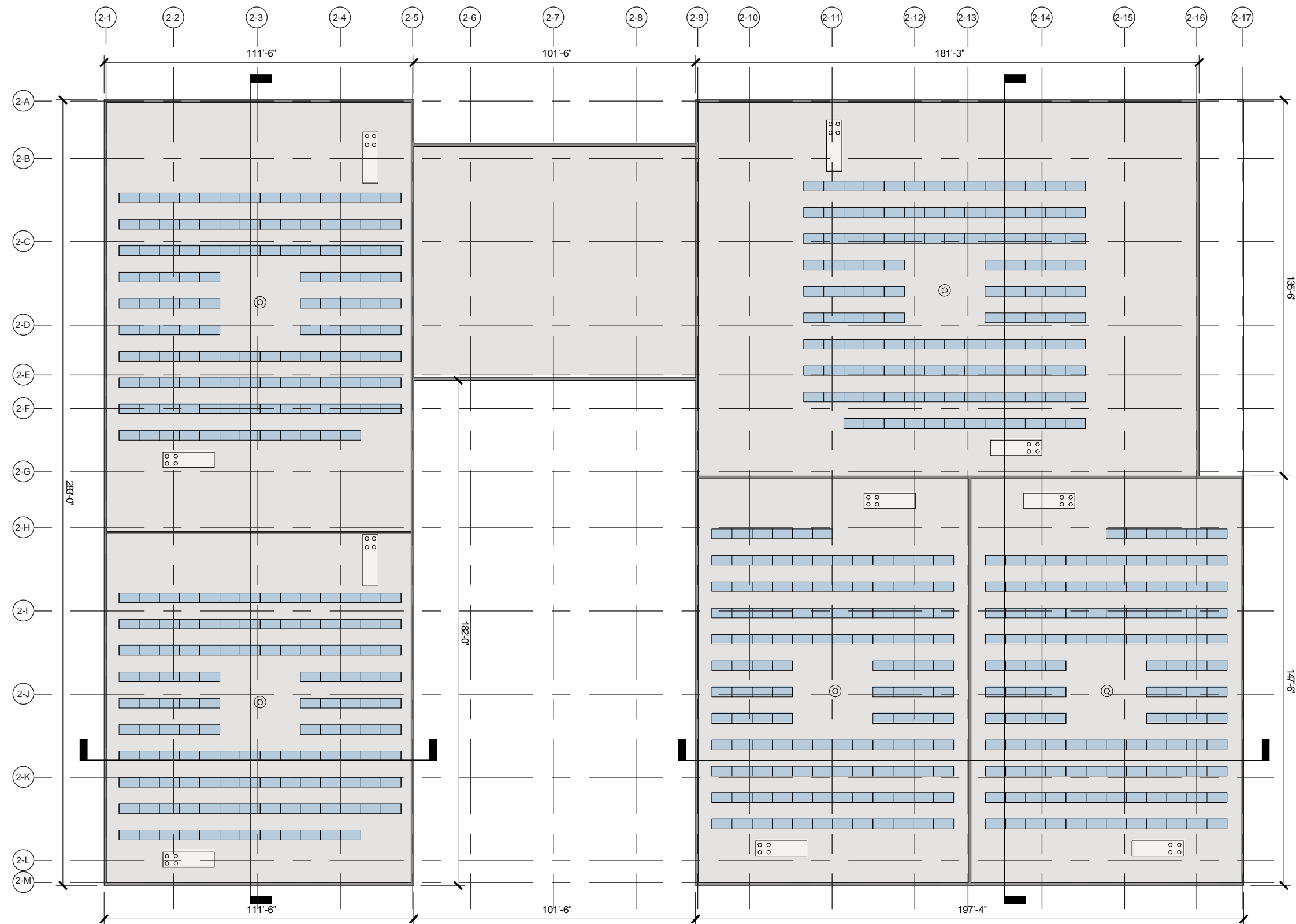
The Project's 114 surface parking spaces require a total of 19 trees. The Project instead would provide a total of 108 trees located mainly along the perimeter of the Project site, on Building 1, and throughout the Property. The Project will provide 69 trees on the Property, with 62 trees in the surface parking area concentrated to buffer the adjacent residential zone to the east and residential uses to the south. The remaining 7 on site trees would be located on Building 1's outdoor decks. At least 75 percent of the proposed trees would have a 25-foot mature span, with the remaining trees having at least a 10-foot mature span. The Project does not strictly comply with the landscaping and tree dispersal requirements of the GMC. The Project would also include landscaping throughout the Project site, including upper-level roof deck landscaping. The Project would include 15,753 square feet of planting on the ground level, 1,737 square feet of planting on the outdoor decks, and 6,726 square feet of off-site streetscape planting. Landscaping would be located along the aforementioned landscape buffer, and the perimeter of the Project site.



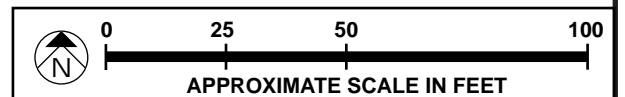
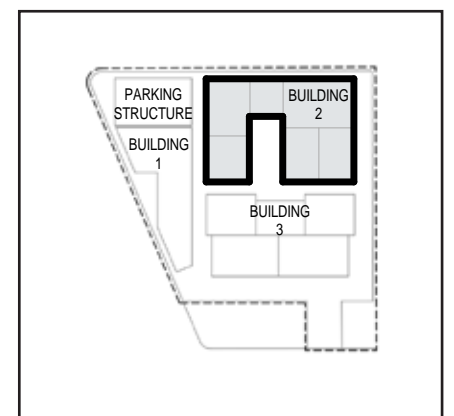
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-18

Building 2 – Floor



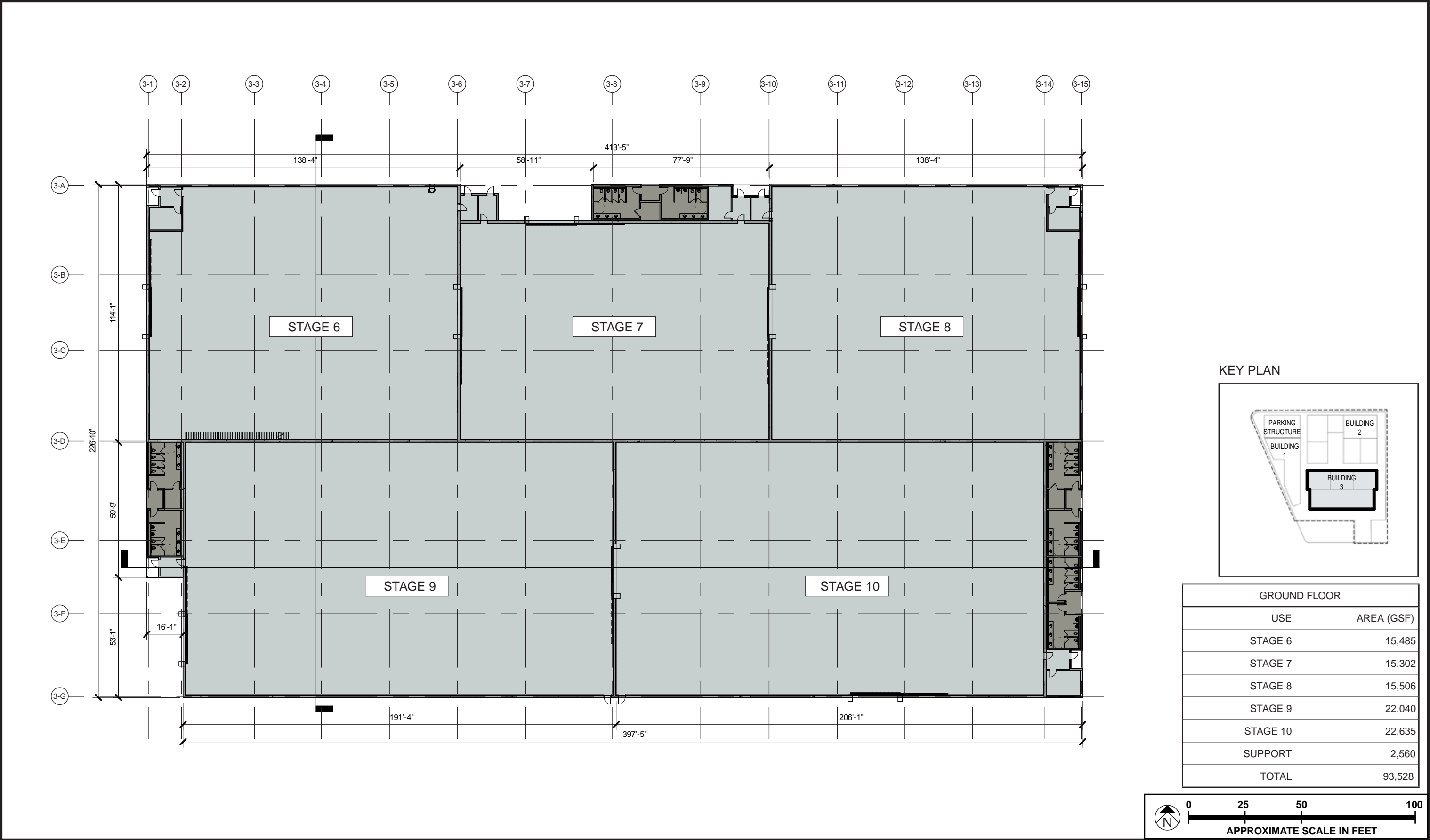
KEY PLAN



SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-19

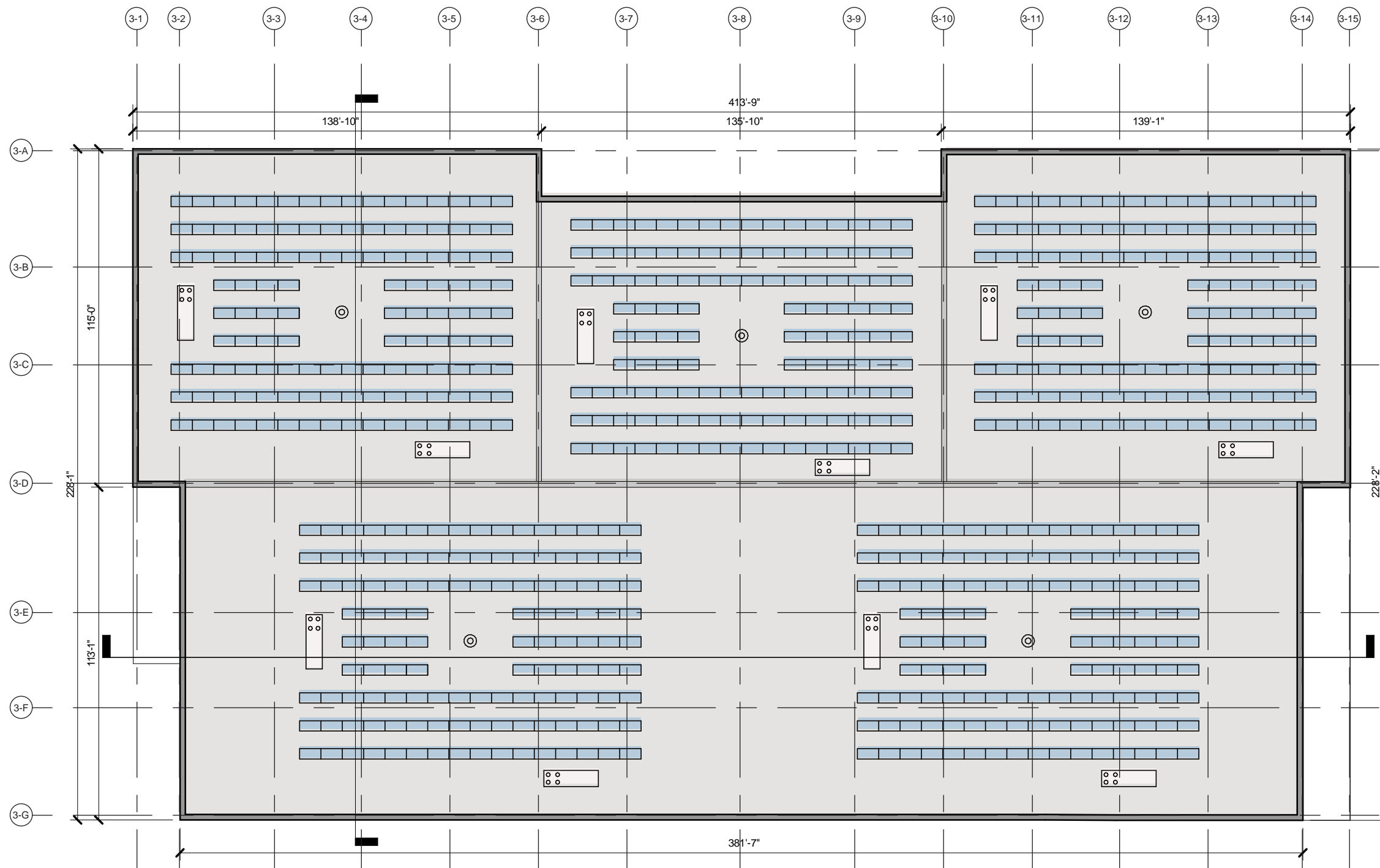
Building 2 – Roof



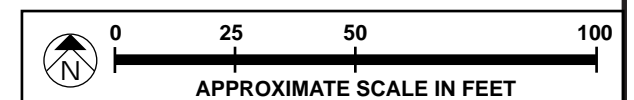
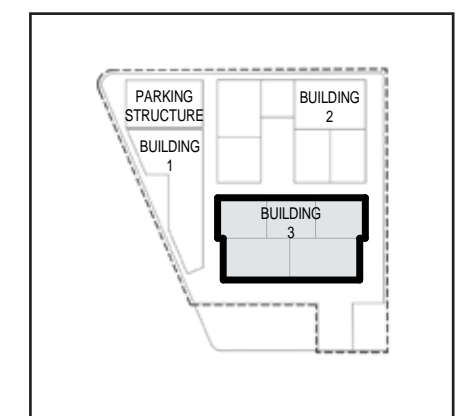
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-20

Building 3 – Floor



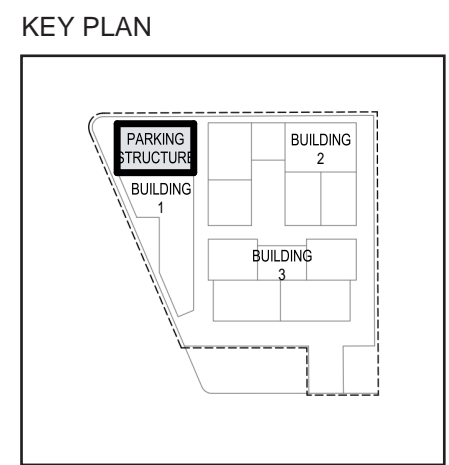
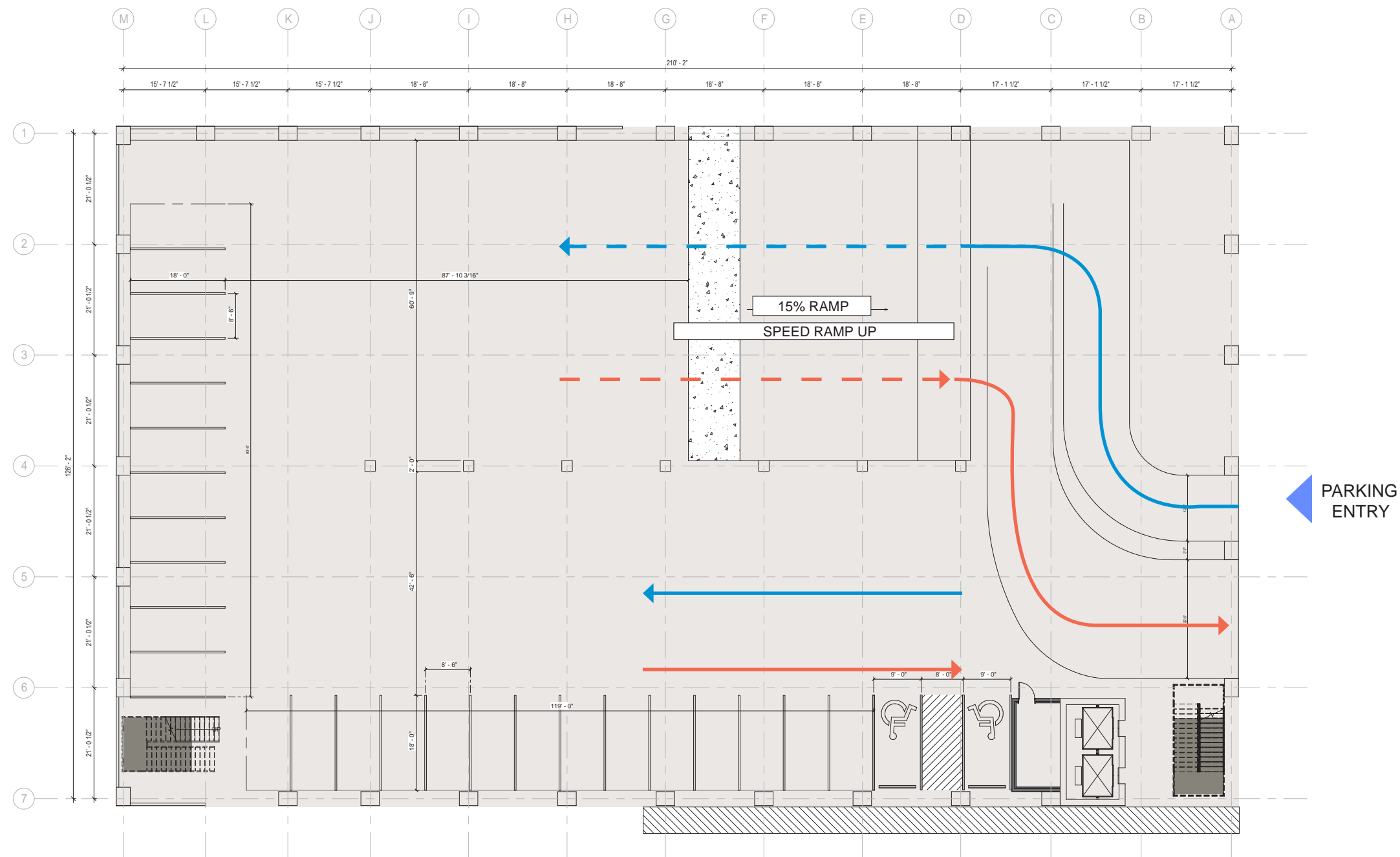
KEY PLAN



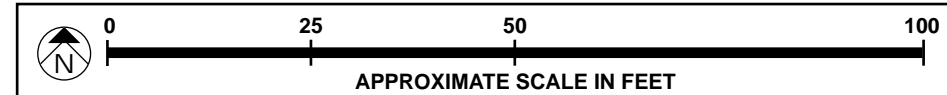
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-21

Building 3 – Roof



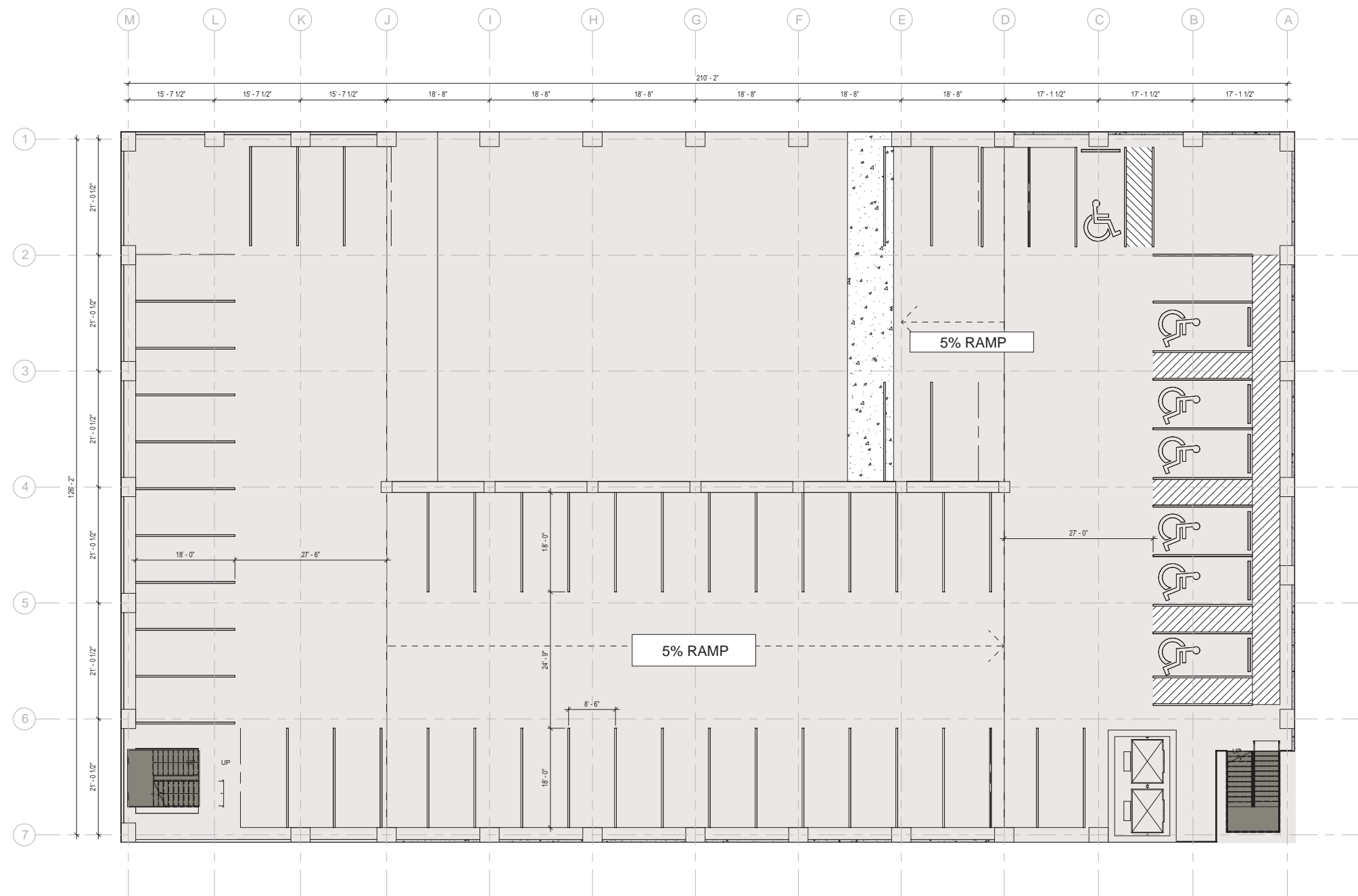
GROUND FLOOR (P1)	
TYPE	STALLS
8.5' X 18'	25
9' X 18' ADA	1
9' X 18' EV ADA	1
TOTAL	27



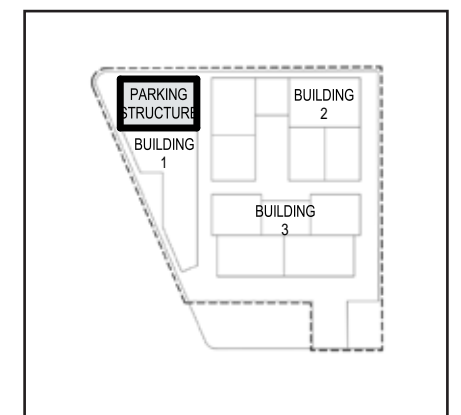
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-22

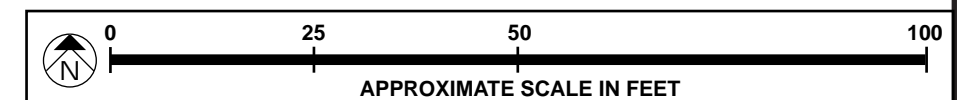
Parking Garage – Ground Floor



KEY PLAN



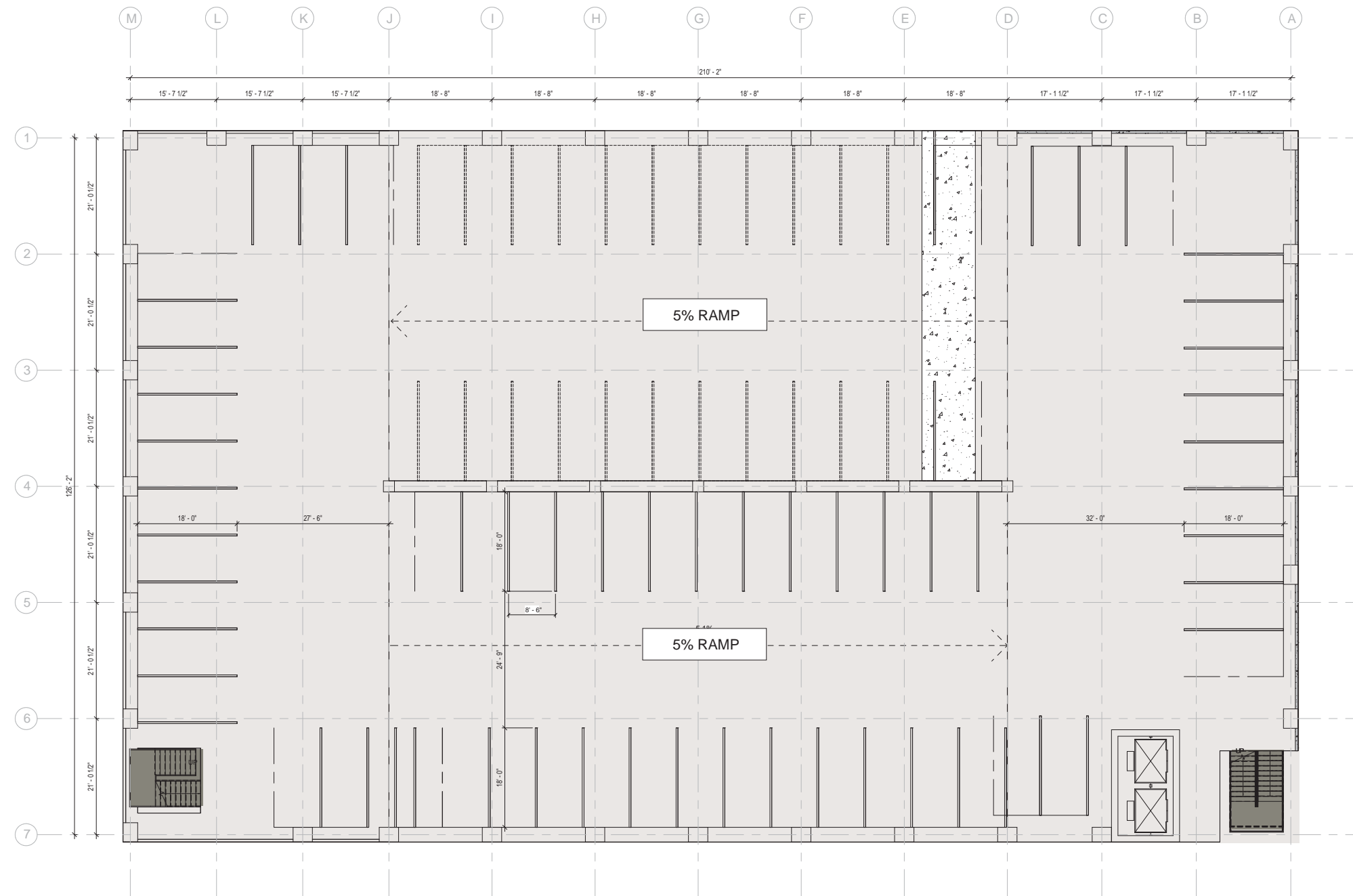
SECOND FLOOR (P2)	
TYPE	STALLS
8.5' X 18'	73
9' X 18' ADA	5
9' X 18' EV ADA	2
TOTAL	80



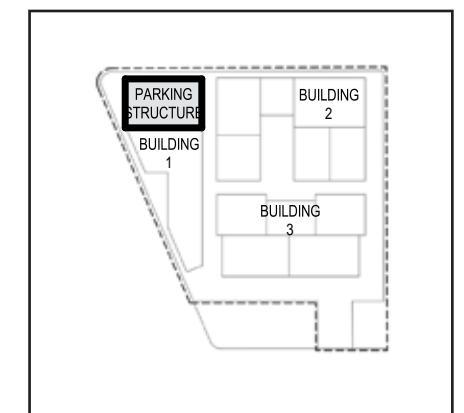
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-23

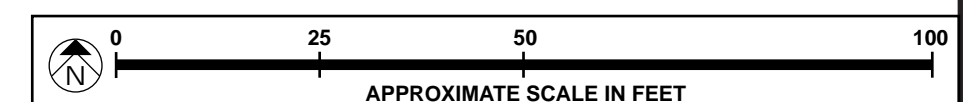
Parking Garage – Second Floor



KEY PLAN



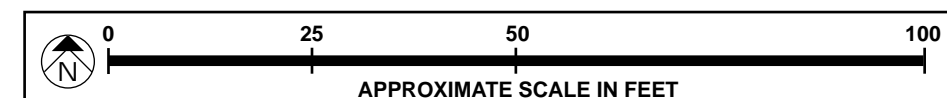
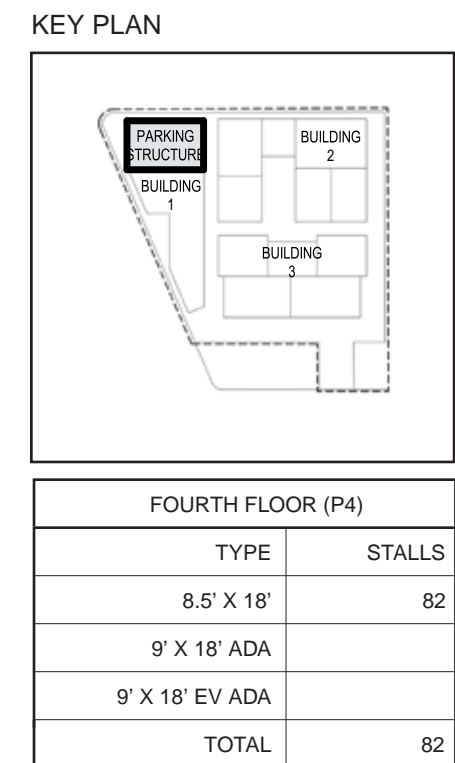
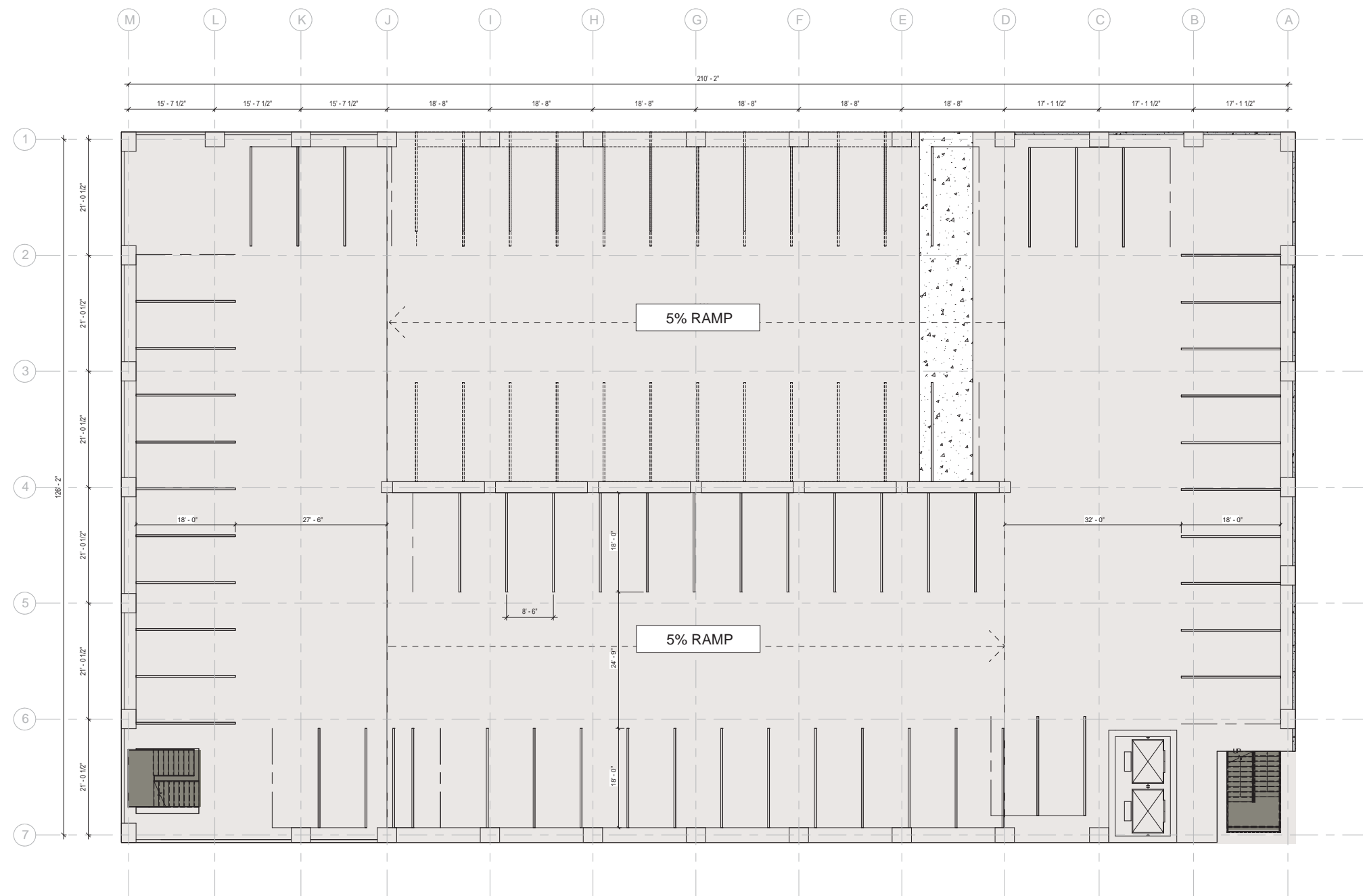
THIRD FLOOR (P3)	
TYPE	STALLS
8.5' X 18'	91
9' X 18' ADA	
9' X 18' EV ADA	
TOTAL	91



SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-24

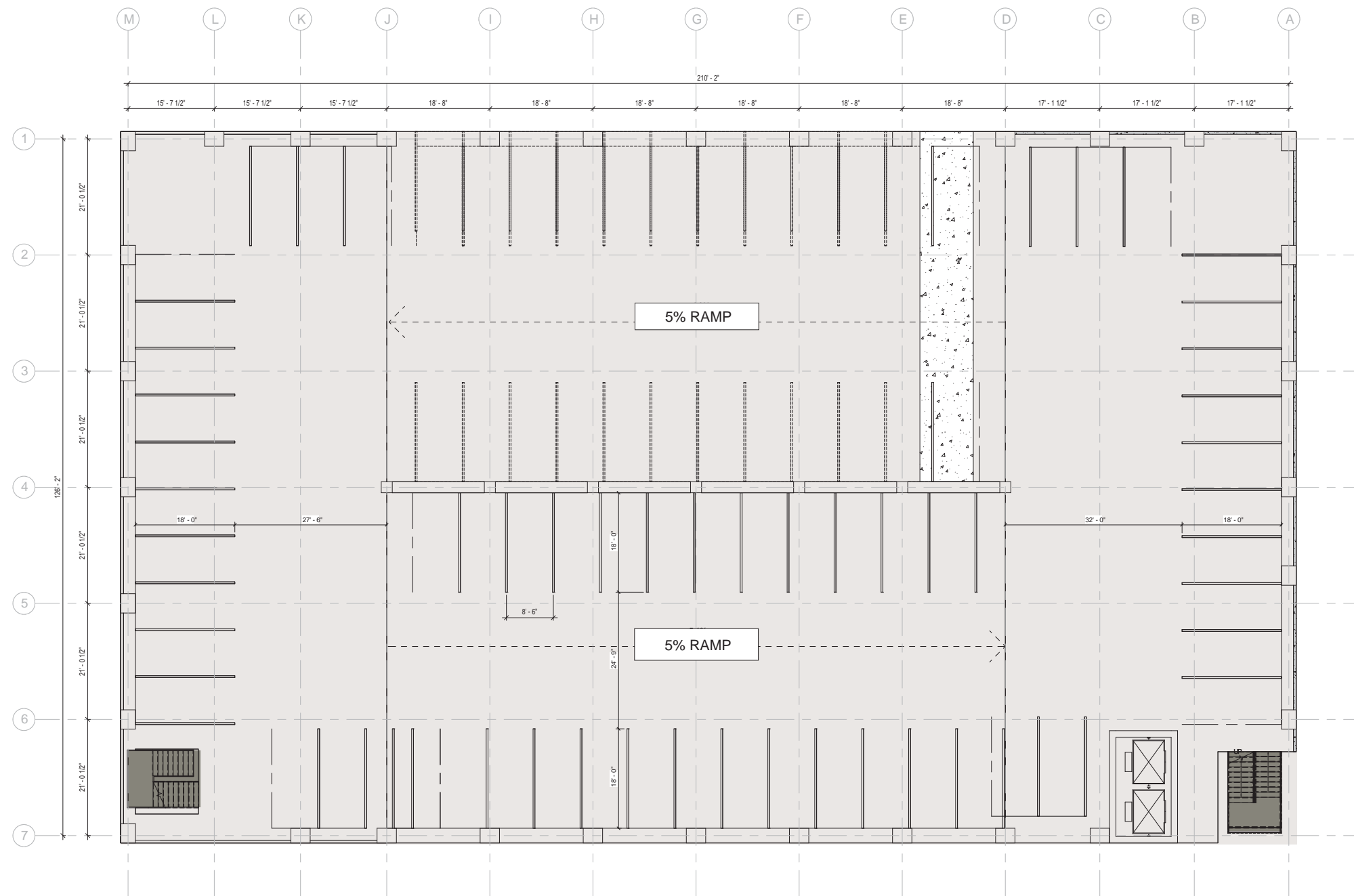
Parking Garage – Third Floor



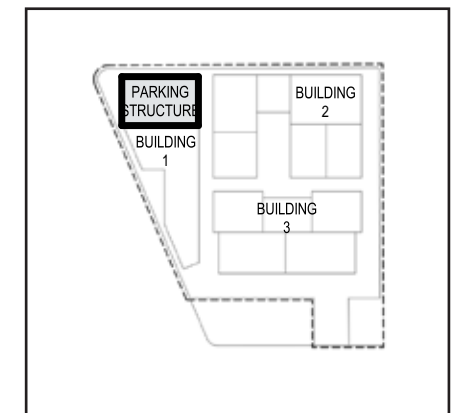
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-25

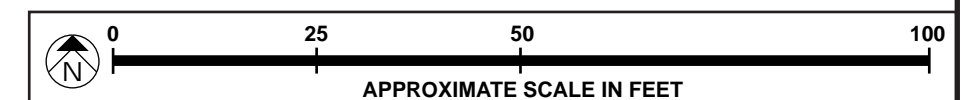
Parking Garage – Fourth Floor



KEY PLAN



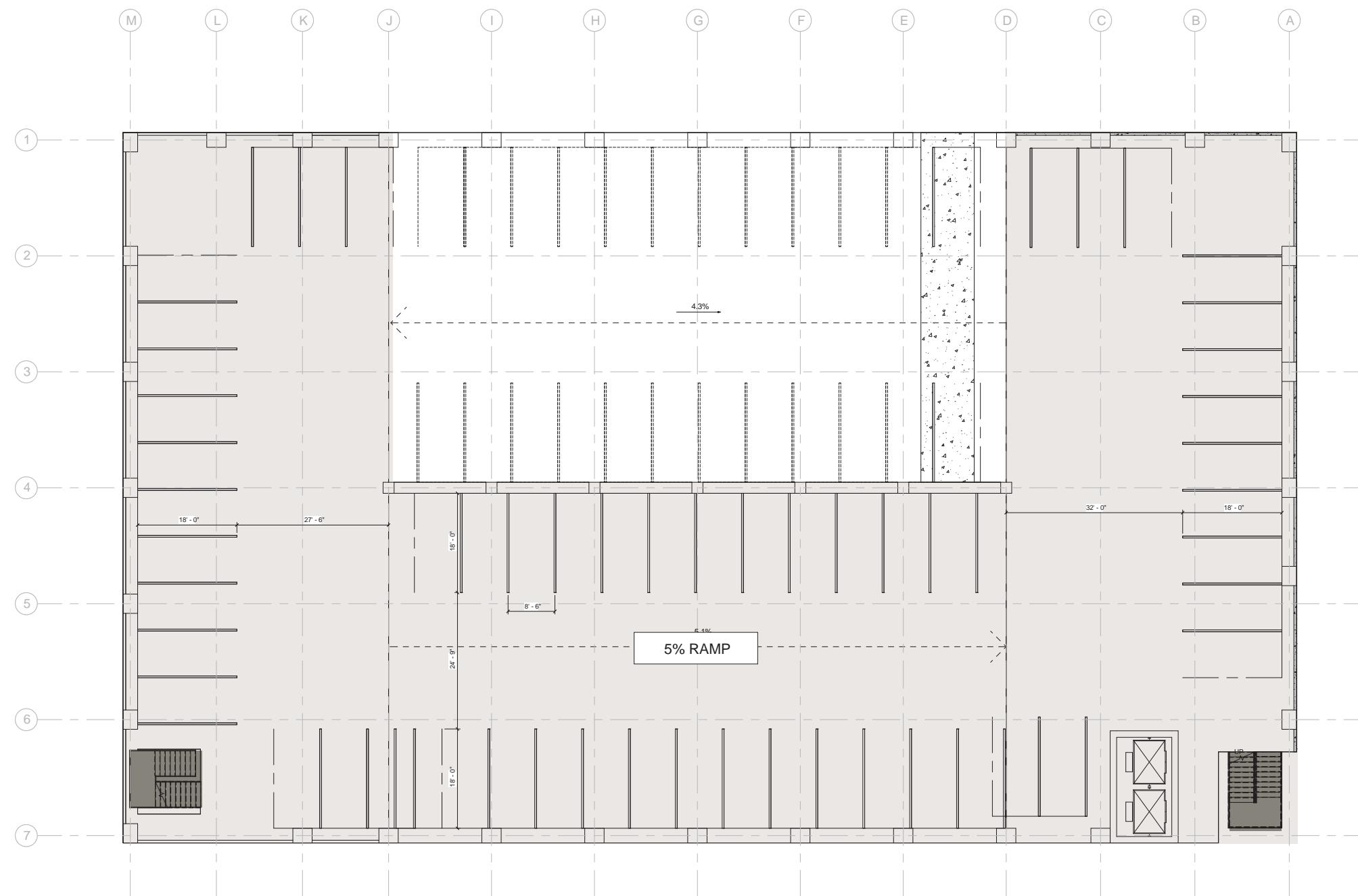
FIFTH FLOOR (P5)	
TYPE	STALLS
8.5' X 18'	82
9' X 18' ADA	
9' X 18' EV ADA	
TOTAL	82



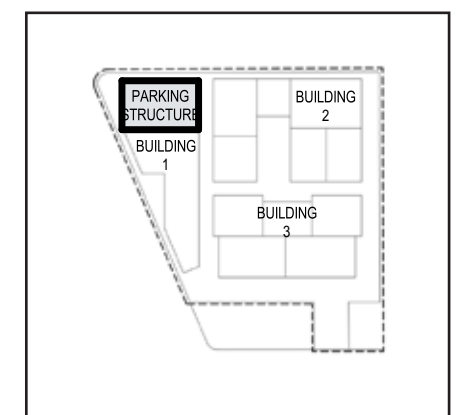
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-26

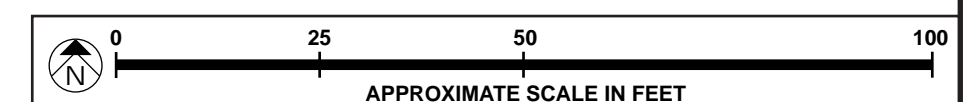
Parking Garage – Fifth Floor



KEY PLAN



SIXTH FLOOR (P6)	
TYPE	STALLS
8.5' X 18'	56
9' X 18' ADA	
9' X 18' EV ADA	
TOTAL	56



SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 3.0-27

Parking Garage – Sixth Floor

3.4.6 Parking and Access

The Project would provide a total of 533 parking spaces (in both the Parking Garage and the Surface Parking) and 12 loading spaces (which would exceed the required eight loading spaces required by the GMC). The Project is required to provide 533 parking space per the GMC.

The Parking Garage provides 419 parking spaces. The first floor provides 43 parking spaces, the second floor provides 82 parking spaces, the third floor provides 80 parking spaces, the fourth floor provides 82 parking spaces, the fifth floor provides 79 spaces, and the sixth floor provides 54 spaces. The remaining 114 parking spaces would be located throughout the Project site within the Surface Parking areas. All 533 parking spaces would be standard size spaces and include 18 regular accessible spaces (including van accessible), 24 electric vehicle capable spaces and 3 accessible electric vehicle capable spaces. The Project would provide 533 standard size parking spaces, the code required amount. All parking and loading would be accessed from the fire lane within the Project site connecting the various components of the Project site. The Parking Garage is accessed by a driveway located within the interior of the Project site near the Gate A entrance.

Access to the Project site would be provided by four separate entrances, Gates A through D with a “u” shaped rideshare entry and exit off San Fernando Road near Building 1. Gates A and B would be located on West Milford Street, abutting the east and west of Building 2. Gate C would be located on West California Avenue, which is the Property’s current main access point. Gate D would be located on San Fernando Road near the Property’s southwestern boundary and away from the rideshare entry and exit. All Gates would provide ingress and egress to the fire lane within the Project site, which would allow for vehicular circulation to all Buildings (including the Parking Garage) and the Surface Parking.

3.4.7 Construction

Table 3.0-3: Construction Schedule shows the construction schedule for the Project. The Project would be constructed in one development phase lasting approximately 18 months, with full build-out expected to occur in Quarter 2 of 2025. The preliminary construction schedule assumes Quarter 4 of 2023 as the construction start and Quarter 2 2025 as the end of construction.

Construction-related activities would typically occur Monday through Friday, between 7 AM and 7 PM, although some work is anticipated to occur on Saturdays between 7 AM and 7 PM. The hours of construction would need to comply with GMC Ordinance 8.36.080. Construction activities are not permitted during the nighttime and on Sundays or holidays pursuant to GMC Chapter 8.36.080.

TABLE 3.0-3
CONSTRUCTION SCHEDULE

Activity	Start Date	End Date
Construction	October 2023	April 2025
Demolition	October 2023	November 2023
Grading	November 2023	January 2024
Building Construction	January 2024	April 2025
Site Improvements	January 2025	April 2025

Demolition of the existing structures and site improvement would generate approximately 168,000 SF of building material, 16,300 SF of structure material, and 258,000 SF of asphalt to be removed, with 50 percent (approximately 129,000 SF) of the asphalt to be crushed and reused onsite. The amount of soil to be imported and/or exported would be approximately 20,000 cubic yards (CY) to accommodate site grading and necessary foundations. It is expected that landfill material would be hauled to the nearest landfill location at Scholl Canyon Landfill in Glendale. The entirety of the 424,453 SF Project site would be modified as a result of the Project. The depths of excavation would be fairly limited considering the Project site's existing GCL cap due to soil vapors that exist below the GCL cap at approximately six feet bgs.

3.5 INTENDED USES OF EIR

This EIR evaluates the environmental effects that would result from the proposed Project, as described herein and compliant with CEQA and CEQA Guidelines, as amended. The City of Glendale is the CEQA Lead Agency for the proposed Project.

The Applicant requests approval of the following discretionary actions:

1. Variances pursuant to GMC Chapter 30.43 to allow deviation from:
 - a. GMC Section 30.14.030 - Table 30.14-B to allow (i) a maximum height for Building 1 of up to 89 feet and 3 inches to the top of the parapet **(5% of Building 1's rooftop footprint will reach up to 100 feet 9 inches to accommodate rooftop equipment and required mechanical screening)** in lieu of the 50-foot height limitation; and (ii) a maximum height for the Parking Garage of up to 65 feet 6 inches to the top of the roof and 69 feet to the top of the parapet 69 in lieu of the 50-foot height limitation; and
 - b. GMC Section 30.14.030 - Table 30.14-B, note #3 - Applicant proposes to provide the required 10-foot corner cutoff. The code, however, requires an entrance to be located on the corner and Applicant requests deviation from this requirement. Applicant proposes various entrances for the Project. A corner entrance at the intersection of San Fernando Road and Milford Street is infeasible.
2. Parking Exceptions pursuant to GMC Section 30.32.020 to allow exceptions to parking requirements and parking standards for projects located in the Redevelopment Area. Applicant requests exceptions from the following:

- a. GMC Section 30.32.160.B.1 - to allow the Project to provide less than the 5% interior landscaping for the Surface Parking as required by the GMC. Applicant requests to provide landscaping along the perimeter of the Property and on the rooftops; and
- b. GMC Section 30.32.160.B.2 - to allow the Project to plant the GMC required trees along the perimeter of the Property. The GMC requires 19 trees planted throughout the Surface Parking area. Applicant will instead plant 69 **trees along the Property's perimeter, on Building 1**, and throughout the Property.
- c. GMC Section 30.34.120.A.2 - to allow the Project to eliminate the minimum landscaped setback **area on the Parking Structure's southern, eastern, and northern sides in lieu of the five-foot** landscaped setback GMC requirement. Applicant requests to provide landscaping along the perimeter and throughout the Property.

4.0 ENVIRONMENTAL IMPACT ANALYSIS

The purpose of this section is to inform decision makers and the public of the type and magnitude of the change to the existing environment that would result from the Project, plus proposed and approved cumulative development in the City of Glendale. This section provides a detailed discussion of the environmental setting for each topic evaluated in this EIR, analysis of the potential impacts of the Project, potential cumulative impacts, and other measures identified to mitigate these impacts.

4.1 CUMULATIVE IMPACT ANALYSIS

The technical analysis contained in **Section 4.0: Environmental Impact Analysis** examines both Project-specific impacts and the potential environmental effects associated with cumulative development. The California Environmental Quality Act (CEQA) requires that EIRs discuss cumulative impacts and Project-specific impacts. In accordance with CEQA, the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the Project alone. According to Section 15355 of the *CEQA Guidelines*:

“Cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- (a) The individual effects may be changes resulting from a single project or a number of separate projects.*
- (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

Section 15130(a)(l) of the *CEQA Guidelines* further states, *“a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.”*

Section 15130(a) of the CEQA Guidelines also requires that EIRs discuss the cumulative impacts of a project when the project's incremental effect is *“cumulatively considerable.”*¹ Where a Lead Agency is examining a project with an incremental effect that is not cumulatively considerable, it need not consider the effect significant but must briefly describe the basis for its conclusion. If the combined cumulative impact associated with the Project's incremental effect and the effects of other projects is

1 Under Section 15065(a)(3) of the State CEQA Guidelines, “cumulatively considerable” means that “the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

not significant, Section 15130(a)(2) of the CEQA Guidelines requires a brief discussion in the EIR of why the cumulative impact is not significant and why it is not discussed in further detail. Section 15130(a)(3) of the CEQA Guidelines requires supporting analysis in the EIR if a determination is made that a project's contribution to a significant cumulative impact is rendered less than cumulatively considerable and, therefore, is not significant. CEQA recognizes that the analysis of cumulative impacts need not be as detailed as the analysis of project-related impacts, but instead should *"be guided by the standards of practicality and reasonableness"* (CEQA Guidelines Section 15130(b)). The discussion of cumulative impacts in this Draft Subsequent EIR focuses on whether the impacts of the Project are cumulatively considerable.

The fact that a cumulative impact is significant does not necessarily mean that the project contribution to the cumulative impact is significant as well. Instead, under CEQA, a project-related contribution to a significant cumulative impact is only significant if the contribution is *"cumulatively considerable."* To support each significance conclusion, the Draft Subsequent EIR provides a cumulative impact analysis and where project-specific impacts have been identified that, together with the effects of other related projects, could result in cumulatively significant impacts, these potential impacts are documented.

Section 15130(b) of the CEQA Guidelines defines consideration of the following two elements as necessary to provide an adequate discussion of cumulative impacts: *"(a) a list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the Agency, or (b) a summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or area-wide conditions."* In this Draft Subsequent EIR, a combination of these two methods is used, depending upon the specific environmental issue area being analyzed.

Related projects within the City are presented in **Table 4.0-1: List of Related Projects** and includes those projects that are (1) completed but not fully occupied; (2) currently under construction or beginning construction; (3) proposed with applications on file at the City of Glendale or the City of Los Angeles; or (4) reasonably foreseeable. Combined, these projects would result in the Citywide development of 28 live/work units, 3,709 multi-family residential units, 123,362 square feet of commercial uses (including commercial/office and commercial/medical uses), 216,548 square feet of auto dealership uses, 1,000 square feet of restaurant uses, 22,250 square feet of office uses, 708 hotel rooms, 28,659 square feet of medical office use, 10,448 square feet of retail use, 80 congregate care facility rooms, 15 condominium units, 60,000 square feet of museum use, 211,574 square feet of personal storage facility use, 15,500 square feet of private school use, 7,500 square feet of warehouse use, and 90 units of assisted living use.

Specific past, present, and reasonably anticipated future projects listed above, as well as applicable Glendale land use planning documents, are considered when evaluating cumulative impacts in **Sections 4.1 through 4.10** of this EIR, as appropriate, for each environmental topic addressed in this EIR.

TABLE 4.0-1
LIST OF RELATED PROJECTS

Project Name	Location	Land Use	Size	Unit	Status
Orange/Milford Project	413 N. Brand Blvd.	Multi-Family	228	du	Under Construction
		Commercial	5,000	sf	
Holiday Inn Suites	1001 E. Colorado St.	Hotel	134	rm	Under Construction
	2612 Honolulu Ave.	Multi-Family	28	du	Approved
	429-503 N. Kenwood St.	Multi-Family	21	du	Approved
	126-132 S. Kenwood St.	Multi-Family	44	du	Proposed
	800 W. Doran St.	Multi-Family	52	du	Proposed
	1838 S. Brand Blvd.	Multi-Family	80	du	Under Construction
	1815-1821 S. Brand Blvd.	Multi-Family	38	du	Approved
		Commercial/Office	950	sf	
Density Bonus Project	1820 S. Brand Blvd.	Live/Work	28	du	Approved
	352-358 W. Milford St.	Multi-Family	32	du	Under Construction
	620 N. Brand Blvd.	Multi-family	294	du	Approved
	601-611 N. Brand Blvd.	Multi-Family	858	du	Proposed
		Commercial	5,820	sf	
Density Bonus Project	401-409 Hawthorne St.	Multi-family	23	du	Proposed
	129 W. Los Feliz	Congregate care facility	80	rms	Approved
	361 Myrtle St.	Condominium	15	du	Under construction
Density Bonus Project	452 W. Milford St.	Multi-Family	15	du	Proposed (DB under appeal)
	712 S. Louise St.	Multi-Family	10	du	Under Construction
	722 E. Acacia Ave.	Multi-Family	14	du	Approved
	913 S. Adams St.	Multi-Family	18	du	Under Construction
	373 W. Doran St.	Multi-Family	5	du	Under Construction
	337 N. Cedar St.	Multi-Family	4	du	Under construction
	604-610 W. Broadway	Medical Office	20,959	sf	Under Construction
		Retail	1,394	sf	

TABLE 4.0-1
LIST OF RELATED PROJECTS

Project Name	Location	Land Use	Size	Unit	Status
	520 N. Central	Multi-Family	99	du	Under Construction
Armenian American Museum	151 E. Colorado - Central Park	Museum	60,000	sf	Under Construction
Density Bonus Project	2817 Montrose Ave.	Multi-Family	42	du	Proposed
Hotel Indigo	515-523 N. Central Ave.	Hotel	142	rm	Approved
Density Bonus Project	3950 Foothill Blvd.	Multi-Family	34	du	Approved
		General Office	1,000	sf	
		Retail	2,473	sf	
		Restaurant	1,000	sf	
Density Bonus Project	2941 Honolulu Ave.	Multi-Family	18	du	Proposed
	423 Oak St.	Multi-Family	18	du	Under Construction
	135 W. Glenoaks Blvd.	Hotel	219	rm	Proposed (Stage I approved)
Density Bonus Project	400 N. Maryland	Multi-family	28	du	Proposed
	901 S. Brand	Addition to Existing Auto Dealership	34,228	sf	Proposed
Density Bonus Project	1642 S. Central Ave.	Multi-family	31	du	Proposed
Density Bonus Project	314-324 W. Doran	Multi-family	33	du	Under Construction
Trojan Storage	620 W. Elk Street	Personal Storage Facility	211,574	sf	Under construction
Holy Family Campus	400 E. Lomita Avenue	Private School	15,500	sf	Approved
	821 E. Colorado	Commercial - 1/2 medical, 1/2 general office	4,900	sf	Approved
	517 E. Broadway		7,700	sf	Approved
		Mixed-use commercial:	Med		
		Medical	21,250	Of	
		General office	3,550		
		Retail	Ret		
Density Bonus Project	1642 S. Central Ave.	Multi-family	31	du	Proposed
Density Bonus Project	200 S. Louise St.	Multi-family	14	du	Approved
Density Bonus Project	238 Concord St.	Multi-family	13	du	Proposed

TABLE 4.0-1
LIST OF RELATED PROJECTS

Project Name	Location	Land Use	Size	Unit	Status
Density Bonus Project	3450 N. Verdugo Rd.	Mixed Use - Retail	3,031 25	sf du	Approved
Density Bonus Project	822 E Chestnut St.	Multi-family	13	du	Proposed
Density Bonus Project	1242 S. Maryland	Multi-family	12	du	Proposed
Density Bonus Project	526 Hazel St.	Multi-family	17	du	Approved
	345 W Cerritos	Multi-family	44	du	Proposed
	3421 Foothill	Multi-family	78	du	Proposed
East End Studios	1233 S. Glendale	Commercial	75,217	sf	Under Construction
Mazda Expansion	1401 S. Brand	Commercial Auto Dealership	11,180	sf	Proposed
Universal Auto Group	1231 S Brand	Commercial Auto Dealership	171,140	sf	Proposed
Density Bonus Project	515 Pioneer	Multi-family	340	du	Approved
Density Bonus Project	900 E Broadway	Multi-family	126	du	Under Construction
Density Bonus Project	920 E Broadway	Multi-family	40	du	Under Construction
Warehouse	628 Thompson	Warehouse	7,500	sf	Proposed
Hotel	1633 Victory	Hotel	64 +18	rm rm	Approved Proposed (on appeal)
	520 N. Glendale	Assisted Living	90 85,505	rm sf	Approved
	727 Sonora	Commercial Office	31,475	Sf	Approved
Density Bonus Project	236 N. Central Ave	Multi-family	683	du	Proposed
Density Bonus Project	448 W. Cypress St.	Multi-family	211	du	Proposed
Density Bonus Project	501 E. California Ave.	Multi-family	9	du	Proposed

Source: City of Glendale, September 2022.

du = dwelling units; sq ft = square feet; rm = rooms

4.1 AESTHETICS

4.1.1 INTRODUCTION

This section of the Draft EIR describes the visual character and aesthetic setting of the Project site and evaluates the potential for the proposed Project to impact scenic vistas, the visual character and quality of the Project site, conflict with applicable zoning and other regulations governing scenic quality, and cause light and glare impacts. The analysis focuses on changes that would be seen from public viewpoints and provides an assessment of whether the proposed Project would impact the existing visual character of the Project site and the surrounding area.

4.1.2 REGULATORY FRAMEWORK

4.1.2.1 Federal Regulations

There are no existing federal regulations pertaining to aesthetics that are applicable to the proposed project.

4.1.2.2 State Regulations

California Department of Transportation (Caltrans) Scenic Highway Program

The California Scenic Highway Program was created in 1963, to preserve and protect scenic highway corridors from change that would reduce the aesthetic value of lands adjacent to highways. Caltrans defines a scenic highway as any freeway, highway, road, or other public ROW, that traverses an area of exceptional scenic quality. Suitability for designation as a State Scenic Highway is based on vividness, intactness, and unity. As discussed above, there are no State Designated Scenic Highways within the vicinity of the Project site.

Senate Bill 743

Senate Bill (SB) 743 addresses transit-oriented infill projects and judicial review streamlining for environmental leadership development projects, and was signed into law in 2013.¹ Senate Bill (SB) 743 (PRC Section 21099(d)) that sets forth guidelines for evaluating aesthetic impacts for an infill, transit-oriented project under CEQA. PRC Section 21099(d)(1) states, "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 miles of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal

¹ California Legislative Information. Senate Bill No. 743 (September 27, 2013).
https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743.

Regulations.” PRC Section 21064.3 defines “major transit stop” as “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 major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”

4.1.2.3 Local Regulations

City of Glendale General Plan

The Glendale General Plan includes the following policies, goals, and objectives in the Open Space and Conservation and Recreation Elements on visual and scenic resources.

Open Space and Conservation Element

- Policy 4: Natural and man-made aesthetic features should be recognized and identified as important natural resources to the community that require proper management.
- Policy 8: Important open space and conservation resources should be protected and preserved through acquisition, development agreements, easements, development exactions, and other regulatory strategies.
- Goal 1: Continue identification, acquisition and protection of open space land vital to ensure enhancement of the quality of life within the City.
- Goal 2: Protect vital or sensitive open space areas including ridgelines, canyons, streams, geological formations, watersheds and historic, cultural, aesthetic and ecologically significant areas from the negative impacts of development and urbanization.
- Goal 4: Develop a program that sustains the quality of Glendale’s natural communities.
- Goal 5: Preserve prominent ridgelines and slopes in order to protect Glendale’s visual resources.
- Goal 7: Continue programs which enhance community design and protect environmental resource quality.

Recreation Element

- Goal 4: Management of aesthetic resources, both natural and man-made, for a visually pleasing City.

City of Glendale Comprehensive Design Guidelines

The Comprehensive Design Guidelines (Guidelines) apply to all new development within the City. The Guidelines are separated into four categories: single family; hillside; commercial; and multi-family and mixed-use.

The Guidelines are to be used by all those applying for permits in the City of Glendale. In order to approve a project under Design Review, decision-makers must find that the project is consistent with the intent of the Design Guidelines. They were developed to provide predictability for property owners and developers, as well as residents and other stakeholders in the Glendale community.

The Guidelines do not recommend a specific architectural style or styles but encourage a diversity of styles. The Guidelines do not prescribe specific means of achieving design intent, but rather provide examples of how it might be achieved. City staff or City Council may find that a project need not comply with certain guidelines due to particular site conditions or if compliance with the Guidelines would restrict the achievement of innovative design or community benefit. Urban Design Principles are provided for each of the four categories of development. These principles are organized as Site Planning and Design, Mass and Scale, and Design and Detailing, and provide relevant direction on building location, yards/usable open spaces, access and parking, landscaping and hardscaping, walls and fences, retaining walls, screening, scale and proportion, entryways, windows, materials, wall thickness, color, awnings, roof forms, architectural concept, solar design, garage locations and driveways, equipment/trash location and enclosure, privacy, and lighting.

4.1.3 ENVIRONMENTAL SETTING

4.1.3.1 Existing Conditions

Visual Character

Project Site

The Project site is located approximately 500 feet south of the State Route (SR) 134 (Ventura) Freeway in the San Fernando Road industrial corridor at the western edge of the City. The Project site is bounded by West Milford Street to the north, medium density residential uses to the east, mixed-use structure to the south, and San Fernando Road to the west. The Project site fronts San Fernando Road and Milford Street and has approximately 102 feet of frontage on West California Avenue, which is primarily used for vehicular access.

The City of Glendale General Plan designates the Project site and other properties along San Fernando Road as Industrial/Commercial Mixed Use (IMU) and the zoning is IMU. The maximum allowed building height for buildings in the City's IMU zone is 50 feet. The IMU does not require any setback on properties that abut multi-family residentially zoned properties but does require a minimum five-foot wide landscaped buffer on properties adjacent to residentially zoned properties regardless of required setbacks.² As shown in Table 4.1-1: Existing Structures, the existing buildings on the site conform to the IMU zone height limit.

TABLE 4.1-1 EXISTING STRUCTURES		
Existing Structure	Square Footage	Height (feet)
Building 1	72,949	25
Building 2	18,367	33
Building 3	11,603	28

² Glendale Municipal Code (GMC). Section 30.14.030 – Table 30.14-B Note (4).

TABLE 4.1-1
EXISTING STRUCTURES

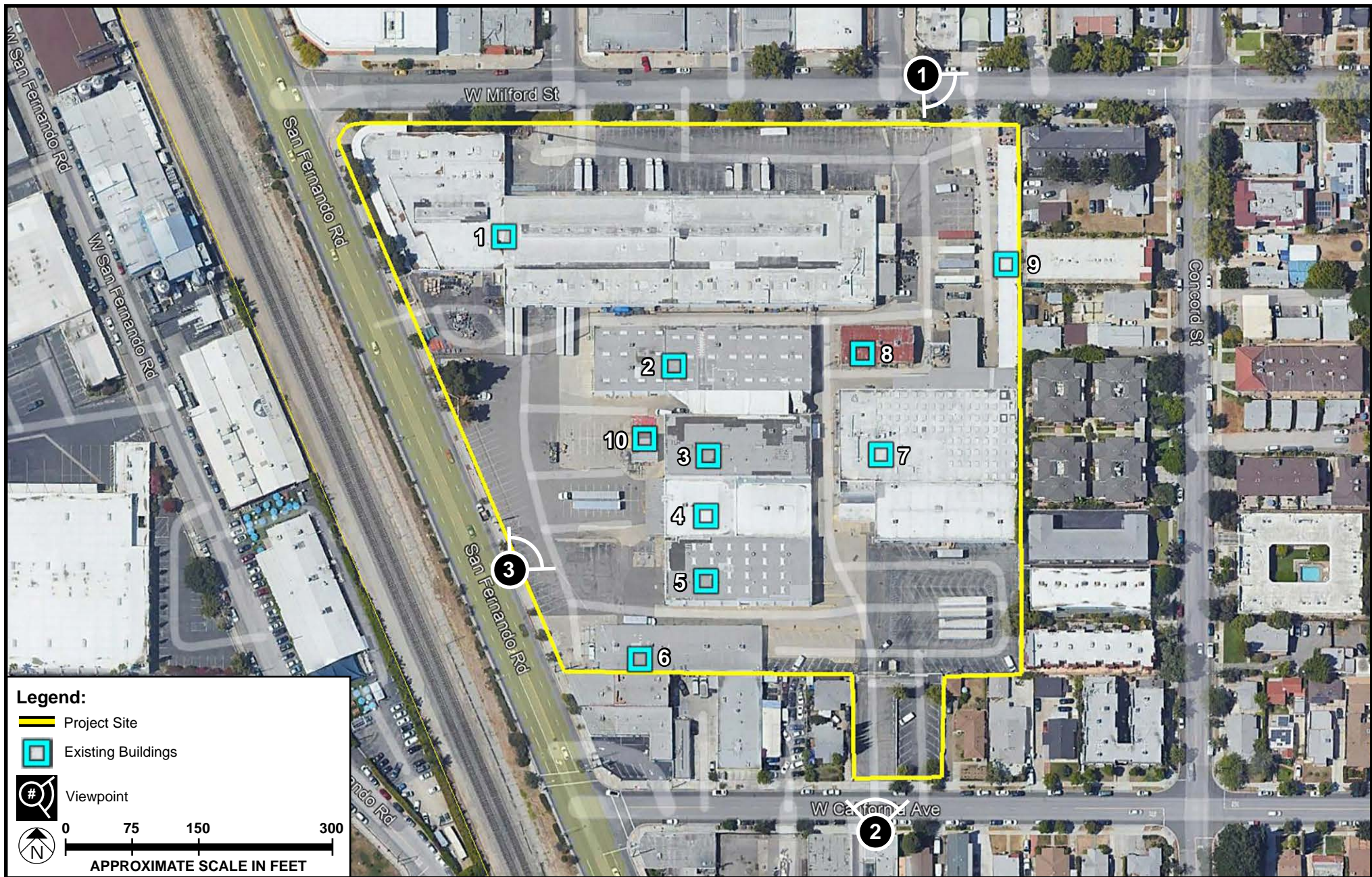
Existing Structure	Square Footage	Height (feet)
Building 4	10,394	20
Building 5	12,401	28
Building 6	9,466	20
Building 7	32,615	20
Building 8	3,955	20
Building 9	5,125	17
Building 10	837	20

Figures 4.1-2 through 4.1-4 provide photographs of the existing buildings and improvements on the Project site. Figure 4.1-1: Viewpoint Key Map — Existing Site identifies the location of the viewpoints these photographs were taken from. As shown in Figure 4.1-1, most of the existing structures on the Project site are located within the center and eastern portions of the site. Building 1 extends to northwest corner of the Project site, fronting both San Fernando Road and Milford Street.

Building 1 is a warehouse building that had a mid-century modern style office added at a later date. The warehouse building is a utilitarian rectangular shaped building with modular prefabricated concrete walls attached to a steel wall matrix, a steel frame structure with monitor skylights along the length of the building, and a flat galvanized iron roof. The façade has a curved overhang, flat roof, and raised parapet with vertical concrete scoring. The front elevation has non-original textured stone veneer cladding on either side of the non-original replacement flush metal door. The overall finish of the building is smooth concrete and stucco, however the finish below the windows on the western wall is painted brick with multi-light metal casement windows and a double door entry to the building. The southern elevation has three entrances to the building, one into the storage space and two into the office space and single hung hopper metal windows on side of the doors. Changes to the building over time include alteration of the façade and removal of the display windows which affects the integrity of design by altering the primary character-defining features of the office and showroom.

Buildings 2, 3, and 5 are concrete structure with plastered walls, and Building 4 is a reinforced concrete structure, with concrete foundation and wooden truss roof. Building 6 is a reinforced concrete building with wooden trusses and Building 7 is a reinforced concrete building with steel columns and beams. Building 8 is an open steel gable structure with a truss roof and Building 9 is a concrete structure with plastered walls.

Limited landscaping in the form of street trees and planted strips are located along the western and northern frontages, along San Fernando Road and Milford Street. Trees are located on the south portion of the Project site, in the parking lot along California Avenue. The rest of the Project site is devoid of trees. Truck docks, truck parking areas and trucks are visible on the site along the majority of the edges of the site on San Fernando Road and Milford Street.



SOURCE: Google Earth - 2022

FIGURE 4.1-1

As shown in Figure 4.1-2: View 1 — Existing Site, the northern portion of the site along Milford Street is bounded by a chain link fence and a white concrete block wall. As shown in Figure 4.1-2, the foreground includes street trees and fencing along Milford Street, the midground shows the existing buildings on the Project site, and the background shows the hillsides in Griffith Park. As shown in this and the other photographs of the buildings on the site, the existing buildings are painted white with the truck doors and other building features painted blue. A painted white concrete block wall bounds the eastern portion of the Project site.

Figure 4.1-3: View 2 — Existing Site, shows approximately 100 feet of the southern boundary of the site on West California Avenue includes driveways and additional parking. Two metal access gates are setback approximately 120 feet from the southern site boundary along West California Avenue. As seen in Figure 4.1-3, the driveways and additional parking are located in the foreground, the existing buildings are located in the midground, and the Verdugo Mountains are visible in the background.

As shown in Figure 4.1-4: View 3 — Existing Site, the western portion of the Project site contains paved surfaces developed with parking for truck trailers and automobiles in the foreground, the existing buildings in the midground, and the Verdugo Mountains in the background. Additionally, as seen in Figure 4.1-4, the existing buildings are primarily painted white.

Surrounding Area

The visual character of San Fernando Road is by the existing industrial and commercial buildings and uses on the east side of San Fernando Road in the City of Glendale and the west side of San Fernando Road in the City of Los Angeles. The Project site is surrounded by industrial and commercial buildings to the north, residential buildings to the east, a mix of industrial, commercial, and multi-family residential buildings to the south, and industrial and commercial buildings to the west, as described below. Figure 4.1-5: Viewpoint Key Map — Surrounding Area identifies the location of the viewpoints these photographs were taken from.

North:

Properties line the north side of Milford Street to the north of the Project site. As shown in Figure 4.1-6: Surrounding Areas A and B, a four-story, 50-foot-high Public Storage building abuts a one-story structure north of the Project site. Further, as shown in Figure 4.1-6, parcels to the north of the Project site across Milford are characterized by one-story structures that contain primarily auto-related uses.

East:

Abutting the Project site to the east along Concord Street are parcels improved with one-story single-family homes and two- to three-story residential multifamily buildings, shown in Figure 4.1-7:

Surrounding Area C and D, Surrounding Area C. As discussed previously, the IMU zone does not require any interior setbacks from multifamily residentially zoned parcels.³

South:

Directly abutting the southern portion of the Project site fronting West California Avenue are properties containing industrial, commercial, and residential buildings, as shown in Figure 4.1-7, Surrounding Area D. Across West California Avenue are multifamily and single-family residences, and one story commercial and auto related buildings, shown in Figure 4.1-8: Surrounding Areas E and F, Surrounding Area E.

West:

Directly to the west of the Project site, separated by San Fernando Road, is existing development in the City of Los Angeles. The properties located across West San Fernando Road and the railroad tracks in the City of Los Angeles have a General Plan land use designation of Light Industrial and are zoned M2-1-RIO, which is a light industrial zone. The properties contain one- to two- story buildings with industrial uses, as shown in Figure 4.1-8, Surrounding Area F. Golden Road Brewing and Trans Gas Propane are among some of the businesses located across San Fernando Road from the Project site.

4.1.3.2 Light and Glare

Existing lighting on the Project site includes security lights on buildings. Existing structures on the Project site generate little glare because there are few reflective glass or brightly painted surfaces.

4.1.3.3 Visual Resources

Scenic Vistas

A scenic vista generally provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given public vantage point. The Glendale General Plan Open Space and Conservation Element does not define any scenic vistas within the City.

The Glendale General Plan Open Space and Conservation Element identifies the Verdugo Mountains and the San Gabriel Mountains as valuable scenic resources. Available views from the vicinity of the Project site include portions of the Verdugo Mountains to the north, the San Gabriel Mountains to the northwest, San Rafael Hills to the northeast, Adams Hill to the southeast, and Griffith Park (Santa Monica Mountains) to the west.

³ GMC. Section 30.14.030 – Table 30.14-B.



SOURCE: Google Earth - 2022

FIGURE 4.1-2



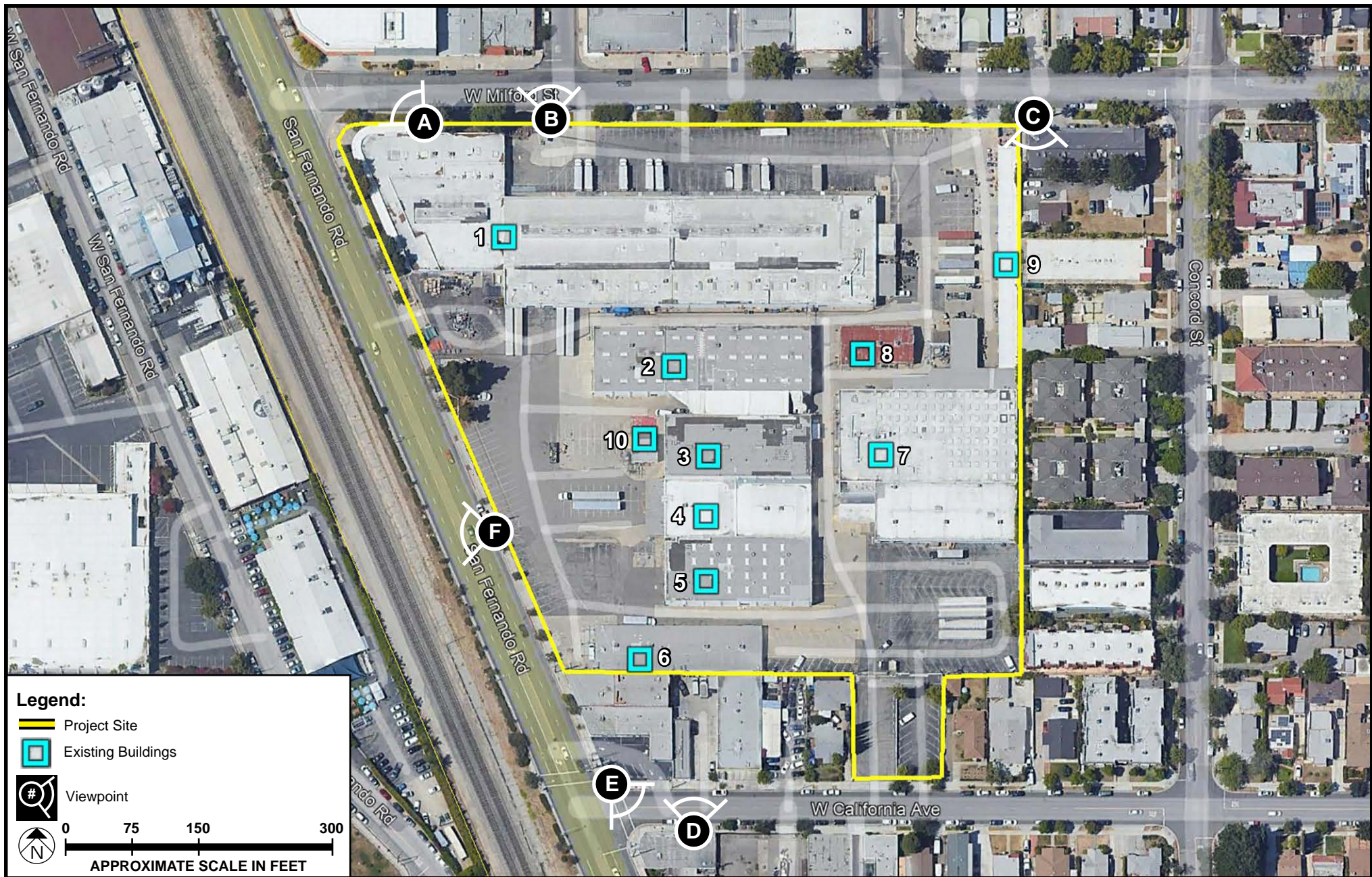
SOURCE: Google Earth - 2022

FIGURE 4.1-3



SOURCE: Google Earth - 2022

FIGURE 4.1-4



SOURCE: Google Earth - 2022

FIGURE 4.1-5



Surrounding Area A: Looking Northwest



Surrounding Area B: Looking North

SOURCE: Meridian Consultants - 2022

FIGURE 4.1-6



Surrounding Area C: Looking South



Surrounding Area D: Looking North

SOURCE: Meridian Consultants - 2022

FIGURE 4.1-7



Surrounding Area E: Looking South Southwest



Surrounding Area F: Looking West

SOURCE: Meridian Consultants - 2022

FIGURE 4.1-8

Public views of the Verdugo Mountains to the north in the vicinity of the Project site are limited, as shown in Figures 4.1-3, 4.1-4, and 4.1-6. Existing buildings in the area around the Project site to the north partially obscure full view of the mountains. Additionally, public views to Griffith Park are obstructed by existing structures to the west, as shown in Figure 4.1-10. Due to the relatively flat terrain of the Project site and surrounding area, views of the San Rafael Hills to the northeast and Adams Hill to the southeast are fully obstructed by existing structures.

4.1.3.4 Scenic Highways

There are no State Designated Scenic Highways within the vicinity of the Project site. The nearest designated State Scenic Highway is a portion of State Route 2, approximately 7.38 miles northeast of the Project site.⁴ The nearest Eligible State Scenic Highway is portion of State Route 2, approximately 4.60 miles northeast.

4.1.4 ENVIRONMENTAL IMPACT ANALYSIS

4.1.4.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact related to land use and planning if it would:

Threshold AES-1:	Have a substantial adverse effect on a scenic vista?
Threshold AES-2:	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
Threshold AES-3:	In nonurbanized 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 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?
Threshold AES-4:	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

4.1.4.2 Methodology

The documentation of aesthetics involves establishing existing visual character, including resources and scenic vistas unique to the Project area. Visual resources are determined by identifying existing landforms, views (e.g., scenic resources such as natural features or urban characteristics), viewing points/locations, and existing light and glare (e.g., nighttime illumination). Guidance provided by the Glendale General Plan, Glendale Municipal Code, and the Glendale Comprehensive Design Guidelines are identified are used to assess the changes to the visual environment caused by the implementation of the proposed Project.

Aesthetic effects are identified and qualitatively evaluated based on the proposed modifications to the existing setting and the viewer's sensitivity and with regard to the above thresholds of significance above,

⁴ California Department of Transportation (Caltrans). "California State Scenic Highways Map." Accessed August 2022. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

AES-1 through AES-4. Viewer sensitivity to visual changes depends, in large part, on the activities in which they are engaged. For example, park visitors or travelers on designated scenic highways generally are considered more sensitive to visual changes than workers in an industrial area.

The analysis considers the compatibility of the proposed Project with the visual character of the surrounding area, potential to remove valued scenic elements and to block scenic vistas. The potential for proposed Project lighting and/or glare to adversely affect surrounding uses is also assessed.

4.1.4.3 Project Impacts

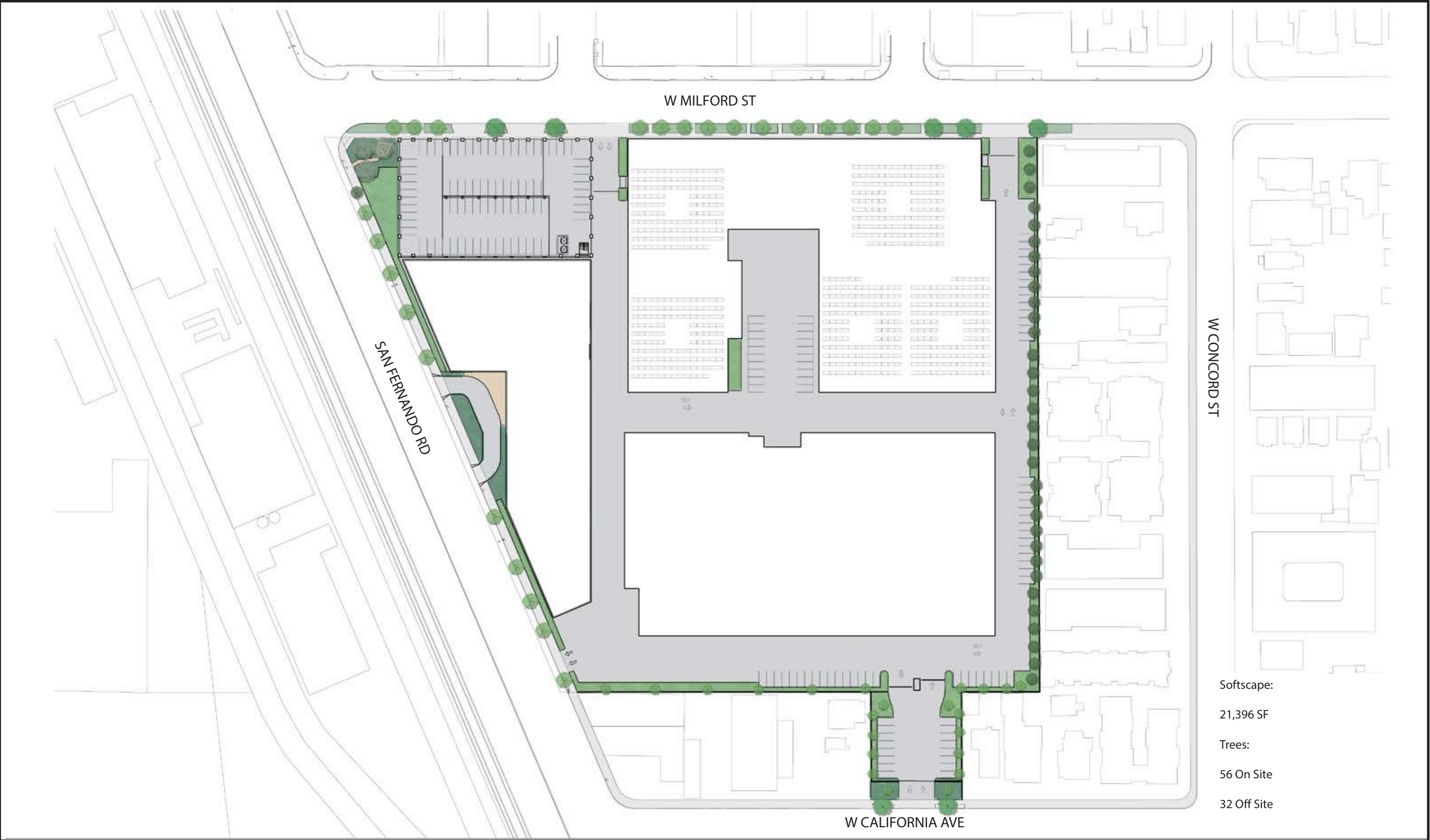
Impact AES-1: Have a substantial adverse effect on a scenic vista?

As stated in Section 4.1.2 above, SB 743 made changes to CEQA requirements that apply to infill projects located within transit priority areas (TPAs). Among other changes, SB 743 provides that the aesthetic impacts of a residential, mixed-use residential, or employment center project, as defined, on an infill site within a transit priority area shall not be considered significant impacts on the environment. The Project site is located within a TPA pursuant to SB 743. The proposed Project meets the requirements for an employment center project under SB 743 (PRC Section 21099). Nonetheless, the following analysis is provided for informational purposes only and not for a determination of an environmental impact under CEQA.

As described above, scenic vistas include focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from public vantage point. The South Glendale Community Plan EIR defines the following viewsheds for the area: the Verdugo Mountains to the north, the San Gabriel Mountains to the northwest, San Rafael Hills to the northeast, Adams Hill to the southeast, and Griffith Park (Santa Monica Mountains) to the west. Due to the relatively flat topography, existing structures, and mature landscaping in the vicinity of the Project site, the available views of these mountains and hills are largely blocked or obstructed, except along major street corridors.

The proposed Project would include demolition of the existing buildings and surface parking areas on the site and development of 4 new buildings, including above-grade Parking Garage, and surface parking areas. Figure 4.1-9: Proposed Project Site Plan, identifies the proposed buildings by number and presents the proposed landscaping. An aerial rendering of the proposed Project along San Fernando Road is provided in Figure 4.1-10: Proposed Project Overview. Figure 4.1-11: Proposed Project Building Elevations presents elevations of the four proposed buildings.

Building 1 would be a six-story structure located along San Fernando Road containing production offices, commissary space, two flex spaces and one mill space uses. Building 1 also contains outdoor decks on each floor facing towards San Fernando and smaller outdoor decks facing east. This building is proposed to reach up to 89 feet 6 inches in height measured from the ground to the top of the parapet. Rooftop equipment and required mechanical screening will reach a height of up to 100 feet 9 inches for portions of Building 1.



SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 4.1-9



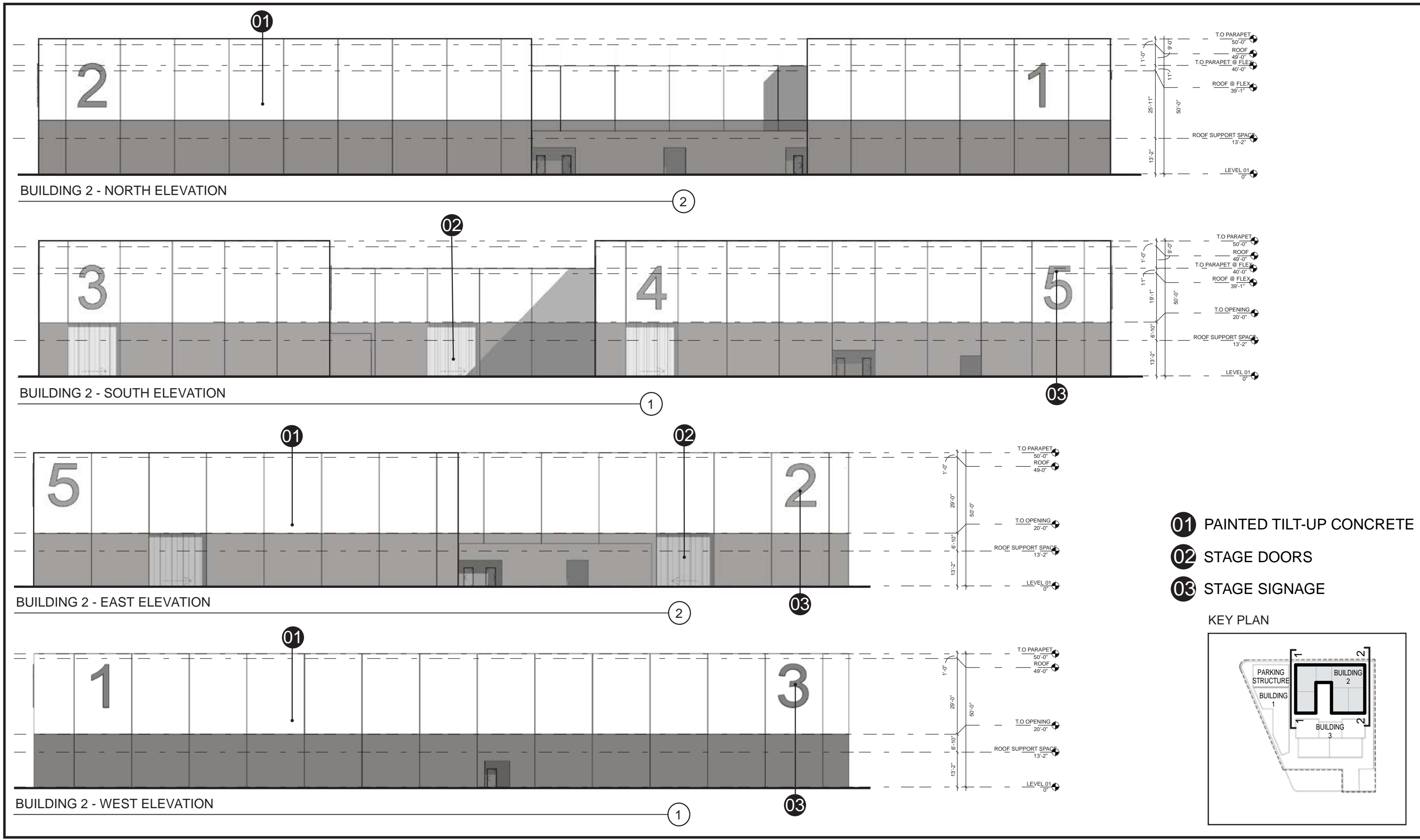
SOURCE: Gensler - February 2023, Meridian Consultants - 2023

FIGURE 4.1-10



SOURCE: Relativity Architects - 2022

FIGURE 4.1-11



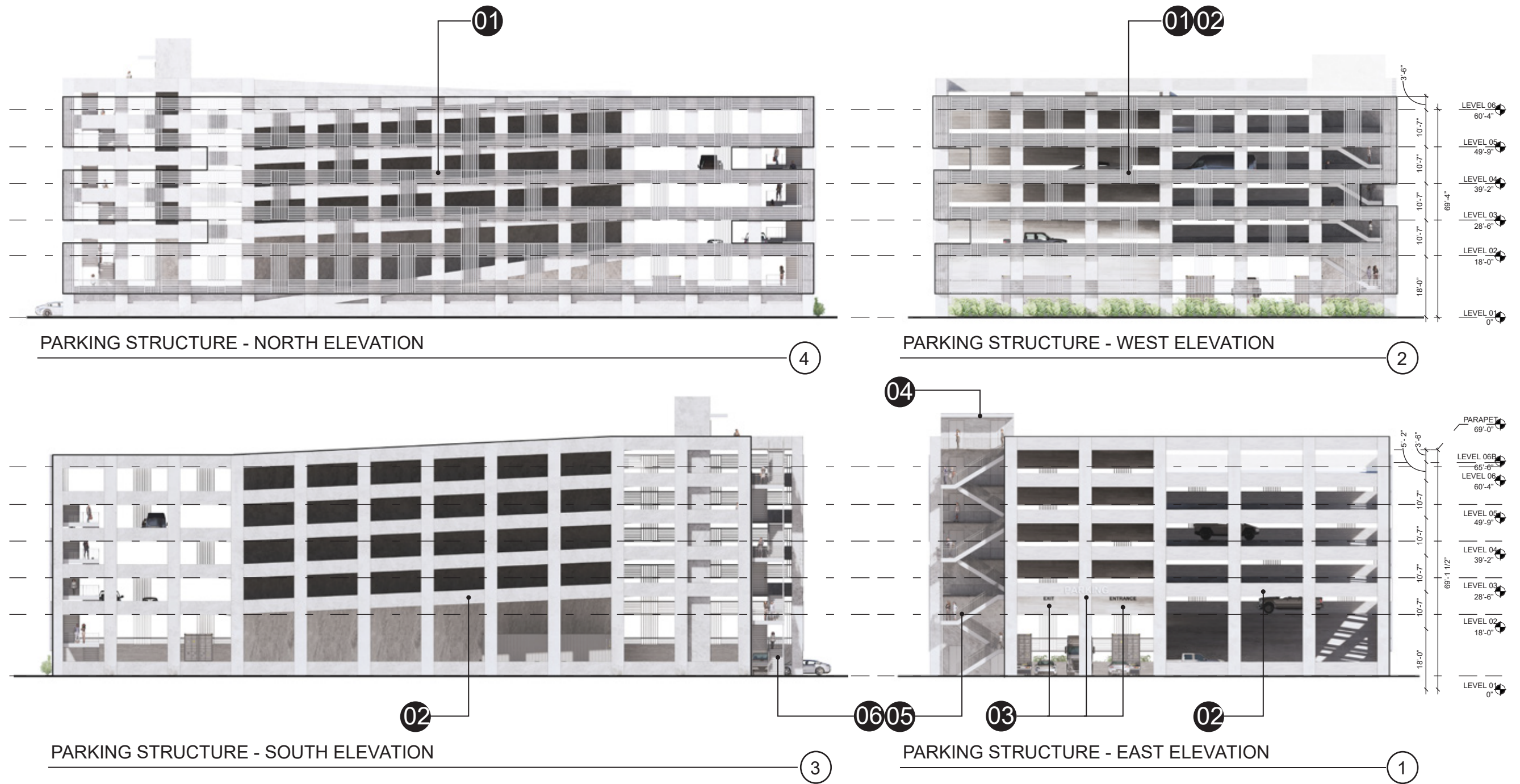
SOURCE: Relativity Architects - 2022

FIGURE 4.1-12



SOURCE: Relativity Architects - 2022

FIGURE 4.1-13



- | | |
|--------------------------------|---|
| 01 SCREENING SYSTEM | 04 PAINTED METAL CANOPY |
| 02 CONCRETE UPTURN BEAM | 05 PAINTED METAL GUARDRAIL & HANDRAIL |
| 03 PARKING SIGNAGE | 06 GALVANIZED STEEL WITH PRECAST CONCRETE TREADS |

SOURCE: Relativity Architects - 2022

FIGURE 4.1-14

Buildings 2 and 3 would be production studio buildings on the eastern portion of the site. Building 2 is located to the east of the Building 1, fronts Milford Street and contains Stage, Stage support and Flex Space uses. Building 3 is located to the south of Building 2 and contains Stage and Stage support uses. These studio buildings would have reach up to 48 feet 4 inches to the top of the roof and 50 feet to the top of the parapet. The fourth building, the Parking Garage, is a six-story structure which fronts San Fernando Road and West Milford Street. The Parking Garage is proposed with a height of 65 feet 6 inches to the top of the roof and 69 feet to the top of the parapet. The Parking Garage can be accessed by a ramp abutting the fire lane to the east.

As shown in **Figure 4.1-9: Proposed Project Landscape Plan**, a total of 108 trees would be planted on the Project site as part of the Project. These trees would be primarily located mainly along the perimeter of the Project site, on Building 1, and throughout the Property. The Project will provide 69 trees on the Property, with 62 trees in the surface parking area concentrated to buffer the adjacent residential zone to the east and residential uses to the south. The remaining 7 on site trees would be located on Building 1's outdoor decks. At least 75 percent of the proposed trees would have a 25-foot mature span, with the remaining trees having at least a 10-foot mature span. The Project does not strictly comply with the landscaping and tree dispersal requirements of the GMC. The Project would also include landscaping throughout the Project site, including upper-level roof deck landscaping. The Project would include 15,753 square feet of planting on the ground level, 1,737 square feet of planting on the outdoor decks, and 6,726 square feet of off-site streetscape planting. Landscaping would be located along the aforementioned landscape buffer, and the perimeter of the Project site.

As discussed in Section 3.4 (Project Description), the existing buildings range in height from 17-feet to 33-feet as shown in **Figure 4.1-2**, **Figure 4.1-3**, and **Figure 4.1-4**. As visualized in **Figure 4.1-2**, **Figure 4.1-3**, and **Figure 4.1-4**, the existing buildings partially obstruct views of the Verdugo Mountains and Griffith Park. Views of the San Gabriel Mountains to the northwest, San Rafael Hills to the northeast, and Adams Hill to the southeast in the vicinity of the Project site are already limited or obstructed due to the relatively flat topography, existing structures, and mature landscaping surrounding the Project site.

The proposed Project would result in taller buildings being located on the site than currently exist. The existing buildings on the site range in height from 17 to 33 feet (see **Table 3.0-1: Existing Structures in Section 3.0: Project Description**). The largest existing building on the site, located along Milford Street, has a height of 28 feet. The tallest existing building on the site is a 33-foot tall building located in the center of the site visible from San Fernando Road. The buildings located south of this building, also visible from San Fernando Road, have heights of 20 and 28 feet. The existing buildings located on the eastern edge of the site have a height of 17 feet.

Buildings 2 and 3, the primary studio buildings, would occupy the eastern and central portions of the site. These buildings would have a height of 50 feet and would replace existing buildings with heights ranging from 17 to 33 feet. The taller proposed buildings, Buildings 1 and the Parking Garage, would be located along San Fernando Road. Building 1 would have a height 89 feet 6 inches in height measured

from the ground to the top of the parapet and the Parking Garage is proposed with a height of 65 feet 6 inches to the top of the roof and 69 feet to the top of the parapet. These buildings would replace existing buildings with heights ranging from 20 to 33 feet.

While the proposed buildings would be taller than existing buildings on the site, as views of the Verdugo Mountains and Griffith Park are already partially obstructed by the existing buildings along San Fernando Road and Milford Street, the proposed Project would have a minimal effect on existing views of the Verdugo Mountains and Griffith Park. For these reasons, the development of the proposed Project would not have a substantial adverse effect on a scenic vista. Additionally, consistent with State and local regulations, aesthetic impacts shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Less than significant impact.

Impact AES-2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

As stated in *Section 4.1.2*, SB 743 made changes to CEQA requirements that apply to infill projects located within transit priority areas (TPAs). Among other changes, SB 743 provides that the aesthetic impacts of a residential, mixed-use residential, or employment center project, as defined, on an infill site within a transit priority area shall not be considered significant impacts on the environment. The Project site is located within a TPA pursuant to SB 743. The proposed Project meets the requirements for an employment center project under SB 743 (PRC Section 21099). Nonetheless, the following analysis is provided for informational purposes only and not for a determination of environmental impact under CEQA.

There are no State Designated Scenic Highways within the vicinity of the Project site. The nearest designated State Scenic Highway is a portion of State Route 2, approximately 7.38 miles northeast of the Project site.⁵ Therefore, the Project site is not located near, or visible from any designated or eligible State scenic highway.

The Project site does not contain scenic resources, including, trees, rock outcroppings, or other locally recognized scenic natural features. The Project site is currently developed with ten existing industrial buildings and related surface parking and loading areas.

The Project site does not contain any historic buildings, as discussed in **Section 4.3: Cultural Resources**. The existing buildings do not embody the distinctive characteristics and methods of construction

5 Caltrans. "California State Scenic Highways Map."

sufficient for eligibility. Existing buildings on the Project site are ineligible for listing under National Register, California Register, or Glendale Register of Historic Resources. Therefore, the proposed Project would not have a substantial adverse effect any historic buildings.

As the Project site does not contain any scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway, the Project will not result in any substantial adverse effects to scenic resources. In addition, consistent with State and local regulations, impacts to scenic resources or any other aesthetic impacts shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

No impact.

Impact AES-3: In nonurbanized 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 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?

As stated in *Section 4.1.2*, SB 743 made changes to CEQA requirements that apply to infill projects located within transit priority areas (TPAs). Among other changes, SB 743 provides that the aesthetic impacts of a residential, mixed-use residential, or employment center project, as defined, on an infill site within a transit priority area shall not be considered significant impacts on the environment. The Project site is located within a TPA pursuant to SB 743. The proposed Project meets the requirements for an employment center project under SB 743 (PRC Section 21099). Nonetheless, the following analysis is provided for informational purposes only and not for a determination of environmental impact under CEQA.

The Project is proposed in an existing developed industrial corridor along San Fernando Road, and it would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Building 1 would be a six-story building with a height up to 89 feet 6 inches in height located along the San Fernando Road. Rooftop equipment and required mechanical screening will reach a height of up to 100 feet 9 inches for portions of Building 1. Buildings 2 and 3 would be one story buildings with a height of 48 feet 4 inches to the top of the roof and 50 feet to the top of the parapet. The Parking Garage is proposed with a height of 65 feet 6 inches to the top of the roof and 69 feet to the top of the parapet.

The Project would contain a total gross floor area of approximately 406,318 square feet, for a floor area ratio (FAR) of approximately 0.96 to 1. As noted above, the IMU zone allows soundstage-production and supporting office uses by right and does not impose an FAR restriction. The IMU zone does, however,

restrict height to a maximum of 50 feet. Buildings 2 and 3 would conform to the GMC height requirement of 50 feet.

Buildings 1 and the Parking Garage would exceed the 50-foot allowed height in the IMU Zone. The approval of a height variance is requested as part of the Project to allow these buildings because, as discussed in **Section 4.5: Hazards and Hazardous Materials**, of the requirements to maintain the existing geosynthetic clay line (GCL) cap 6 feet below the ground surface to prevent releases of hazardous substances affecting subsurface soil, soil vapor, and groundwater. The need to maintain this GCL cap prevents subterranean construction on the site which could accommodate parking or ancillary sound stage studio uses.

Building 1 is proposed along the western edge of the site along San Fernando Road and the Parking Garage is proposed along San Fernando Road and West Milford Street away from the residential uses located along the eastern edge of the Project site. Building 1 includes 7 on site trees and 1,737 square feet of planting on the outdoor decks.

The exterior of Building 1 would clad with a smooth plaster finish at the ground floor and exterior insulation finishing system (EIFS) on the upper levels and would incorporate subtle gray finish color tones ranging from a bright light gray to medium gray. Building 1 would include windows throughout with aluminum frames and energy efficient glazing and there would be a partial expanse of floor to ceiling glass windows located over the primary entrance to this building. Additionally, there are patio balconies at the upper floors on the north and south ends of the building that have medium gray painted metal guardrails, painted metal shade structures, and painted metal exposed framing structures. The Parking Garage would be a concrete framed parking structure fenestrated with a partially covering light gray gauge steel frame clad with silvery perforated metal panels. These elements would break up the visual mass these buildings. Buildings 2 and 3 would be identical finished buildings with tilt-up concrete exterior walls with a bright light gray paint finish. Buildings 2 and 3 would have a medium gray painted-on wainscoting that matches the height of the adjacent ground floor base of Building 1. The wainscot paint color is slightly darker than the primary paint color.

The proposed Project would provide a total of 108 trees. These trees primarily located mainly along the perimeter of the Project site, on Building 1, and throughout the Property as shown in **Figure 4.1-9: Proposed Project Site Plan**. The proposed Project would also include streetscape improvements with the landscape improvements along San Fernando Road and Milford Street, including 6,726 square feet of off-site streetscape planting. The Project does not strictly comply with the landscaping and tree dispersal requirements of the GMC. Landscaping and tree dispersals throughout the Project's surface parking would disturb circulation within the Property due to the Property's size and layout. The proposed landscape plan places the trees along the most visible edges of the site.

Based on these design characteristics, the proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The proposed use is consistent

with the Glendale General Plan and IMU Zone, and the proposed variances and deviations from GMC standards are justified by the existing physical characteristics of the site, which include continued maintenance of the GCL cap on-site and groundwater restrictions, and would not result in any significant impact on the visual character of the site or the surrounding area. Further, the proposed Project would comply with and be consistent with the intent of the Glendale Comprehensive Design Guidelines, as required by permit applicants in the City. As such, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. The proposed Project will not result in any substantial adverse effects on the scenic quality of the Project site or the surrounding area. Moreover, consistent with State and local regulations, aesthetic impacts shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Less than significant impact.

Impact AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

As stated in Section 4.1.2 above, SB 743 made changes to CEQA requirements that apply to infill projects located within transit priority areas (TPAs). Among other changes, SB 743 provides that the aesthetic impacts of a residential, mixed-use residential, or employment center project, as defined, on an infill site within a transit priority area shall not be considered significant impacts on the environment. The Project site is located within a TPA pursuant to SB 743. The proposed Project meets the requirements for an employment center project under SB 743 (PRC Section 21099). Nonetheless, the following analysis is provided for informational purposes only and not for a determination of environmental impact under CEQA.

The exterior of Building 1 would clad with a smooth plaster finish at the ground floor and exterior insulation finishing system (EIFS) on the upper levels and would incorporate subtle gray finish color tones ranging from a bright light gray to medium gray. Building 1 would include windows throughout with aluminum frames and energy efficient glazing and there would be a partial expanse of floor to ceiling glass windows located over the primary entrance to this building. Additionally, there are patio balconies at the upper floors on the north and south ends of the building that have medium gray painted metal guardrails, painted metal shade structures, and painted metal exposed framing structures. Buildings 2 and 3 would be identical finished buildings with tilt-up concrete exterior walls with a bright light gray paint finish. Buildings 2 and 3 would have a medium gray painted-on wainscoting that matches the height of the adjacent ground floor base of Building 1. The wainscot paint color is slightly darker than the primary paint color. The Parking Garage would be a concrete framed parking structure fenestrated with

a partially covering light gray gauge steel frame clad with silvery perforated metal panels. These materials would not be reflective and would not create substantial new sources of light or glare.

The proposed Project would include exterior lighting. All Project lighting would comply with the GMC, which requires that lighting be directed onto the driveways, walkways and parking areas within the development and away from adjacent properties and public rights-of-way.⁶ The lighting from these sources would be similar to the existing nighttime lighting associated with the surrounding industrial buildings and would not result in enough glare to be considered substantial or affect nighttime views because lighting would be designed to be consistent with the development regulations in the GMC.

For these reasons, the proposed Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the surrounding urban area and would not result in substantial adverse effects for light and glare. Further, consistent with State and local regulations, aesthetic impacts shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Less than significant impact.

4.1.4.4 Cumulative Impacts

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for aesthetics. Cumulative projects in the City would have the potential to result in a cumulative impact to aesthetic resources if, in combination, they would result in the removal or substantial adverse change of one or more features that contribute to the valued visual character or image of a neighborhood, community, state scenic highway, or localized area, such as a designated landmark, historic resource, trees, or rock outcropping.

The analysis of cumulative impacts is based on an assessment of reasonably foreseeable growth associated with a list of past, present, and anticipated future projects, as shown in **Table 4.0-1: List of Related Projects in Section 4.0**. Each of these projects, as well as all proposed projects in the City, would be subject to their own consistency analysis for policies and regulations governing scenic quality and would be reviewed for consistency with any applicable specific plan goals and policies and Zoning Code development standards. If there were any potential for significant impacts to aesthetics,

⁶ GMC, Section 30.30.040.A

appropriate mitigation measures would be identified to reduce and/or avoid impacts related to aesthetics.

As described in this section, implementation of the proposed Project would not result in a significant impact related to aesthetics. The proposed Project and all related projects are required to adhere to City and State regulations, discussed above in Section 4.1.2.2, designed to reduce and/or avoid impacts related to aesthetics. Additionally, projects within the City and the proposed Project would be subject to Glendale City Council approval to avoid impacts related to aesthetics. With compliance with these regulations, no substantial adverse cumulative effects related to aesthetics would result from the proposed Project, related projects and other growth and the proposed Project's contribution to cumulative impacts would not be cumulatively considerable.

Moreover, consistent with State and local regulations, visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

Level of Significance Before Mitigation

Upon implementation of regulatory requirements, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Compliance with local, State, and federal plans, policies, and programs would ensure impacts related to aesthetics would be less than significant.

4.2 AIR QUALITY

4.2.1 INTRODUCTION

This section evaluates the potential effects of the air emissions that would be generated by construction and operation of the Project. The analysis also addresses consistency of the Project with the air quality policies set forth within the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP) and the City of Glendale (City) General Plan. The analysis of air emissions generated by the Project focuses on whether the Project would cause an exceedance of an ambient air quality standard or SCAQMD significance threshold. An Air Quality and Greenhouse Gas Technical Study was prepared for the Project and is provided in **Appendix A**.

4.2.2 OVERVIEW OF AIR QUALITY

4.2.2.1 Air Quality Background

The Project is located within the South Coast Air Basin (Air Basin), an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and San Diego County to the south. The Air Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the Coachella Valley area in Riverside County. The regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Air Basin is primarily influenced by meteorology and a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry.

Air pollutant emissions within the Air Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point sources and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples of point sources are boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products, such as barbeque lighter fluid and hair spray. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircrafts, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

The U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) designate air basins where air pollution levels exceed the State or federal ambient air quality standards (AAQS) as “nonattainment” areas. These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, which have been adopted for them. The federal and State standards have been set at levels considered safe to protect public health, including the health of “sensitive” populations, such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, an area is considered “unclassified.” Federal nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards. Transportation conformity for nonattainment and maintenance areas is required under the federal Clean Air Act (CAA) to ensure federally supported highway and transit projects conform to the State Implementation Plan (SIP). The USEPA approved California’s SIP revisions for attainment of the 1997 8-hour ozone (O₃) National AAQS for the Basin in October 2019.

Ambient air pollution can cause public health concerns and can contribute to increases in respiratory illness and death rates. Air pollution can affect the health of both adults and children. The adverse health effects associated with air pollution are diverse and include cardiovascular effects, premature mortality, respiratory effects, cancer, reproductive effects, neurological effects, and other health outcomes.¹

4.2.2.2 Criteria Air Pollutants and Health Effects

The criteria air pollutants that are most relevant to current air quality planning and regulation in the Air Basin include ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), sulfur dioxide (SO₂), and lead (Pb). In addition, volatile organic compounds (VOC) and toxics air contaminants (TACs) are a concern in the Air Basin but are not classified under AAQS.

The State and federal AAQS and their attainment status in the Basin for each of the criteria pollutants are summarized below in **Table 4.2-1: Ambient Air Quality Standards and Attainment Status**. Under the federal standards, the Basin is currently designated as nonattainment for the O₃, Pb, and PM_{2.5} thresholds. Under the State standards, the Basin is currently designated as nonattainment for the O₃, PM₁₀, and PM_{2.5} thresholds.

1 South Coast Air Quality Management District (SCAQMD), *2016 Air Quality Management Plan*, Appendix I: Health Effects (March 2017), <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf?sfvrsn=14>. Accessed June 2022.

**TABLE 4.2-1
AMBIENT AIR QUALITY STANDARDS AND ATTAINMENT STATUS**

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Nonattainment	—	Nonattainment
	8-hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)	
Nitrogen Dioxide (NO ₂)	Annual Arithmetic mean	0.03 ppm (57 µg/m ³)	Attainment	0.053 ppm (100 µg/m ³)	Unclassified/ Attainment
	1-hour	0.18 ppm (339 µg/m ³)		0.100 ppm (188 µg/m ³)	
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Unclassified/ Attainment
	1 hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)	
Sulfur Dioxide (SO ₂)	1 hour	0.25 ppm	Attainment	0.075 ppm	Attainment
	24 hours	0.04 ppm		—	
Lead (Pb)	30-day average	1.5 µg/m ³	Attainment	—	Nonattainment
	Rolling 3-month average	—		0.15 µg/m ³	
Respirable Particulate Matter (PM ₁₀)	24 hours	50 µg/m ³	Nonattainment	150 µg/m ³	Attainment
	Annual arithmetic mean	20 µg/m ³		—	
Fine Particulate Matter (PM _{2.5})	24 hours	—	Nonattainment	35 µg/m ³	Nonattainment
	Annual arithmetic mean	12 µg/m ³		12 µg/m ³	

Source: California Air Resources Board (CARB), *Area Designations Maps/State and National*, <http://www.arb.ca.gov/desig/adm/adm.htm>. Accessed June 2022.

Note: ppm = parts per million; µg = micrometer; m³ = cubic meter; mg = milligram.

Elevated concentrations of certain air pollutants in the atmosphere have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants. In the United States, such pollutants have been identified and are regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the USEPA and are subject to emissions control requirements adopted by federal, State, and local regulatory agencies. These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, which have been adopted pertaining to them.

The EPA established the National Ambient Air Quality Standards (NAAQS) to “provide public health protection, including protecting the health of ‘sensitive’ populations such as asthmatics, children, and the elderly,” allowing “an adequate margin of safety.” California Ambient Air Quality Standards (CAAQS)

were “established to protect the health of the most sensitive groups in our communities” and “defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.”² The characteristics of each criteria pollutant and their health effects are briefly described below.

Ozone (O₃)

O₃ is a highly reactive and unstable gas that is formed when reactive organic gases (ROGs), sometimes referred to as VOCs and NO_x, byproducts of internal combustion engine exhaust that undergo slow photochemical reactions in the presence of sunlight. O₃ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.

According to USEPA, O₃ can cause the muscles in the airways to constrict potentially leading to wheezing and shortness of breath. O₃ can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways; aggravate lung diseases such as asthma, emphysema and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease.³

Long-term exposure to O₃ is linked to aggravation of asthma and is likely to be one of many causes of asthma development. Long-term exposures to higher concentrations of O₃ may also be linked to permanent lung damage, such as abnormal lung development in children.⁴ According to CARB, inhalation of ozone causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms, and exposure to O₃ can reduce the volume of air that the lungs breathe in and cause shortness of breath.⁵

USEPA states that people most at risk from breathing air containing O₃ include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers.⁶ Children are at greatest risk from exposure to O₃ because their lungs are still developing and they are more likely to be active outdoors when O₃ levels are high, which increases their exposure.⁷ According to CARB, studies

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- 2 California Air Resources Board (CARB), “California Ambient Air Quality Standards,” <https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards>. Accessed June 2022.
 - 3 US Environmental Protection Agency (USEPA), “Health Effects of Ozone Pollution,” <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed June 2022.
 - 4 USEPA, “Health Effects of Ozone Pollution,” <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed June 2022.
 - 5 USEPA, “Health Effects of Ozone Pollution,” <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed June 2022.
 - 6 USEPA, “Health Effects of Ozone Pollution,” <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed June 2022.
 - 7 USEPA, “Health Effects of Ozone Pollution,” <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed June 2022.

show that children are no more or less likely to suffer harmful effects than adults; however, children and teens may be more susceptible to O₃ and other pollutants because they spend nearly twice as much time outdoors and engaged in vigorous activities compared to adults.⁸ Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults and are less likely than adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better distinguish between health effects in children and adults.

Carbon Monoxide (CO)

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Air Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

According to the USEPA, breathing air with a high concentration of CO reduces the amount of oxygen that can be transported in the blood stream to critical organs like the heart and brain, and at very high levels, which is possible indoors or in other enclosed environments, CO can cause dizziness, confusion, unconsciousness, and death.⁹ Very high levels of CO are not likely to occur outdoors; however, when CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease since these people already have a reduced ability for getting oxygenated blood to their hearts and are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain, also known as angina.

According to CARB, the most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain.¹⁰ For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress; inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance. Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO.

8 USEPA, "Health Effects of Ozone Pollution," <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed June 2022.

9 USEPA, "Carbon Monoxide (CO) Pollution in Outdoor Air," <https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution>. Accessed June 2022.

10 CARB, "Carbon Monoxide & Health," <https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health>. Accessed June 2022.

Nitrogen Dioxide (NO₂)

NO₂ is a reddish-brown, highly reactive gas that is formed in the ambient air through the oxidation of nitric oxide (NO), similar to O₃. NO₂ is also a byproduct of fuel combustion. NO and NO₂ are collectively referred to as NO_x and are major contributors to O₃ formation. NO₂ also contributes to the formation of PM₁₀. High concentrations of NO₂ can cause breathing difficulties and there is some indication of a relationship between NO₂ and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.

According to the USEPA, short-term exposures to NO₂ can potentially aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing, or difficulty breathing), hospital admissions, and visits to emergency rooms. Longer exposures to elevated concentrations of NO₂ may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. According to CARB, controlled human exposure studies show that NO₂ exposure can intensify responses to allergens in allergic asthmatics.¹¹

In addition, a number of epidemiological studies have demonstrated associations between NO₂ exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.¹² Infants and children are particularly at risk from exposure to NO₂ because they have disproportionately higher exposure to NO₂ than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration; while in adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease.

CARB states that much of the information on distribution in air, human exposure and dose, and health effects is specifically for NO₂; and there is only limited information for NO and NO_x, as well as large uncertainty in relating health effects to NO or NO_x exposure.¹³

Particulate Matter (PM₁₀) and Fine Particulate Matter (PM_{2.5})

Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals, and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Sources of PM₁₀ emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands.¹⁴ Sources of PM_{2.5} emissions include combustion of gasoline, oil, diesel fuel, or wood. PM₁₀ and PM_{2.5} may be either directly emitted from sources (primary particles) or formed in the

11 CARB, "Nitrogen Dioxide & Health," <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed June 2022.

12 CARB, "Nitrogen Dioxide & Health," <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed June 2022.

13 CARB, "Nitrogen Dioxide & Health," <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>. Accessed June 2022.

14 CARB, "Inhalable Particulate Matter and Health (PM_{2.5} and PM₁₀)," <https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed June 2022.

atmosphere through chemical reactions of gases (secondary particles) such as SO₂, NO_x, and certain organic compounds.

A consistent correlation between elevated ambient respirable and fine particulate matter (PM₁₀ and PM_{2.5}) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life span, and an increased mortality from lung cancer.

According to CARB, both PM₁₀ and PM_{2.5} can be inhaled, with some depositing throughout the airways; PM₁₀ is more likely to deposit on the surfaces of the larger airways of the upper region of the lung, while PM_{2.5} is more likely to travel into and deposit on the surface of the deeper parts of the lung, which can induce tissue damage, and lung inflammation.¹⁵ Short-term (up to 24 hours duration) exposure to PM₁₀ has been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits. The effects of long-term (months or years) exposure to PM₁₀ are less clear, although studies suggest a link between long-term PM₁₀ exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer.

Short-term exposure to PM_{2.5} has been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. Long-term exposure to PM_{2.5} has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children.¹⁶ According to CARB, populations most likely to experience adverse health effects with exposure to PM₁₀ and PM_{2.5} include older adults with chronic heart or lung disease, children, and asthmatics. Children and infants are more susceptible to harm from inhaling pollutants, such as PM₁₀ and PM_{2.5}, compared to healthy adults because they inhale more air per pound of body weight than do adults, spend more time outdoors, and have developing immune systems.

Sulfur Dioxide (SO₂)

Sulfur Dioxide (SO₂) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, as well as from chemical processes occurring at chemical plants and refineries. When SO₂ oxidizes in the atmosphere, it forms sulfates (SO₄). Collectively, these pollutants are referred to as sulfur oxides (SO_x).

15 CARB, "Inhalable Particulate Matter and Health (PM_{2.5} and PM₁₀)," <https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed June 2022.

16 CARB, "Inhalable Particulate Matter and Health (PM_{2.5} and PM₁₀)," <https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>. Accessed June 2022.

According to the USEPA, short-term exposures to SO₂ can harm the human respiratory system and make breathing difficult.¹⁷ According to CARB, health effects at levels near the State one-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath and chest tightness, especially during exercise or physical activity and exposure at elevated levels of SO₂ (above 1 parts per million [ppm]) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality.¹⁸ Children, the elderly, and those with asthma, cardiovascular disease, or chronic lung disease (such as bronchitis or emphysema) are most likely to experience the adverse effects of SO₂.^{19,20}

Lead (Pb)

Lead (Pb) occurs in the atmosphere as particulate matter and is also considered a TAC. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles, so the majority of such combustion emissions are associated with off-road vehicles. However, because leaded gasoline was emitted in large amounts from vehicles when leaded gasoline was used for on-road motor vehicles, Pb is present in many urban soils and can be resuspended in the air. Other sources of Pb include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and the use of secondary Pb smelters.

Pb can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system, and affects the oxygen carrying capacity of blood. The Pb effects most commonly encountered in current populations are neurological effects in children, such as behavioral problems and reduced intelligence, anemia, and liver or kidney damage.²¹ Excessive Pb exposure in adults can cause reproductive problems in men and women, high blood pressure, kidney disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain.

While the SCAQMD CEQA Air Quality Handbook contains numerical indicators of significance for Pb, project construction and operation would not include sources of Pb emissions and would not exceed the numerical indicators for Pb. Unleaded fuel and unleaded paints have virtually eliminated Pb emissions from commercial land use projects.

Volatile Organic Compounds (VOCs)

VOCs include any compound of carbon, excluding CO, CO₂, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions and, thus, a precursor of ozone formation. VOC emissions often result from the evaporation of solvents in

17 USEPA, Sulfur Dioxide (SO₂) Pollution, <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics>. Accessed June 2022.

18 CARB, Sulfur Dioxide & Health, <https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health>. Accessed June 2022.

19 CARB, Sulfur Dioxide & Health, <https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health>. Accessed June 2022.

20 USEPA, Sulfur Dioxide (SO₂) Pollution, <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics>. Accessed June 2022.

21 CARB, Lead & Health, <https://ww2.arb.ca.gov/resources/lead-and-health>. Accessed June 2022.

architectural coatings. Reactive organic gases are any reactive compounds of carbon, excluding methane, CO, CO₂ carbonic acid, metallic carbides or carbonates, ammonium carbonate, and other exempt compounds. ROG emissions are generated from the exhaust of mobile sources.²² Both VOCs and ROGs are precursors to ozone and the terms can be used interchangeably.²³

Toxic Air Contaminants (TACs)

Toxic Air Contaminants (TACs) or hazardous air pollutants (HAPs), are defined by the USEPA as those contaminants that are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. For consistency within this document, they will be referred to as TACs. TACs are also defined as an air pollutant that may increase a person's risk of developing cancer and/or other serious health effects. TACs are emitted by a variety of industrial processes such as petroleum refining, electric utility and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. TACs may exist as PM₁₀ and PM_{2.5} or as vapors (gases). TACs include metals, other particles, gases absorbed by particles, and certain vapors from fuels and other sources. The emission of a TAC does not automatically create a health hazard. Other factors, such as the amount of the TAC, its toxicity, how it is released into the air, the weather, and the terrain, all influence whether the emission could be hazardous to human health. Emissions of TACs into the air can be damaging to human health and to the environment. Human exposure to TACs at sufficient concentrations and durations can result in cancer, poisoning, and rapid onset of sickness, such as nausea or difficulty in breathing. Other less measurable effects include immunological, neurological, reproductive, developmental, and respiratory problems. TACs deposited onto soil or into lakes and streams affect ecological systems and eventually human health through consumption of contaminated food. The carcinogenic potential of TACs is a particular public health concern because many scientists currently believe that there is no "safe" level of exposure to carcinogens. Any exposure to a carcinogen poses some risk of contracting cancer.²⁴

The public's exposure to TACs is a significant public health issue in California. The Air Toxics "Hotspots" Information and Assessment Act is a State law requiring facilities to report emissions of TACs to air districts.²⁵ The program is designated to quantify the amounts of potential TACs released, the location of the release, the concentrations to which the public is exposed, and the resulting health risks. The Air Toxics "Hotspots" Program (AB 2588) identified over 200 TACs, including the 188 TACs identified in the CAA.²⁶

22 SCAQMD, Appendix A: Calculation Details for CalEEMod (April 2022), https://www.caleemod.com/documents/user-guide/02_Appendix%20A.pdf. Accessed June 2022.

23 Both VOC and ROGs are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.

24 USEPA, "Hazardous Air Pollutants," <https://www.epa.gov/haps>. Accessed June 2022.

25 CARB, General Information About "Hot Spots." <https://www.arb.ca.gov/ab2588/general.htm>. Accessed June 2022.

26 CARB, AB 25188 Air Toxics "Hot Spots" Program. <https://www.arb.ca.gov/ab2588/ab2588.htm>. Accessed June 2022.

The USEPA has assessed this expansive list and identified 21 TACs as Mobile Source Air Toxics (MSATs).²⁷ MSATs are compounds emitted from highway vehicles and nonroad equipment. Some toxic compounds are present in fuel and are emitted to the air when the fuel evaporates or passes through the engine unburned. Other toxics are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil or gasoline. USEPA also extracted a subset of these 21 MSAT compounds that it now labels as the nine priority MSATs: 1,3-butadiene, acetaldehyde, acrolein, benzene, diesel particulate matter (DPM)/diesel exhaust organic gases, ethylbenzene, naphthalene, and polycyclic organic matter (POM). While these nine MSATs are considered the priority transportation toxics, USEPA stresses that the lists are subject to change and may be adjusted in future rules.²⁸

Diesel Exhaust

According to the California Almanac of Emissions and Air Quality, the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from the exhaust of diesel-fueled engines (i.e., DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances).

Diesel exhaust is composed of two phases, gas and particle, and both phases contribute to the health risk. The gas phase is composed of many of the urban TACs, 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 diesel particulates are of the greatest health concern and may be composed of elemental carbon with adsorbed compounds such as organic compounds, sulfate, nitrate, metals, and other trace elements. Diesel exhaust is emitted from a broad range of diesel engines; the on-road diesel engines of trucks, buses and cars and the off-road diesel engines that include locomotives, marine vessels, and heavy-duty equipment. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

The most common exposure to DPM is breathing air that contains diesel exhaust. The fine and ultra-fine particles are respirable (similar to $PM_{2.5}$), which means that they can avoid many of the human respiratory system defense mechanisms and enter deeply into the lungs. Exposure to DPM comes from both on-road and off-road engine exhaust that is either directly emitted from the engines or lingering in the atmosphere.

27 US Environmental Protection Agency, "Air Toxics Risk Assessment Reference Library, Volume 1 Technical Resource Manual, <https://www.epa.gov/fera/air-toxics-risk-assessment-reference-library-volumes-1-3>. Accessed June 2022.

28 US Department of Transportation Federal Highway Administration, Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents, https://www.fhwa.dot.gov/Environment/air_quality/air_toxics/policy_and_guidance/aqintguidmem.cfm#fig1. Accessed June 2022.

Diesel exhaust causes health effects from long-term chronic exposures. The type and severity of health effects depends upon several factors including the amount of chemical exposure and the duration of exposure. Individuals also react differently to different levels of exposure. There is limited information on exposure to only DPM, but there is enough evidence to indicate that inhalation exposure to diesel exhaust causes chronic health effects as well as having cancer-causing potential.

Because it is part of $PM_{2.5}$, DPM also contributes to the same noncancer health effects as $PM_{2.5}$ exposure. These effects include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies. Those most vulnerable to noncancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.²⁹

Gasoline Exhaust

Similar to diesel exhaust, gasoline is composed of two phases, gas and particle, and both phases contribute to the health risk. The gas phase is composed of the same TACs, 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 diesel particulates are of the greatest health concern and may be composed of elemental carbon with adsorbed compounds such as organic compounds, sulfate, nitrate, metals, and other trace elements. Gasoline exhaust is primarily emitted from light-duty passenger vehicles. The compounds in the gas and particles phases can cause health effects from short- and long-term exposures similar to those described under the TAC and particulate matter discussions above.

Visibility Reducing Particles

Visibility-reducing particles are any particles in the atmosphere that obstruct the range of visibility by creating haze.³⁰ These particles vary in shape, size and chemical composition, and come from a variety of natural and manmade sources including windblown metals, soil, dust, salt, and soot. Other haze-causing particles are formed in the air from gaseous pollutant (e.g., sulfates, nitrates, organic carbon particles) which are the major constituents of fine PM, such as $PM_{2.5}$ and PM_{10} , and are caused from the combustion of fuel. CARB's standard for visibility reducing particles is not based on health effects, but rather on welfare effects, such as reduced visibility and damage to materials, plants, forests, and ecosystems. The health impacts associated with $PM_{2.5}$ and PM_{10} are discussed above under Particulate Matter.

29 CARB, Overview: Diesel Exhaust & Health, <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>. Accessed June 2022.

30 CARB, Visibility Reducing Particles and Health, <https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health>. Accessed June 2022.

4.2.3 REGULATORY FRAMEWORK

4.2.3.1 Federal Regulations

Clean Air Act

The USEPA is responsible for the implementation of portions of the CAA³¹ of 1970, which regulates certain stationary and mobile sources of air emissions and other requirements. Charged with handling global, international, national, and interstate air pollution issues and policies, the USEPA sets national vehicle and stationary source emission standards, oversees the approval of all State Implementation Plans,³² provides research and guidance for air pollution programs, and sets NAAQS.³³ NAAQS for the six common air pollutants (O₃, PM₁₀ and PM_{2.5}, NO₂, CO, Pb, and SO₂) are identified in the CAA.

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 to meet interim milestones. The sections of the CAA that are most applicable to the Basin include Title I, Nonattainment Provisions, and Title II, Mobile Source Provisions.

The NAAQS were also amended in July 1997 to include an 8-hour standard for O₃ and to adopt a NAAQS for PM_{2.5}. The NAAQS were amended in September 2006 to include an established methodology for calculating PM_{2.5} and to revoke the annual PM₁₀ threshold. The CAA includes the following deadlines for meeting the NAAQS within the Basin: (1) 24-hour PM_{2.5} by the year 2019, which has not been updated since the adoption of the 2016 AQMP and (2) 8-hour O₃ by the year 2024. In addition, more stringent area requirements now apply including implementation of Best Available Control Measures/Best Available Control Technology (BACM/BACT), a lower major source threshold (from 100 tons per year to 70 tons per year), and an update to the reasonable further progress (RFP) analysis.³⁴

4.2.3.2 State Regulations

California Clean Air Act

The California CAA, signed into law in 1988, requires all areas of the State to achieve and maintain the California AAQS by the earliest practicable date. CARB, a part of the CalEPA, is responsible for the coordination and administration of both State and federal air pollution control programs within

31 42 U.S.C Section 7401, et seq, <https://www.law.cornell.edu/uscode/text/42/7401>. Accessed June 2022.

32 A State Implementation Plan (SIP) is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain National Ambient Air Quality Standards (NAAQS).

33 The NAAQS were established to protect public health, including that of sensitive individuals; for this reason, the standards continue to change as more medical research becomes available regarding the health effects of the criteria pollutants. The primary NAAQS define the air quality considered necessary, with an adequate margin of safety, to protect the public health.

34 SCAQMD, *Final 2016 Air Quality Management Plan (2017)*, <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>. Accessed June 2022.

California. In this capacity, CARB conducts research, sets State AAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions and the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the State. The CAAQS include more stringent standards than the NAAQS.

California Air Toxics Program

The California Air Toxics Program was established in 1983, when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air. In the risk identification step, CARB and the OEHHA determine if a substance should be formally identified, or “listed,” as a TAC. Since inception of the program, a number of such substances have been listed. In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants (HAPs) as TACs. In 1999, CARB completed the final staff report, Update to the Toxic Air Contaminant List. The list represented the priorities for identifying and regulating substances as directed by State law. The report described the process followed by CARB in reviewing and revising the TAC List and presented changes to the list.

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of airborne toxic control measures (ATCMs), both for mobile and stationary sources. In 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to DPM and other TACs (see below for additional information).

Air Toxics “Hotspots” Program (AB 2588)

AB 2588 was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The Air Toxics program’s goals include collecting emission data, identifying facilities having localized impacts, ascertaining health risks, notifying nearby residents of significant risks, and reducing those significant risks to acceptable levels. The Air Toxics program provides direction and criteria to facilities on how to compile and submit air toxic emission data required by the “Hot Spots” Program, and requires the local air district to prioritize facilities to determine which facilities must perform a health risk assessment. Facilities identified as high risk are required to reduce their toxic emissions to acceptable levels as determined by the local air district.³⁵

California Code of Regulations

The California Code of Regulations (CCR) includes regulations that pertain to air quality emissions. Specifically, 13 Cal. Code of Regs. Section 2485 limits idling of all diesel-fueled commercial vehicles

35 CARB, AB 2588 Air Toxics “Hot Spots” Program, <http://www.arb.ca.gov/ab2588/ab2588.htm>. Accessed June 2022.

(weighing over 10,000 pounds) during construction to 5 minutes at any location. Additionally, 17 Cal. Code of Regs. Section 93115 requires operation of any stationary, diesel-fueled, compression-ignition engines meet specified fuel and fuel additive requirements and emission standards.

California Motor Vehicle Code

The vehicle programs are a critical component in the SIP for achieving national ambient air quality standards in the South Coast.³⁶ They are also integral in CARB's Scoping Plan³⁷ to achieve the greenhouse gas (GHG) emission reduction goals that were established through the California legislation and Executive Orders. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13 of the California Code of Regulations, Section 2485).

The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling³⁸ measure includes regulations that pertain to air quality emissions. Specifically, Section 2485 states that the idling of all diesel-fueled commercial vehicles weighing more than 10,000 pounds shall be limited to five minutes at any location. In addition, Section 93115 in Title 17 of the CCR³⁹ states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

CARB Rule 2449, General Requirements for In-Use Off-Road Diesel-Fueled Fleets

CARB Rule 2449 requires off-road diesel vehicles to limit nonessential idling to no more than five consecutive minutes.⁴⁰

California Building Standards Code

California Energy Code

California's Energy Efficiency Standards for Residential and Nonresidential Buildings⁴¹ were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 requires

36 CARB, "California State Implementation Plans" (last reviewed September 21, 2018), <https://www.arb.ca.gov/planning/sip/sip.htm>. Accessed June 2022.

37 CARB, *AB 32 Scoping Plan (January 8, 2018)*, <https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>. Accessed June 2022.

38 CARB, Section 2485 in Title 13 of the CCR, https://www.arb.ca.gov/msprog/truck-idling/13ccr2485_09022016.pdf. Accessed June 2022.

39 CARB, *Final Regulation Order: Amendments to the Airborne Toxic Control Measure For Stationary Compression Ignition Engines (May 19, 2011)*, <https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/finalreg2011.pdf>. Accessed June 2022.

40 CARB, "Final Regulation Order: Regulation For In-Use Off-Road Diesel-Fueled Fleets," <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation>. Accessed June 2022.

41 California Energy Commission, "2019 Building Energy Efficiency Standards," <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency>. Accessed June 2022.

the design of building shells and components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The California Energy Commission (CEC) adopted the Title 24 standards as well as the 2019 Title 24 standards, which became effective on January 1, 2020, and are applicable to the Project.⁴² The 2019 standards will continue to improve upon prior Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings.⁴³

California Green Building Code

The California Green Building Standards Code, which is Part 11 of the CCR, is commonly referred to as the CALGreen Code.⁴⁴ The most current version of the CALGreen building code went into effect in January 2020. The purpose is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, outdoor lighting standards, use and occupancy, location, and maintenance of all building and structures within its jurisdiction.

4.2.3.3 Regional Regulations

South Coast Air Quality Management District

The Project site lies within the jurisdiction of the SCAQMD, and compliance with SCAQMD rules and guidelines is required. SCAQMD is responsible for controlling emissions primarily from stationary sources. SCAQMD, in coordination with the Southern California Association of Governments (SCAG), is also responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the Basin. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as “nonattainment” of the national and/or California AAQS. The term “nonattainment area” is used to refer to an air basin in which one or more AAQS are exceeded.

The SCAQMD approved a Final 2016 AQMP on March 3, 2017.⁴⁵ The 2016 AQMP includes transportation control measures developed by SCAG from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as well as the integrated strategies and measures needed to meet the NAAQS. The 2016 AQMP demonstrates attainment of the 1-hour and 8-hour ozone NAAQS as well as the latest 24-hour and annual PM_{2.5} standards.

Under the Federal CAA, SCAQMD has adopted federal attainment plans for O₃ and PM₁₀. The SCAQMD reviews projects to ensure that they would not (1) cause or contribute to any new violation of any air

42 See California Energy Commission, “2019 Building Energy Efficiency Standards” for additional information.

43 See California Energy Commission, “2019 Building Energy Efficiency Standards” for additional information.

44 California Buildings Standards Commission, California Green Building Standards Code (Cal. Code Regs., Title 24, Part 11), <http://www.bsc.ca.gov/Home/CALGreen.aspx>. Accessed June 2022.

45 SCAQMD, *Final 2016 Air Quality Management Plan (2017)*, <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>. Accessed June 2022.

quality standard; (2) increase the frequency or severity of any existing violation of any air quality standard; or (3) delay the timely attainment of any air quality standard or any required interim emission reductions or other milestones of any federal attainment plan.

The SCAQMD is responsible for limiting the number of emissions that can be generated throughout the Basin by various stationary, area, and mobile sources. Specific rules and regulations have been adopted by the SCAQMD Governing Board. These rules and regulations limit the emissions that can be generated by various uses or activities and identify specific pollution reduction measures, which must be implemented in association with various uses and activities. These rules not only regulate the emissions of the federal and State criteria pollutants, but also toxic air contaminants and acutely hazardous materials. The rules are also subject to ongoing refinement by SCAQMD.

Among the SCAQMD rules applicable to the Project are Rule 212 (Standards for Approving Permits and Issuing Public Notice), Rule 403 (Fugitive Dust), Rule 1113 (Architectural Coatings), Rule 1401 (New Source Review of Toxic Air Contaminants), and Regulation XIII (New Source Review). Rule 212 states that the Executive Officer has the power to deny a Permit to Construct or Permit to Operate based on standard operating procedures and required notifications. Rule 403 requires the use of stringent best available control measures to minimize PM₁₀ emissions during grading and construction activities. Rule 1113 requires reductions in the VOC content of coatings, with a substantial reduction in the VOC content limit for specified types of coatings. Rule 1401 requires limits for maximum individual cancer risk, cancer burden, and noncancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants. Regulation XIII requires new on-site facility nitrogen dioxide emissions to be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion such as boilers, emergency generators, and water heaters).

CEQA Air Quality Handbook

In 1993, the SCAQMD prepared its CEQA Air Quality Handbook (CEQA Handbook) to assist local government agencies and consultants in preparing environmental documents for projects subject to CEQA.⁴⁶ The CEQA Handbook and the Guidance Handbook describe the criteria that SCAQMD uses when reviewing and commenting on the adequacy of environmental documents. The Guidance Handbook provides the most up-to-date recommended thresholds of significance in order to determine if a project will have a significant adverse environmental impact. SCAQMD provides additional supplementation information including methodologies for estimating project emissions and mitigation measures that can be implemented to avoid or reduce air quality impacts on the Guidance Handbook website.⁴⁷ As discussed previously, air quality in the Air Basin has improved substantially over the years, primarily due to the impacts of air quality control programs at the federal, State, and local levels. Air Quality levels continue

⁴⁶ SCAQMD, *Air Quality Analysis Guidance Handbook*, <http://www.aqmd.gov/CEQA/hdbk.html>. Accessed June 2022.

⁴⁷ SCAQMD, *Frequently Asked CEQA Questions*, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/frequently-asked-questions>. Accessed June 2022.

to trend downward as the economy and population increase, demonstrating that it is possible to maintain a healthy economy while improving public health through air quality improvements.

Southern California Association of Governments

SCAG is the metropolitan planning organization (MPO) for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and serves as a forum for the discussion of regional issues related to transportation, the economy, community development, and the environment. As the federally-designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and air quality. Pursuant to California Health and Safety Code Section 40460(b),⁴⁸ SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.

With regard to air quality planning, SCAG has prepared and adopted the 2020-2045 RTP/SCS,⁴⁹ which includes a SCS that addresses regional development and growth forecasts. The SCAG 2020-2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level. Although the RTP/SCS is not technically an air quality plan, consistency with the RTP/SCS has air quality implications, including the reduction of VMT which reduces air quality emissions.

4.2.3.4 Local Regulations

Local jurisdictions, such as the City, have the authority and responsibility to reduce air pollution through their police power and decision-making authority. With respect to land use decisions, the City is responsible for the assessment of potential air quality impacts and the identification of feasible mitigation measures related to air emissions associated with proposed projects.

The following Glendale General Plan policies, goals and objectives located in the Air Quality Element are applicable to air quality.

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

48 California Health and Safety Code, Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b), <https://law.justia.com/codes/california/2014/code-hsc/division-26/part-3/chapter-5.5> Accessed June 2022.

49 Southern California Association of Governments (SCAG), *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft*, <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>. Accessed June 2022.

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.

Goal 3: Air emissions from City operations will be minimized, while meeting public service requirements.

Objective 3.a: Continue the aggressive programs of recycling, energy conservation, and hazardous waste collection in order to minimize emissions from the Grayson power plant and Scholl Canyon landfill.

Objective 3.e: Provide leadership as a City by utilizing and advancing innovative technology to reduce air emissions.

Goal 4: The reliance on automobile transportation will be reduced.

Objective 4.b: Promote the use of public transportation and non-polluting transportation in standards for new construction.

Objective 4.c: Expand existing public transportation and non-polluting transportation systems and develop new systems in order to reach a greater number of potential users. Continue to seek federal, State, and regional funding sources.

Objective 4.d: Coordinate various transportation modes with transfer facilities to increase convenience.

Objective 4.e: Coordinate non-automobile transportation systems with surrounding jurisdictions.

Objective 4.f: Increase carpooling opportunities in Glendale.

Objective 4.g: Develop incentives for businesses with fewer than 100 employees to reduce vehicle trips. These businesses are not regulated by SCAQMD Rule 1501, but account for the majority of Glendale's work force.

Goal 5: Air quality programs will assist businesses in Glendale.

Objective 5.a: Inform the businesses of Glendale on ways to reduce air pollution, both directly, as well as by reducing waste, minimizing energy usage, reducing vehicle trips, and managing truck delivery schedules and routes.

Objective 5.b: Provide incentives for existing and new businesses in Glendale to reduce both stationary and mobile emissions.

Objective 5.c: Assist businesses, schools, and colleges in reducing vehicle trips by using City-operated services and facilities.

Objective 5.d: Continue and expand public/private partnerships which reduce air pollution.

Objective 5.e: Support the use of new air pollution control technologies by Glendale's business community.

Objective 5.f: Assist the business community with environmental regulations through improved communication and technical assistance.

Greener Glendale Plan

In March 2012, the City completed the Greener Glendale Plan,⁵⁰ consisting of the Greener Glendale 2010 Report, the Greener Glendale Plan for Municipal Operations, and the Greener Glendale Plan for Community Activities. The Greener Glendale Plan analyzes City activities related to sustainability and GHG emissions to show how implementing sustainability measures will result in reduced GHG emissions. The list of quantifiable GHG reduction categories in the Greener Glendale Plan includes 2020 emissions reduction targets to be achieved through California vehicle and fuel standards, building energy efficiency audits and upgrades, smart grid applications, green building standards, Zero Waste Plans, EV charging station installation, and a plastic bag ban to name a few. The Greener Glendale Plan identified 2035 reduction targets through continued implementation of California vehicle and fuel standards, building energy and water efficiency audits and upgrades, Zero Waste Plan 90 percent diversion by 2030, tree planning programs, and turf reduction rebates. These features would also serve to reduce air quality emissions.

Ordinance No. 5999

On November 15, 2022 the City of Glendale adopted new reach codes to electrify new construction, increase local solar generation, and increase electric vehicle (EV) charging.⁵¹ These ordinances mean that new homes and businesses built in Glendale after January 1, 2023, would be all-electric, with increased capacity to generate local solar power and increased availability of EV charging infrastructure. Ordinance No. 5999 also supports the City's recent authorization to prepare a Climate Action and Adaptation Plan (CAAP) which will aim to reduce communitywide emissions.

⁵⁰ City of Glendale, "Greener Glendale," <https://www.glendaleca.gov/government/departments/management-services/office-of-sustainability/greener-glendale>. Accessed June 2022.

⁵¹ City of Glendale, Ordinance No. 5999, November 15, 2022.

4.2.4 ENVIRONMENTAL SETTING

4.2.4.1 Existing Conditions

Regional Meteorology

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, 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 Air Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential.

The greatest air pollution throughout the Air Basin occurs from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. O₃ 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 Air Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in Southern California. However, as discussed earlier, the Air Basin fails to meet the national standards for O₃ and PM_{2.5} as well as the State standards for O₃, PM₁₀, and PM_{2.5}.

California Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. **Table 4.2-2: South Coast Air Basin Attainment Status (Los Angeles County)** provides a summary of the attainment status of the Los Angeles County portion of the Air Basin with respect to the federal and State standards.

TABLE 4.2-2 SOUTH COAST AIR BASIN ATTAINMENT STATUS (LOS ANGELES COUNTY)		
Pollutant	State Status	National Status
Ozone (O ₃)	Nonattainment	Nonattainment
Carbon monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen dioxide (NO ₂)	Attainment	Unclassified/Attainment
Sulfur dioxide (SO ₂)	Attainment	Unclassified/Attainment
Respirable particulate matter (PM ₁₀)	Nonattainment	Attainment
Fine particulate matter (PM _{2.5})	Nonattainment	Nonattainment

Source: California Air Resources Board (CARB) Area Designation Maps / State and National, <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>. Accessed June 2022.

Existing Ambient Air Quality

For evaluation purposes, the SCAQMD territory is divided into 38 source receptor areas (SRAs). These SRAs are designated to provide a general representation of the local meteorological, terrain, and air quality conditions within the particular geographical area.

The Project site is within SRA 7, East San Fernando Valley.⁵² The nearest air monitoring station SCAQMD operates is located at 1630 North Main Street.⁵³ This station monitors O₃, NO₂, PM₁₀ and PM_{2.5}. **Table 4.2-3: Air Quality Monitoring Summary** summarizes published monitoring data from 2018 through 2020, the most recent 3-year period available. The data shows that during the past few years, the region has exceeded the O₃, and PM₁₀, PM_{2.5} standards.

TABLE 4.2-3 AIR QUALITY MONITORING SUMMARY				
Air Pollutant	Average Time (Units)	2018	2019	2020
Ozone (O ₃)	State Max 1 hour (ppm)	0.098	0.093	0.185
	Days > CAAQS threshold (0.09 ppm)	2	0	14
	National Max 8 hour (ppm)	0.073	0.080	0.118
	Days > NAAQS threshold (0.075 ppm)	4	2	22
	State Max 8 hour (ppm)	0.074	0.080	0.118
	Days > CAAQS threshold (0.07 ppm)	4	2	22
Carbon monoxide (CO)		—	—	—
Nitrogen dioxide (NO ₂)	National Max 1 hour (ppm)	0.070	0.070	0.061
	Days > NAAQS threshold (0.100 ppm)	0	0	0
	State Max 1 hour (ppm)	0.070	0.069	0.061
	Days > CAAQS threshold (0.18 ppm)	0	0	0
Respirable particulate matter (PM ₁₀)	National Max (µg/m ³)	68.2	62.4	83.7
	National Annual Average (µg/m ³)	30.2	23.0	33.1
	Days > NAAQS threshold (150 µg/m ³)	0	0	0
	State Max (µg/m ³)	81.2	93.9	185.2
	State Annual Average (µg/m ³)	34.0	—	33.9
	Days > CAAQS threshold (50 µg/m ³)	31	15	34
	National Max (µg/m ³)	61.4	43.5	175.0
Fine particulate matter (PM _{2.5})	National Annual Average (µg/m ³)	12.8	10.8	13.7
	Days > NAAQS threshold (35 µg/m ³)	6	1	12
	State Max (µg/m ³)	65.3	43.5	175.0
	State Annual Average (µg/m ³)	16.0	10.8	15.0

Source: CARB, iADAM: Air Quality Data Statistics.

Note: (—) = Data not available.

52 SCAQMD, “General Forecast Areas and Air Monitoring Areas,” map, <http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf>. Accessed June 2022.

53 South Coast Air Quality Management District, *Site Survey Report for Los Angeles (Central)–North Main Street, AQS ID 060371103*, <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-monitoring-network-plan/aaqmpn-losangeles.pdf?sfvrsn=16>. Accessed June 2022.

Existing Emissions

The Project site is currently developed with ten warehouse related structures, which would be demolished as part of the Project. The current site usage generates existing vehicle trips and air quality emissions from operations related to these uses. **Table 4.2-4: Existing Operational Daily Emissions** identifies the emissions from the existing warehouse facilities.

TABLE 4.2-4 EXISTING OPERATIONAL DAILY EMISSIONS						
Source	VOC	CO	NOx	PM ₁₀	PM _{2.5}	SO ₂
	pounds/day					
Mobile	1	<1	2	<1	<1	<1
Area	6	<1	8	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Total	7	2	12	<1	<1	<1

Source: Refer to **Appendix A** for Air Quality and Greenhouse Gas Technical Study.

4.2.4.2 Sensitive Receptors

SCAQMD considers a sensitive receptor to be a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. Sensitive receptors are identified near sources of air pollution to determine the potential for health hazards. Locations evaluated for exposure to air pollution include but are not limited to residences, schools, hospitals, and convalescent facilities.

The Project site is predominantly surrounded by a mix of residential and industrial uses. As mentioned previously, the Project site is bound by West Milford Street to the north, medium density residential uses to the east, mixed-use structures to the south, and San Fernando Road to the west. The nearest sensitive receptors to the Project site include:

- Residential uses to the east along W. Milford Street and Concord Street
- Residential use to the south along W. California Avenue
- Residential uses to the northeast along W. Milford Street

4.2.5 ENVIRONMENTAL IMPACT ANALYSIS

4.2.5.1 Thresholds of Significance

- Threshold AQ-1:** Conflict with or obstruct implementation of the applicable air quality plan.
- Threshold AQ-2:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.
- Threshold AQ-3:** Expose sensitive receptors to substantial pollutant concentrations.

4.2.5.2 Methodology

Emissions Inventory Modeling

The California Emissions Estimator Model, known as CalEEMod, is the CARB-approved computer program model recommended by SCAQMD for use in the quantification of air quality emissions. CalEEMod was developed under the auspices of SCAQMD, with input from other California air districts. CalEEMod utilizes widely accepted models for emissions estimates combined with appropriate data that can be used if site-specific information is not available. For example, CalEEMod incorporates USEPA-developed emission factors; CARB's on-road and off-road equipment emission models, such as EMFAC and OFFROAD;⁵⁴ and studies commissioned by other California agencies, such as the California Energy Commission and California Department of Resources Recycling and Recovery (CalRecycle).

CalEEMod provides a platform to calculate both construction emissions and operational emissions from a land use development project. CalEEMod version 2022.1 was used to quantify the Project's air quality pollutants. Project development would generate air pollutants from a number of individual sources during both construction and post-construction (operational) use of the buildings and related activities (e.g., painting operations and landscape maintenance). The following emission sources covered by CalEEMod model include:

- One-time construction emissions associated with site clearing and demolition, grading, construction of the retaining walls, utilities, buildings, and landscaping. Emission sources include both off-road construction equipment and on-road mobile equipment associated with workers and the delivery of construction materials to the Project site. Construction emissions associated with dust control and disposal of waste at landfills are also included in the CalEEMod model.
- Operational emissions associated with the proposed uses, including on-road mobile vehicle traffic generated by the land uses; off-road emissions from landscaping equipment; energy (i.e., electricity) and water usage in the buildings; and emissions from emergency generators, painting operations, and fuel use. The disposal of solid waste generated during the postconstruction use of the buildings is also included in the CalEEMod model.

54 EMFAC is an emissions factor model used to calculate emissions rates from on-road vehicles (e.g., passenger vehicles). OFFROAD is an emissions factor model used to calculate emission rates from off-road mobile sources (e.g., construction equipment). CalEEMod version 2022.1 utilizes CARB's 2022 version of EMFAC.

Refer to **Section 3.0: Project Description** of this EIR, for more detailed characteristics of the Project. Information needed to parameterize the Project in CalEEMod was obtained from the Project Applicant.

Construction

Table 4.2-5: Project Construction Schedule provides the dates and durations of each of the activities will take place during construction, as well as a brief description of the scope of work. Future dates represent approximations based on the general Project timeline and are subject to change pending unpredictable circumstances that may arise.

Each phase of construction would result in varying levels of intensity and number of construction personnel. The construction workforce would consist of approximately 15 worker trips per day and 1,425 total hauling trips during demolition; 15 worker trips per day and 2,500 total hauling trips during grading; 236 worker trips per day and 101 vendor trips per day during building construction; 15 worker trips per day during paving; and 47 worker trips per day during architectural coating. Also included in construction activities are mobile source emissions from construction traffic. Construction traffic is generated by vendor deliveries of construction materials and construction worker daily trips to the Project site. An assessment of air pollutant emissions was prepared utilizing the construction schedule in **Table 4.2-5**.

TABLE 4.2-5 PROJECT CONSTRUCTION SCHEDULE				
Construction Activity	Start Date	End Date	Duration (Days)	Description
Demolition	10/1/2023	11/10/2023	30	Removal of existing warehouse facilities
Grading	11/11/2023	2/2/2024	60	Grading of site and export of 20,000 cubic yards of soil
Building Construction	2/3/2024	5/3/2025	325	Construction of approximately 406,318 square feet of studio and support space
Paving	3/3/2025	5/3/2025	45	Paving of asphalt surfaces
Architectural Coating	2/3/2025	5/3/2025	65	Application of architectural coatings to building materials

Source: Refer to **Appendix A** for Air Quality and Greenhouse Gas Technical Study.

Table 4.2-6: Project Construction Diesel Equipment Inventory displays the construction equipment required for each activity described in **Table 4.2-5**. The Project would be required to adhere to SCAQMD Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings) during construction activities.

**TABLE 4.2-6
PROJECT CONSTRUCTION DIESEL EQUIPMENT INVENTORY**

Phase	Off-Road Equipment Type	Amount	Daily Hours	Horsepower [HP] (Load Factor)
Demolition	Concrete/Industrial Saws	1	8	81 (0.73)
	Rubber Tired Dozers	2	8	247 (0.40)
	Excavators	3	8	158 (0.38)
Grading	Excavators	1	8	158 (0.38)
	Graders	1	8	187 (0.41)
	Rubber Tired Dozers	1	8	247 (0.40)
	Tractors/Loaders/Backhoes	3	8	97 (0.37)
Building Construction	Cranes	1	7	231 (0.29)
	Forklifts	3	8	89 (0.20)
	Generator Sets	1	8	84 (0.74)
	Tractors/Loaders/Backhoes	3	7	97 (0.37)
	Welders	1	8	46 (0.45)
Architectural Coating	Air compressors	1	6	78 (0.48)
Paving	Pavers	2	8	130 (0.42)
	Paving Equipment	2	8	132 (0.36)
	Rollers	2	8	80 (0.38)

Source: Refer to **Appendix A** for Air Quality and Greenhouse Gas Technical Study.

Operation

Operation of the Project has the potential to generate criteria pollutant emissions through vehicle trips traveling to and from the Project site. In addition, emissions would result from area sources on site, such as landscaping equipment and use of consumer products. Area-source emissions are based on landscaping equipment and consumer product (including paint) usage rates provided in CalEEMod.

Operational emissions were estimated using the CalEEMod software, which was used to forecast the daily regional emissions from area sources that would occur during long-term Project operations. In calculating mobile-source emissions, trip-length values were based on the distances provided in CalEEMod.

SCAQMD CEQA Air Quality Handbook

The following criteria was used to evaluate air quality impacts:

SCAQMD's CEQA Air Quality Handbook

Because of the SCAQMD's regulatory role in the Air Basin, the significance thresholds and analysis methodologies in the SCAQMD's CEQA Air Quality Handbook.⁵⁵ are used in evaluating project impacts for construction, operations, and air toxics.⁵⁶

Daily Emissions Thresholds

SCAQMD has identified thresholds to determine the significance of regional air quality emissions for construction activities and project operation, as shown in **Table 4.2-7: Mass Daily Emissions Thresholds**.

TABLE 4.2-7 MASS DAILY EMISSIONS THRESHOLDS		
Pollutant	Construction	Operation
	Significant Threshold (pounds/day)	
Volatile organic compounds (VOCs)	75	55
Nitrogen dioxide (NO _x)	100	55
Carbon monoxide (CO)	550	550
Sulfur dioxide (SO _x)	150	150
Respirable particulate matter (PM ₁₀)	150	150
Fine particulate matter (PM _{2.5})	55	55

Source: SCAQMD, "Air Quality Significance Thresholds," <http://www.aqmd.gov/ceqa/hdbk.html>. Accessed June 2022.

Localized Significance Thresholds

The local significance thresholds (LST) are based on the SCAQMD's Final Localized Significance Threshold Methodology (LST Methodology)⁵⁷ guidance document for short-duration construction activities. The SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the Project site because of construction activities. The SCAQMD provides voluntary guidance on the evaluation of localized air quality impacts to public agencies conducting environmental review of projects located within its jurisdiction. Localized air quality impacts are evaluated by examining the on-site generation of pollutants and their resulting downwind concentrations. For

55 SCAQMD, *Air Quality Analysis Guidance Handbook*, <http://www.aqmd.gov/CEQA/hdbk.html>. Accessed June 2022.

56 SCAQMD, "Air Quality Significance Thresholds," <http://www.aqmd.gov/ceqa/hdbk.html>. Accessed June 2022.

57 SCAQMD, "Final Localized Significance Threshold (LST) Methodology," <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed June 2022.

construction, pollutant concentrations are compared to significance thresholds for particulates (PM₁₀ and PM_{2.5}), CO, and NO₂. The significance threshold for PM₁₀ represents compliance with SCAQMD Rule 403 (Fugitive Dust). The threshold for PM_{2.5} is designed to limit emissions and to allow progress toward attainment of the AAQS. Thresholds for CO and NO₂ represent the allowable increase in concentrations above background levels that would not cause or contribute to an exceedance of their respective AAQS.

The LST Methodology provides lookup tables of maximum allowable emissions in pounds per day that are based on the area of a construction site from 1 acre up to 5 acres in size.⁵⁸ The threshold is a daily emissions level and thus the acreage is an approximation of the daily disturbed area.⁵⁹ Based on the anticipated off-road equipment utilized during construction, the maximum daily disturbed area during Project construction would be 2.5 acres. Thus, the ambient conditions for a 2.5-acre site within East San Fernando Valley, as recorded in SRA 7 by the SCAQMD, were used in determining appropriate threshold levels. Thresholds for each criteria pollutant for construction activity and Project operation are listed in **Table 4.2-8: Localized Significance Thresholds**.

Lead agencies may use the LST mass rate look-up tables as a screening analysis. If the project exceeds any applicable LST when the mass rate look-up tables are used as a screening analysis, then project specific air quality modeling may be performed.

TABLE 4.2-8 LOCALIZED SIGNIFICANCE THRESHOLDS		
Pollutant	Construction	Operational
	pounds/day	
Nitrogen dioxide (NO ₂)	118	118
Carbon monoxide (CO)	868	868
Respirable particulate matter (PM ₁₀)	8	2
Fine particulate matter (PM _{2.5})	5	1
<i>Notes: Based on a distance to sensitive receptors of 25 meters (82 feet). SCAQMD's Localized Significance Threshold (LST) Methodology for CEQA Evaluations guidance document provides that projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 50 meters.</i>		

58 SCAQMD, "Final Localized Significance Threshold (LST) Methodology, Appendix C - Mass Rate LST Look-up Table," <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>. Accessed June 2022.

59 See Example 1 of SCAQMD "Fact Sheet" for *Applying CalEEMod to Localized Significance Thresholds*, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2>. Accessed June 2022.

Toxic Air Contaminants

As set forth in the SCAQMD Handbook, the determination of significance of a project with respect TACs shall be made on a case-by-case basis, considering the following factors:

- Regulatory framework for toxic materials and process involved;
- Proximity of TACs to sensitive receptors;
- Quantity, volume, and toxicity of the contaminants expected to be emitted;
- Likelihood and potential level of exposure; and
- Degree to which project design will reduce risk of exposure.

Consistency with Applicable Air Quality Plans

Section 15125 of the State CEQA Guidelines requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD Handbook, the following criteria were used to evaluate the Project's consistency with SCAQMD and SCAG regional plans and policies, including the AQMP:

- Will the Project result in any of the following:
 - Increase the frequency or severity of existing air quality violations?
 - Cause or contribute to new air quality violations?
 - Delay the timely attainment of the air quality standards or the interim emission reductions specified in the AQMP?
- Will the Project exceed the assumptions utilized in preparing the AQMP?
- Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based?
- Does the Project include air quality mitigation measures?
- To what extent is Project development consistent with the AQMP land use policies?

Cumulative Threshold

SCAQMD recommends that a project be considered to result in a cumulatively considerable impact to air quality if any construction-related emissions and operational emissions from individual development projects exceed the mass daily emissions thresholds for individual projects.⁶⁰

The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

60 SCAQMD, *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions*, board meeting, Agenda No. 29 (September 5, 2003), Appendix D, p. D-3, <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf>. Accessed June 2022.

A project is also considered to result in a cumulatively considerable contribution to significant impacts if the population and employment projections for the project exceed the rate of growth defined in SCAQMD's AQMP.

4.2.5.3 Project Impacts

Impact AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

As discussed in greater detail below, the Project's air quality emissions would not exceed any SCAQMD thresholds. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016-2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Glendale General Plan and SCAG's RTP. The General Plan serves as a comprehensive, long-term plan for future development of the City.

The 2020-2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. Additionally, SCAG estimates the Arts, Entertainment, and Recreation industry will see a 36.4 percent increase in the number of jobs over the 2016 to 2045 period.⁶¹ The

⁶¹ Southern California Association of Governments (SCAG). 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). "Demographics and Growth Forecast Technical Report." Table 7. Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579. Accessed September 2022.

Entertainment and Digital Media industry was estimated to employ 306,066 people in the year 2020.⁶² SCAG projects that total future employment within the City of Glendale will grow from 117,000 jobs in 2016 to an estimated 125,900 employees by 2045.⁶³

The proposed Project does not include any residential uses and would not result in any direct new population growth in the City, as the number of housing units in the City would not change due to the Project.

In the short term, the Project would generate temporary construction employment opportunities. Project construction would occur over several phases with the Building Construction Phase having a peak number of 220 construction workers (see **Appendix A**). There would be fewer workers in other phases of Project construction. There are approximately 152,083 construction workers within Los Angeles County.⁶⁴ Given the size of the existing construction workforce in Los Angeles County, it is expected that the majority of the temporary construction jobs created by the Project will be filled by local construction workers. For this reason, the temporary construction jobs created by the Project are not likely to result in direct population growth in the City.

The Project is proposed to meet the current demand for entertainment production space in the region. The *SCAG 2020 RTP/SCS Demographics and Growth Forecast* includes population, housing, and employment projections for the SCAG region. SCAG estimates the Arts, Entertainment, and Recreation industry will see a 36.4 percent increase in the number of jobs over the 2016 to 2045 period.⁶⁵ The entertainment industry was estimated to employ 367,293 people in Los Angeles County in 2021.⁶⁶ The Project will production space for individual productions on a short-term rental basis and will not have any permanent employees for this reason. During operation, the Project would accommodate approximately 1,713 employees.⁶⁷ Because the Project will not have any permanent employees onsite and given the large number of existing employees in the entertainment industry in Los Angeles County, it is not expected the Project will induce much additional growth in the entertainment industry in Los Angeles County or indirectly increase the demand for housing in the City of Glendale or surrounding communities. In addition, the 1,713 employment opportunities associated with the Project would be

⁶² The Otis College of Art and Design. “2022 Otis College Report on the Creative Economy.” Available at: <https://www.otis.edu/creative-economy/2022>. Accessed September 2022.

⁶³ Southern California Association of Governments (SCAG). *2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*. “Demographics and Growth Forecast Technical Report.” Table 14. Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579. Accessed September 2022.

⁶⁴ Southern California Association of Governments (SCAG), Los Angeles County 2019 Local Profile, <https://scag.ca.gov/data-tools-local-profiles>, accessed March 2023.

⁶⁵ Southern California Association of Governments (SCAG). *2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*. “Demographics and Growth Forecast Technical Report.” Table 7. Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579. Accessed September 2022

⁶⁶ The Otis College of Art and Design. “2023 Otis College Report on the Creative Economy.” Available at: <https://www.otis.edu/creative-economy>. Accessed March 2023.

⁶⁷ Employee generation factors based on TVC 2050 Project Draft EIR, State Clearing House Number: 2021070014.

consistent with the growth in employment in Glendale as forecast by SCAG. The Project would be consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based and would not result in significant impacts for this reason.

As such, the Project would fall within the growth forecasts for the City and similar projections that form the basis of the emissions inventory in the 2016 AQMP, and it can be concluded that the Project would be consistent with the projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

As discussed below, the Project would not result in any significant air quality impacts and therefore would not require mitigation. In addition, the Project would comply with all applicable regulatory standards, including SCAQMD Rule 403, SCAQMD Rule 1113, and SCAQMD Rule 402 as required by SCAQMD. As such, the Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

With regard to land use developments such as the Project, the AQMP's air quality policies focus on the reduction of vehicle trips and VMT. The Project is served by multiple bus and shuttle lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and the City of Glendale Beeline along San Fernando Road and SR 134. In the vicinity of the Project site, existing bicycle routes are provided on Doran Street and Broadway. These features would offer alternative modes of transportation and would reduce VMT's, thereby reducing air quality emissions. The Project would comply with CALGreen through energy conservation, water conservation, and waste reduction features.

The air quality plan applicable to the Project area is the 2016 AQMP. The 2016 AQMP is the SCAQMD plan for improving regional air quality in the Basin. The 2016 AQMP is the current management plan for continued progression toward clean air and compliance with State and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources, and area sources. The 2016 AQMP also incorporates current scientific information and meteorological air quality models. It also updates the federally approved 8-hour O₃ control plan with new commitments for short-term NO_x and VOC reductions. The 2016 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management.

As demonstrated in the following analyses, the Project would not result in significant regional emissions. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour PM_{2.5} NAAQS for the Basin. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2016 AQMP.

Based on the discussion above, Project impacts with respect to AQMP consistency would be less than significant.

City of Glendale Policies

The Project would be consistent with applicable policies of the Air Quality Element which calls for complying with SCAQMD's AQMP, minimizing emissions within the City, and reducing VMT's. As demonstrated above, the Project would be consistent with SCAQMD's AQMP as it is within the AQMP's growth projections and does not exceed any significant thresholds for air quality. Moreover, the Project would be required to meet the CALGreen Code by incorporating strategies such as low-flow toilets, low-flow faucets and other energy and resource conservation measures. The Project would comply with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CALGreen standards. The Project would also be consistent with the Greener Glendale Plan (see **Section 4.4: Greenhouse Gases** of this Draft EIR). The Project is served by multiple bus and shuttle lines operated by Metro and the City of Glendale Beeline along San Fernando Road and SR 134. Additionally, the Glendale Train Station is located approximately 2.2 miles south of the Project site. In the vicinity of the Project site, existing bicycle routes are provided on Doran Street and Broadway. These features would offer alternative modes of transportation and would reduce VMT's, thereby reducing air quality emissions. As such, the Project would not conflict with the City's Air Quality Element.

Based on the analysis above, the Project would not conflict with or obstruct implementation of applicable air quality plans and impacts would be less than significant.

Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

There are no mitigation measures required and impacts would be less than significant.

Impact AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?

The Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 403, which would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.
- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.
- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project site. Fugitive dust emissions would primarily result from grading activities. NO_x emissions would primarily result from the use of construction equipment and truck trips. During the building finishing phase, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Table 4.2-9: Maximum Daily Construction Emissions identifies daily emissions that are estimated to occur on peak construction days for each construction phase. As shown in **Table 4.2-9**, construction emissions associated with the Project would not exceed the SCAQMD's emission thresholds and would therefore not result in a cumulatively considerable net increase of any criteria pollutant. As such, construction impacts would be less than significant.

TABLE 4.2-9 MAXIMUM DAILY CONSTRUCTION EMISSIONS						
Year	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
pounds/day						
2023	3	39	29	<1	6	2
2024	2	22	29	<1	4	2
2025	33	24	42	<1	5	2
Maximum	33	39	42	<1	6	2
SCAQMD Mass Daily Threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: Refer to **Appendix A for Air Quality and Greenhouse Gas Technical Study**.

Notes: CO = carbon monoxide; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns; SO_x = sulfur oxides; VOC = volatile organic compounds.

Operational activities associated with the Project would result in long-term emissions from area and mobile sources. Area-source emissions are based on landscaping equipment and consumer product (including paint) usage rates provided in CalEEMod. Mobile source emissions are derived primarily from vehicle trips generated by the Project. Vehicles traveling on paved roads would be a source of fugitive

emissions due to the generation of road dust inclusive of tire wear particulates. The emission estimates for travel on paved roads were calculated using the CalEEMod model.

The results presented in **Table 4.2-10: Maximum Daily Operational Emissions** are compared to the SCAQMD-established operational significance thresholds. As shown in **Table 4.2-10**, operational emissions associated with the Project would not exceed the SCAQMD's emission thresholds and would therefore not result in a cumulatively considerable net increase of any criteria pollutant. As such, operational impacts would be less than significant.

Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

There are no mitigation measures required and impacts would be less than significant.

TABLE 4.2-10 MAXIMUM DAILY OPERATIONAL EMISSIONS						
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Year	pounds/day					
Mobile	8	2	17	<1	0	0
Area	13	0	25	<1	<1	<1
Total	21	2	42	<1	<1	<1
Existing	7	2	12	<1	<1	<1
Net Total	14	<1	30	<1	<1	<1
SCAQMD Mass Daily Threshold	55	55	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: Refer to **Appendix A** for Air Quality and Greenhouse Gas Technical Study.

Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Localized Emissions

As discussed previously, residential uses are located adjacent to the Project site. The results of the localized air quality analysis are provided in **Table 4.2-11: Localized Construction and Operational Emissions**. As shown in **Table 4.2-11**, emissions would not exceed the SCAQMD localized significance construction and operational thresholds.

TABLE 4.2-11
LOCALIZED CONSTRUCTION AND OPERATIONAL EMISSIONS

Source	NO _x	CO	PM ₁₀	PM _{2.5}
On-Site Emissions (pounds/day)				
<i>Construction</i>				
Total maximum emissions	27	24	4	2
LST threshold	118	868	8	5
Threshold Exceeded?	No	No	No	No
<i>Operation</i>				
Project area/energy emissions	<1	25	<1	<1
LST threshold	118	868	2	1
Threshold Exceeded?	No	No	No	No

Source: Refer to Appendix A for Air Quality and Greenhouse Gas Technical Study.

CO = carbon monoxide; NO_x = nitrogen oxide; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns.

Toxic Air Contaminants

Project construction would result in short-term emissions of diesel particulate matter, which is a TAC. Off-road heavy-duty diesel equipment would emit diesel particulate matter over the course of the construction period. As mentioned previously, the Project is adjacent to residential uses. Localized diesel particulate emissions (strongly correlated with PM_{2.5} emissions) would be minimal and would be substantially below localized thresholds, as shown in Table 4.2-11. Project compliance with the CARB anti-idling measure, which limits idling to no more than 5 minutes at any location for diesel-fueled commercial vehicles, would further minimize diesel particulate matter emissions in the Project area.

Project operations would generate only minor amounts of diesel emissions from delivery trucks and incidental maintenance activities. Trucks would comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce emission from existing diesel trucks. In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed uses within the Project site. Based on the uses expected on the Project site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the SCAQMD thresholds of significance.

Odors

As shown in Table 4.2-11, the construction of the Project would result in emissions below the localized significance thresholds. Mandatory compliance with SCAQMD Rule 1113 would limit the number of VOCs in architectural coatings and solvents. According to SCAQMD, while almost any source may emit objectionable odors, some land uses are more likely to produce odors because of their operation. Land uses more likely to produce odors include agriculture, chemical plants, composting operations, dairies,

fiberglass molding manufacturing, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants. The Project does not contain any active manufacturing activities and would not convert current agricultural land to residential land uses. Therefore, objectionable odors would not be emitted by the proposed uses.

Any unforeseen odors generated by the Project will be controlled in accordance with SCAQMD Rule 402. As previously noted, Rule 402 prohibits the discharge of air contaminants that harm, endanger, or annoy individuals or the public; endanger the comfort, health or safety of individuals or the public; or cause injury or damage to business or property. Failure to comply with Rule 402 could subject the offending facility to possible fines and/or operational limitations in an approved odor control or odor abatement plan. Based on the analysis above, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

There are no mitigation measures required and impacts would be less than significant.

4.2.5.4 Cumulative Impacts

The geographic scope for cumulative effects on air quality impacts is the Los Angeles County portion of the South Coast Air Basin. **Section 4.0: Environmental Impact Analysis** includes a list of related projects identified within **Table 4.0-1**. All related projects consist of individual development projects that would be individually analyzed for air quality impacts.

Development of the Project in conjunction with the related projects near the Project site would result in an increase in construction and operational emissions in an already urbanized area of the City. However, cumulative air quality impacts from construction, based on SCAQMD guidelines, are not analyzed in a manner similar to project-specific air quality impacts. Instead, SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. According to SCAQMD, individual development projects that generate construction or operational emissions that exceed SCAQMD recommended daily regional or localized thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

Based on the Project impact analysis above, the Project would not generate construction or operational emissions that exceed SCAQMD recommended daily regional or localized thresholds. With the implementation of regulatory compliance measures such as Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coating), the Project's construction and operational emissions are not expected to significantly contribute to cumulative emissions for CO, NO_x, PM₁₀, and PM_{2.5}. As such, the Project's

contribution to cumulative air quality emissions in combination with any related projects would not be cumulatively considerable.

As discussed in this Section, the Project would not jeopardize the attainment of air quality standards in the 2016 AQMP for the South Coast Air Basin and the Los Angeles County portion of the South Coast Air Basin. As such, the Project would not have a cumulatively considerable contribution to a potential conflict with or obstruction of the implementation of the AQMP regional reduction plans.

Level of Significance Before Mitigation

Upon implementation of regulatory requirements, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Compliance with local, State, and federal plans, policies, and programs would ensure impacts related to air quality would be less than significant.

4.3 CULTURAL RESOURCES

4.3.1 INTRODUCTION

This section addresses potential impacts to cultural resources, which include archaeological and historical resources. Archaeological artifacts include places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Historical resources include sites, structures, objects, or places that are at least 50 years old and are significant for their engineering, architecture, and cultural importance. Cultural resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. The analysis of potential impacts to cultural resources is based in part on the Historic Preservation Services Memo prepared by Sapphos Environmental, Inc. dated May 18, 2021 (*May 2021 Historic Preservation Memo*; see **Appendix B**), as well as Preliminary Historical Resources Assessment for 5426 San Fernando Road prepared for the Project by Environmental Science Associates (ESA), dated August 11, 2021 (*August 2021 Historical Resources Assessment*; see **Appendix B**).

4.3.2 REGULATORY FRAMEWORK

4.3.2.1 Federal Regulations

National Historic Preservation Act

The 1966 NHPA authorized formation of the National Register of Historic Places (National Register) and coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources.¹ Buildings, districts, sites, and structures may be eligible for listing in the National Register if they possess significance at the national, State, or local level in American history, culture, architecture, or archaeology and, in general, are more than 50 years old.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. A Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation (ACHP), an independent federal agency, administers the review process, with assistance from the State Historic Preservation Offices (SHPOs). If any impacts are identified, the agency undergoing the project must identify the appropriate SHPO to consult with during the process.

¹ National Historic Preservation Act of 1966 amend thru 1992, Public Law. Approved October 15, 1966 (Public Law 89-665; 80 STAT. 915; 16 U.S.C. 470) as amended by Public Law 91-243, Public Law 93-54, Public Law 94-422, Public Law 94-458, Public Law 96-199, Public Law 96-244, Public Law 96-515, Public Law 98-483, Public Law 99-514, Public Law 100-127, and Public Law 102-575.

National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as “an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment” (36 Code of Federal Regulations [CFR] 60.2). The NRHP recognizes properties that are significant at the national, State, and local levels. In general, a resource must be 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

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

- Criterion A (Events): It is associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B (Persons): It is associated with the lives of persons who are significant in our past;
- Criterion C (Design/Construction): It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; and/or
- Criterion D (Information Potential): It has yielded, or may be likely to yield, information important in prehistory or history.²

Although there are exceptions, certain kinds of resources are not usually considered for listing in the National Register. These include religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

Secretary of the Interior’s Standards

The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Secretary’s Standards) were published in 1995 and codified as 36 CFR 68.3,4 Neither technical nor prescriptive, these standards are intended to promote responsible preservation practices that help protect irreplaceable cultural resources. The Secretary’s Standards for Rehabilitation consist of 10 basic principles created to help preserve the distinctive character of a historic building and its site while allowing for reasonable changes to meet new needs. The preamble to the Secretary’s Standards states that they “are to be applied to

² Code of Federal Regulations, Title 36, Chapter 1, Part 60, Section 60.4.

specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.” The standards for rehabilitation of a historic resource are as follows:

(a) *Preservation.*

- (1) A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.
- (2) The historic character of a property will be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
- (3) Each property will be recognized as a physical record of its time, place and use. Work needed to stabilize, consolidate and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection and properly documented for future research.
- (4) Changes to a property that have acquired historic significance in their own right will be retained and preserved.
- (5) Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- (6) The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color and texture.
- (7) Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- (8) Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

(b) *Rehabilitation.*

- (1) A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
- (2) The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
- (3) Each property will 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 elements from other historic properties, will not be undertaken.
- (4) Changes to a property that have acquired historic significance in their own right will be retained and preserved.

- (5) Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- (6) Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
- (7) Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- (8) Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- (9) New additions, exterior alterations or related new construction will not destroy historic materials, features and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
- (10) New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

(c) Restoration.

- (1) A property will be used as it was historically or be given a new use that interprets the property and its restoration period.
- (2) Materials and features from the restoration period will be retained and preserved. The removal of materials or alteration of features, spaces and spatial relationships that characterize the period will not be undertaken.
- (3) Each property will be recognized as a physical record of its time, place and use. Work needed to stabilize, consolidate and conserve materials and features from the restoration period will be physically and visually compatible, identifiable upon close inspection and properly documented for future research.
- (4) Materials, features, spaces and finishes that characterize other historical periods will be documented prior to their alteration or removal.
- (5) Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize the restoration period will be preserved.
- (6) Deteriorated features from the restoration period will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials.
- (7) Replacement of missing features from the restoration period will be substantiated by documentary and physical evidence. A false sense of history will not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically.

- (8) Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
- (9) Archeological resources affected by a project will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
- (10) Designs that were never executed historically will not be constructed.

(d) Reconstruction.

- (1) Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture and such reconstruction is essential to the public understanding of the property.
- (2) Reconstruction of a landscape, building, structure or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts that are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.
- (3) Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.
- (4) Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color and texture.
- (5) A reconstruction will be clearly identified as a contemporary re-creation.
- (6) Designs that were never executed historically will not be constructed.

Archaeological Resources Protection Act

The intent of the Archaeological Resources Protection Act (ARPA) of 1979³ is to ensure the preservation and protection of archaeological resources on public and Indian lands. ARPA places a primary emphasis on a federal permitting process to control the disturbance and investigation of archaeological sites on these lands. In addition, ARPA's protective provisions are enforced by civil penalties for violation of the ARPA.

4.3.2.2 State Regulations

California State Office of Historic Preservation

The mission of the California State Office of Historic Preservation (OHP) and the State Historical Resources Commission (SHRC), in partnership with the people of California and governmental agencies, is to preserve and enhance California's irreplaceable historic heritage as a matter of public interest so

3 United States Code, Title 16, Sections 470aa-470mm, Archaeological Resources Protection Act of 1979, Public Law 96-95, as amended.

that its vital legacy of cultural, educational, recreational, aesthetic, economic, social, and environmental benefits will be maintained and enriched for present and future generations.

The OHP is responsible for administering federally and State-mandated historic preservation programs to further the identification, evaluation, registration, and protection of California's irreplaceable archaeological and historical resources under the direction of the OHP and the SHRC. OHP reviews and comments on several thousand federally sponsored projects, State programs, and State projects annually pursuant to Section 106 of the National Historic Preservation Act.

California Register of Historical Resources

The California Register of Historical Resources is an authoritative guide to California's significant historical and archeological resources intended to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State; and determining which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.

The rights and responsibilities of owners of historic properties are the same as those of owners of non-historic properties. Listing does not prevent the use, sale, or transfer of the property. Because land use authority in California generally belongs to the local government, listing does not give either the State or the federal government any additional authority over the property. Consent from the property owner is not required, but a resource cannot be listed over an owner's objections. The State Historic Resources Commission can, however, formally determine a property eligible for the California Register even if the resource owner objects.

Resources eligible for listing include buildings, sites, structures, objects, or historic districts that retain historic integrity and are historically significant at the local, State, or national level under one or more of the following criteria:

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

In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired, or significant individuals made their important contributions.

California Health and Safety Code

If human remains are encountered unexpectedly during implementation of a project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98.23.

California Public Resources Code Sections 5020-5029.5 — Historical Resources

The State Historic Preservation Office (SHPO) maintains the California Register of Historic Resources (CRHR). Properties listed, or formally designated as eligible for listing, on the NRHP are automatically listed on the CRHR, as are State Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

State law seeks to protect cultural resources by requiring evaluations of the significance of prehistoric and historic resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in Section 15064.5(a)(3) of the CEQA Guidelines. These criteria, which are nearly identical to those for the NRHP, are listed below.

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

As stated earlier, CEQA Section 15064.5(a)(4) also affords the lead agency the ability to determine whether a resource may be an historical resource without it being listed in the CRHR. Resources eligible for listing in the California Register must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Buildings, structures, or objects that have been moved or reconstructed, and resources that have achieved significance within the past 50 years, may also be considered for listing in the California Register under specific circumstances.

California Historical Landmarks

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have Statewide historical significance by meeting at least one of the criteria listed in the following paragraph. The resource also must be approved for designation by the County Board of Supervisors or the City/Town Council in whose jurisdiction it is located, must be recommended by the SHRC, and must be officially designated by the Director of California State Parks.

California Points of Historical Interest

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the SHRC are also listed in the California Register. No historical resource may be designated as both a Landmark and a Point. If a Point is subsequently granted status as a Landmark, the Point designation will be retired.

California Environmental Quality Act

CEQA and the CEQA Guidelines have specific provisions relating to the evaluation of a project's impact on historical and unique archaeological resources. PRC Section 21084.1 and Section 15064.5 of the CEQA Guidelines together establish the prevailing test for determining whether a resource can or must be considered a historical resource under CEQA.

CEQA Guidelines Section 15064.5(a), in Title 14 of the California Code of Regulations, defines a “historical resource” as follows:

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

First, a resource is considered a historical resource for purposes of CEQA if it is listed or “deemed eligible for listing” in the California Register by the State Historical Resources Commission (SHRC).⁴ Second, it will be considered a historical resource, based on a presumption of significance, if it is either (1) listed in a local register of historic resources as defined in PRC Section 5010.1.4, or (2) identified in a local survey of historic resources meeting the criteria set forth in PRC Section 5024.1.5. If a resource meets either of these criteria, the lead agency must treat the resource as historically significant, unless the “preponderance of the evidence” indicates that the resource is not historically significant. Third, a lead agency may find a resource to be a historical resource even though it is not formally listed in the California Register, listed in a local register, or identified in a local survey.⁵ Any such determination must be based on substantial evidence in light of the whole record.

CEQA also provides further guidance with respect to historical resources of an archeological nature and unique archaeological resources. A unique archeological resource is defined in PRC Section 21083.2(g) as:

“[A]n archaeological artifact, object or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, (2) has a special and particular quality such as being the oldest of its type or best available example of its type, and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.”

According to the CEQA Guidelines Section 15064.5(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.”* This section of the guidelines defines historical resources as including both the built environment and archaeological resources.

A substantial adverse change is defined in the CEQA Guidelines Section 15064.5(4)(b)(1), as *“physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.”* The significance of an historical resource is materially impaired, according to the CEQA Guidelines Section 15064.5(4)(b)(2), when a project:

- a. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- b. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public

⁴ PRC sec. 21084.1 and 15064.5 20

⁵ PRC sec. 21084.1; sec. 15064.5(a)(3)(4)

Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of the evidence that the resource is not historically or culturally significant; or

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

Archaeological resources are defined in CEQA Section 21083.2, which states that a “unique” archaeological resource is an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:

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

Unique archaeological resources, as defined in Section 21083.2, may require reasonable efforts to preserve resources in place (Section 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. Additionally, the State CEQA Guidelines state that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (State CEQA Guidelines Section 15064.5(c)(4)).

4.3.2.3 Local Regulations

City of Glendale General Plan

The following elements and the relevant goals and policies apply to the Project.

Historic Preservation Element

The Historic Preservation Element of the General Plan reinforces the preservation ethic of the City.

Goal 1: Preserve historic resources in Glendale which define community character.

- Policy 1-2:** Recognize archaeological and historic resources as links to community identity.
- Policy 1-5:** Temporarily suspend construction work when archaeological sites are discovered; establish procedures which allow for the timely investigation and/or excavation of such sites by qualified professionals as may be appropriate.

City of Glendale Historic Preservation Program

The City of Glendale has established a historic preservation program that is in accordance with the provisions of the NHPA, Certified Local Government (CLG) program. The City's historic preservation program relies on the goals, objectives, and policies outlined in the Historic Preservation Element of the City's General Plan and the Preservation Ordinance in the Glendale Municipal Code.

According to Section 15.20.020 of the Glendale Municipal Code, an "historic resource" means any site, building, structure, area or place, man-made or natural, which is historically or archaeologically significant in the cultural, architectural, archaeological, engineering, scientific, economic, agricultural, educational, social, political or military heritage of the City of Glendale, the State of California, or the United States and which has been designated as historically significant in the National Register of Historic Places, the State of California Register of Historical Resources, or the Historic Preservation Element of the Glendale General Plan. The City has declared that "the recognition, preservation, protection and use of historic resources are required in the interest of the health, prosperity, social and cultural enrichment and general welfare of the people." The purpose of the historic preservation program, as outlined in Section 15.20.010 of the Glendale Municipal Code is to:

1. **Safeguard the heritage of the City by preserving resources which reflect elements of the City's history**
2. Encourage public understanding and involvement in the unique architectural and environmental heritage of the City
3. Strengthen civic pride in the notable accomplishments of the past
4. **Deter the demolition, misuse or neglect of historic resources, historic districts, and potential historic resources or districts which represent an important link to Glendale's past**
5. Promote the conservation, preservation, protection and enhancement of historic resources, historic districts, potential historic resources or districts
6. Promote the private and public use of historic resources for the education, appreciation and general welfare of the people

According to Section 2.76.100 of the Glendale Municipal Code, the Glendale Historic Preservation Commission "shall consider and recommend to the City Council additions to and deletions from the Glendale Register of Historic Resources; shall keep current and publish a register of historic resources; shall make recommendations to the Planning Commission, and the City Council on amendments to the Historic Preservation Element of the City General Plan; and shall have the power to grant or deny applications for permits for demolition, major alterations of historic resources."

The recently amended Historic Preservation Ordinance (No. 5110) created the Glendale Register of Historic Resources, which is the official list of designated historic resources in the City and any properties specified in the Historic Preservation Element of the Glendale General Plan. The new ordinance also

establishes criteria for designation or deletion of historic resources to or from the Glendale Register of Historical Resources.

City of Glendale Municipal Code

Designation of Historic Resources

Chapter 15.20.050 of the City of Glendale Municipal Code states that upon recommendation of the historic preservation commission, City Council shall consider and make findings for additions of designated historic properties to the Glendale Register of Historic Resources. According to the Municipal Code Chapter 15.20.020, a “Historic Resource” is any site, building, structure, area or place, man-made or natural, which is historically or archaeologically significant in the cultural, architectural, archaeological, engineering, scientific, economic, agricultural, educational, social, political or military heritage of the City of Glendale, the state of California, or the United States and retains sufficient historic integrity to convey its significance.

The designation of any proposed resource in the City as a historic resource shall be granted only if City Council first finds that the proposed historic resource meets one or more of the following criteria:

- a. 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;
- b. 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;
- c. 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; or
- d. 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 Section 6, 2020; Ord. 5784 Section 7, 2012; Ord. 5347 Section 7, 2003; Ord. 5110 Section 12, 1996; prior code Sections 21-02).

Glendale Historic District Overlay Zones

Chapter 30.25.020 of the City of Glendale Municipal Code defines a historic district as a geographically definable area possessing a concentration, linkage or continuity, constituting more than 60 percent of the total, of historic or scenic properties, or thematically-related grouping of properties. Properties must contribute to each other and be unified aesthetically by plan or historical physical development. A geographic area may be designated as a historic district overlay zone by the City Council upon the recommendation of the historic preservation commission and planning commission if the district:

- 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, 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; or
- i. Has been designated a historic district in the National Register of Historic Places or the California Register of Historical Resources. (Ord. 5399 Attach. A, 2004)⁶

At this time, the City Council has adopted nine historic districts and other districts are currently under review and consideration.⁷

4.3.3 ENVIRONMENTAL SETTING

4.3.3.1 Existing Conditions

The Project site is located approximately 500 feet south of State Route (SR) 134 (Ventura) Freeway in the industrial corridor along San Fernando Road on the western edge of the City of Glendale. The Project site is located on the northeast corner of San Fernando Road and West Milford Street with medium density residential uses to the east and mixed-use structures to the south. Ten existing warehouse related structures and related surface parking and loading areas are located on the Project site.

This section includes contextual information for understanding the history and potential significance of the Project site and describes its existing conditions. This section also discusses the identification aspects of CEQA compliance for historical resources.

⁶ City of Glendale Municipal Code, Chapters 30.25.020, Available at: <http://www.qcode.us/codes/glendale/>. Accessed August 2021.

⁷ City of Glendale, Historic Districts, Available at <https://www.glendaleca.gov/government/departments/communitydevelopment/planning/historic-preservation/historic-districts>. Accessed February 2022.

4.3.3.2 Regional and Local History

Pre-History

The earliest inhabitants of the Glendale area were the Gabrielino, a Native American group of Shoshonean descent, a culturally prestigious community known for their advancements in pre-industrial technology, maritime trade, religion and oral literature.⁸ After the Spanish established the Mission San Gabriel de Archangel and the Mission San Fernando Rey de España in their territory in the late eighteenth century, the Gabrielino were relocated to the missions, where their culture experienced decline. In 1772, a Spanish soldier named Jose Maria Verdugo arrived at the Mission San Gabriel de archangel, eventually settling down to raise horses and cattle on the Rancho San Rafael in 1784.

The 36,000-acre Rancho San Rafael, bordering the Los Angeles River and the Arroyo Seco, was granted in 1784 to Jose Maria Verdugo, a Spanish officer who had served with the Portola-Serra Expedition.⁹ The Verdugo Adobe was constructed c. 1826 or c. 1860 (the exact date is unknown) and is located at what is now 2211 Bonita Drive. After California became a state in 1850, Spanish and Mexican landowners were required to validate their land claims. Julio and Catalina Verdugo were officially granted title to the rancho by the Board of Land Commissioners in 1855, and in 1861 they split the rancho between southern and northern portions.

In the years following, various other land transactions and economic misfortunes reduced the Verdugos' holdings.¹⁰ What became known as the "Great Partition" of 1871, the result of a lawsuit brought by Andrew Glassell, among others, against a debt-ridden Julio Verdugo, saw the land pass into the hands of several Anglo landholders. They included Captain C. E. Thom, Judge Erskine M. Ross, B. F. Patterson, H. J. Crow, and E. T. Byram.

Spanish Colonial and Mexican Periods

European settlers, led by Juan Rodriguez Cabrillo, began exploration of Los Angeles in 1542.¹¹ The Spanish colonization of California was achieved through military-civilian-religious conquest. Under this system, soldiers secured areas for settlement by suppressing native and foreign resistance and established fortified structures (presidios) from which the colony would be governed. Civilians established towns (pueblos) and stock-grazing operations (ranchos) that supported the settlement and provided products for export. Four presidios and 21 missions were established in Spanish California between 1769 and 1821.

8 City of Glendale General Plan, Historic Preservation Element, accessed July 2022, <https://www.glendaleca.gov/government/departments/community-development/planning/city-wide-plans/historic-preservation-element>.

9 City of Glendale General Plan, Historic Preservation Element, accessed July 2022, <https://www.glendaleca.gov/government/departments/community-development/planning/city-wide-plans/historic-preservation-element>.

10 City of Glendale General Plan, Historic Preservation Element, accessed July 2022, <https://www.glendaleca.gov/government/departments/community-development/planning/city-wide-plans/historic-preservation-element>.

11 City of Glendale General Plan, Historic Preservation Element, accessed July 2022, <https://www.glendaleca.gov/government/departments/community-development/planning/city-wide-plans/historic-preservation-element>.

Missions founded near the proposed SGCP area include the Mission San Gabriel de archangel (1771), Pueblo of Los Angeles (1781), and Mission San Fernando Mission Rey de España (1797).

American Period

Fueled by the completion of the transcontinental railroad in 1876 and a subsequent fare war between Southern Pacific and Santa Fe railroads, Southern California experienced a land boom in the 1880s.¹² The land boom made South Glendale ripe for development. The Southern Pacific Railroad elected to build its depot on 16 acres donated by W.C.B. Richardson from his Santa Eulalia Ranch. In 1877, the “Tropico” depot was built at roughly the same location as the current depot (400 Cerritos Avenue) and the area became known by that name. It was the first depot stop north of Los Angeles at the time. The presence of the new depot paved the way for increased agricultural production and shipment and residential development in Tropico. As a result, development in South Glendale was largely focused on two areas: the area immediately around the depot and the area north and east of Tropico. This area would become the original township of Glendale.

In 1887, near the site of present-day Central Avenue and San Fernando Road, the township of Tropico was officially established.¹³ Strawberry cultivation grew rapidly and by 1903 the Tropico Improvement Association boasted of over 200 acres in the town. In 1911, the city of Tropico incorporated and by 1914 had a population of 3,200 residents. Present-day Los Feliz Boulevard was the primary east-west street in Tropico; at that time, the street was known as Tropico Boulevard. The township limit between Glendale and Tropico was the mid-point between Windsor and Garfield Streets.

To the north and east of Tropico, development was underway in what would become the township of Glendale.¹⁴ The Glendale Improvement Society, a civic organization dedicated to promoting the town, was organized in 1883. In January of 1887, a sub-group of the partition landholders pooled their holdings and had 150 acres for a new town called “Glendale” surveyed. The lack of development during the town’s early years was largely due to the lack of proximity to transportation. In 1902, the Glendale Improvement Association appointed a railroad committee to focus on getting better service from the San Pedro, Los Angeles, and Salt Lake Railway. The group’s secretary, Edgar D. Goode, had a better idea and refocused the effort to secure electric car service into Glendale, a concept he had pursued for several years. Goode turned to Leslie C. Brand, a local businessman and developer, to help secure a right-of-way for an electric railway.

In 1902, the Los Angeles & Glendale Railway Company was formed with Brand as president.¹⁵ Brand and his business partner Howard E. Huntington (son of Henry Huntington) donated land in Glendale for the

12 South Glendale Community Plan PEIR, Section 4.4, accessed July 2022, <https://www.glendaleca.gov/home/showpublisheddocument/45635/636651682926330000>.

13 South Glendale Community Plan PEIR, Section 4.4, accessed July 2022, <https://www.glendaleca.gov/home/showpublisheddocument/45635/636651682926330000>.

14 South Glendale Community Plan PEIR, Section 4.4, accessed July 2022, <https://www.glendaleca.gov/home/showpublisheddocument/45635/636651682926330000>.

15 South Glendale Community Plan PEIR, Section 4.4, accessed July 2022, <https://www.glendaleca.gov/home/showpublisheddocument/45635/636651682926330000>.

streetcar tracks. In Glendale, the line was to enter via Brand Boulevard, thus creating a new business artery to the west of the original central business district on Glendale Avenue, where the steam trains of the Los Angeles Terminal Railroad had previously offered the only transportation via rail to the City. Brand sold the company to the Los Angeles Interurban Railway Company in 1904 and the first electric car entered Glendale in April of that year. The line expanded over the years and was also augmented by a separate railway line running east that was established by Goode in 1909.

4.3.3.3 Historic Background

Historic Contexts

Industrial Development (1890-1955)

Early industrial development in Glendale and Tropicco was associated primarily with the citrus and building industries and developed along the rail lines that connected the towns to Los Angeles. Industrial development after 1920 was focused almost exclusively in the area around San Fernando Road, which grew into a major industrial corridor and was a significant factor in the development and growth of Glendale and the surrounding area. The 1995 San Fernando Road Corridor survey determined that resources from this early era of development are rare.

One of the earliest industries in the Glendale vicinity was the West Glendale Winery, established about 1890 in a brick building located on San Fernando Road near what is now Doran Street, which at that time was outside the town limits. Proprietor Charles R. Pironi's products included orange wine. Sanborn Fire Insurance maps (Sanborn maps) show that by 1908 a number of industries had been established in the town proper. Charles M. Lund, a wagon maker from Council Bluffs, Iowa opened Glendale's first blacksmith shop in 1906 on West Third Street (now Wilson Avenue) between Howard Street and Isabel Street. By 1908, Lund had added a buggies and implements shop and, by 1912, a harness shop. Four fruit packing houses were located along Glendale Avenue, adjacent to the railroad tracks. The Pinkham & McKeivitt packing house, which by 1912 was owned by the Edmund Peycke Company, was located at the south end of town at the intersection of Glendale Avenue and Lomita Avenue. The Sparr Fruit Packing Company was located on Glendale Avenue just south of West Second Street (now California Avenue), and the C.C.U. packing house occupied the northeast corner of the intersection of Glendale Avenue and West First Street (now Lexington Avenue). Further north along the tracks, just outside of town, was the E.M. Ross packing house. The growing town also had three large lumber yards: the Independent Lumber Company at West Second Street (California Avenue) and Geneva Street; the Litchfield Lumber Company on Glendale Avenue, just south of the Sparr Fruit Packing Company; and the Valley Lumber Company at West Fourth Street (now Broadway) and Maryland Avenue. No physical remnant of these early industries remains.

The nearby town of Tropicco was simultaneously developing its own industries. There was a small packing house at Brand Boulevard and Depot Street (now Cerritos Avenue), adjacent to the public school, but industrial development was logically focused west of San Fernando Road along the Southern Pacific

Railroad tracks. The Los Angeles Basket Company occupied a long, narrow property between the tracks and Los Angeles Avenue, north of Cypress Street; its warehouse is still standing at 448 West Cypress Street. The Tropico Manufacturing Company planing mill was located on Tropico Avenue (now Los Feliz Road) just east of the tracks; across the street and immediately adjacent to the tracks was the Tropico Lumber Company. Across the tracks in Atwater was the Western Art Tile Works, which made decorative terra cotta, faience tile, vitrified clay sewer pipe, water pipe, drain tile, and other products. The plant was subsequently known by various names including Tropico Potteries, Pacific Tile Company, and Gladding McBean, and in the 1920s was the area's largest manufacturing plant. The site is now occupied by a Costco shopping center. Tropico was annexed by the city of Glendale in 1918, and in 1920 the Greater Glendale Development Association asked the City Council to set aside land flanking San Fernando Road as an industrial area. The Association focused on San Fernando because of its strategic location linking Los Angeles and the San Fernando Valley, and its proximity to both the Southern Pacific and Pacific Electric railways. Within a year a number of industries located in that section, and during the 1920s the area developed into a major industrial corridor stretching along the entire southwest flank of Glendale. One of the leading figures in the development of the San Fernando Road industrial corridor in the 1920s was Lloyd Harmond Wilson (1878-1942), a prominent Glendale realtor, developer, and real estate speculator. Wilson was born in Missouri in 1878 and began his career in Chicago in the publishing and advertising businesses. He moved to Glendale with his family in 1921 and quickly launched a successful career in real estate development, specializing in industrial properties in the San Fernando Road area. Wilson played an important role in the city's commercial life for two decades and was "instrumental in promoting much of the city's industrial growth and development, especially in the western part of the city." Wilson shrewdly focused his development efforts on San Fernando Road, then primarily a residential district.

By late 1928 Wilson was credited with the establishment of 70 separate industrial businesses in the city in the 1920s, settling them in extensive tracts he developed along San Fernando Road and "adding materially to the wealth of Glendale and paving the way for the distribution of immense sums of money through the different firms that he has established here." In 1928 alone Wilson brokered deals that brought 14 companies to the San Fernando Road area and built nine industrial buildings, five of which he sold before the end of that year. By mid-1929 Wilson had signed leases for six more buildings that were then under construction. Among the diverse industries Wilson attracted to Glendale were the Security Baking Company, the Glendale Glass Tile Company, the Hollywood Shoe Manufacturing Company, the Hollywood Mosaic Tile Company the Indium Steel and Alloys Company, and the West Coast Style Shoes Co. In the late 1920s, Wilson, with his extensive holdings along San Fernando Road, was a leader in the effort to widen ten miles of the thoroughfare to 55 feet between curbs. The complex project required the demolition of existing buildings along both sides of the street, involving 540 separate parcels and more than 1,000 property owners.

Most of the industrial buildings developed by Wilson in the San Fernando Road corridor have been demolished or substantially altered. One extant example includes 4500 San Fernando Road. Post-World War II industrial development in Glendale received a significant boost beginning in 1955, when Grand

Central Air Terminal was closed to air traffic and the airport property was subdivided for development. The Grand Central Industrial Center opened in 1955 with four buildings and gradually took over the airport's entire 112-acre site. Though located outside of the South Glendale study area, the development of the Grand Central property extended the San Fernando Road industrial corridor along Glendale's entire southwest border. By 2006, the Chamber of Commerce reported 575 industries, many located on the city's west side, employing more than 21,000 persons.¹⁶

Mid-Century Modern

Mid-Century Modern context defined as a sub-theme of Post-World War II Modernism in the City of Glendale South Glendale Historic Resources Survey, prepared for the City of Glendale in 2014:

Mid-century Modern is a term used to describe the post-World War II iteration of the International Style in both residential and commercial design. The International Style was characterized by geometric forms, smooth wall surfaces, and an absence of exterior decoration. Mid-century Modern represents the adaptation of these elements to the local climate and topography, as well as to the postwar need for efficiently-built, moderately-priced homes. In Southern California, this often meant the use of wood post-and-beam construction. Mid-century Modernism is often characterized by a clear expression of structure and materials, large expanses of glass, and open interior plans.

*The roots of the style can be traced to early Modernists like Richard Neutra and **Rudolph Schindler**, whose local work inspired "second generation" Modern architects like Gregory Ain, Craig Ellwood, Harwell Hamilton Harris, Pierre Koenig, Raphael Soriano, and many more. These postwar architects developed an indigenous Modernism that was born from the International Style but matured into a fundamentally regional style, fostered in part by Art and **Architecture magazine's pivotal Case Study Program (1945-1966)**. The style gained popularity because its use of standardized, prefabricated materials permitted quick and economical construction. It became the predominant architectural style in the postwar years and is represented in almost every property type, from single-family residences to commercial buildings to gas stations.¹⁷*

Merchandise Display Windows

Building 1A was originally constructed with display windows along its west front and north corner elevation situated along San Fernando Road. These display windows would have featured American Radiator & Standard Sanitary Company's latest products in the windows, oriented such that drivers-by and pedestrians could see the company's products—even at night. In the early to mid-20th century, commercial businesses began deliberately appealing to potential roadside customers through their architecture.

By the 1920s, buildings and associated businesses were competing for attention from drivers navigating streets and highways. One approach to accomplish this was to make buildings appear to be bolder, in

¹⁶ City of Glendale South Glendale Historic Resources Survey, 2014, 140-142.

¹⁷ City of Glendale South Glendale Historic Resources Survey, 2017, 224.

order to catch attention from the rapidly changing community and environment. Modern architecture served to fill the need for more eye-catching imagery in the built environment during a time of increased demand for roadside visibility. Architectural design offered solutions for businesses to present themselves with attention-grabbing modern style.¹⁸

Streamline Moderne (1935 to 1945)

Building 1A includes limited Streamline Moderne features, including the canopy, rounded corner, smooth stucco cladding, and a flat roof. The City of Glendale does not have a context statement for the Streamline Moderne style. Since Glendale's architecture generally follows regional trends, excerpts from SurveyLA's Los Angeles Citywide Historic Context Statement regarding eligibility standards for the Streamline Moderne style were referenced in the August 2021 Historical Resources Assessment for Building 1 and the Project site.¹⁹

Summary Statement of Significance: Resources evaluated under this sub-theme are significant in the area of Architecture as excellent examples of the Streamline Moderne styles and exhibit quality of design through distinctive features. Streamline Moderne architecture was popular between the mid-1930s and mid-1940s; the style underscored the American public's affinity for technology, progress, and modernity, and evinces a sense of motion and speed. It was applied to single-family and multi-family residences, as well as some commercial and institutional properties. On rare occasion it was applied to industrial properties.²⁰

Property Type Description: The Streamline Moderne style was a versatile idiom that was applied to an array of property types. Some of the most iconic and architecturally distinctive examples of the style are represented in the context of commercial buildings; however, the style was often expressed in the form of custom single-family residences and small-scale multi-family residences. To a lesser extent, the style was also applied to institutional and industrial properties. Groupings of resources in the style may be evaluated as historic districts. Given Streamline Moderne's relatively brief period of popularity, examples of the style are relatively rare in [the] Los Angeles [area as well as Glendale]. Many of the buildings designed in the style are attributed to notable architects of the 1930s and 1940s. Milton J. Black and William Kesling designed single-family and multi-family dwellings in the style; Stiles Clements, Robert Derrah, Parkinson and Parkinson, Wurdeman and Becket, and other notable local architects are more closely aligned with larger-scale commercial, institutional, and industrial buildings designed in the style.²¹

18 Chester Liebs, *Main Street to Miracle Mile: American Roadside Architecture*, United States, John Hopkins University Press, 1985, 53.

19 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

20 Architectural Resources Group, *Los Angeles Citywide Historic Context Statement; Context: Architecture and Engineering; Sub-Context: L.A. Modernism, 1919-1980*, Prepared for the City of Los Angeles, Department of City Planning, 2019, 88.

21 Architectural Resources Group, *Los Angeles Citywide Historic Context Statement; Context: Architecture and Engineering; Sub-Context: L.A. Modernism, 1919-1980*, Prepared for the City of Los Angeles, Department of City Planning, 2019, 89.

Character-Defining/Associative Features:

- Retains most of the essential character-defining features of the style from the period of significance
- Horizontal orientation
- **Rounded corners and curved surfaces, emulating a “windswept” appearance**
- Flat or nearly flat roof
- Speedlines at wall surfaces, such as horizontal moldings and continuous sill courses
- Smooth stucco cladding
- Metal, often steel casement, windows
- Unadorned wall surfaces, with minimal ornament
- **Windows “punched” into walls, with no surrounds²²**

4.3.3.4 Property Setting

A 1925 Sanborn map depicts the Project site prior to the construction of any of the buildings existing on the site.²³ At that time, the surrounding neighborhood included partially developed residential single-family lots to the east, northeast, and south, with commercial businesses including a veterinary hospital, feed mill, and cabinet manufacturing company located to the immediate north. While today the property is one single parcel, it was comprised of two distinct parcels in 1925. The southernmost parcel was occupied by the Glendale Lumber Company and included a shop and a mill building. The West Glendale Winery was located in the northern parcel, in the northwestern portion of the Project site. The northern parcel included several different wine manufacturing buildings including a distillery/fermenting building, wine storage, and adjacent dwellings which were possibly for workers.

A 1950 Sanborn map and 1952 aerial photograph show further residential development surrounding the Project site with many single-family residences to the immediate east, northeast, and south of the subject property. A mix of manufacturing businesses were located to the north of the Project site including auto wrecking, refrigerator manufacturing, wood working, rubber manufacturing products, sheet metal works, air conditioning fixtures, aircraft part shops, and machine shops.

Los Angeles County Assessor records indicate that an early manufacturing or office building was constructed along San Fernando Road on the Project site in 1940. The early building was likely the original location of the Products Research Company when the company began in 1945 and is visible on the 1950 Sanborn map. This early building was demolished in 2008.

22 Architectural Resources Group, *Los Angeles Citywide Historic Context Statement: Context: Architecture and Engineering: Sub-Context: L.A. Modernism, 1919-1980*, Prepared for the City of Los Angeles, Department of City Planning, 2019, 89.

23 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

Eight of the existing structures on site were identified for historic resource evaluation as shown in **Figure 4.3-1: Existing Structures for Historic Resource Evaluation**. Buildings 1A and 1B, located at the northwest corner of the 5426 San Fernando Road property at the junction of San Fernando Road and Milford Street, is comprised of a warehouse which was constructed in 1946 (Building 1B); and an attached office and display room which was constructed in 1947 (Building 1A) that replaced the West Glendale Winery. This building was originally occupied by American Radiator & Standard Sanitary Corporation. In 1974, a large L-shaped addition was constructed to the south and east of the warehouse portion of Building 1B.

The 1950 Sanborn map shows a building on the southern portion of the Project Site used as a felt gasket manufacturing facility by Products Research Company. Building 6 which was then used as a bottle soft drink depot by a different business, truck storage, offices, and a parking lot.

Buildings 2, 3, 4, and 7 were constructed between 1953 and 1967, around the time that Products Research Company began to occupy more and more of the Project Site, and likely reflect a large construction campaign to accommodate this rapidly growing company. A newspaper article from 1960 indicates Products Research Company was known nationally by this time and was involved in manufacturing products for a wide range of industries.²⁴ These new buildings replaced some of the buildings in the southern portion of the Project Site by the mid-1960s, and by the early 1970s, nearly all of the previous improvements on the southern portion of the site had been removed and replaced by Products Research Company, with additional infill toward the center of the Project Site.

Building 7, used as offices and warehouse spaces with a punch press tool room, and Building 4, used as a factory building for staging and packing were both constructed between 1953 and 1964. The Los Angeles County Assessor's records erroneously indicate that Buildings 7 and 4 were constructed in 1947 and 1950, yet the 1950 Sanborn map and 1952 aerial photograph do not show either of these buildings. Building 7 was modified with additional office space in 2000.

Buildings 2 and 3 were both constructed as factories in 1967 according to the Los Angeles County Assessor records, a construction date supported by an 1964 aerial photograph, and the aerial photograph and Sanborn map from 1970. Building 2 was expanded substantially to the west by 1989. A permit to construct Building 8 was issued in 1967, and the structure appears on both the 1970 aerial photograph and Sanborn map. Building 8 was not visible in the 1964 aerial, and thus does not reflect the Los Angeles County Assessor records which indicate its construction date as 1957. Building 5 was constructed in 1975, according to Los Angeles County Assessor records and is first visible on an aerial photograph taken in 1981.²⁵

²⁴ August 2021 Historical Resources Assessment, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

²⁵ August 2021 Historical Resources Assessment, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

Previous Historic Resources Study

The City of Glendale South Glendale Historic Resources Survey identified and recorded Building 1A as potentially eligible for the Glendale Register under local Criterion 1 “as an excellent example of industrial development from the immediate post-WWII period, representing the continued growth of San Fernando Road as an important industrial corridor.” Building 1A was assigned a California Historical Resource (CHR) Status Code of 5S3, which means Building 1A “Appears to be individually eligible for local listing or designation through survey evaluation.”²⁶ The survey also identified Building 1A as eligible under local Criterion 1 as an “excellent example of industrial development from the immediate post-World War II period, representing the continued growth of San Fernando Road as an important industrial corridor in South Glendale.” The period of significance in the City’s Context: Industrial Development is from 1890 to 1955. Therefore, the “immediate post-World War II period” would be from 1945-1955.²⁷

Building 1A and 1B (Building 1) was identified as having a “Mid-century Modern/Industrial” architectural style, with “No major alterations.”²⁸ However, the construction history on the survey form included only a partial building permit history for the address 5426 San Fernando Road, which further research determined also includes building permits for the other seven structures located on the property, and are not specific to Building 1A. Further, building permits for the property at 5430 and 5454 San Fernando were not included in the survey report or inventory, which resulted in an incomplete depiction of all of the modifications undertaken at the property. Also, the survey did not mention the Streamline Modern features that are present at Building 1B.

Notable engineer Eugene Birnbaum was also erroneously identified as having worked at the Project site on an alteration building permit from the 1950s as indicated in the 2017 DPR form. However, no such building permit was located in the permit search for any of the buildings on the Project site.²⁹

Building 1 — Comprised of Buildings 1A and 1B

Exterior

The eastern warehouse portion of Building 1, Building 1B, was constructed first, and was originally used for shipping. The Utilitarian Industrial style rectangular shaped building has modular prefabricated concrete walls attached to a steel wall matrix, a steel frame structure with monitor skylights along the length of the building, and a flat galvanized iron roof.

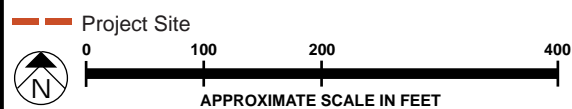
26 Christine Lazzaretto and Robby Aranguren, “DPR 523 Series Forms: 5426 San Fernando Road,” Prepared for the City of Glendale, 2017, 1-2.

27 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

28 “DPR 523 Series Forms: 5426 San Fernando Road,” 2017, page 2 (BSO form).

29 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

- | | |
|--|---------------------------------|
| ①A Constructed in 1947 | ⑥ Constructed in 1950 |
| ①B Constructed in 1946, addition in 1974 | ⑦ Constructed between 1953-1964 |
| ② Constructed in 1967 | ⑧ Constructed by 1967 |
| ③ Constructed in 1967 | ⑨ Unknown, TBD. |
| ④ Constructed between 1953-1964 | ⑩ Unknown, TBD. |
| ⑤ Constructed between 1975 | — APN 5638-018-032 |



SOURCE: ESA - 2022; Google Earth - 2022

FIGURE 4.3-1

The northern elevation of warehouse portion is articulated by a ribbon of metal casement windows and large metal roll up doors (altered) at regular intervals that lead to a concrete platform outside for docking. There is an ADA access ramp adjacent to the concrete platform on the corner of the building leading to the loading dock, which appears to be a contemporary alteration.

The main entrance to former office and display room in Building 1A is located at northwest corner of the Project site at the corner of San Fernando Road and Milford Street. A concrete staircase flanked by exposed brick retaining walls on either side leads to the primary entrance doors of the Industrial/Mid-Century Modern style office and warehouse building. The one-story building is roughly L-shaped and includes an irregular footprint at the western office portion, and an elongated rectangular footprint at the eastern warehouse portion. A surface parking lot sits to the north of the warehouse portion of the building. Building 1A was constructed in 1947, as a display room and office addition to the warehouse in Building 1B. The façade has a curved overhang, flat roof, and raised parapet with vertical concrete scoring. The front elevation has non-original textured stone veneer cladding on either side of the non-original replacement flush metal door. All original display windows appear to have been removed and either walled in or replaced with tall, fixed windows with tinted tempered glass. Some original multi-lite metal casement windows remain on the warehouse behind the former office and display area. The overall finish of the building is smooth concrete and stucco, however the finish below the windows on the western wall is painted brick. The eastern rear elevation of Building 1A has multi-light metal casement windows and a double door entry to the building. The southern elevation has three entrances to the building, one into the storage space and two into the office space and single hung hopper metal windows on side of the doors.

Interior

The character of the interior spaces is industrial and utilitarian. The display room and offices in Building 1A have been entirely removed and the area is currently used for storage. There are no remaining original features at the building interior, as evidenced by the extensive permitted interior modifications over time. The former office and display area is constructed of board-formed concrete with concrete girders. However, there is warehouse space behind the former office and display room that is covered by a metal truss roof and monitor windows. This area also has a building envelope constructed of board formed concrete. There is a clear structural division between Building 1A and the long-attached warehouse Building 1B to the east, which was constructed a year earlier in a separate building campaign and with a different construction method.

While the east wall of Building 1A is board-formed concrete, the construction system of the attached Building 1B is not board formed concrete but appears to be a form of prefabricated modular construction consisting of a metal frame to which are affixed modular concrete sections that form the building envelope. This structural system is visible throughout Building 1B space at the north elevation. The original south elevation of Building 1B, however, has a series of board-formed concrete rooms that are accessed off the main space. Metal roll-up doors are located at regular intervals on the north and south elevations of Building 1B; and the south elevation and east entrance area of Building 1B are later

additions. The main space of Building 1B has trussed roof with corrugated metal sheeting covering and monitor skylights that run the length of the warehouse portion. The metal roll-up doors on the northern wall open onto a docking platform and the concrete loading dock which connect directly onto Milford Street.

A wide corridor with a concrete ramp acts as an internal entrance from the warehouse Building 1B into the office Building 1A. The original office, restrooms, and a display area in Building 1A have been removed. Post and beam construction is visible in the interior space of office portion of Building 1A. The walls and the ceiling are generally painted concrete in Building 1A, but have a stucco finish in the northern portion of the office space of Building 1A reflecting later alterations.

4.3.4 ENVIRONMENTAL IMPACT ANALYSIS

4.3.4.1 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines, as amended. For purposes of this EIR, implementation of the proposed project may have a significant adverse impact on cultural resources if it would result in any of the following:

Threshold CUL-1:	Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.
Threshold CUL-2:	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?
Threshold CUL-3:	Disturb any human remains, including those interred outside of formal cemeteries?

4.3.4.2 Methodology

May 2021 Historic Preservation Memo

Background and literature research reviewed included the *2018 Historic Context Statement and Survey Report* prepared for the South Glendale Community Plan. Additionally, historic Sanborn maps, building permits, and online newspaper articles were reviewed. A site visit was also conducted by a historian meeting the Secretary of the Interior's Professional Qualification Standards in the fields of History and Architectural History (see Appendix B).

August 2021 Historical Resources Assessment

A review of the National Register and its annual updates, the California Register, the Statewide Historical Resources Inventory (HRI) database maintained by OHP, and the City of Glendale's Register of Historic Resources was completed to identify any previously recorded properties within the Project site.

In addition, the following tasks were performed:

- Conducted field inspections of the Project site and utilized the survey methodology of the OHP.
- Photographed the Project site and associated landscape features.

- Conducted site-specific research on the Project site utilizing assessor records, building permits, Sanborn maps, city directories, historical photographs, historical newspapers, and other published sources.
- **Conducted research through the Los Angeles County Assessor's Office** and the City of Glendale Department of Public Works.
- Reviewed and analyzed ordinances, statutes, regulations, bulletins, and technical materials relating to federal, state, and local historic preservation, designation assessment processes, and related programs.
- **Reviewed the City of Glendale's previous historical resources surveys and the Citywide historic context.**
- Evaluated potential historical resources based upon criteria used by the National Register of Historic Places (36 CFR Section 60.2), the California Register of Historical Resources (PRC Section 5024.1), and City of Glendale Historic Preservation Ordinance (Section 15.20.050 of the Glendale Municipal Code).

4.3.4.3 Project Impacts

Impact CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

The assessment of a project's impacts on historical resources is a two-step analysis: first, the project site is analyzed to determine if it contains a "historical resource(s)" as defined under CEQA; second, if the site is found to contain historical resources, an analysis is carried out to determine whether the project could cause a substantial adverse change to the resource. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment (Public Resources Code Section 21084.1).

As discussed above, eight structures on the Project site were identified for historic resource evaluation as shown in **Figure 4.3-1**. Building 1A was previously identified in 2017 and assigned a CHR Status Code of 5S3 as a part of the City of Glendale's South Glendale Historic Resources Survey, meaning Building 1A "Appears to be individually eligible for local listing or designation through survey evaluation."³⁰ The survey also identified Building 1A as eligible under local Criterion 1 as an "excellent example of industrial development from the immediate post-World War II period, representing the continued growth of San Fernando Road as an important industrial corridor."³¹

Detailed site-specific evaluations of the Project site have been completed by two qualified historians, as discussed above to further review the preliminary findings in the South Glendale Historic Resources Survey. The research and findings of these studies are presented below.

The May 2021 Historic Preservation Memo reflect a review of historic aerials, which review demonstrates the buildings associated with the West Glendale Winery were demolished between 1925 and 1947, and

30 August 2021 Historical Resources Assessment, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

31 "DPR 523 Series Forms: 5426 San Fernando Road," 2017, page 2 (BSO form); and Historic Resources Group, "Appendix B: Individually Eligible Properties, South Glendale Community Plan," City of Glendale, 2018, 62.

the Project site was redeveloped with the existing warehouse in 1947.³² In addition, substantially more permits have been issued for the Project site than those cited in the 2018 survey results; many for interior alterations which would have greatly impacted the use of the buildings use for manufacturing and warehouse storage.

In order for a property to be considered eligible for a historical register, it must meet one or more eligibility criteria and also possess integrity. The post-World War II development period is commonly considered to have occurred between 1945 and 1969. Although the Project site may be associated with post-war industrial development of southwest Glendale, the businesses associated with the Project site did not significantly contribute to the history of Glendale. Numerous buildings on the Project site were constructed following the post-war period, the use of the buildings has not been retained, and the primary office building's façade and display windows has been substantially altered. For these reasons, the evaluation in the May 2021 Historic Preservation Memo determined the Project site does not appear eligible for listing in a historical register.³³

An intensive survey of the Project site was conducted as part of the August 2021 Historical Resources Assessment to uncover new information about the history, site development, construction, use, and later changes to Building 1A and the overall Project site from the South Glendale Historic Resources Survey (see **Appendix B**).³⁴ Building 1A was previously identified as an example of Mid-Century Modern style in the South Glendale Historic Resources Survey, yet it also includes some Streamline Moderne characteristics which were not discussed in the survey.

The August 2021 Historic Resources Assessment involved a review of the National Register and its annual updates, the California Register, the HRI database maintained by the OHP, and the City of Glendale's Register of Historic Resources to identify any previously recorded properties within the Project site and whether the buildings on site are eligible under the NRHP, CRHR, and the Glendale Register of Historic Resources criteria.

Criteria A/1/1 Events

The Building 1 was constructed in 1946-1947, in the immediate post-World War II era, at the end of the period of significance for the City's Industrial Development context, which ranges from 1890 to 1955. The Project site's proximity to the Southern Pacific Railway line was an intentional planned component of the San Fernando Road industrial corridor, an area that was set aside for industrial development in the 1920s strategically due to its proximity to the railways. Much of the corridor was constructed with an emphasis on high quality materials and architectural design. The Project site as a whole continued in industrial use during the Post World War period, supporting a variety of industrial enterprises, most notably including American Radiator & Standard Sanitary Corporation (c. 1946-1955); Ames Harris Neville

32 May 2021 Historic Preservation Memo prepared by Sapphos Environmental, Inc. dated May 18, 2021 (Appendix B).

33 May 2021 Historic Preservation Memo prepared by Sapphos Environmental, Inc. dated May 18, 2021 (Appendix B).

34 August 2021 Historical Resources Assessment, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

Co. (c.1955-1958); and Product Research Company (c. 1945-1991); and generally contributed to economic development of area.

Building 1A appears to have been constructed for the American Radiator & Standard Sanitary Corporation, and originally included offices, a display room with large display windows, and a small warehouse with a monitor roof and daylight windows. The attached building 1B included a large utilitarian warehouse with a monitor roof and daylight windows and shipping facilities with multiple garage bays. The American Radiator & Standard Sanitary Corporation occupied the building between about 1946 to 1955, however, it was not a significant building in the corporation's history nor was it representative of the company's corporate identity. The company headquarters were in the truly iconic American Radiator Building, a 23-story black-and-gold skyscraper in New York City designed by Raymond M. Hood and built in 1923-24; a five-story showroom and office addition designed by J. Andre Fouilhoux to harmonize with the existing tower was built in 1936-37.³⁵

Building 1A served as a local order processing and distribution facility for the much larger, national company. It appears that this company occupied the building for a short period, only a decade. It does not appear that this was a significant company facility but represented a branch facility in a larger sales and distribution network as the headquarters was located in New York City. As such, this was probably not the site of a locally significant industry or manufacturing plant that contributed significantly to the economic development of Glendale, it was only a general sales and shipping facility that was part of a broader network.

Based upon the maps, aerial views, permit, and occupancy history, it appears the building underwent substantial changes when Products Research Company moved into the building in the late-1950s, and then later for subsequent occupants--modifications which would fall out of the period of significance for the City's Industrial Development context. Products Research Company occupied Building 1 from the late-1950s through to the early 1990s, yet its headquarters was located in Burbank, with another large facility in New Jersey. Additionally, the remainder of the site development is associated with Products Research Company, which came in after the period of significance for industrial development (1890-1955). For these reasons, the remainder of the Project Site does not qualify for eligibility for association with Products Research Company or as a potential historic district because the buildings were constructed after the period of significance. As a result, it appears that Building 1A and 1B were not significantly associated with a notable business, as both the American Radiator & Standard Sanitary Company that built and occupied the building (c. 1946-1955), and Products Research Company that occupied and remodeled the Building 1 after the period of significance, both were headquartered elsewhere around

35 The American Radiator Building (now American Standard Building), as located at 40 West 40th Street, New York City, New York, is listed in the National Register of Historic Places (May 7, 1980) and as a New York City Landmark. Constructed in 1924, the building is identified for its architectural significance and for its association with master architect, Raymond Hood. The American Radiator Building is an architectural icon associated with the early American Radiator Company, five years before it merged with Standard Manufacturing Company to form American Radiator & Standard Sanitary Company, who built Building 1 in 1946-1947. National Register Nomination: American Radiator Building (American Standard Building), prepared by Landmarks Preservation Commission, 1979.

the country and are not significantly identified with this site, and Building 1A and 1B are not associated with activities that appear to have contributed significantly to economic or industrial development or manufacturing (e.g. aviation, etc.) in Glendale.³⁶

While Building 1A was identified in the South Glendale Historic Resources Survey as eligible for the Glendale Register under local Criterion 1 for its association as an “excellent example of industrial development from the immediate post-WWII period, representing the continued growth of San Fernando Road as an important industrial corridor,” the changes to the building over time do not allow the building to be considered an excellent example of industrial development in the area. In order to be considered eligible Building 1A would have had to retain the integrity of its original façade and display windows. The alteration of the façade and removal of the display windows affects the integrity of design, altering the primary character-defining features Building 1A. Additionally, Building 1B and 1A are not excellent examples of early industrial development along San Fernando Road as an industrial corridor, as it was constructed after World War II, after most of the development along the corridor was completed.

The Project site is not a rare example of a pre-War industrial facility; it is not associated with a highly significant Post World War II industrial enterprise (e.g., aviation, etc.), but was constructed as a branch distributing center for the American Radiator & Standard Sanitary Corporation that made radiators, sinks, and refrigerators. Buildings 1A and 1B were not occupied by Products Research Company until after the period of significance. Furthermore, the Project site was largely redeveloped during the 1960s and 1970s by Products Research Company and these changes substantially detract from the property’s potential eligibility as a historic district. Therefore, the August 2021 Historical Resources Assessment determined Building 1A is ineligible for listing under National Register Criterion A, California Register Criterion 1, or Glendale Register of Historic Resources Criterion 1 as it lacks historical significance and integrity.³⁷ Furthermore, Building 1 appears ineligible for listing, and as such, the Project site as a whole does not appear eligible under National Register Criterion A, California Register Criterion 1, or Glendale Register of Historic Resources Criterion 1 as it lacks historical significance and integrity.³⁸

Criteria B/2/2 Persons

Building 1B and 1A do not appear to be associated with notable persons at the National, State, or Local level. Emma E. Boyd was the early landowner, and developed much of the parcel after her husband, who owned the Glendale Lumber Company passed away. It appears as though Emma was enterprising and developed the Project Site in a piecemeal fashion until her death in the mid-1950s, at a time when the Project site was rapidly developing due to the Products Research Company tenant. Comparably, Glendale realtor, and real estate developer Lloyd Harmond Wilson notably developed the San Fernando Road industrial corridor, beginning as early as the 1920s. Wilson owned and developed hundreds of parcels for industrial purposes in the area. While Emma was involved in industry development of San Fernando Road

³⁶ August 2021 Historical Resources Assessment, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

³⁷ August 2021 Historical Resources Assessment, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

³⁸ August 2021 Historical Resources Assessment, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

and contributed generally to the economic development of the area Emma does not appear to have been significant in Glendale, or in California. Therefore, Buildings 1B and 1A, as located at 5426 San Fernando Road, is ineligible for listing under National Register Criterion B, California Register Criterion 2, or Glendale Register of Historic Resources Criterion 2 as they do not appear to be associated with notable persons at the national, State, or local level.³⁹

Criteria C/3/3 Design/Architecture

Buildings 1A and 1B is an example of a Mid-Century Modern industrial building. Building 1A reflects late influences of the Streamline Moderne style in its curved corner form and canopy, and appears to be Modern derivative of the earlier style which was most prominent from 1924 to 1938.⁴⁰ While Building 1A was identified in the 2014 South Glendale Historic Resources Survey, some of the statements related to potential historic eligibility of Building 1A were found to be incorrect due to the low historic integrity present at the Project Site, and the relatively high thresholds necessary for local eligibility.

Building 1A was identified in the survey as having a “Mid-century Modern/Industrial” architectural style, with “No major alterations.”⁴¹ However, the façade has been substantially altered by removal of the display windows, filling in of window openings with stucco, replacement of the front entrance, installment of tall, narrow, fixed tinted tempered-glass windows, and alteration of the exterior finish with stone veneer. In the survey, Building 1A was not identified as significant as an excellent or rare example of the “Mid-century Modern/Industrial” style, and rather, was identified for its pattern of industrial development along the San Fernando Road corridor. Additionally, the survey did not identify the Streamline Moderne stylistic elements present at Building 1A, which include the curved overhanging canopy, flat roof, rounded corner, and unadorned wall surfaces.

The Construction History in the DPR 523 forms for Building 1A included only a partial building permit history for the address of 5426 San Fernando Road, which further research has determined also includes building permits for the other seven structures located on the property, and are not specific to Building 1A.⁴² Research uncovered numerous additional building permits for the property, listed as 5430 and 5454 San Fernando Road, that were not reviewed as part of the DPR 523 forms, which resulted in an incomplete depiction of the site development and all of the modifications undertaken at Building 1A and at the Project Site. Additionally, notable engineer Eugene Birnbaum was erroneously identified as having worked at the Project Site on alteration building permit from the 1950s as indicated in the DPR 523 forms for

³⁹ *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

⁴⁰ “SurveyLA: Los Angeles Citywide Historic Context Statement, Context: Architecture and Engineering, Sub-Context: L.A. Modernism, 1919-1980,” Prepared for the City of Los Angeles, Department of City Planning, Office of Historic Resources, 2019, 65-70. A more notable example of a Steamline Moderne commercial building is the May Company Building in Los Angeles, constructed in 1939.

⁴¹ “SurveyLA: Los Angeles Citywide Historic Context Statement, Context: Architecture and Engineering, Sub-Context: L.A. Modernism, 1919-1980,” Prepared for the City of Los Angeles, Department of City Planning, Office of Historic Resources, 2019, 65-70. A more notable example of a Steamline Moderne commercial building is the May Company Building in Los Angeles, constructed in 1939.

⁴² *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

Building 1A and 1B. No such building permit was located in the permit search for Buildings 1A and 1B or the Project site.⁴³

While Building 1A includes a few character-defining features, namely the curved overhang, smooth exterior concrete and stucco walls, and horizontally oriented windows, Building 1A is not an outstanding or distinctive example of Mid-Century Modern architecture, as it is an altered Mid-Century Modern addition to a utilitarian industrial warehouse Building 1B. While the Building 1A was identified in the City survey, it does not retain integrity to convey its association or design intent due to the alteration of the façade and removal of the display windows. Additionally, while Building 1A was overall Mid-Century Modern in style, it retains some elements of the Streamline Moderne style, including the curved overhanging canopy, flat roof, rounded corner, and unadorned wall surfaces. Therefore, it is not a rare example of an industrial resource nor is it an excellent or rare example of a Mid-Century Modern or Streamline Moderne style building within the city. In addition, the Modern design of the display windows was a distinctive feature associated with the American Radiator & Standard Sanitary Corporation and with automobile culture during the immediate post-World War II period. Their removal and the alterations to the façade substantially detract from Building 1A's integrity of design, workmanship of the display windows, materials, and association as a Mid-Century Modern or Streamline Moderne style building. Further, there is no longer a strong distinction between the office portion and the warehouse portion as the interiors have been largely modified over time.

The character-defining features that were identified as part of the City's survey focused solely on the 1947 office portion addition (Building 1A), and did not address the warehouse portion (Building 1B), nor the other buildings that comprise the Project site.⁴⁴ The original display windows have been removed and filled, the primary entrance was replaced, incompatible veneer tiles were added, and several original windows were replaced with incompatible new windows. As a consequence, the integrity of association with the American Radiator & Standard Sanitary Corporation is materially impaired by these changes since the original function of the building as a sales and warehouse facility is largely dependent upon the fact that the front of the building was a display area and offices. Furthermore, the offices and early display areas along San Fernando Road have been entirely removed from the interior and the area is presently used for warehouse storage. Additionally, the integrity of design, workmanship, and materials is also affected by these changes to the façade of the building where the architectural detailing was originally concentrated. The rest of the Project site was altered after the period of significance (c. 1946-1955) for new uses associated with Products Research Company and these changes substantially detract from the integrity of the property as an example of a post-WWII industrial facility within the period of significance as defined by the City's historic context.⁴⁵ As such, the August 2021 Historical Resources Assessment determined Building 1A is not eligible for listing on national, State, or local registers for its lack of design or architectural integrity.⁴⁶ Therefore, Building 1A, located at 5426 San Fernando Road, is

43 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

44 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

45 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

46 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

ineligible for listing under National Register Criterion C California Register Criterion 1, and Glendale Register of Historic Resources Criterion 3.

Integrity Criterion

With regard to integrity, the character-defining features as defined in the City's survey form for the subject property focus on Building 1A, and not the other buildings that comprise the Project Site. Several of the character defining features that were identified in the survey have compromised integrity, including modification and removal of several of the steel sash windows, and replacement of the main entrance door and window assembly.

The façade of Building 1A has been substantially altered as the original display windows have been removed and infilled, the primary entrance was replaced, incompatible veneer tiles were added, and several original windows were replaced with new non-original tinted tempered glass fixed windows. Furthermore, Building 1B was substantially altered by later additions on the south and east elevations and replacement of the garage bays on the north elevation and alteration of the loading dock. As a consequence, the integrity of association with the American Radiator & Standard Sanitary Corporation and the original industrial warehouse and office building type is materially impaired by these changes since the original function of the building as an office and warehouse facility is largely dependent upon the fact that the front of the building was a display area and offices. Furthermore, the offices and early display areas along San Fernando Road have been entirely removed and the area is presently used for warehouse storage. Additionally, the integrity of design, workmanship and materials is also affected by the changes to the west and north corner facade of the building where the architectural detailing was originally concentrated. The rest of the property was altered after the period of significance (ca. 1946-1955) and substantially detracts from the integrity of the property as an example of a post-WWII industrial facility.

Building 1A was identified as an example of Mid-Century Modern style, yet it also includes some Streamline Moderne characteristics which were not discussed in the survey. Based upon this new research, ESA found Building 1A, as well as the Project site as a whole, to be ineligible for listing on the National Register of Historic Places (NR), California Register of Historic Resources (CR), and on the Glendale Register of Historic Resources, as Building 1A fails to convey significant historic associations and is not a distinctive example of its style as applied to an industrial office and display room due to a substantial lack of integrity. The original display windows had been removed and filled, the primary entrance was replaced, incompatible veneer tiles were added, and several original windows were replaced with incompatible new windows. As a consequence, the integrity of association with the American Radiator & Standard Sanitary Corporation is materially impaired by these changes since the original function of the building as a sales and warehouse facility is largely dependent upon the fact that the front of the building was a display area and offices.

Furthermore, the offices and early display areas along San Fernando Road have been entirely removed from the interior and the area is presently used for warehouse storage. Additionally, the integrity of

design, workmanship, and materials is also affected by these changes to the façade of the building where the architectural detailing was originally concentrated.⁴⁷ The alteration of the façade and removal of the display windows affects the integrity of design, altering the primary character-defining features Building 1A. Furthermore, the attached Buildings 1A and 1B taken together do not appear to meet the thresholds of significance or integrity as applied to an industrial office and warehouse property type under any of the applicable criteria. The rest of the Project site was altered after the period of significance (c. 1946-1955) for new uses associated with Products Research Company and these changes substantially detract from the integrity of the property as an example of a post-WWII industrial facility within the period of significance as defined by the City's historic context.⁴⁸

Additionally, a historic resources survey was conducted for the proposed Project.⁴⁹ Initially it was thought that the site was potentially locally significant for industrial development from the post-World War II period; continued growth of San Fernando Road as an important industrial corridor (Criterion 1). A review of historic aerials demonstrates the buildings associated with the West Glendale Winery were demolished between 1925 and 1947, and the Project site was redeveloped with the existing Moderne warehouse in 1947. Furthermore, substantially more permits have been issued for the Project site than those cited in the 2018 survey results; many for interior alterations which would have greatly impacted the use of the buildings for manufacturing and warehouse storage.

In order for a property to be considered eligible for a historical register, it must meet one or more eligibility criteria and possess integrity. The post-World War II development period is commonly considered to have occurred between 1945 and 1969. Although the Project may be associated with post-war industrial development of southwest Glendale, the businesses associated with this property did not significantly contribute to the history of Glendale. Numerous buildings on the Project site were constructed following the post-war period, the use of the buildings has not been retained, and the primary office building has been substantially altered. Therefore, the Project site does not appear eligible for listing in a historical register.

The intensive survey of the Project site conducted for the August 2021 Historical Resources Assessment to uncover new information about the history, site development, construction, use, and later changes to Building 1A and the overall Project site from the South Glendale Historic Resources Survey (see Appendix B).⁵⁰ Building 1A was previously identified as an example of Mid-Century Modern style in the South Glendale Historic Resources Survey, yet it also includes some Streamline Moderne characteristics which were not discussed in the survey.

Based on the analysis above and in the August 2021 Historical Resources Assessment, Building 1A, as well as the Project site as a whole, is determined to be ineligible for listing on the NRHP, CRHR, and on the

47 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

48 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

49 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

50 *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

Glendale Register of Historic Resources, as Building 1A fails to convey significant historic associations and is not a distinctive example of its style as applied to an industrial office and display room due to a substantial lack of integrity. Furthermore, the attached Buildings 1A and 1B taken together do not appear to meet the thresholds of significance or integrity as applied to an industrial office and warehouse property type under any of the applicable criteria due to a substantial lack of integrity of significant historic associations and of design, workmanship, and materials.⁵¹

Conclusion

Based on the evaluations in the *May 2021 Historic Preservation Memo* and the *August 2021 Historical Resources Assessment*, the existing warehouse structures on the Project site are not eligible for listing in the NRHP, CRHR, or Glendale Register of Historic Resources. The Project site has been reconstructed multiple times since its original development. While numerous buildings on the Project site were constructed following the post-war period, the original use of the buildings have not been retained, and the primary office building has been substantially altered. For these reasons, the Project site is not eligible for listing in a historic register and is not a historical resource as defined by CEQA. Because the buildings on the Project site are not historical resources, the proposed demolition of all existing structures and the existing surface parking for the construction of the proposed Project would not result in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Project impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Less than significant.

Impact CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

CEQA Guidelines Section 15064.5(a)(3)(D) defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important to prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project site is not identified by the City of Glendale General Plan Open Space and Conservation Element as containing any archaeological resources.⁵² In addition, the Project site has already been subject to extensive ground disturbance from historical development. Any superficial archaeological

⁵¹ *August 2021 Historical Resources Assessment*, prepared by Environmental Science Associates, August 11, 2021 (Appendix B).

⁵² *City of Glendale General Plan*, Open Space and Conservation Element, accessed May 2022, <https://www.glendaleca.gov/government/departments/community-development/planning/city-wide-plans/open-space-and-conservation-element>.

resources that may have existed at one time have likely been previously disturbed by past development activities. As a result, it is highly unlikely that any intact buried archaeological resources would be present in the Project area. Additionally, construction of Project would not involve excavation through the geosynthetic clay liner (GCL) which is at a depth of six feet bgs along the western portion of the Project site. This would further reduce the potential for archaeological resources to be unearthed during construction of the Project.

Should archaeological resources be unearthed during construction of the Project, the Project would be required to comply with PRC Section 21083.2(i), which states a lead agency may make provisions for archaeological sites accidentally discovered during construction. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required, during which construction work may continue on other parts of the site. With compliance with PRC Section 21083.2(i), impacts related to a substantial adverse change in the significance of an archaeological resource would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Less than significant impact.

Impact CUL-3: Disturb any human remains, including those interred outside of formal cemeteries?

There are no known formal or informal cemeteries located on the Project site. The nearest designated cemetery to the Project site is Grand View Memorial Park and Crematory located approximately 1.2 miles north. The Project site is currently developed with ten existing warehouse related structures and related surface parking and loading areas. For this reason, it is highly unlikely that any intact buried human remains would be present in the Project area. However, given the prehistory of human occupation and development of Glendale in the early 20th century, the potential to disturb unknown human remains outside of a formal cemetery could occur. In the event of inadvertently discovering human remains during ground disturbing activities, Section 7050.5 of the California Health and Safety Code would be in effect. The Health and Safety Code requires that no further ground disturbance, after the discovery of human remains, shall continue until a County Coroner has made a determination about the human remains. PRC Section 5097.98 states that the NAHC shall be notified if the County Coroner determines the human remains are prehistoric to determine the Most Likely Descendant. The appropriate Native American tribe shall then coordinate with the City for proper handling of any prehistoric human remains discoveries.

Compliance with Section 7050.5 of the California Health and Safety Code and PRC Section 5097.98 would ensure the potential to disturb human remains would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Less than significant.

4.3.4.4 Cumulative Impacts

A cumulative impact analysis for cultural resources evaluates whether impacts of a project and related projects, when taken as a whole, would have significant environmental impacts under the cultural resources thresholds. If the related projects identified in combination with the Project would result in a cumulatively significant impact, then the significance of the Project's incremental contribution to that cumulatively significant impact must be determined.

Historic Resources

As discussed in Impact CUL-1, the Project would not directly or indirectly impact any historical resources on the Project site and surrounding area. No buildings on the Project site are contributors to the significance of historical resources and districts in the City, Los Angeles County, and South California (as a region). None of the buildings present within the Project site are eligible for listing in the NRHP, CRHR, or Glendale Register of Historic Resources and are not historic resources as defined by CEQA. Furthermore, **Section 4.0: Environmental Impact Analysis**, includes a list of related projects identified within **Table 4.0-1**. All related projects consist of individual development projects that would be individually analyzed for historic resources impacts. For this reason, the Project will not contribute to any cumulative impact to historic resources within the City.

Archaeological Resources

The geographic scope for cumulative effects on archaeological resources is the area of South Glendale within Los Angeles County. The Project, like other related development projects, would have the potential to impact archaeological resources that may be present in undisturbed native soils during construction. Like the Project, related projects listed in **Section 4.0** would be required to comply with PRC Section 21083.2(i), which states a lead agency may make provisions for archaeological sites accidentally discovered during construction. If the find is determined to be a unique archaeological resource, contingency funding, and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required, during which construction work may continue on other parts of the site. Compliance with PRC Section 21083.2(i) would ensure that provisions are in place to address accidental discoveries of archaeological resources. For these reasons, no significant cumulative impacts to archeological resources will occur.

Human Remains

All projects, including those related projects listed in **Section 4.0**, would be required to comply with the California Health and Safety Code Section 7050.5, and PRC Section 5097.98 to minimize potential impacts

to human remains. For these reasons, the impact of the Project in combination with related projects would not result in a significant cumulative impact on human remains.

Level of Significance Before Mitigation

Upon implementation of regulatory requirements, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Compliance with local, State, and federal plans, policies, and programs would ensure impacts related to cultural resources would be less than significant.

4.4 GREENHOUSE GASES

4.4.1 INTRODUCTION

This section provides a discussion of global climate change, existing regulations pertaining to climate change, an inventory of the greenhouse gas (GHG) emissions that would result from the Project, and an analysis of the potential impact of those GHGs. An *Air Quality and Greenhouse Gas Technical Study* was prepared for the Project and is provided in **Appendix A**.

4.4.2 OVERVIEW OF GREENHOUSE GAS EMISSIONS

4.4.2.1 Global Context

GHGs are global pollutants that have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere for a long enough time to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule depends on multiple variables and cannot be pinpointed, more CO₂ is currently emitted into the atmosphere than is avoided or sequestered. CO₂ sinks, or reservoirs, include vegetation and the ocean, which absorb CO₂ through photosynthesis and dissolution, respectively. These are two of the most common processes of CO₂ sequestration. Of the total annual human-caused CO₂ emissions, approximately 54 percent is sequestered within a year through ocean uptake, northern hemisphere forest regrowth, and other terrestrial sinks; the remaining 46 percent of human-caused CO₂ emissions are stored in the atmosphere.

Similarly, the effects of GHGs are borne globally (sea-level rise, hurricanes, droughts, etc.), as opposed to the localized air quality effects of criteria air pollutants and toxic air contaminants (TACs). The quantity of GHGs that it takes to ultimately result in climate change is not precisely known, but that quantity is enormous. No single project would be expected to measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or microclimates. However, it is the combined GHG contributions per project that create an impact.

4.4.2.2 Greenhouse Gas Effects

GHGs play a critical role in determining the Earth's surface temperature because these gases absorb solar radiation. Solar radiation enters the Earth's atmosphere from space. A portion of the radiation is absorbed by the Earth's surface, and a smaller portion of this radiation is reflected back into space. The radiation absorbed by the Earth is reradiated as lower-frequency infrared radiation, which is then selectively absorbed by GHGs in the Earth's atmosphere. As a result, the greater the amount of GHGs in the atmosphere, the greater the amount of infrared radiation trapped, resulting in a warming of the atmosphere. This phenomenon is commonly referred to as the "greenhouse effect." Scientists have speculated that increased GHG emissions from human activity (anthropogenic) could lead to a less habitable climate. Anthropogenic GHG emissions leading to atmospheric levels in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of warming of the Earth's atmosphere and oceans, with corresponding effects on global air and water

circulation patterns and climate. CO₂ emissions associated with fossil fuel combustion are the primary contributors to human-induced emissions.

4.4.2.3 Climate Change Effects for California

Climate change could affect environmental conditions in California in a variety of ways. One effect of climate change is rising sea levels. Sea levels along the California coast rose approximately 7 inches during the last century, and they are predicted to rise an additional 7 to 22 inches by 2100, depending on the future levels of GHG emissions. The effects of a rise in sea level could include increased coastal flooding, saltwater intrusion (especially a concern in the low-lying Sacramento-San Joaquin Delta, where pumps delivering potable water to Southern California could be threatened), and disruption of wetlands.

As the State's climate changes over time, the range of various plant and wildlife species could shift or be reduced, depending on the favored temperature and moisture regimes of each species. In the worst cases, some species would become extinct or be extirpated from the State if suitable conditions are no longer available. Additional concerns associated with climate change include a reduction in the snowpack, leading to less overall water storage in the mountains (the largest "reservoir" in the State), and increased risk of wildfires caused by changes in rainfall patterns and plant communities. Changes in the climate can also impact California's weather patterns and rainfall, causing droughts in certain areas and flooding in others.

4.4.2.4 Sources of Greenhouse Gas Emissions

GHGs are the result of both natural and anthropogenic activities. With respect to anthropogenic activities, motor vehicle travel, air travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfire are the primary sources of GHG emissions. Additionally, land use decisions and future development projects pursuant to implementation of a general plan can affect the generation of GHG emissions from multiple sectors, resulting in direct or indirect GHG emissions. For example, electricity consumed in the lighting and heating of buildings is an indirect source of GHG emissions because it requires electricity from power plants, which emit GHGs directly into the atmosphere. Conversely, tailpipe emissions from the use of vehicles generates direct GHG emissions.

GHGs are a group of emissions that include CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, and nitrogen trifluoride (NF₃). Carbon dioxide is the most abundant GHG. As stated above, other GHGs are less abundant, but have higher global warming potential than CO₂. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂; denoted as CO₂e. A general description of GHGs discussed is provided in **Table 4.4-1: Description of Identified Greenhouse Gases.**

TABLE 4.4-1
DESCRIPTION OF IDENTIFIED GREENHOUSE GASES

GHG	General Description
Carbon Dioxide (CO ₂)	An odorless, colorless GHG that has both natural and anthropogenic sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of CO ₂ are burning coal, oil, natural gas, and wood.
Methane (CH ₄)	A flammable gas and is the main component of natural gas. When one molecule of CH ₄ is burned in the presence of oxygen, one molecule of CO ₂ and two molecules of water are released. A natural source of CH ₄ is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH ₄ , which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N ₂ O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N ₂ O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH ₄ or ethane (C ₂ H ₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorinated Chemicals (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conduction manufacturing.
Sulfur Hexafluoride (SF ₆)	An inorganic, odorless, colorless, nontoxic, and nonflammable gas. SF ₆ is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF ₃)	An inorganic, nontoxic, odorless, nonflammable gas. NF ₃ is used in the manufacture of semiconductors, as an oxidizer of high energy fuels, for the preparation of tetrafluoro hydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

^a GHGs identified in this table are ones identified in the Kyoto protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.

4.4.3 REGULATORY FRAMEWORK

4.4.3.1 Federal

Federal Clean Air Act

The US Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*¹ that carbon dioxide (CO₂) and other GHGs are pollutants under the federal Clean Air Act (CAA), which the US Environmental Protection Agency (USEPA) must regulate if it determines they pose an endangerment to public health or welfare.² The Court did not mandate that the USEPA enact regulations to reduce GHG emissions. Instead, the Court found that the USEPA could avoid taking action if it found that GHGs do not contribute to climate change or if it offered a “reasonable explanation” for not determining that GHGs contribute to climate change.

On April 17, 2009, the USEPA issued a proposed finding that GHGs contribute to air pollution that may endanger public health or welfare. On April 24, 2009, the proposed rule was published in the Federal Register under Docket ID No. EPA-HQ-OAR-2009-0171.³ The USEPA stated that high atmospheric levels of GHGs “are the unambiguous result of human emissions and are very likely the cause of the observed increase in average temperatures and other climatic changes.” The USEPA further found that “atmospheric concentrations of greenhouse gases endanger public health and welfare within the meaning of Section 202 of the Clean Air Act.” The final rule was effective on January 14, 2010.⁴ While these findings alone did not impose any requirements on industry or other entities, this action was a prerequisite to regulatory actions by the USEPA, including, but not limited to, GHG emissions standards for light-duty vehicles.

In response, the USEPA promulgated a regulation to require reporting of all GHG emissions from all sectors of the economy. The final rule applies to fossil fuel suppliers and industrial gas suppliers, direct greenhouse gas emitters and manufacturers of heavy-duty and off-road vehicles and engines. The rule does not require control of greenhouse gases; rather, it requires only that sources above certain threshold levels monitor and report emissions.⁵

1 *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), <https://www.oyez.org/cases/2006/05-1120>. Accessed June 2022.

2 Perry W. Payne and Sara Rosenbaum, “Massachusetts et al. v Environmental Protection Agency: Implications for Public Health Policy and Practice,” *Public Health Reports* 122 No. 6 (2007): 817-819, <https://doi.org/10.1177/003335490712200614>. Accessed June 2022.

3 Federal Register, *Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act* (December 15, 2009), <https://www.federalregister.gov/documents/2009/12/15/E9-29537/endangerment-and-cause-or-contribute-findings-for-greenhouse-gases-under-section-202a-of-the-clean>. Accessed June 2022.

4 United States Environmental Protection Agency (USEPA), *Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Section 202(a) of the Clean Air Act*, <https://www.epa.gov/ghgemissions/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a-clean/>. Accessed June 2022.

5 Federal Register, *Mandatory Reporting of Greenhouse Gases* (October 30, 2009), <https://www.gpo.gov/fdsys/pkg/FR-2009-10-30/pdf/E9-23315.pdf>. Accessed June 2022.

Corporate Average Fuel Economy (CAFE) Standards

In response to the *Massachusetts v. Environmental Protection Agency* ruling, the George W. Bush administration issued Executive Order 13432 in 2007, directing the USEPA, the US Department of Transportation (USDOT), and the US Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, nonroad vehicles, and nonroad engines by 2008.⁶ In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011; in 2010, the USEPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012-2016.⁷

In 2010, President Obama issued a memorandum directing the USEPA, USDOT, USDOE, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the USEPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017-2025 light-duty vehicles.⁸ The proposed standards projected to achieve 163 grams/mile of CO₂ in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon (mpg) if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017-2021, and NHTSA intends to set standards for model years 2022 - 2025 in a future rulemaking. On April 2, 2018, the USEPA signed the Mid-term Evaluation Final Determination, which finds that the model year 2022-2025 greenhouse gas standards are not appropriate and should be revised.⁹ The Final Determination serves to initiate a notice to further consider appropriate standards for model year 2022-2025 light duty vehicles. On August 24, 2018, the USEPA and NHTSA published a proposal to freeze the model year 2020 standards through model year 2026 and to revoke California's waiver under the Clean Air Act to establish more stringent standards.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2016, the USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. If implemented, the Phase 2 standards would be expected to lower CO₂ emissions by approximately 1.1 billion metric tons (MT), save vehicle owners fuels costs of about \$170 billion.¹⁰ But as discussed above, the USEPA and NHTSA have proposed to roll back

6 US Government Publishing Office, *Administration of George W. Bush, Executive Order 13432—Cooperation Among Agencies in Protecting the Environment With Respect to Greenhouse Gas Emissions From Motor Vehicles, Nonroad Vehicles, and Nonroad Engines*, 631 (May 14, 2007), <https://www.gpo.gov/fdsys/pkg/WCPD-2007-05-21/pdf/WCPD-2007-05-21-Pg631.pdf>. Accessed June 2022.

7 USEPA, *Regulations for Greenhouse Gas Emissions from Commercial Trucks & Buses* (December 27, 2017), <https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-greenhouse-gas-emissions-commercial-trucks>. Accessed June 2022.

8 USEPA, *Presidential Announcements and Letters of Support related to Greenhouse Gas Emissions* (August 28, 2017), <https://www.epa.gov/regulations-emissions-vehicles-and-engines/presidential-announcements-and-letters-support-related>. Accessed June 2022.

9 Federal Register, *Mid-Term Evaluation of Greenhouse Gas Emissions Standards for Model Year 2022 - 2025 Light-Duty Vehicles*, April 13, 2018, <https://www.federalregister.gov/documents/2018/04/13/2018-07364/mid-term-evaluation-of-greenhouse-gas-emissions-standards-for-model-year-2022-2025-light-duty>. Accessed June 2022.

10 USEPA, "EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond," <https://www.nhtsa.gov/sites/nhtsa.gov/files/detailed-fact-sheet.pdf>. Accessed June 2022.

GHG and fuel economy for cars and light-duty trucks, which suggest a similar rollback of Phase 2 standards for medium and heavy-duty vehicles may be pursued.

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:¹¹

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of renewable fuel in 2022, with at least 16 billion gallons from cellulosic biofuels and a cap of 15 billion gallons for corn-starch ethanol;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks; and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks, and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”¹²

4.4.3.2 State Regulations and Directives

Executive Orders

Executive Order S-3-05

Executive Order S-3-05, signed by Governor Arnold Schwarzenegger and issued in June 2005, proclaimed that California is vulnerable to the impacts of climate change.¹³ It declared that increased temperatures could reduce the Sierra snowpack, further exacerbate California’s air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established the following total GHG emission targets:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and

11 USEPA, *Summary of the Energy Independence and Security Act*, <https://www.epa.gov/laws-regulations/summary-energy-independence-and-security-act>. Accessed June 2022.

12 A green job, as defined by the United States Department of Labor, is a job in business that produce goods or provide services that benefit the environment or conserve natural resources.

13 Executive Department, State of California, *Executive Order S-3-05*, <https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf>. Accessed June 2022.

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

However, in adopting the California Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32 (Pavley), discussed below, the Legislature did not adopt the 2050 horizon-year goal from Executive Order No. S-3-05 and, in the 2006 legislative session, rejected legislation to enact the Executive Order's 2050 goal.

Executive Order S-01-07

Executive Order S-1-07, the Low Carbon Fuel Standard (issued on January 18, 2007), requires a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020.¹⁴ Regulatory proceedings and implementation of the Low Carbon Fuel Standard have been directed to the California Air Resources Board (CARB). CARB has identified the Low Carbon Fuel Standard as a discrete early action item in the adopted Climate Change Scoping Plan (discussed below). CARB expects the Low Carbon Fuel Standard to achieve the minimum 10 percent reduction goal; however, many of the early action items outlined in the Climate Change Scoping Plan work in tandem with one another. Other specific emission reduction measures included are the Million Solar Roofs Program¹⁵ and Assembly Bill (AB) 1493 (Pavley I), Vehicle Emissions: Greenhouse Gases, which establishes motor vehicle GHG emissions standards.¹⁶ To avoid the potential for double-counting emission reductions associated with AB 1493, the Climate Change Scoping Plan has modified the aggregate reduction expected from the Low Carbon Fuel Standard to 9.1 percent. In accordance with the Climate Change Scoping Plan, this analysis incorporates the modified reduction potential for the Low Carbon Fuel Standard. CARB released a draft version of the Low Carbon Fuel Standard in October 2008. The final regulation was approved by the Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the Low Carbon Fuel Standard became effective on the same day.

Executive Order B-30-15

Executive Order B-30-15, signed by Governor Edmund Gerald "Jerry" Brown and issued on April 29, 2015, established a new Statewide policy goal to reduce GHG emissions to 40 percent below their 1990 levels by 2030. Reducing GHG emissions by 40 percent below 1990 levels in 2030, and by 80 percent below 1990 levels by 2050 (consistent with Executive Order S-3-05), aligns with scientifically established levels needed to limit global warming to less than 2 degrees Celsius.¹⁷

14 Office of the Governor, *Executive Order S-01-07* (January 18, 2007), <https://climateactionnetwork.ca/wp-content/uploads/2011/06/eos0107.pdf>. Accessed June 2022.

15 US Department of Energy, *Laying the Foundation for Solar America: The Million Solar Roofs Initiative*, <https://www.nrel.gov/docs/fy07osti/40483.pdf>. Accessed June 2022.

16 The standards enacted in Pavley I are the first GHG standards in the nation for passenger vehicles and took effect for model years starting in 2009 and going through 2016. Pavley I could potentially result in 27.7 million metric tons CO₂e reduction in 2020. Pavley II will cover model years 2017 to 2025 and potentially result in an additional reduction of 4.1 million metric tons CO₂e.

17 Office of the Governor, "Governor Brown Established Most Ambitious Greenhouse Gas Reduction Target in North America" (April 29, 2015), <https://www.ca.gov/archive/gov39/2015/04/29/news18938/index.html>. Accessed June 2022.

Assembly Bill 32 and Related Legislation

AB 32, the Global Warming Solutions Act of 2006, requires a sharp reduction of GHG emissions to 1990 levels by 2020. To achieve these goals, which are consistent with the California Climate Action Team, which works to coordinate statewide efforts to implement global warming emission reduction programs and the state's Climate Adaptation Strategy after the passing of AB 32, AB 32 mandates that CARB establish a quantified emissions cap and institute a schedule to meet the cap; implement regulations to reduce Statewide GHG emissions from stationary sources consistent with the California Climate Action Team strategies; and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. To reach the reduction targets, AB 32 requires CARB to adopt—in an open, public process—rules and regulations that achieve the maximum technologically feasible and cost-effective GHG reductions.

Climate Change Scoping Plan

CARB approved a Climate Change Scoping Plan (Scoping Plan) on December 11, 2008, as required by AB 32. The Scoping Plan proposed a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.”¹⁸ The Scoping Plan had a range of GHG reduction actions, including direct regulations; alternative compliance mechanisms; monetary and nonmonetary incentives; voluntary actions; market-based mechanisms, such as a cap-and-trade system; and an AB 32 implementation regulation to fund the program.

The Scoping Plan called for a “coordinated set of strategies” to address all major categories of GHG emissions.¹⁹ Transportation emissions were to be addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard,²⁰ and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to implement energy efficiency practices. Utility energy supplies will change to include more renewable energy sources through implementation of the Renewables Portfolio Standard. This will be complemented with emphasis on local generation, including rooftop photovoltaics and solar hot water installations. Additionally, the Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicated that substantial savings of electricity and natural gas would be accomplished through improving energy efficiency.

CARB updated the Scoping Plan in May 2014 (2014 Scoping Plan). The 2014 Scoping Plan²¹ adjusted the 1990 GHG emissions levels to 431 million metric tons of carbon dioxide equivalents (MMTCO₂e); the

18 CARB, *Climate Change Scoping Plan: A Framework for Change*, https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed June 2022.

19 CARB, *Climate Change Scoping Plan*, p. ES-7.

20 Office of the Governor, *Executive Order S-01-07*, (January 18, 2007), <https://climateactionnetwork.ca/wp-content/uploads/2011/06/eos0107.pdf>. Accessed June 2022.

21 CARB, *First Update to the Climate Change Scoping Plan: Building on the Framework*, https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed June 2022.

updated 2020 GHG emissions forecast is 509 MMTCO₂e, which credited for certain GHG emission reduction measures already in place (e.g., the RPS). The 2014 Scoping Plan also recommended a 40 percent reduction in GHG emissions from 1990 levels by 2030, and a 60 percent reduction in GHG emissions from 1990 levels by 2040.

The 2017 Scoping Plan,²² approved on December 14, 2017, builds on previous programs, and takes aim at the 2030 target established by the SB 32 (Pavley), which is further discussed below. The 2017 Scoping Plan outlines options to meet California's aggressive goals to reduce GHGs by 40 percent below 1990 levels by 2030. In addition, the plan incorporates the State's updated RPS requiring utilities to procure 50 percent of their electricity from renewable energy sources by 2030. It also raises the State's Low Carbon Fuel Standard²³ and aims to reduce emissions of methane and hydrofluorocarbons by 40 percent from 2013 levels by 2030 and emissions of black carbon by 50 percent from 2013 levels.

The 2017 Scoping Plan²⁴ advises that absent conformity with a qualified GHG reduction plan, projects should incorporate all feasible GHG reduction measures and that achieving "no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development."

Advanced Clean Cars Regulations

In 2012, CARB approved the Advanced Clean Cars (ACC) program, a new emissions-control program for vehicle model years 2017-2025. The program combines the control of smog, soot, and GHGs with requirements for greater number of zero-emission vehicles. By 2025, when the rules will be fully implemented, automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.²⁵

AB 197: Statewide GHG Emissions Limit

On September 8, 2016, Governor Brown signed AB 197, which requires CARB to approve a Statewide GHG emissions limit equivalent to the Statewide GHG emission level in 1990 to be achieved by 2020.²⁶ AB 197 requires the CARB to prepare and approve a scoping plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions. The bill became effective on January 1, 2017.

22 CARB, *California's 2017 Climate Change Scoping Plan*, https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf. Accessed June 2022.

23 Office of the Governor, *Executive Order S-01-07*, (January 18, 2007), <https://climateactionnetwork.ca/wp-content/uploads/2011/06/eos0107.pdf>. Accessed June 2022.

24 California Air Resources Board, 2017. *California's 2017 Climate Change Scoping Plan*. pp. 100-101. Available: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf. Accessed June 2022.

25 CARB, "The Advanced Clean Cars Program" (January 18, 2018), <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program>. Accessed June 2022.

26 California Legislative Information, *Assembly Bill No. 197* (September 8, 2016), https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB197. Accessed June 2022.

Senate Bills

Senate Bill 375

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations.²⁷ The act requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) that prescribes land use allocation in that MPO's regional transportation plan (RTP). CARB, in consultation with MPOs, provided regional reduction targets for GHGs for the years 2020 and 2035.

Senate Bill X1-2: 2020 Renewable Portfolio Standard

On April 12, 2011, California governor Jerry Brown signed SB X1-2.²⁸ This bill supersedes the 33 percent by RPS created by Executive Order S-14-08, previously signed by Governor Schwarzenegger. The RPS required that all retail suppliers of electricity in California serve 33 percent of their load with renewable energy by 2020. A number of significant changes are made in SB X1-2. It extends application of the RPS to all electric retailers in the State, including municipal and public utilities, and community choice aggregators.

SB X1-2 creates a three-stage compliance period for electricity providers to meet renewable energy goals: 20 percent of retail sales must be renewable energy products by 2013, 25 percent of retail sales must be renewable energy products by 2016, and 33 percent of retail sales must be renewable energy products by 2020. The 33 percent level must be maintained in the years that follow. This three-stage compliance period requires the RPS to be met increasingly with renewable energy that is supplied to the California grid and is located within or directly proximate to California. SB X1-2 mandates that renewables from this category make up:

- At least 50 percent for the 2011-2013 compliance period;
- At least 65 percent for the 2014-2016 compliance period; and
- At least 75 percent for 2016 and beyond.

SB X1-2 sets rules for the use of Renewable Energy Credits (RECs) as follows:

- Establishes a cap of no more than 25 percent unbundled RECs going toward the RPS between 2011 and 2013, 15 percent from 2014 to 2016, and 10 percent thereafter;
- Does not allow for the grandfathering of tradable REC contracts executed before 2010, unless the contract was (or is) approved by the California Public Utilities Commission (CPUC);
- Allows banking of RECs for 3 years only; and
- Allows energy service providers, community choice aggregators, and investor-owned utilities with 60,000 or fewer customers to use 100 percent RECs to meet the RPS.

27 California Legislative Information, *Senate Bill No. 375* (September 30, 2008), https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375. Accessed June 2022.

28 California Energy Commission, "Renewable Portfolio," <http://www.energy.ca.gov/portfolio>. Accessed June 2022.

SB X1-2 also eliminates the Market Price Referent, which was a benchmark to assess the above-market costs of RPS contracts based on the long-term ownership, operating, and fixed-price fuel costs for a new 500-megawatt (mW) natural-gas-fired, combined-cycle gas turbine.

Senate Bill 350: Clean Energy and Pollution Reduction Act

SB 350, the Clean Energy and Pollution Reduction Act of 2015, was signed on October 7 of that year.²⁹ SB 350 implements some of the goals of Executive Order B-30-15 described above. The objectives of SB 350 are: (1) to increase the procurement of our electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.³⁰

Senate Bill 32 and Assembly Bill 197

Enacted in 2016, SB 32 codifies the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that Statewide GHG emissions are reduced to 40 percent below 1990 levels by 2030. The reduction of GHG emissions is a priority for development projects throughout the State and is achieved through a combination of policies, planning, direct regulations, market approaches, incentives, and voluntary efforts. Generally speaking, the focus of GHG emission reductions is on energy production and motor vehicles.

SB 32 was coupled with a companion bill: AB 197. Designed to improve the transparency of CARB's regulatory and policy-oriented processes, AB 197 created the Joint Legislative Committee on Climate Change Policies, a committee with the responsibility to ascertain facts and make recommendations to the Legislature concerning Statewide programs, policies and investments related to climate change. AB 197 also requires CARB to make certain GHG emissions inventory data publicly available on its website; consider the social costs of GHG emissions when adopting rules and regulations designed to achieve GHG emission reductions; and include specified information in all Scoping Plan updates for the emission reduction measures contained therein.

Center for Biological Diversity v. California Department of Fish and Wildlife

The California Supreme Court's decision published on November 30, 2015, in *Center for Biological Diversity v. California Department of Fish and Wildlife*³¹ reviewed the methodology used to analyze GHG emissions in an EIR prepared for a project that proposed 20,885 dwelling units with 58,000 residents on 12,000 acres of undeveloped land in a rural area of the City of Santa Clara.³² That EIR used the "business

29 California Legislative Information, *Senate Bill No. 350* (October 7, 2015), https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350. Accessed June 2022.

30 California Legislative Information, *Senate Bill No. 350* (October 7, 2015), https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB350. Accessed June 2022.

31 *Center for Biological Diversity et al. v. California Department of Fish and Wildlife* (2015) (62 Cal.4th 204, 195 Cal.Rptr.3d 247, 361 P.3d 342), <http://climatecasechart.com/case/center-for-biological-diversity-v-california-department-of-fish-and-wildlife/>. Accessed June 2022.

32 California Department of Fish and Wildlife, *Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan*, <https://www.wildlife.ca.gov/regions/5/newhall>. Accessed June 2022.

as usual” (BAU) methodology to determine whether the project would impede the State of California’s compliance with statutory emissions reduction mandate established by the AB 32 Scoping Plan. The Court did not invalidate the BAU approach entirely, but did hold that:

*The Scoping Plan nowhere related that statewide level of reduction effort to the percentage of reduction that would or should be required from individual projects and nothing Department of Fish and Wildlife or Newhall have cited in the administrative record indicates the required percentage reduction from business as usual is the same for an individual project as for the entire state population and economy.*³³

The California Supreme Court suggested regulatory consistency as a pathway to compliance, stating that a Lead Agency might assess consistency with AB 32’s goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities. The Court recognized that to the extent a project’s design features comply with or exceed the regulations outlined in the Scoping Plan, and adopted by CARB or other State agencies, a Lead Agency could appropriately rely on their use as showing compliance with performance-based standards adopted to fulfill a Statewide plan for the reduction or mitigation of greenhouse gas emissions. This approach is consistent with CEQA Guidelines Section 15064, which provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of greenhouse gas emissions. Importantly, the Supreme Court also suggested “a lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions (brightline threshold approach).”³⁴

California Energy Commission

Building Energy Efficiency Standards

Title 24, Part 6 of the California Code of Regulations (CCR), regulates the design of building shells and building components. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The CEC adopted the 2016 Building Energy Efficiency Standards (2016 Building Standards), effective January 1, 2017. The CEC adopted the 2019 Building Energy Efficiency Standards, and became effective January 1, 2020. Two key areas specific to nonresidential development in the 2019 standards focus on nonresidential ventilation requirements

33 *Center for Biological Diversity et al. v. California Department of Fish and Wildlife* (2015) (62 Cal.4th 204, 195 Cal.Rptr.3d 247, 361 P.3d 342), <http://climatecasechart.com/case/center-for-biological-diversity-v-california-department-of-fish-and-wildlife/>. Accessed June 2022.

34 The South Coast Air Quality Management District (SCAQMD), *Interim CEQA Greenhouse Gas (GHG) Significance Thresholds*, draft guidance document (October 2008), Attachment E, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgattachmente.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf). Accessed June 2022.

and nonresidential lighting requirements.³⁵ Under the 2019 standards, nonresidential buildings will be 30 percent more energy efficient compared to the 2016 standards.

The CPUC, CEC, and CARB also have a shared, established goal of achieving Zero Net Energy (ZNE) for new construction in California. The key policy timelines include (1) all new residential construction in California will be ZNE by 2020, and (2) all new commercial construction in California will be ZNE by 2030.

The ZNE goal generally means that new buildings must use a combination of improved efficiency and renewable energy generation to meet 100 percent of their annual energy need, as specifically defined by the CEC:

A ZNE Code Building is one where the value of the energy produced by on-site renewable energy resources is equal to the value of the energy consumed annually by the building, at the level of a single “project” seeking development entitlements and building code permits, measured using the [CEC]’s Time Dependent Valuation (TDV) metric. A ZNE Code Building meets an Energy Use Intensity value designated in the Building Energy Efficiency Standards by building type and climate zone that reflect best practices for highly efficient buildings.

In addition to the CEC’s efforts, in 2008, the California Building Standards Commission adopted the nation’s first green building standards. The California Green Building Standards Code (Part 11 of Title 24), commonly referred to as CALGreen, establish voluntary and mandatory standards pertaining to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality. CALGreen is periodically amended; the most recent 2022 standards became effective on January 1, 2023.

Appliance Standards

The CEC periodically amends and enforces Appliance Efficiency Regulations contained in Title 20 of the CCR. The regulations establish water and energy efficiency standards for both federally regulated appliances and non-federally regulated appliances. The most current Appliance Efficiency Regulations, dated July 2015, cover 23 categories of appliances (e.g., refrigerators; plumbing fixtures; dishwashers; clothes washer and dryers; televisions) and apply to appliances offered for sale in California.

³⁵ California Energy Commission (CEC), “2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings,” <https://www.energy.ca.gov/title24/2019standards/>. Accessed June 2022.

4.4.3.3 Regional

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) adopted a “Policy on Global Warming and Stratospheric Ozone Depletion” on April 6, 1990.³⁶ The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan (AQMP). In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

In December 2008, SCAQMD adopted an interim 10,000 metric tons CO₂e (MTCO₂e) per year screening level threshold for stationary source/industrial projects for which SCAQMD is the lead agency. SCAQMD continues to consider adoption of significance thresholds for non-industrial development projects.³⁷ Specifically, SCAQMD has proposed combining performance standards and screening thresholds for the residential and commercial sectors. The performance standards primarily focus on energy efficiency measures beyond Title 24 and a screening level of 3,000 MTCO₂e per year based on the relative GHG emissions contribution between residential/commercial sectors and stationary source (industrial) sectors.³⁸

Southern California Association of Governments

The City of Glendale (City) is a member agency of the Southern California Association of Governments (SCAG). SCAG is the MPO for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for the discussion of regional issues related to transportation, the economy, community development, and the environment. As the federally-designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and air quality. Pursuant to California Health and

36 SCAQMD, “SCAQMD’s Historical Activity on Climate Change,” <http://www.aqmd.gov/nav/about/initiatives/climate-change>. Accessed June 2022.

37 SCAQMD, *Greenhouse Gases: CEQA Significance Thresholds*, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed June 2022.

38 SCAQMD, *Greenhouse Gases: CEQA Significance Thresholds*, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed June 2022.

Safety Code Section 40460(b),³⁹ SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.

With regard to GHG emissions, SCAG has prepared and adopted the 2020-2045 RTP/SCS,⁴⁰ which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts. The SCAG 2020-2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level.

4.4.3.4 Local

Greener Glendale Plan

In March 2012, the City completed the Greener Glendale Plan,⁴¹ consisting of the Greener Glendale 2010 Report, the Greener Glendale Plan for Municipal Operations, and the Greener Glendale Plan for Community Activities. The Greener Glendale Plan analyzes City activities related to sustainability and GHG emissions to show how implementing sustainability measures will result in reduced GHG emissions. The list of quantifiable GHG reduction categories in the Greener Glendale Plan includes 2020 emissions reduction targets to be achieved through California vehicle and fuel standards, building energy efficiency audits and upgrades, smart grid applications, green building standards, Zero Waste Plans, EV charging station installation, and a plastic bag ban to name a few. The Greener Glendale Plan identified 2035 reduction targets through continued implementation of California vehicle and fuel standards, building energy and water efficiency audits and upgrades, Zero Waste Plan 90 percent diversion by 2030, tree planning programs, and turf reduction rebates.

39 California Health and Safety Code, Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b). https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=40460.&lawCode=HSC. Accessed June 2022.

40 Southern California Association of Governments (SCAG), *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft*, Chapter 1, <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>. Accessed June 2022.

41 City of Glendale, “Greener Glendale,” <https://www.glendaleca.gov/government/departments/management-services/office-of-sustainability/greener-glendale>. Accessed June 2022.

South Glendale Community Plan Final Program EIR

According to the South Glendale Community Plan Final Program EIR,⁴² Policy GHG-1 requires the City to update the Greener Glendale Plan for community and municipal operations and establish GHG reduction goals that are consistent with California’s established goals of 40 percent below baseline emissions by 2030 and 80 percent below baseline emissions by 2050. This update would be evaluated against potential environmental impacts with the objective of qualifying the Greener Glendale Plan as the City’s Climate Action Plan. The updated plan would include quantifiable and feasible measures that the City can implement to achieve established GHG reduction targets. Furthermore, Policy GHG-3 requires the City to reduce GHG emissions from new development by discouraging auto-dependent sprawl and dependence on the private automobile; promoting water conservation and recycling; promoting development that is compact, mixed use, pedestrian friendly, and transit oriented; and promoting energy-efficient building design and site planning.

Ordinance No. 5999

On November 15, 2022 the City of Glendale adopted reach codes to electrify new construction, increase local solar generation, and increase electric vehicle (EV) charging.⁴³ These ordinances, known as reach codes, are local building energy codes that “reach” beyond the minimum State requirements for building construction and design elements including energy efficiency, electrification, and renewable energy installation. The State of California updates the Building Code every three years. With each update, local jurisdictions can choose to adopt the State’s building code or implement reach codes. The reach code amends the municipal code in sync with the State of California Energy Code, which is updated every three years by the California Energy Commission.

The City of Glendale’s Reach Codes require that new homes and businesses built in Glendale after January 1, 2023 be all-electric, with increased capacity to generate local solar power and increased availability of EV charging infrastructure. The required installation of a photovoltaic (PV) system for a non-residential building is required to be sized according to one of the following methods: (a) Installation of a PV system that offsets 100% of building electricity use based on energy models conducted for the building—the solar PV system should offset 100% of average annual building electricity demand; or (b) Installation of a PV system that covers 50% of gross roof space based on gross roof area—the solar PV system should cover a square footage equal to 50% of the total roof area. Electric vehicle (EV) charging for new non-residential construction is adopted as mandatory at the Tier 2 level. Ordinance No. 5999 also supports the City’s recent authorization to prepare a Climate Action and Adaptation Plan (CAAP) which will aim to reduce communitywide emissions.

42 City of Glendale, *South Glendale Community Plan Environmental Impact Report*, <https://www.glendaleca.gov/government/departments/community-development/planning/community-plans/sgcp-eir>. Accessed June 2022.

43 City of Glendale, Ordinance No. 5999, November 15, 2022.

4.4.4 ENVIRONMENTAL SETTING

4.4.4.1 Existing Conditions

State Emissions

California is the second largest contributor of GHGs in the United States and the 16th largest in the world.⁴⁴ In 2019, California produced 418.2 million metric tons of carbon dioxide equivalents (MMTCO₂e), including imported electricity and excluding combustion of international fuels and carbon sinks or storage. The major source of GHGs in California is transportation, contributing to 40 percent of the State's total GHG emissions. The Statewide inventory of GHGs by sector is shown in **Table 4.4-2: California GHG Inventory 2011-2019**.

Existing Emissions

The Project site is currently developed with ten warehouse related structures, which would be demolished as part of the Project. The current site usage generates existing vehicle trips and air quality emissions from operations related to these uses. **Table 4.4-3: Existing Uses GHG Emissions** identifies the GHG emissions from the existing warehouse related structures.

TABLE 4.4-2 CALIFORNIA GHG INVENTORY 2011-2019									
Main Sector	Emissions (MMTCO ₂ e)								
	2011	2012	2013	2014	2015	2016	2017	2018	2019
Transportation ^a	161.8	161.4	161.3	162.6	166.2	169.8	171.2	169.6	166.1
Electric Power	89.2	98.2	91.4	88.9	84.8	68.6	62.1	63.1	58.8
Industrial ^b	89.4	88.9	91.7	92.5	90.3	89.0	88.8	89.2	88.2
Commercial and Residential	46.0	43.5	44.2	38.2	38.8	40.6	41.3	41.4	43.8
Agriculture	34.4	35.5	33.8	34.7	33.5	33.3	32.5	32.7	31.8
High GWP ^{c,d}	14.5	15.5	16.8	17.7	18.6	19.2	20.0	20.4	20.6
Recycled and waste	8.4	8.3	8.4	8.4	8.5	8.6	8.7	8.7	8.9
Total Emissions	443.7	451.3	447.6	443.0	440.7	429.1	424.6	425.1	418.2

Source: CARB, "GHG Current California Emission Inventory Data," <https://ww2.arb.ca.gov/ghg-inventory-data>. Accessed June 2022.

Note: MMTCO₂e - million metric tons of carbon dioxide equivalent emissions

^a Includes equipment used in construction, mining, oil drilling, industrial and airport ground operations.

^b Reflects emissions from combustion of natural gas, diesel, and lease fuel plus fugitive emissions.

^c These categories are listed in the Industrial sector of CARB's GHG Emission Inventory sectors.

^d This category is listed in the Electric Power sector of CARB's GHG Emission Inventory sectors.

44 California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004, Staff Final Report*, https://planning.lacity.org/eir/8150Sunset/References/4.E.%20Greenhouse%20Gas%20Emissions/GHG.20_CEC%20GHG%20Emissions%20and%20Sinks.pdf. Accessed June 2022.

TABLE 4.4-3
EXISTING USES GHG EMISSIONS

Source	MTCO ₂ e
Mobile	9
Area	4
Energy	1117
Water	122
Waste	71
Refrigerants	8
Total	1,331

Source: Refer to **Appendix A for Air Quality and Greenhouse Gas Technical Study.**

4.4.5 ENVIRONMENTAL IMPACT ANALYSIS

4.4.5.1 Thresholds of Significance

To assist in determining whether the Project would have a significant effect on the environment, the City finds the Project may be deemed to have a significant impact related to greenhouse gas emissions if it would:

- Threshold GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- Threshold GHG-2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Pursuant to CEQA Guidelines Section 15064.4, the methods suitable for analysis of GHG emissions are:

- Use a model or methodology to quantify greenhouse gas emissions resulting from a project. The Lead Agency has discretion to select the model it considers most appropriate provided it supports its decision with substantial evidence. The Lead Agency should explain the limitation of the particular model or methodology selected for use.
- Rely on a qualitative analysis or performance-based standards.

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Nor have SCAQMD, OPR, CARB, CAPCOA, or any other state or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project.

Assessing the significance of a project's contribution to cumulative global climate change involves: (1) developing pertinent inventories of GHG emissions, and (2) considering project consistency with applicable emission reduction strategies and goals. As discussed previously, the City adopted the *Sustainable City Action Plan* per CEQA Guidelines Section 15183.5. As such, the Project's GHG analysis may "tier off" the City's General Plan and Sustainable City Action Plan to meet project-level CEQA evaluation requirements for GHG emissions.

Consistency Analysis

The Project's GHG impacts are evaluated by assessing the Project's consistency with applicable GHG reduction strategies and local actions adopted by the City. As discussed previously, the City has established goals and actions to reduce the generation and emission of GHGs from both public and private activities in the City's Greener Glendale Plan and Ordinance No. 5999.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. The City does not have a programmatic mitigation plan to tier from, such as a Greenhouse Gas Emissions Reduction Plan, as recommended in the relevant amendments to the CEQA Guidelines. However, the City has adopted the Greener Glendale Plan that encourages and requires applicable projects to implement energy efficiency measures. In addition, CARB's Climate Change Scoping Plan includes a range of GHG reduction actions, including direct regulations, alternative compliance mechanisms, monetary and nonmonetary incentives, voluntary actions, market-based mechanisms, and an AB 32 implementation regulation. Thus, if the Project is designed in accordance with these policies and regulations, the Project would result in a less-than-significant impact, because it would be consistent with the overarching State regulations on GHG reduction (AB 32).

A consistency analysis is provided below and describes the Project's compliance with, or exceedance of, performance-based standards included in the regulations outlined in the applicable portions of CARB's Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, the City's Greener Glendale Plan, and the South Glendale Community Plan Final Program EIR.

4.4.5.2 Methodology

Methodologies for Evaluating Significance

The analysis of the Project's GHG emissions consists of a quantitative analysis of the GHG emissions generated by the Project and a qualitative analysis of the Project's consistency with adopted GHG-related legislation, plans, and policies. This approach is in accordance with CEQA Guidelines Section 15064.4(a), which affirms the discretion of a lead agency to determine, in the context of a particular project, whether to use quantitative and/or qualitative methodologies to determine the significance of a project's impacts.

Emissions Inventory Modeling

The total GHG emissions from the Project were quantified to determine the level of the Project's estimated annual GHG emissions. As with the Air Quality section of this EIR (see **Section 4.2: Air Quality**), construction emissions were estimated using CalEEMod 2022.1 by assuming a conservative estimate of construction activities and applying the mobile-source emissions factors. The modeling used the same input values as previously discussed under the methodology section for air quality. SCAQMD's Draft

Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold⁴⁵ recognizes that construction-related GHG emissions from projects occur over a relatively short-term period of time and contributes a relatively small portion of a project's overall lifetime GHG emissions. The guidance recommends that a project's construction-related GHG emissions be amortized over a 30-year project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operation GHG reduction strategies.

CalEEMod was also used to estimate operational GHG emissions from electricity, solid waste, water and wastewater, and landscaping equipment. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. Mobile-source emissions were estimated based on the CARB EMFAC model. For mobile sources, CalEEMod was used to generate the vehicle miles traveled from the existing and proposed uses based on the Project *Transportation Analysis*.⁴⁶

With regard to energy demand, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Energy demand rates were estimated based on square footage as well as predicted water supply needs for this use. Energy demand (off-site electricity generation) for the Project was calculated within CalEEMod using the CEC's CEUS data set, which provides energy demand by building type and climate zone.

Emissions of GHGs from solid waste disposal were also calculated using CalEEMod software. The emissions are based on the waste disposal rate for the land uses, the waste diversion rate, and the GHG emission factors for solid waste decomposition. The GHG emission factors, particularly for methane, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery), which are Statewide averages, were used in this assessment.

Emissions of GHGs from water and wastewater result from the required energy to supply and distribute the water and treat the wastewater. Wastewater also results in emissions of GHGs from wastewater treatment systems. Emissions are calculated using CalEEMod and are based on the water usage rate for the proposed uses; the electrical intensity factors for water supply, treatment, and distribution and for wastewater treatment; the GHG emission factors for the electricity utility provider; and the emission factors for the wastewater treatment process.

45 SCAQMD, *Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2). Accessed June 2022.

46 Gibson Transportation Consulting, Inc., *CEQA Transportation Analysis for the 5426 San Fernando Studios Glendale, California*, August 10, 2021.

CalEEMod also quantifies common refrigerant GHGs used in air conditioning and refrigeration equipment, some of which are HFCs.

With respect to emission rates, CalEEMod incorporates EMFAC2021 emission rates by vehicle class and vehicle process. Specific CO₂ emissions, EMFAC and subsequently CalEEMod take into account the following emission processes related to CO₂ on an annual basis:

- Start Exhaust: Extra emissions that occur when starting a vehicle.
- Idle Exhaust: Emissions occur during extended idling events or when the vehicle is not operating any significant distance.
- Run Exhaust: Emissions occur when traveling on the road, including at speed and idling, as part of normal driving.

4.4.5.3 Project Impacts

Impact GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction

Construction activity impacts are relatively short in duration, so they contribute a relatively small portion of the total lifetime GHG emissions of a project. The combustion of fossil fuels in construction equipment results in GHG emissions of CO₂ and smaller amounts of CH₄ and N₂O. Emissions of GHG would also result from the combustion of fossil fuels from vendor trucks delivering materials and construction worker vehicles commuting to and from the Project site. Typically, light-duty and medium-duty automobiles and trucks would be used for worker trips and heavy-duty trucks would be used for vendor trips. The vast majority of motor vehicles used for worker trips rely on gasoline as an energy source while motor vehicles used for vendor trips would primarily rely on diesel as an energy source. In addition, GHG emissions-reduction measures for construction equipment are relatively limited. Therefore, in its Draft Guidance Document - Interim CEQA Greenhouse Gas (GHG) Significance Thresholds, the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.

Construction assumptions used in the analysis of GHG emissions conservatively assume that the Project would be constructed with the most intensive activities occurring on a daily basis. The total emissions from construction of the Project are shown in **Table 4.4-4: Annual Construction GHG Emissions**.

TABLE 4.4-4
ANNUAL CONSTRUCTION GHG EMISSIONS

Construction Year	MTCO ₂ e
2023	277
2024	994
2025	394
Overall Total	1,665
<i>30-Year Annual Amortized Rate</i>	<i>56</i>

Source: Refer to **Appendix A** for Air Quality and Greenhouse Gas Technical Study.

As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory. Total GHG emissions from the construction activities are forecast to be 1,665 MTCO₂e. The total GHG emissions were amortized over a 30-year project lifetime and forecast to be 56 MTCO₂e per year.

Operation

Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, as well as waste management would occur every year after buildout. The Project would comply with the City's reach codes and would be all-electric. This section addresses operational GHG emissions.

Area Sources

The area source GHG emissions included in this analysis result primarily from landscaping-related fuel combustion sources, such as lawn mowers. CalEEMod defaults were used for landscape maintenance emissions. Area source emissions are shown in **Table 4.4-5: Area Source GHG Emissions**. As shown in Table 4.4-5, Project emissions would result in less than 1 MTCO₂e per year from area sources.

TABLE 4.4-5
AREA SOURCE GHG EMISSIONS

Source	Unmitigated MTCO ₂ e per year
Landscaping	<1
Total	<1

Source: Refer to **Appendix A** for Air Quality and Greenhouse Gas Technical Study.

Energy Sources

GHGs are emitted as a result of activities in buildings when electricity is used as an energy source. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity

generation typically takes place off-site at the power plant; electricity use in a building generally causes emission in an indirect manner.

GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for Glendale Water and Power were selected in CalEEMod. Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

Energy source emissions are shown in **Table 4.4-6: Energy Source GHG Emissions**. As shown in **Table 4.4-6**, the Project would generate 2,383 MTCO₂e per year from electricity consumption.

TABLE 4.4-6 ENERGY SOURCE GHG EMISSIONS	
Source	Unmitigated MTCO ₂ e per year from Electricity
Office space	1,000
Stage space	1,236
Parking	147
Total	2,382

Source: Refer to **Appendix A** for Air Quality and Greenhouse Gas Technical Study.

Mobile Sources Emissions

Vehicle trips generated by growth within the Project site vicinity would result in operational emissions through the combustion of fossil fuels. CO₂ emissions were determined based on the trip rates from the Project's *Transportation Analysis* (refer to **Appendix E**). The Project site is served by multiple bus and shuttle lines operated by Metro and the City of Glendale Beeline along San Fernando Road and SR 134. In the vicinity of the Project site, existing bicycle routes are provided on Doran Street and Broadway. As shown in **Table 4.4-7: Mobile Source GHG Emissions**, the Project's mobile source emissions would result in 71 MTCO₂e per year.

TABLE 4.4-7 MOBILE SOURCE GHG EMISSIONS	
Source	Unmitigated MTCO ₂ e per year
Mobile (trips)	71
Total	71

Source: Refer to **Appendix A** for Air Quality and Greenhouse Gas Technical Study.

Solid Waste Emissions

Solid waste generation and associated emissions are calculated using default data found in CalEEMod for the proposed land uses. Disposal of organic waste in landfills can lead to the generation of CH₄, a potent GHG. By generating solid waste, the Project would contribute to the emission of fugitive CH₄ from landfills, as well as CO₂ and N₂O from the operation of trash collection vehicles. As shown in **Table 4.4-8: Solid Waste Source GHG Emissions**, GHG emissions resulting from solid waste would forecast to be 136 MTCO₂e per year.

TABLE 4.4-8 SOLID WASTE SOURCE GHG EMISSIONS	
Land Use	Unmitigated MTCO ₂ e per year
Office space	62
Stage space	74
Total	136

Source: Refer to **Appendix A for Air Quality and Greenhouse Gas Technical Study**.

Water Consumption and Wastewater Emissions

California's water conveyance system is energy intensive, with electricity used to pump and treat water. The Project would result in indirect GHG emissions due to water consumption and wastewater generation. Water consumption and wastewater generation, and their associated emissions, are calculated based on the square footage of the proposed uses, using CalEEMod data. As shown in **Table 4.4-9: Water Source GHG Emissions**, the Project's water and wastewater GHG emissions would forecast to be 236 MTCO₂e per year.

TABLE 4.4-9 WATER SOURCE GHG EMISSIONS	
Land Use	Unmitigated MTCO ₂ e per year
Office space	109
Stage space	127
Total	236

Source: Refer to **Appendix A for Air Quality and Greenhouse Gas Technical Study**.

Refrigerants

CalEEMod quantifies common refrigerant GHGs used in air conditioning and refrigeration equipment, some of which are HFCs. This includes refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime. As shown in **Table 4.4-10: Refrigerant GHG Emissions**, the Project's GHG emissions from refrigerants would be 8 MTCO₂e per year.

TABLE 4.4-10
REFRIGERANT GHG EMISSIONS

Land Use	Unmitigated MTCO ₂ e per year
Office space	<1
Stage space	8
Total	8

Source: Refer to **Appendix A** for Air Quality and Greenhouse Gas Technical Study.

Total Emissions

As shown in **Table 4.4-11: Operational GHG Emissions**, the Project is forecasted to generate a net total of 1,571 MTCO₂e per year.

TABLE 4.4-11
OPERATIONAL GHG EMISSIONS

Source	Unmitigated MTCO ₂ e per year
Construction (amortized)	56
Mobile	71
Area	12
Energy	2382
Water	236
Waste	136
Refrigerants	8
Total	2,902
Existing	1,331
Net Total	1,571

Source: Refer to **Appendix A** for Air Quality and Greenhouse Gas Technical Study.

It should be noted that each source category of GHG emissions from the Project would be subject to a number of regulations that directly or indirectly reduce climate change-related emissions:

- Stationary and Area Sources: Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.
- Energy: Both construction and operational activities associated with the Project would generate energy-related emissions that are covered by the **State's renewable portfolio mandates, including SB 350**, which requires that at least 50 percent of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030.
- Transportation: Both construction and operational activities associated with the Project would generate transportation-related emissions from combustion of fossil fuels that are covered in the **State's Cap and Trade program**.
- Building Structures: Operational efficiencies would be incorporated into the Project that reduce energy use and waste, as mandated by CALGreen, such as use of energy efficient windows and construction materials.

- Water and Wastewater Use: The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.
- Major appliances: The Project would include major appliances that are regulated by CEC requirements for energy efficiency.
- Solid Waste Management: The Project would be subject to solid waste diversion policies that reduce GHG emissions, such as the City's recycling program.

As discussed under Impact GHG-2, the Project adheres to regulatory compliance measures that would reduce the Project's GHG emissions profile. The analysis below shows that the Project would not conflict with applicable plans including CARB's Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, the City's Greener Glendale Plan, and the South Glendale Community Plan Final Program EIR. In addition, the Project site's proximity to mass transit would further reduce what emissions are produced through the above regulations and applicable air quality plans. As such, the Project would have a less than significant direct or indirect GHG impact on the environment.

Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

There are no mitigation measures required and impacts would be less than significant.

Impact GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Compliance with applicable GHG emission reduction plans would result in a less than significant project-level and cumulative impact. The following section describes the extent the Project complies with or exceeds the performance-based standards included in the regulations and policies outlined in CARB's Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, the City's Greener Glendale Plan, and the South Glendale Community Plan Final Program EIR. Key regulations incorporated into this analysis include California Code of Regulations, Title 20 and Title 24.

Climate Change Scoping Plan

Table 4.4-12: Project Consistency with Climate Change Scoping Plan contains a list of GHG-reducing strategies set forth in the Climate Change Scoping Plan that are applicable to the Project. The analysis presented in **Table 4.4-12** describes the Project's compliance and consistency with these strategies as outlined in the State's Climate Change Scoping Plan to reduce GHG emissions. As shown in **Table 4.4-12**, the Project would not conflict with the policies included in the Climate Change Scoping Plan.

TABLE 4.4-12
PROJECT CONSISTENCY WITH CLIMATE CHANGE SCOPING PLAN

Regulation, Actions, and Strategies	Responsible Party(ies)	Proposed Project Consistency Analysis
California Code of Regulations (CCR), Title 20: The 2016 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.	State and CEC	No Conflict. The Project would develop new buildings that would be outfitted with appliances and lighting that comply with CEC's standards. These standards are included in the default parameters provided in CalEEMod and are reflected in the Project-related GHG emissions provided in Table 4.4-10 .
CCR, Title 24, Building Standards Code: The 2022 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy.	State and CEC	No Conflict. Consistent with regulatory requirements, the Project would comply with applicable provisions of the California Green Building Standards Code.
The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.		
Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act establishes standards structured to reduce average statewide electrical energy consumption by not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018. ^b	State/ Manufacturers	No Conflict. The Project would not conflict with the requirements under AB 1109 because it would comply with local and state green building programs and incorporates energy efficient lighting and other required measures that would reduce electricity consumption.
By 2019, develop pricing policies to support low- GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	No Conflict. The Project would not conflict with this policy as this policy would not be implemented at the project level.
CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.	State	No Conflict. Consistent with regulatory requirements, the Project would comply with applicable provisions of the California Green Building Standards Code.
CARB In-Use Off-Road Regulation: CARB's in-use off-road diesel vehicle regulation ("Off-Road Diesel Fleet Regulation") requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.	CARB	No Conflict. Construction contractors that would comply with this regulation would be used throughout Project development.

TABLE 4.4-12
PROJECT CONSISTENCY WITH CLIMATE CHANGE SCOPING PLAN

Regulation, Actions, and Strategies	Responsible Party(ies)	Proposed Project Consistency Analysis
CARB In-Use On-Road Regulation: CARB's in-use on- road heavy-duty vehicle regulation ("Truck and Bus Regulation") applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds. ^a	CARB	No Conflict. Construction contractors that would comply with this regulation would be used throughout Project development.
Implement the Short-Lived Climate Pollutant Strategy by 2030: 40-percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. 50-percent reduction in black carbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	No Conflict. Senate Bill 605 (SB 605) was adopted in 2014 which directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels. ^b The Project would comply with the CARB SLCP Reduction Strategy which limits the use of hydrofluorocarbons for refrigeration uses.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	No Conflict. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. In October 2020, CalRecycle released the proposed regulation text for the Short-lived Climate Pollutants (SLCP): Organic Waste Reductions program." ^c The Project would not conflict with AB 341 which requires not less than 75 percent of solid waste generated be source reduced through recycling, composting or diversion. Reduction in solid waste generated by the Project would reduce overall GHG emissions. Compliance with AB 341 would also help achieve the goals of SB 1383.

^a CARB, *Truck and Bus Regulation—On-Road Heavy Duty Diesel Vehicles (In-Use) Regulation*.

^b CARB, *Reducing Short-Lived Climate Pollutants in California*.

^c CalRecycle, *Short-Lived Climate Pollutants (SLCP): Organic Waste Reductions Proposed Methane Emissions Reductions, Proposed Regulation Text, October 2020*.

SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

A discussion of the Project's consistency with the policies applicable to individual development projects in the 2020-2045 RTP/SCS is presented in **Table 4.4-13: Project Consistency with SCAG 2020-2045 RTP/SCS**, below. As shown in **Table 4.4-13**, the Project would not conflict with the 2020-2045 RTP/SCS.

TABLE 4.4-13
PROJECT CONSISTENCY WITH SCAG 2020-2045 RTP/SCS

Goals and Policies	Consistency Analysis
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	No Conflict. The Project site is served by multiple bus and shuttle lines operated by Metro and the City of Glendale Beeline along San Fernando Road and SR 134. In the vicinity of the Project site, existing bicycle routes are provided on Doran Street and Broadway. The location of the Project encourages a variety of transportation options and access.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	No Conflict. While not necessarily applicable on a project-specific basis, the Project would support this goal by improving the viability of alternative forms of transportation through higher density development. Moreover, the Project is served by multiple bus and shuttle lines operated by Metro and the City of Glendale Beeline along San Fernando Road and SR 134. In the vicinity of the Project site, existing bicycle routes are provided on Doran Street and Broadway. Additionally, as discussed in Section 4.8: Transportation of this EIR and the <i>Transportation Analysis (Appendix E)</i> , the Project would not result in significant transportation impacts.
Goal 4: Increase person and goods movement and travel choices within the transportation system.	No Conflict. While not necessarily applicable on a project-specific basis, the Project would support this goal by improving local access to alternative forms of transportation, with appropriate design considerations to account for future population growth and multimodal choices.
Goal 5: Reduce greenhouse gas emissions and improve air quality.	No Conflict. The location of the Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. These would serve to reduce VMT which generates GHG's.
Goal 6: Support healthy and equitable communities.	No Conflict. As mentioned previously, the Project is served by multiple bus and shuttle lines operated by Metro and the City of Glendale Beeline along San Fernando Road and SR 134. In the vicinity of the Project site, existing bicycle routes are provided on Doran Street and Broadway.
Goal 7: Adapt to a changing climate and support an integrated regional development pattern in transportation network.	No Conflict. This policy is directed towards SCAG to support regional development patterns areas. However, the Project would be served by existing transit services and would comply with the California Green Building Standards Code (CALGreen).
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	No Conflict. This policy is directed towards SCAG to leverage the use of new transportation technologies using data-driven solutions. However, as stated above, the Project is served by existing transit services which is consistent with this policy.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	No Conflict. This policy is directed towards housing developments and does not apply to the Project. However as stated above, the Project would be served by existing transit services.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	No Conflict. This policy is directed towards SCAG and does not directly apply to the Project.

TABLE 4.4-13
PROJECT CONSISTENCY WITH SCAG 2020-2045 RTP/SCS

Goals and Policies	Consistency Analysis
Guiding Principle 2: Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	No Conflict. This policy is directed towards SCAG in allocating transportation system funding. However, the Project would contribute to a safe, well maintained, and efficient multimodal transportation system. As discussed in Section 4.8: Transportation of this EIR and the <i>Transportation Analysis (Appendix E)</i> , the Project would not result in significant transportation impacts.
Guiding Principle 3: Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	No Conflict. This Goal is directed towards SCAG and the City and does not apply it to individual development projects. However, as stated above, the Project site is located in an urbanized area in the City and is located near existing transit services.
Guiding Principle 4: Encourage RTP/SCS investments in strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	No Conflict. This policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. However, the Project would support the policy as it is located near existing transit services.
Core Vision Topic 1: Sustainable Development Through our continuing efforts to better align transportation investments and land use decisions, we strive to improve mobility and reduce greenhouse gases by bringing housing, jobs and transit closer together.	No Conflict. The Project would comply with the California Green Building Standards Code (CALGreen), and would incorporate eco-friendly building materials, systems and high-performance building envelopment. The Project would be located near existing transit services and bicycle infrastructure. As such, the location of the Project promotes the use of a variety of transportation options, which includes walking and the use of public transportation.
Core Vision Topic 4: Transit Backbone Expanding the transit network and fostering development in transit-oriented communities is central to the region's plan for meeting mobility and sustainability goals while continuing to grow the regional economy.	No Conflict. This core vision topic is directed towards SCAG goals for the region and is not directly applicable to individual development projects. However, as stated above, the Project would be located near existing transit services and bicycle infrastructure. As such, the location of the Project promotes the use of a variety of transportation options, which includes walking and the use of public transportation.
Core Vision Topic 5: Complete Streets Creating "complete streets" that are safe and inviting to all roadway users is critical to increasing mobility choices, reducing traffic fatalities and serious injuries and meeting greenhouse gas reduction targets.	No Conflict. This core vision topic is directed toward SCAG and is not specifically applicable to the Project. Nonetheless, the Project site's location near existing transit services and bicycle infrastructure would promote a variety of transportation options.
Core Vision Topic 6: Goods Movement The efficient movement of goods is critical to a strong economy and improves quality of life in the SCAG region by providing jobs and access to markets through trade. However, increased volumes of goods moving across the transportation system contribute to greater congestion, safety concerns and harmful emissions. It is critical to integrate land use decisions and technological advancements to minimize environmental and health impacts while fostering continued growth in trade and commerce.	No Conflict. This core vision topic is directed toward SCAG and is not specifically applicable to the Project. Nonetheless, the Project site's location near existing transit services and bicycle infrastructure would promote a variety of transportation options to minimize environmental health impacts while fostering continued economic growth.

TABLE 4.4-13
PROJECT CONSISTENCY WITH SCAG 2020-2045 RTP/SCS

Goals and Policies	Consistency Analysis
<i>Sustainable Community Strategy 1: Focus Growth Near Destinations and Mobility Options</i>	
Sustainable Community Strategy 1a: Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	No Conflict. The location of the Project promotes the use of a variety of transportation options, which includes walking and the use of public transportation.
Sustainable Community Strategy 1b: Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets	No Conflict. This strategy is directed toward SCAG and is not specifically applicable to the Project. Nonetheless, the Project includes studio and support uses which would improve the job/housing balance. Further, the location of the Project promotes the use of a variety of transportation options, which includes walking and the use of public transportation.
Sustainable Community Strategy 1c: Plan for growth near transit investments and support implementation of first/last mile strategies	No Conflict. This strategy is directed toward SCAG and is not specifically applicable to the Project. Nonetheless, the Project would be located near existing transit services and bicycle infrastructure.
Sustainable Community Strategy 1d: Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	No Conflict. This strategy is directed toward SCAG and is not specifically applicable to the Project. Nonetheless, the Project would redevelop the existing uses with updated, higher-efficiency buildings.
Sustainable Community Strategy 1e: Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	No Conflict. This strategy is directed towards SCAG and the City and does not apply to individual development projects. Nonetheless, the Project would increase the utilization of the Project site by redeveloping the site with new buildings.
Sustainable Community Strategy 1f: Encourage design and transportation options that reduce the reliance on number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	No Conflict. The location of the Project promotes the use of a variety of transportation options, which includes walking and the use of public transportation. Thus, the Project would reduce VMT and promote alternatives to driving.
<i>Sustainable Community Strategy 2: Promote Diverse Housing Choices</i>	
Sustainable Community Strategy 2a: Preserve and rehabilitate affordable housing and prevent displacement.	No Conflict. Strategy 2a is directed towards SCAG and does not apply to the Project. Moreover, the Project would not develop residential uses
Sustainable Community Strategy 2b: Identify funding opportunities for new workforce and affordable housing development.	No Conflict. This strategy is directed towards SCAG in identifying funding opportunities for affordable housing development. Moreover, the Project would not develop residential uses.
Sustainable Community Strategy 2d: Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	No Conflict. This strategy is directed towards SCAG and does not apply to individual development projects. Moreover, the Project would not develop residential uses.
<i>Sustainable Community Strategy 3: Leverage Technology Innovations</i>	
Sustainable Community Strategy 3a: Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking /drop off space.	No Conflict. This strategy is directed towards SCAG and does not apply to individual development projects.

TABLE 4.4-13
PROJECT CONSISTENCY WITH SCAG 2020-2045 RTP/SCS

Goals and Policies	Consistency Analysis
Sustainable Community Strategy 3c: Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	No Conflict. This strategy is directed towards SCAG and does not apply to individual development projects. Nonetheless, the Project would comply with the California Green Building Standards Code (CALGreen), and would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-VOC paints/adhesives, drought tolerant planting, and high-performance building envelopment.
<i>Sustainable Community Strategy 4: Support Implementation of Sustainability Policies</i>	
Sustainable Community Strategy 4a: Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.	No Conflict. This strategy is directed towards SCAG and does not apply to individual development projects. Nonetheless, the location of the Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. As discussed in Section 4.2: Air Quality and above, operational emissions and greenhouse gas emissions generated by the Project’s construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD and therefore, the Project would be consistent with this strategy.
<i>Sustainable Community Strategy 5: Promote a Green Region</i>	
Sustainable Community Strategy 5b: Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	No Conflict. This strategy is directed towards SCAG and does not apply to individual development projects.
Sustainable Community Strategy 5d: Promote more resource efficient development focus on conservation, recycling and reclamation.	No Conflict. This strategy is directed towards SCAG and does not apply to individual development projects. Nonetheless, the Project would comply with the California Green Building Standards Code (CALGreen), and would incorporate eco-friendly building materials, systems and high-performance building envelopment.
Sustainable Community Strategy 5e: Preserve, enhance, and restore regional wildlife connectivity.	No Conflict. This policy is directed towards SCAG and does not directly apply to the Project. However, the Project would not remove any areas that have significant value as wildlife habitats given the fully developed and disturbed nature of the Project site.
Sustainable Community Strategy 5f: Reduce consumption of resource areas, including agricultural land.	No Conflict. This policy is directed towards SCAG and does not directly apply to the Project. Nonetheless, development of the Project would not remove any areas that have significant value as agricultural lands given the fully developed and disturbed nature of the Project site.
Sustainable Community Strategy 5g: Identify ways to improve access to public park space.	No Conflict. This strategy is directed towards SCAG and does not apply to individual development projects.

Source: SCAG, Connect SoCal, 2020-2045 RTP/SCS, September 2020.

Consistency with Greener Glendale Plan

As discussed previously, the City adopted the Greener Glendale Plan which identified 2035 reduction targets through continued implementation of California vehicle and fuel standards, building energy and water efficiency audits and upgrades, Zero Waste Plan 90 percent diversion by 2030, tree planning programs, and turf reduction rebates.⁴⁷ The Project would not conflict with these programs as they would be implemented at the State level. Moreover, the Project would comply with the California Green Building Standards Code (CALGreen), and the City's reach codes by being all-electric, including solar panels on Building 2 and on Building 3 and providing 27 electric vehicles spaces. This would comply with the reach codes requirement of installation of a solar photovoltaic system for a non-residential building that covers 50% of gross roof space based on gross roof area. Further, the Project's electric vehicle spaces would meet the reach codes requirement that electric vehicle charging for new non-residential and hotel construction is adopted as mandatory at the Tier 2 level. As such, the Project would be consistent with the Greener Glendale Plan.

Consistency with South Glendale Community Plan Final Program EIR

As discussed previously, Policy GHG-3 of the South Glendale Community Plan Final Program EIR requires the City to reduce GHG emissions from new development by discouraging auto-dependent sprawl and dependence on the private automobile; promoting water conservation and recycling; promoting development that is compact, mixed use, pedestrian friendly, and transit oriented; and promoting energy-efficient building design and site planning. As mentioned previously, the Project is served by multiple bus and shuttle lines operated by Metro and the City of Glendale Beeline along San Fernando Road and SR 134. In the vicinity of the Project site, existing bicycle routes are provided on Doran Street and Broadway. Furthermore, the Project is committed to meeting the requirements of the CALGreen Code by incorporating strategies such as low-flow toilets, low-flow faucets and other energy and resource conservation measures. The Project would comply with applicable energy, water, and waste efficiency measures specified in the Title 24 Building Energy Efficiency Standards and CALGreen standards. Moreover, the Project would comply with the City's reach codes by being developed as all-electric, providing solar panels on Building 2 and Building 3, and provide 27 electric vehicles spaces. This would comply with the reach codes requirement of installation of a solar photovoltaic system for a non-residential building that covers 50% of gross roof space based on gross roof area. Further, the Project's electric vehicle spaces would meet the reach codes requirement that electric vehicle charging for new non-residential and hotel construction is adopted as mandatory at the Tier 2 level. As such, the Project would be consistent with the policies mentioned in the South Glendale Community Plan Final Program EIR.

47 City of Glendale, "Greener Glendale," <https://www.glendaleca.gov/government/departments/management-services/office-of-sustainability/greener-glendale>. Accessed June 2022.

Conclusion

As shown above, the Project would not conflict with CARB's Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, the City's Greener Glendale Plan, or the South Glendale Community Plan Final Program EIR. As such, impacts would be less than significant.

Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

There are no mitigation measures required and impacts would be less than significant.

4.4.5.4 Cumulative Impacts

As discussed previously, cumulative greenhouse gas impacts are a global issue. **Section 4.0: Environmental Impact Analysis**, includes a list of related projects identified within **Table 4.0-1**. All related projects consist of individual development projects that would be individually analyzed for greenhouse gas impacts.

To achieve Statewide goals, CARB is continuing its ongoing process of updating, establishing, and implementing regulations to reduce Statewide GHG emissions. Currently, no applicable quantitative significance thresholds or specific reduction targets exist to assist in determining significance at the project or cumulative level. Additionally, currently no generally accepted methodology exists to determine whether GHG emissions associated with a specific project represent new emissions or existing and/or displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064h(3), the City as a lead agency, has determined that the Project's contribution to cumulative GHG emissions would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. As stated above, the Project would not result in a potentially significant impact because it would not conflict with CARB's Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, the City's Greener Glendale Plan, or the South Glendale Community Plan Final Program EIR. As such, cumulative impacts would be less than significant.

The related projects would generate both construction and operational GHG emissions during the life of each project. Given that the Project would not have a potentially significant impact to GHG emissions, the Project's contribution to cumulative impacts is not considered a significant impact.

Level of Significance Before Mitigation

Upon implementation of regulatory requirements, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Compliance with local, State, and federal plans, policies, and programs would ensure impacts related to greenhouse gas emissions would be less than significant.

4.5 HAZARDS AND HAZARDOUS MATERIALS

4.5.1 INTRODUCTION

This section addresses the potential environmental effects associated with exposure to hazards and hazardous materials associated with the transport, storage, and use of hazardous materials, the presence of existing hazardous material contamination within the Project site, exposure to hazards from operations at any nearby airports, and wildland fires. The analysis also addresses consistency of the Project with applicable federal, State, and local hazardous materials policies and regulations. This section incorporates information from the Phase I Environmental Site Assessment (ESA), prepared by SCS Engineers for the Project Site, dated May 25, 2021 (*May 2021 Phase I ESA*; see **Appendix C**).

4.5.2 REGULATORY FRAMEWORK

4.5.2.1 Federal Regulations

Resource Conservation and Recovery Act of 1976 (42 USC 6901-6987)
(RCRA)

The RCRA gives the EPA the authority to control hazardous waste from the “cradle-to-grave.” This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled the EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

The CERCLA, commonly known as a Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries, and provided federal authority to respond directly to releases, or threatened releases, of hazardous substances that may endanger public health or the environment. CERCLA:

- Establishes prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- Provides for liability of persons responsible for releases of hazardous waste at these sites; and
- Establishes a trust fund for cleanup when no responsible party can be identified.

The law authorizes two kinds of response actions:

- Short-term removals: actions may be taken to address release or threatened release requiring prompt response; or
- Long-term remedial response actions: permanently and significantly reduce the dangers associated with release or threat of release of hazardous substances that are serious, but not immediately life threatening. **These actions can be conducted only at sites listed on EPA’s National Priorities List.**

CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List.

*Emergency Planning and Community Right-to-Know Act
(42 USC 11001 et seq.)*

The Emergency Planning and Community Right-to-Know Act (EPCRA) was passed in 1986 in response to concerns regarding the environmental safety that hazards posed by the storage and handling of toxic chemicals. To reduce the risk of a toxic chemical disaster, Congress imposed requirements for federal, State, local governments, tribes, and industries. These requirements covered emergency planning and “Community Right-to-Know” reporting on hazardous and toxic chemicals. The Community Right-to-Know provisions help the public’s knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. States and communities, working with facilities, can use the information to improve chemical safety, and protect public health and the environment.

Hazardous and Solid Wastes Amendment Act

The Hazardous and Solid Waste Amendment Act are the 1984 amendments to RCRA that focus on waste minimization and phasing out land disposal of hazardous waste, as well as corrective action for release. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.

Chemical Accident Prevention Provisions

The Chemical Accident Prevention Provisions (CAPP) was adopted to address chemical accident prevention at facilities using extremely hazardous substances. The CAPP requires all facilities that use or manage certain flammable and toxic materials to prepare a Risk Management Plan (RMP) that describes the materials used over the previous five years, a worst-case accident scenario and alternatives, a prevention program, and an emergency response program.

Clean Water Act (CWA) 402

The CWA Section 402 provides for the restoration and maintenance of the physical, chemical, and biological integrity of the nations’ waters. Discharges of pollutants must be authorized under the National Pollutant Discharge Elimination System (NPDES) permits. These permits can include Waste Discharge Requirements (WDRs) and Stormwater Pollution Prevention Plans (SWPPPs). The CWA (33 USC 1344) seeks to restore and maintain the chemical, physical, and biological integrity of the waterways of the nation. The CWA sets up a system of water quality standards, discharge limitations, and permit requirements.

Department of Transportation Hazardous Materials Regulations (49 CFR 100-185)

The Department of Transportation (DOT), the Federal Highway Administration (FHWA), and the Federal Railroad Administration (FRA) regulate the transport of hazardous materials at the federal level. The Hazardous Materials Transportation Act requires carriers to report accidental releases of hazardous materials to DOT at the earliest practical moment. Other incidents that must be reported include deaths, injuries requiring hospitalization, and property damage exceeding \$50,000.

Enforcement of DOT regulations are shared by each of the following administrations under delegations from the Secretary of the DOT:

- Research and Special Programs Administrations - Responsible for container manufacturers, reconditioners, and re-testers, and shares authority over shippers of hazardous materials.
- FHWA - Enforces all regulations pertaining to motor carriers.
- FRA - Enforces all regulations pertaining to rail carriers.

4.5.2.2 State Regulations

California Environmental Protection Act

The California Environmental Protection Agency (CalEPA) was created in 1991 with the signing of Executive Order W-5-91 by Governor Pete Wilson. Several State regulatory boards, departments, and offices were placed under the CalEPA umbrella to create a cabinet-level voice for the protection of human health and the environment, and to assure the coordinated deployment of State resources. Among those responsible for hazardous materials and waste management include the Department of Toxic Substance Control (DTSC), Department of Pesticide Regulation, the State Water Quality Control Board and its Regional Water Quality Control Boards (RWQCB), and Office of Environmental Health Hazard Assessment. CalEPA also oversees the unified hazardous waste and hazardous materials management regulatory program (Unified Program), which consolidates, coordinates, and makes consistent the following six programs:

- Hazardous Materials Release Response Plans and Inventories (Business Plans);
- UST Program;
- Aboveground Petroleum Storage Tank Act;
- Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs;
- California Uniform Fire Code: Hazardous Material Management Plans and Inventory Statements; and
- California Accidental Release Prevention (CalARP) Program.

In addition, in compliance with California Public Resources Code Section 3229, before commencing any work to abandon any oil well, the owner or operator shall file with the CalGEM, formerly known as the Division of Oil, Gas, and Geothermal Resources, a written notice of intention to abandon the well (California State Division of Oil, Gas and Geothermal Resources form OG108).

Department of Toxic Substances Control

The DTSC is authorized by CalEPA to administer the hazardous waste laws and oversee remediation of hazardous wastes sites. Regulations require that DTSC “shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following: (1) All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (HSC).”¹

The DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. Approximately 1,000 scientists, engineers, and specialized support staff ensure that companies and individuals handle, transport, store, treat, dispose of, and clean up hazardous wastes appropriately. Through these measures, DTSC contributes to greater safety for all Californians and, thus, less hazardous waste reaches the environment. DTSC’s role is limited to projects with State funding.

The waste facilities identified in HSC Section 25187.5 are those where DTSC has taken or contracted for corrective action because a facility owner/operator has failed to comply with a date for taking corrective action in an order issued under the HSC, or because DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment.

Certified Unified Program Agency

Under the California Unified Hazardous Waste and Hazardous Material Management Regulatory Program, (Chapter 6.11, Division 20, Section 25404 of the Health and Safety Code), hazards/hazardous materials management is addressed locally through the Certified Unified Program Agency (CUPA). The CUPA for the County is the Los Angeles County Fire Department (LACFD). However, for the City of Glendale, the Glendale Fire Department (GFD) has the responsibility to administer and enforce all six Program Elements of the Unified Program.² As a CUPA, the following six hazardous material and hazardous waste programs are maintained:

- Hazardous Materials Release Response Plans and Inventory (Business Plan);
- California Accidental Release Program (CalARP);
- Underground Storage Tanks (UST);
- Aboveground Petroleum Storage Act (APSA)/Spill Prevention, Control, and Countermeasure Plan (SPCC Plan);
- Hazardous Waste Generation and On-site Treatment; and
- Hazardous Materials Management Plans and Inventory Statements under Uniform Fire Code Article 80.

1 California Government Code (GOV). Development Permits for Classes of Projects [65960 - 65964.1]. sec. 65962.5.

2 City of Glendale. “Hazardous Materials/CUPA.” Available at: <https://www.glendaleca.gov/government/departments/fire-department/fire-prevention/environmental-management-center/hazardous-materials-cupa>. Accessed September 2022.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) has set forth work requirements for disturbance of Asbestos-containing material (ACMs), including removal operations for all types of ACMs. In addition, the agency has developed standards for general industry and the construction industry hazardous waste operations and emergency response. Cal/OSHA ensures that employers must have controls to reduce and monitor exposure levels of hazardous materials and oversees an informational program describing any exposure during operations, as well as the inspection of drums and containers prior to removal or opening. Decontamination procedures and emergency response plans must be in place before employees begin working in hazardous waste operations.

Senate Bill 14: California Hazardous Waste Source Reduction and Management Review Act of 1989

The California Hazardous Waste Source Reduction and Management Review Act of 1989, also known as Senate Bill (SB) 14, required large-quantity generators—those that annually produce more than 13.2 tons of hazardous waste or 26.4 pounds of extremely hazardous waste—to periodically conduct a source evaluation of their facilities and develop plans to reduce their volume of hazardous waste through measures such as changes in raw materials production methods, product reformulations, and employee training. The primary objective of the legislation was to reduce the quantity of hazardous waste generated in California and thereby promote public health and improve environmental quality. Generators that exceed the aforementioned waste volume thresholds are required to file waste minimization reports with DTSC every 4 years.

California Emergency Response Plan

California has developed an emergency response plan to coordinate emergency services provided by federal, State, local governments, and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by Cal OES, which coordinates the responses of other agencies, including CalEPA, the California Highway Patrol, the RWQCB, and the LACFD.

Hazardous Waste Control Act

The Hazardous Waste Control Act (HWCA) is the State equivalent of RCRA and regulates the generation, treatment, storage, and disposal of hazardous waste.³ This act implements the RCRA “cradle-to-grave” waste management system in California but is more stringent in its regulation of non-RCRA wastes, spent lubricating oil, small-quantity generators, and transportation and permitting requirements, as well as in its penalties for violations. HWCA applies to the proposed Project because contractors will be required to comply with its hazardous waste requirements to reduce the possibility of spills.

3 DTSC. California Hazardous Waste and Hazardous Substances Law. California Code of Regulations. Title 22. Division 4.5. Environmental Health Standards for the Management of Hazardous Waste.

Hazardous Material Release Response Plans and Inventory Law (Health and Safety Code, Chapter 6.6)

The Hazardous Material Release Response Plans and Inventory Law requires businesses to develop a Hazardous Material Management Plan or a business plan for hazardous materials emergencies if they handle more than 500 pounds, 55 gallons, or 200 cubic feet of hazardous materials. In addition, the business plan would include an inventory of all hazardous materials stored or handled at the facility above these thresholds. This law is designed to reduce the occurrence and severity of hazardous material releases. The Hazardous Materials Management Plan or business plan must be submitted to the CUPA, which, in this case, is the Glendale Fire Department.

California Accidental Release Prevention Program (CCR Title 19)

The California Accidental Release Prevention (CalARP) program (CCR Title 19, Division 2, Chapter 4.5) covers certain businesses that store or handle more than a certain volume of specific, regulated substances at their facilities. The CalARP program regulations became effective on January 1, 1997, and include the provisions of the Federal Accidental Release Prevention Program (Title 40, CFR Part 68) with certain additions specific to the State pursuant to Article 2, Chapter 6.95, of the Health and Safety Code.

The list of regulated substances is found in Article 8, Section 2770.5 of the CalARP program regulations. The businesses that use a regulated substance above the noted threshold quantity must implement an accidental release prevention program, and some may be required to prepare an RMP. An RMP is a detailed engineering analysis of the potential accident factors present at a business and the mitigation measures that can be implemented to reduce this accident potential. The purpose of an RMP is to decrease the risk of an offsite release of a regulated substance that might harm the surrounding environment and community. An RMP includes the following components: safety information, hazard review, operating procedures, training, maintenance, compliance audits, and incident investigation. The RMP must consider the proximity to sensitive populations located in schools, residential areas, general acute care hospitals, long-term health care facilities, and child daycare facilities, and must also consider external events such as seismic activity.

4.5.2.3 Local Regulations

Glendale General Plan

The following policies, goals, and programs located in the Safety Element of the City's General Plan are applicable to the proposed Project.

Goal 4: Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses and social dislocation and other impacts resulting from fire hazards.

Policy 4-2: The City shall require that all new development in areas with a high fire hazard incorporate fire resistant landscaping and other fire hazard reduction techniques into the project design in order to reduce the fire hazard.

Goal 5: Reduce threats to the public health and safety, and to the environment, from hazardous materials.

Policy 5-1: The City shall strive to reduce the potential for residents, workers, and visitors to Glendale to being exposed to hazardous materials and wastes.

Policy 5-1.4: The City shall maintain the capability of responding to hazardous materials incidents in the City and along the sections of freeways that extend across the City. This includes maintaining cooperation agreements with adjacent jurisdictions and continuing to coordinate with regional providers of emergency services.

Program 5-1.8: The City shall coordinate hazardous materials regulation with other agencies. The Los Angeles County Hazardous Waste Management Plan is incorporated herein by reference and shall be used by the City as a guide to hazardous waste management efforts.

Goal 8: Maintain a high level of emergency preparedness.

Program 8-1.6: The City shall promote the development of evacuation plans in high-rise buildings, immobile population centers, businesses that use hazardous substances, and in other critical facilities. The evacuation procedures should be designed to be carried out without aid from the City's emergency response resources.

4.5.3 ENVIRONMENTAL SETTING

4.5.3.1 Existing Conditions

The approximately 424,453 square feet (SF) (9.74 acres) Project site is developed with existing warehouse structures, ancillary offices, production studios, and associated surface parking lots and loading areas. The buildings located on-site are shown and identified in **Figure 4.5-1: Existing Building Locations on Project Site:**^{4,5}

- Buildings 1A/1B — Conjoined buildings at the northwestern/northern portion of the Project site. These buildings have a total estimated footprint of 73,900 square feet.
- Building 2 — Approximately 16,700-square-foot building on the north-central portion of the Project site, north of Buildings 8 and 9, and south of Building 6.
- Building 3 — Approximately 11,600-square-foot building on the central portion of the Project site abutting Buildings 2/3 to the north.
- Building 4 — Conjoined buildings on the central portion of the Project site with a footprint of approximately 10,500 square feet.
- Building 5 — Approximately 12,400-square-foot building abutting Buildings 2/3 immediately to the south.
- Building 6 — Approximately 11,500-square-foot building at the southwestern portion of the Project site.

4 SCS Engineers. *Phase I Environmental Site Assessment (ESA)*. pg. 3. May 2021 (see Appendix C).

5 The building numbering is not sequential because some former buildings were demolished and removed. (e.g., Buildings 1 and 11).

- Buildings 7 – Conjoined buildings on the central-eastern portion of the Project site with a footprint of approximately 30,000 square feet.
- Building 8 – Approximately 3,200-square-foot building on the eastern side of the Project site, north of Buildings 4/4A.
- Building 9 – A long, narrow structure on the northeastern portion of the Project site with a footprint of approximately 5,000 square feet.
- Building 10 – Approximately 1,000-square-foot building on the central-western portion of the Project site, northwest of Buildings 2/3 and immediately west of Building 9.

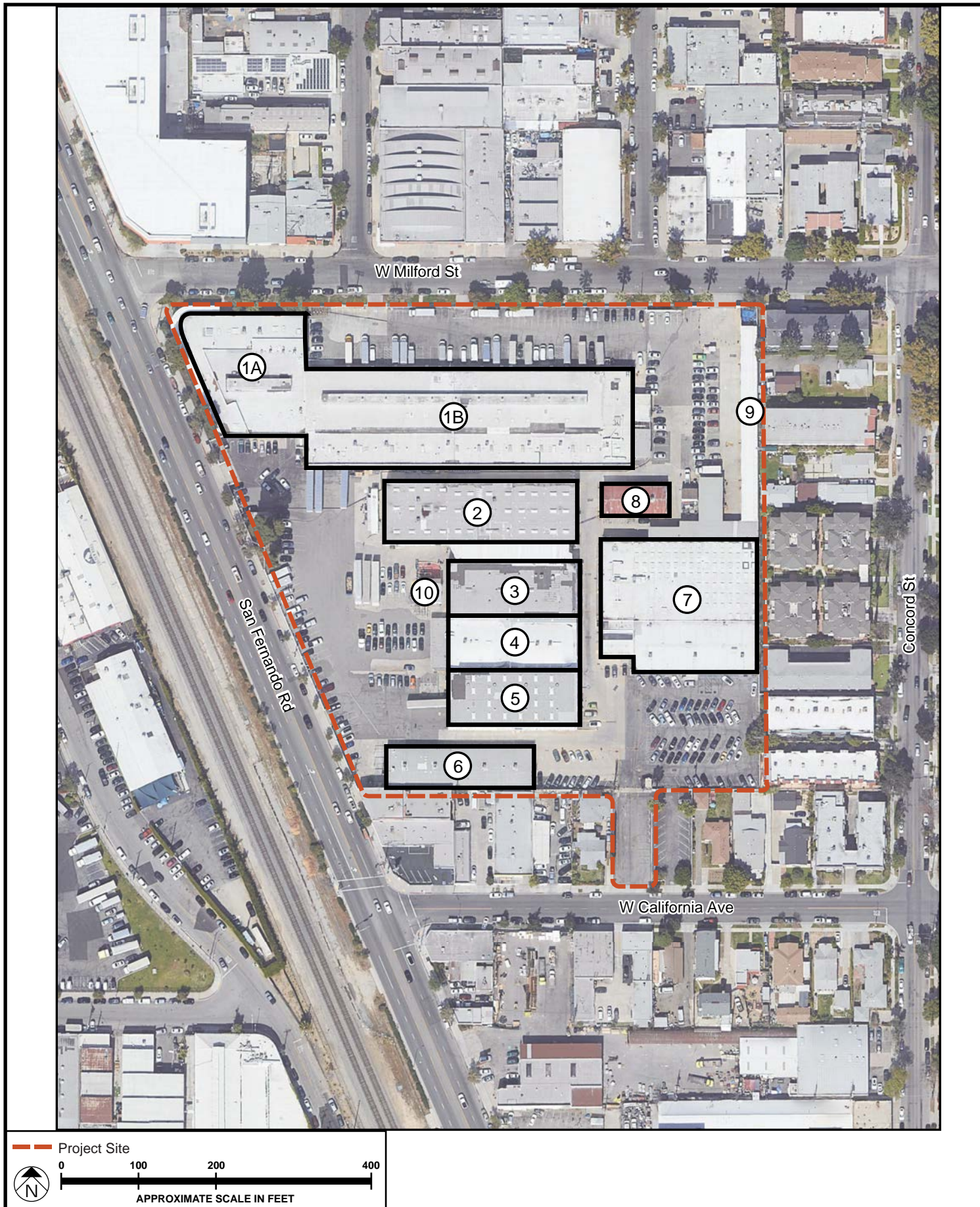
As discussed further below, in place (in-situ) treatment of soil and groundwater on the site contaminated with hexavalent chromium/chromic acid (CrVI) began in the late-1990s. In 2008, following the demolition of Buildings 1 and 11 on the western-central side of the Property, a remedial excavation was conducted to a depth of 15 feet below ground surface (bgs). The excavation was backfilled with clean fill to a depth of six feet bgs and then covered with a geosynthetic clay liner (GCL) to prevent infiltration.

4.5.3.2 Historical Uses of the Project Site

The following historical uses were recorded in the *May 2021 Phase I ESA* prepared by SCS Engineers for the Project Site (see **Appendix C**).

Research determined a hotel was developed on the northwestern corner of the Project site in the 1880s. That hotel was converted to the West Glendale Winery in the 1890s. The rest of the Project site was undeveloped land between at least 1894 and 1902. In 1925, the winery was still present on the northwestern side of the Project site and the Glendale Lumber Company occupied the southern portion of the Project site. By 1935, an auto service station was located at the southeastern corner of San Fernando Road and Milford Road. A review of regulatory databases indicated that a service station was located at this same address in 1940 and 1945.

The Project site was redeveloped beginning in the 1940s. More than a dozen buildings were constructed on the Project site between the 1940s and late-1970s. By 1950, American Radiator and Standard Sanitary Corporation was occupying new buildings on the northern portion of the Project site while the southern portion of the Project site was occupied by felt gasket manufacturing and bottled soft drink businesses. Manufacturing activities, laboratories, storage areas, and warehouses were located on the Project site during this time. In 1955, Products Research Company (PRC), Amess Harris Neville Company, Pepsi-Cola Bottling Company, and Bireley's Bottling Company were listed as the occupants of the Project site. An aluminum and glass door manufacturer was located on the Project site in 1960. By 1970, Products Research and Chemical Corporation (a successor company to PRC) and Semco Molding Division of Products Research and Chemical were located on the Project site. By 1994/1995, Courtaulds Aerospace and PRC Products Research and Chemical Corp. occupied the Project site. In the late-2000s, two buildings on the western side of the Project site were demolished, leaving the Project site in its present-day configuration.



SOURCE: SCS Engineers – 2021; Google Earth - 2022

FIGURE 4.5-1

Building permits issued for the Project site documented the installation of underground storage tanks (USTs), aboveground chemical storage tanks, clarifiers, and at least one spray booth, the investigation of which is discussed further below. According to previous environmental reports, production operations for the aerospace industry conducted at the Project site between the late-1940s and late-1990s included the manufacturing of metal products, gaskets, and sealants. These activities included non-aqueous lead dioxide curing and polysulfide resins treated with aqueous dichromate curing agent. Hazardous substances used in the processes include lead dioxide and chromic acid (CrVI).

At its peak, the Project site was developed with more than one building to support sealant manufacturing; injection molding; storage of automotive coatings; repackaging of aerospace adhesives, coatings, and sealants; warehousing; and shipping. Sealant manufacturing ceased in the late-1990s, and plastic injection molding of aerospace and electronic packaging ended in 2006.

PRG Gear (PRG), an audio/video (A/V) equipment rental and service business, most recently occupied the Project Site. PRG activities included A/V equipment storage, rental, and repair. Equipment rented out included audio recording devices, cameras, computers, fiber optic cable, LEDs, lighting, media services, monitors, presentation equipment, projection equipment, rigging, etc. PRG did not use or store significant quantities of hazardous substances or generate hazardous waste.

4.5.4 ENVIRONMENTAL IMPACT ANALYSIS

4.5.4.1 Thresholds of Significance

The following threshold of significance are based on the 2022 State CEQA Guidelines Appendix G. For the purposes of this DEIR, impacts of the proposed Project related to hazards and hazardous materials are considered significant if the Project would:

- | | |
|------------------|--|
| Threshold HAZ-1: | Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? |
| Threshold HAZ-2: | Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? |
| Threshold HAZ-3: | Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? |
| Threshold HAZ-4: | Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment? |
| Threshold HAZ-5: | For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? |

- Threshold HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Threshold HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

4.5.4.2 Methodology

A Phase I ESA was completed in May 2021 for the Project site.⁶ The *May 2021 Phase I ESA* was conducted in conformance with Title 40 of the Code of Federal Regulations (CFR), Standards for Conducting All Appropriate Inquiries, and in general conformance with American Society for Testing and Materials (ASTM) International, Inc. Standard E 1527-13. Preparation of the *May 2021 Phase I ESA* included completion of the following tasks:

- Interviews with past and/or present owners, operators, and occupants of the Project site;
- Reviews of federal, State, and local government records;
- Visual inspections of the Project site and adjoining properties;
- Review of historical property use information; and
- Assessment of the likelihood of the presence of contamination on the Project site and the level of contamination.

A site inspection of the Project site and surrounding area was performed on April 22, 2021, as part of the preparation of the *May 2021 Phase I ESA*. During the site inspection, no hazardous substances or hazardous wastes were observed. PRG, current residents of the site at the time of the inspection, only used and stored small amounts methanol, ethanol, isopropyl alcohol, acetone, and denatured alcohol used to clean audio/visual equipment.

According to previous environmental reports, production operations for the aerospace industry conducted on the Project site between the late-1940s and late-1990s included the manufacturing of metal products, gaskets, and sealants. At its peak, the Project site was developed with more than 15 buildings to support sealant manufacturing, injection molding, storage of automotive coatings, and repackaging of aerospace adhesives, coatings, sealants, warehousing, and shipping.

Historical documents identified and reported the installation of USTs, aboveground chemical storage tanks, clarifiers, and at least one spray booth. The site inspection verified that concrete catch basins, spill containment tanks, sumps, clarifiers, a boiler, a cooling tower, at least 18 aboveground storage tanks (ASTs), and 27 underground storage tanks (USTs) previously identified have been removed from the Project site.⁷

⁶ SCS Engineers. *Phase I Environmental Site Assessment (ESA)*. May 2021. (see Appendix C).

⁷ SCS Engineers. *Phase I Environmental Site Assessment (ESA)*. May 2021. pg. 25. (see Appendix C).

4.5.4.3 Project Impacts

Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impacts

Construction of the Project will involve the use and storage of small amounts of vehicle fuel, paints, mastics, solvents, and other acidic or alkaline solutions that require special handling, transport, and disposal. Debris encountered or generated during Project construction would include waste such as fluorescent bulbs, ballast, thermostats, electrical switches, and batteries.

All materials used during construction would be used and stored in compliance with applicable federal, State, and local regulations. These regulations include the Hazardous Material Transportation Act, the RCRA, the California HWCA, CUPA, and the CalARP. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. The quantity of potential hazardous substances used during construction is very limited and does not require special permitting.

As the use and transport of regulated materials would be limited, in terms of volume and duration, these materials are not considered a significant hazard to the public or environment.

Furthermore, any unexpected spills or leakages (for example, fuel from a vehicle) that occur during construction would be required to be remediated in accordance with the State and local regulations for hazardous waste cleanup. Specifically, the construction site would be subject to the regulations in Title 8 of the California Code of Regulations (T8 CCR) that governs workplace safety, and which address the handling of hazardous materials in a workplace environment. Any contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility.

Adherence to all emergency response plan requirements set forth by the GFD would be required through the duration of the proposed Project construction phase.

One remaining UST (T-22) on the Project site would be removed during construction after demolition of Building 10.⁸ Sampling demonstrated there had not been any leaks or releases from this UST. The GFD will perform inspections and enforce federal and State laws governing the storage, use, transport, and disposal of any regulated materials and wastes. Removal of the remaining underground storage tank on the Project site would be subject to the issuance of a permit by the City of Glendale Fire Prevention Bureau, Fire Engineering Unit.⁹ The City's Underground Storage Tank Application Package defines Storage Tank Closure Requirements and Conditions. No work related to the removal of a UST is allowed before

⁸ SCS Engineers. *Phase I Environmental Site Assessment (ESA)*. May 2021. pg. 25. (see Appendix C).

⁹ City of Glendale. "Underground Storage Tank (UST) Program." Available at: <https://www.glendaleca.gov/government/departments/fire-department/fire-prevention/environmental-management-center/underground-storage-tank-program-ust>. Accessed August 2022.

plans have been submitted and approved by the City of Glendale Fire Prevention Bureau. The Fire Prevention Bureau must witness parts of the work and an inspection must be scheduled at least 48 hours in advance of work. A tank closure report is also required containing soil and groundwater sampling. Once removed, the City's conditions require that the tank be secured on an appropriate vehicle for immediate removal from the site and transported for material recycling or salvage with their respective certification(s).

Through compliance with applicable federal, State, and local regulations, potential impacts related to the transport, use, or disposal of hazardous materials during construction of the Project would be less than significant.

Operational Impacts

Use of the proposed entertainment production studios, related office space, commissary, and other support areas would not involve the storage or use of hazardous materials. Standard household chemicals such as surface and floor cleaning products utilized for routine janitorial cleaning procedures would be used. These materials would be stored and used in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including but not limited to, those set forth by the federal and State Occupational Safety and Health Acts. Any associated risk would be adequately reduced to a less than significant level through implementation and compliance with these existing laws and regulations. Operational impacts through the routine transport, use, or disposal of hazardous materials would be less than significant and no mitigation measure is required.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Less than significant.

Impact HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The Project site has undergone extensive investigation and remediation activities over the past 20 plus years under the oversight of the Los Angeles Regional Water Quality Control Board (LARWQCB). The prior owner of the property has been determined to be the party responsible for past contaminating activities (the Responsible Party) on the Project site by the LARWQCB, and has completed all required remediation. The Project Applicant, not being the Responsible Party, has no obligation to perform any additional remediation at the Project site.

Historical uses of the Project site resulted in chemical releases (specifically volatile organic compounds [VOCs] and hexavalent chromium [CrVI]) affecting subsurface soil, soil vapor, and groundwater. Remediation of this contamination was completed to reduce CrVI concentrations.

The contamination of soil and water on the Project site was previously remediated under the regulatory oversight of the LARWQCB. While environmental remediation efforts have achieved levels suitable for regulatory case closure under a continued commercial/industrial land use scenario, the closure comes with certain conditions. One of the required remediated actions was the installation and continued maintenance of the underground GCL cap located on the west side of the site, approximately 6 feet bgs. The GCL cap was installed to prevent direct contact with the residual soil contamination beneath it. This GCL cap is located beneath portions of proposed Buildings 1 and 3 and the Parking Garage.

Following additional in-situ remediation injection treatment in 2009 and 2010 to address chlorinated VOCs, groundwater monitoring has shown that CrVI and total chromium in groundwater have been reduced to levels below the California Maximum Contaminant Levels (MCLs) for drinking water at on-site wells.¹⁰ The LARWQCB authorized the decommissioning of all the on-site monitoring wells upon completion of remediation (see **Appendix C**). A human health risk assessment (HHRA) determined the residual volatile organic compounds (VOCs) in soil vapor do not represent a significant vapor intrusion risk to indoor air space at the current buildings. Notwithstanding the foregoing, to mitigate any potential for vapor intrusion risk to future structures, a Vapor Intrusion Mitigation System (VIMS) meeting all applicable LARWQCB design criteria will be installed under all Project structures. The VIMS will be installed beneath all structural slabs and will include an engineered membrane that will incorporate a perforated pipe system installed in a bed of stone beneath the membrane to allow for the capture and venting of any residual VOCs present in soil vapor. The VIMS will provide for a pathway to exhaust vapors above the roof and away from any receptors such as windows, doors, or HVAC equipment serving to mitigate/prevent any risk of residual VOC vapor intrusion into indoor air within the buildings. Indoor air sampling will be conducted prior to building occupancy to demonstrate VIMS effectiveness. Installation of the VIMS system will reduce the potential for impacts from vapor intrusion to a less than significant level.

An extensive soil vapor investigation was conducted in 2007 and 2014 to evaluate the potential impact of VOCs in on-site indoor air and soil vapor and crawl spaces at nearby off-site residential locations. This investigation concluded there is a minimal risk to off-site uses from VOCs present on the site. The Office of Environmental Health Hazard Assessment (OEHHA) noted that the applicability for future workers was uncertain due to the need for future building dimensions in order to calculate vapor intrusion risk.

A draft closure report was prepared and submitted to the Los Angeles Regional Water Quality Control Board in September 2017 and a request for case closure was submitted on August 16, 2018. On December 26, 2017, the State Office of Environmental Health and Hazard Assessment (OEHHA) evaluated and commented on the Draft Closure Report, the Off-site Crawl Space Air Sampling Report, and Supplemental Soil Vapor Survey and Indoor Air Sampling Report. Based on the results of its assessment, OEHHA concluded the following:¹¹

10 SCS Engineers. *Phase I Environmental Site Assessment (ESA)*. May 2021. pg. 43. (see Appendix C).

11 SCS Engineers. *Phase I Environmental Site Assessment (ESA)*. May 2021. pg. 29. (see Appendix C).

- Although vapor intrusion risk and hazard estimates based on maximum soil gas concentrations exceed typical benchmarks, estimates for current workers based on maximum indoor air concentrations were below applicable standards.
- Commercial risk and hazard estimates from combined soil exposure and vapor intrusion are below applied benchmarks.
- Based on VOCs detected in soil gas and crawl-space air, risks to current off-site residents are minimal.¹²

OEHHA agreed with the conclusion that soil risk and hazard estimates for any commercial or industrial workers on the Project site are below the applicable thresholds of 1×10^{-5} (equivalent to 1 in 100,000) and 1, respectively.

LARWQCB agreed with the conclusion reached by the OEHHA that the Project site was in a condition to receive a No Further Action (NFA)¹³ determination with regard to soil and groundwater contamination on the site provided that an environmental land use covenant (LUC) limiting the uses on site to commercial/industrial land uses be recorded, that the previously installed GCL cap be maintained and that groundwater on the Project site not be extracted for drinking water use unless adequate treatment as approved by the LARWQCB is provided.

The applicant will record the environmental land use covenant at a future date which would limit the uses on the site to commercial/industrial land uses and require the installation, operation, and maintenance of a Vapor Intrusion Mitigation System (VIMS) as part of the proposed Project and prohibit the withdrawal and use of groundwater on the site.

The Project will maintain the existing GCL cap. The Project will include a VIMS installed beneath all new structures to reduce the level of soil vapor intrusion inside new buildings. By maintaining the existing GCL Cap, the Project will have no direct effect on the existing soil conditions on the Project site and, therefore, does not have the potential to impact off-site properties.

A soil management plan (SMP) will also be prepared and implemented to ensure the proper handling of soil on the site during construction. This plan will establish soil reuse criteria, define a sampling plan for stockpiled materials, describe the disposition of materials that do not satisfy the reuse criteria, and specify guidelines for imported materials. Preparation of the SMP will occur after final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction.

The Responsible Party remains responsible for any potential impacts to soil and water on any surrounding properties emanating from the Project site, if any. The Responsible Party is continuing the investigation of such properties under the oversight of the LARWQCB. As directed by the LARWQCB, the Responsible

12 De Minimis is condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

13 A No Further Action (NFA) determination can be made when the site investigation and corrective action for a site have been completed. The lead agency will issue a case closure letter that states that no further action related to the subject hazard is required.

Party will perform specific monitoring of conditions at the Project site in the near future. A continuing right of access to perform such monitoring work will be provided by the Project Applicant.

Construction Impacts

Construction of the proposed Project would involve the temporary use of small amounts of hazardous materials typically associated with construction activities including vehicle fuels, oils, and transmission fluids. These materials would be stored, used, and disposed of in accordance with applicable regulations. Construction workers would be trained in the safe handling and use of these materials. Additionally, as stated above, the existing GCL cap over CrVI-impacted deeper soils on the western side of the Project site would be maintained. Orientation would be conducted for all construction workers regarding the location of the GCL cap and need to prevent disturbance of this cap during construction. This would reduce any potential impacts to workers during excavation and construction of the Project to less than significant. The depths of excavation would be fairly limited considering the Project site's existing GCL cap due to soil vapors that exist below the GCL cap at approximately 6 feet bgs. While there is no significant risk of contact with soil in place beneath the GCL, the GCL cap cannot be removed or penetrated.¹⁴ The Project will maintain the existing GCL Cap in place, and Project construction will not disturb the GCL cap. For this reason, the proposed Project will not directly affect or exacerbate the remaining contamination in the soil under the site.

The Project will have no direct effect on the existing soil conditions on the Project site and, therefore, does not have the potential to impact off-site properties. Release of hazardous materials during construction is not anticipated and impacts would be less than significant.

Operational Impacts

Operation of the proposed Project would not involve the use and storage of hazardous materials. Maintaining the existing GCL cap by the Project Applicant would reduce the potential for impacts from the remaining soil contamination on the Project site. Potential impacts associated with upset or accident conditions would be less than significant.

Mitigation Measures

MM HAZ-1: Vapor Intrusion Mitigation System (VIMS). A Vapor Intrusion Mitigation System (VIMS) will be designed and installed under all Project structures that meets LARWQCB design criteria.

- The VIMS will include an engineered membrane installed beneath all structural slabs that will incorporate a perforated pipe system installed in a bed of stone beneath the membrane to allow for the capture and venting of any residual VOCs present in soil vapor beneath the future buildings.

¹⁴ SCS Engineers, *Phase I Environmental Site Assessment (ESA)*, May 2021. (see Appendix C).

- The VIMS will provide for a preferential pathway to exhaust such vapors above the roof and away from any receptors such as windows, doors, or HVAC equipment serving to mitigate/prevent any risk of residual VOC vapor intrusion into indoor air within the buildings.
- Indoor air sampling will be conducted prior to building occupancy to demonstrate VIMS effectiveness.
- A Land Use Covenant will also be recorded at a future date that will restrict the use of the property to commercial/industrial uses and require the installation, operation, and maintenance of the VIMS.

Level of Significance after Mitigation

Less than significant.

Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

There are no schools located within 0.25 miles of the Project site. The nearest school to the Project site is Columbus Elementary School, located approximately 0.46 miles to the east. The proposed Project would not emit hazardous emissions or include the handling of hazardous or acutely hazardous materials, substances, and/or wastes within one-quarter mile of an existing or proposed school. Any transport of hazardous substances or materials to-and-from the Project site that may occur during construction and operation of the Project would be required to comply with applicable federal, State, and local regulations intended to reduce public safety hazards.

Section 4.2: Air Quality, provides analysis of the air quality impacts of the proposed Project, including determination of the air emission concentrations at nearby receptors from construction and operation of the Project. As concluded in **Section 4.2: Air Quality**, concentrations of toxic air containment emissions, and their associated health risks, would be less than significant for all sensitive receptors located in the area around the Project site.

The proposed Project would not pose a significant risk of hazardous emissions or significant handling of hazardous materials or substances within one-quarter mile of an existing or proposed school. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Less than significant.

Impact HAZ-4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

California Government Code Section 65962.5 references the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated.

Information on hazardous materials sites pursuant to Government Code Section 65962.5 is compiled on the websites of the State Department of Toxic Substance Control (DTSC), the State Water Resources Control Board, and California Environmental Protection Agency (CalEPA). The DTSC maintains the EnviroStor database, which hazardous materials sites pursuant to Government Code Section 65962.5 and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. This database provides a listing of federal Superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites.

As part of the research completed as part of the preparation of the *May 2021 Phase I ESA*, the DTSC EnviroStor database was reviewed. The Project site is not identified in the EnviroStor database.

As stated above, the *May 2021 Phase I ESA* concluded the Project site has been adequately investigated and did not identify new areas of environmental concern that have not been previously investigated and addressed. The Project includes commercial uses, consistent with the recommendation of the LARWQCB. The existing GCL cap over deeper soils on the western side of the Project site prevents direct contact with residual soil contamination. Groundwater would not be extracted from the Project site for domestic use. A draft closure report was prepared and submitted to the LARWQCB in September 2017 and a request for case closure was submitted on August 16, 2018, in favor of issuing a conditional NFA for the Property. As discussed, LARWQCB agreed with the conclusion reached that the Project site was in a condition to receive a NFA¹⁵ determination with regard to soil and groundwater contamination on the site provided that an environmental land use covenant limiting the uses on site to commercial/industrial land uses be recorded, that the previously installed GCL cap be maintained and that groundwater on the Project site not be extracted for drinking water use unless adequate treatment as approved by the LARWQCB is provided. For these reasons, the remaining contamination on the Project site would not create a significant hazard to the public or the environment.

The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would also not be affected by contamination identified in the surrounding

¹⁵ A No Further Action (NFA) determination can be made when the site investigation and corrective action for a site have been completed. The lead agency will issue a case closure letter that states that no further action related to the subject hazard is required.

vicinity of the proposed Project site. For these reasons, the Project would not create a significant hazard to the public or the environment. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Less than significant.

Impact HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The Project site is not within an airport land use plan¹⁶ or within two miles of a public airport. The nearest airport to the Project site is Burbank Airport, located approximately 5.15 miles northwest of the Project site. Therefore, the Project would not expose workers to safety hazards or excessive noise associated with airport or private air strip operations. No impacts would occur.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

No impact.

Impact HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

San Fernando Road, which extends north to south along the western border of the City and is adjacent to the Project site, is a designated County Evacuation Route.¹⁷ During construction and long-term operation of the proposed Project, adequate emergency access for emergency vehicles would be maintained along public streets that abut the Project site. Implementation of the Project would neither result in a reduction of the number of lanes along San Fernando Road nor result in the placement of an impediment to the flow of traffic such as medians. In the event of an emergency, all lanes would be opened to allow for traffic flow to move in one direction and traffic would be controlled by the appropriate agencies, such as the City of Glendale Police Department. During construction, the construction contractor shall notify the City of Glendale Police and Fire Departments of construction activities that would impede movement (such as movement of equipment and temporary lane closures)

16 County of Los Angeles, "Airport Land Use Commission Site," available at: <https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a>, Accessed August 2022.

17 City of Glendale General Plan, Safety Element, Plate P-3, available at: <https://www.glendaleca.gov/home/showpublisheddocument/4551/635242148319870000>, Accessed August 2022.

along San Fernando Road to allow for these first emergency response teams to reroute traffic to an alternative route, if needed. Further, during construction the applicant would be required to obtain any necessary permits from the City of Glendale Public Works Department for all work occurring within the public right-of-way. The proposed Project would not, therefore, impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Less than significant.

Impact HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The California Department of Forestry and Fire Protection (Cal fire) has mapped fire hazard severity zones throughout the state. Designations include Unzoned (the lowest wildland fire risk), Moderate, High, and Very High. The Project site is in a Local Responsibility Area and classified by CAL FIRE as non-VHFHSZ (non-very high fire hazard severity zone).¹⁸

The Project site and surrounding areas are flat and developed with urban uses that would not contribute to the uncontrolled spread of wildfire or exacerbate potential wildfire risks, including downslope flooding and landslides caused by runoff, slope instability, or drainage changes from wildfire. Therefore, the proposed Project would not result in, or be subject to, significant effects related to wildfire risk. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Less than significant.

4.5.4.4 Cumulative Impacts

The cumulative impact analysis for hazards and hazardous materials evaluates whether impacts of a project or contamination on nearby properties, when taken as a whole, would have significant environmental impacts under the hazards and hazardous materials thresholds. If the Project would result

18 CAL Fire - Office of the State Fire Marshal, "Fire Hazards Severity Zones," available at: <https://egis.fire.ca.gov/FHSZ/>. Accessed August 2022.

in a cumulatively significant impact, then the significance of the Project's incremental contribution to that cumulatively significant impact must be determined.

As previously discussed, the presence of contaminated soil and groundwater on-site would be reduced to a less than significant through the maintenance of the GCL cap on-site and extraction on drinking water restrictions. Additionally, any transport or handling of hazardous waste materials would comply with all federal, State, and local requirements to minimize and reduce the exposure of the public to adverse hazardous impacts. Air quality impacts of the transport of soil and other construction equipment is discussed in **Section 4.2: Air Quality**.

The *May 2021 Phase I ESA* included an Environmental Data Resources (EDR) Report which identified hazardous materials sites in the vicinity of the Project site. Based on a review of this database information, the Project Site is mapped within the boundaries of the San Fernando Valley Superfund (Areas 1 and 2). However, the potential contribution to the Superfund COCs by historical operations at the Project site has been resolved as soils at the Property have been broadly and sufficiently investigated and COCs have been delineated to the satisfaction of the LARWQCB. Based on the recent plume maps, history of remediation on the Project site and results of recent groundwater investigations on the site, the San Fernando Valley Groundwater Basin Superfund sites are considered controlled with respect to the Property. As the Project will not result in any significant hazards or hazardous materials impacts and no hazardous materials sites are located near the Project site, the Project will not contribute to any significant hazards and hazardous materials impacts.

All future projects involving hazardous waste materials or contaminated sites would be required to conduct technical studies and implement remediation action plans and mitigation measures in order to minimize any adverse impacts to the public. Future projects would also be required to comply with all federal, State, and local requirements in handling hazardous waste materials which would further reduce any potential adverse impacts to the public. Such requirements would minimize adverse effects anticipated from future projects. For these reasons, cumulative hazards and hazardous waste impacts would be less than significant.

Level of Significance Before Mitigation

Upon implementation of regulatory requirements, impacts to Thresholds HAZ-1, HAZ-3, HAZ-4, HAZ-5, HAZ-6, and HAZ-7 would be less than significant. Without mitigation, the following impact would be potentially significant:

Impact HAZ-2: Potential for vapor intrusion to future structures.

Mitigation Measures

MM HAZ-1: Vapor Intrusion Mitigation System (VIMS). A Vapor Intrusion Mitigation System (VIMS) will be designed and installed under all Project structures that meets LARWQCB design criteria.

- The VIMS will include an engineered membrane installed beneath all structural slabs that will incorporate a perforated pipe system installed in a bed of stone beneath the membrane to allow for the capture and venting of any residual VOCs present in soil vapor beneath the future buildings.
- The VIMS will provide for a preferential pathway to exhaust such vapors above the roof and away from any receptors such as windows, doors, or HVAC equipment serving to mitigate/prevent any risk of residual VOC vapor intrusion into indoor air within the buildings.
- Indoor air sampling will be conducted prior to building occupancy to demonstrate VIMS effectiveness.
- A Land Use Covenant will also be recorded at a future date that will restrict the use of the property to commercial/industrial uses and require the installation, operation, and maintenance of the VIMS.

Level of Significance After Mitigation

Compliance with local, State, and federal plans, policies, and programs and implementation of **Mitigation Measure HAZ-1** would ensure impacts related to hazards and hazardous materials would be less than significant.

4.6 LAND USE AND PLANNING

4.6.1 INTRODUCTION

This section of the EIR analyzes the potential environmental effects on land use and planning from implementation of the Project. Data for this section were taken from the City of Glendale General Plan (General Plan) and the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

4.6.2 REGULATORY FRAMEWORK

4.6.2.1 Regional Regulations

SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

SCAG is responsible for the designated Regional Transportation Plan (RTP), including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. The 2020-2045 RTP/SCS, also known as Connect SoCal, was adopted by SCAG on September 3, 2020. The 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

The 2020-2045 RTP/SCS reflects changes in economics, policy, and demographic conditions in the region.¹ In the SCAG region, annual growth is slowing down in concert with the national population growth trend. According to SCAG, population growth in the region slowed down from about 0.85 percent in 2020 to about 0.45 percent by 2045. These changes are driven by declines in fertility and affected by high housing costs in the region. The population in the region is also growing older, with a median age of 32.3 in 2000 to 35.8 in 2016. By 2045, the median age is expected to reach 39.7. Net migration to the region has also slowed over the last 30 years.

The guiding policies and strategies for the 2020-2045 RTP/SCS are intended to focus future investments on the best-performing projects and strategies to preserve, maintain, and optimize the performance of the existing transportation system.

- Goal 1:** Encourage regional economic prosperity and global competitiveness.
- Goal 2:** Improve mobility, accessibility, reliability, and travel safety for people and goods
- Goal 3:** Enhance the preservation, security, and resilience of the regional transportation system.
- Goal 4:** Increase person and goods movement and travel choices within the transportation system.
- Goal 5:** Reduce greenhouse gas emissions and improve air quality.

¹ SCAG, Connect SoCal, 2020-2045 RTP/SCS, https://scag.ca.gov/sites/main/files/fileattachments/0903fconnectsocialplan_0.pdf?1606001176. Accessed May 2022.

- Goal 6:** Support healthy and equitable communities.
- Goal 7:** Adapt to a changing climate and support an integrated regional development pattern and transportation network.
- Goal 8:** Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
- Goal 9:** Encourage development of diverse housing types in areas that are supported by multiple transportation options.
- Goal 10:** Promote conservation of natural and agricultural lands and restoration of habitats.

4.6.2.2 Local Regulations

City of Glendale General Plan

The Glendale General Plan outlines an order of progress through which the City can grow and maintain economic and environmental integrity. As a policy, the Glendale General Plan serves as a guide to the adoption of laws necessary to execute its intent.

The City's General Plan Land Use Element identifies the land use designations within Glendale. Development standards and controls that consider principles and proposals for each type of land use are also included in this element. These development standards determine type, pattern, and intensity that would be permitted as part of new developments to achieve compatible land use patterns that promote the character of Glendale.

Land Use Element

The primary objective of the Land Use Element is to develop a long-range plan for the City which will provide a comprehensive analysis of current and future land use requirements, economic feasibility, environmental impacts, and implementation techniques. The following goals would be applicable to the Project:

Goals — General

- Reinforce Glendale's image and community identity within the greater Los Angeles area metropolitan complex.
- Promote development and improvement within the community capitalizing on the location of, and access to, Glendale as adjacent to the regional core.

Goals — Industrial

- Provide for the improvement of existing industrial districts through the addition of parking facilities, visual amenities, and the elimination of incompatible influents and blight.

Goals — Circulation

- Develop clusters of uses which will facilitate the development of public transportation networks, decreasing dependence on the automobile.

Goals — Economic

- Provide opportunities for the expansion of revenue producing industrial and commercial establishments within the parameters of other community goals.

Circulation Element

The Circulation Element selects transportation goals and identifies policies and programs to achieve those goals. It also assesses their consistency with other planning efforts. The following goals and policies would relate to the Project and be applicable:

- Goal 2:** Minimization of congestion, air pollution, and noise associated with motor vehicles.
Policy: Increase/support public and high occupancy vehicle transportation system improvements through mitigation of traffic impacts from new development.
- Goal 3:** Reasonable access to services and goods in Glendale by a variety of transportation modes.
Policy: Encourage growth in areas and in patterns which are or can be well served by public transportation.
- Goal 4:** Functional and safe streetscapes that are aesthetically pleasing for both pedestrians and vehicular travel.
Policy: Provide and maintain quality streetscape and pedestrian amenities (i.e., bus shelters, street trees, street furniture, wide sidewalks, etc.).
- Goal 5:** Land use which can be supported within the capacity constraints of existing and realistic future infrastructure.
Policy: Balance land use/zoning with roadway capacity by establishing congestion thresholds and avoiding unacceptable levels of congestion from future development.

Historic Preservations Element

The Historic Preservation Element delineates a course of action through goals, policy, objectives, and implementation measures. This element sets policy direction and reinforces the City's preservation ethic. The following goals and policies would relate to the Project and be applicable:

- Goal 1:** Preserve historic resources in Glendale which define community character.
Policy 1-1: Encourage support for the importance of history and historic preservation.
Policy 1-2: Recognize archaeological and historic resources as links to community identity.

Noise Element

The Noise Element is a comprehensive program for noise management within the City. By addressing the goals and policies within this element, land uses can achieve and maintain compatibility with environmental noise levels. The Noise Element identifies noise sensitive land uses and noise sources and defines areas of noise impact for the purpose of developing programs to ensure that Glendale residents

will be protected from excessive noise intrusion. The following goals and policies in the Noise Element would relate to the Project and be applicable:

- Goal 1:** Reduce noise impacts from transportation noise sources
 - Policy 1.3:* Reduce transportation noise through proper design and coordination of routing
 - Policy 1.5:* Consider noise reduction measures when making revisions to the Circulation Element.
- Goal 3:** Continue incorporating noise considerations into land use planning decisions
 - Policy 3.1:* Ensure that land uses comply with adopted standards.
 - Policy 3.2:* Encourage acoustical mitigation design in new construction when necessary.

Safety Element

The Safety Element describes the natural conditions that pose a hazard, as well as goals, policies, and programs that can substantially reduce the risk that these hazards pose if implemented. This element focuses on fire, earthquakes, flooding, and other geologic hazards, but it also addresses other safety issues that the City of Glendale considers important. The following goals and policies would relate to the Project and be applicable:

- Goal 1:** Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses and social dislocation and other impacts resulting from seismic hazards.
 - Policy 1-1:* The City shall ensure that new buildings are designed to address earthquake hazards and shall promote the improvement of existing structures to enhance their safety in the event of an earthquake.
 - Policy 1-4:* The City shall ensure that current seismic and geologic knowledge and State-certified professional review are incorporated into the design, planning and construction stages of a project, and that site-specific data are applied to each project.
- Goal 2:** Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses and social dislocation and other impacts resulting from geologic hazards.
 - Policy 2-1:* The City shall avoid development in areas of known slope instability or high landslide risk when possible, and will encourage that developments on sloping ground use design and construction techniques appropriate for those areas.
- Goal 3:** Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses, and social dislocation and other impacts resulting from flooding hazards.
 - Policy 3-1:* The City shall investigate the potential for future flooding in the area and will encourage the adoption of flood-control measures in low-lying areas of alluvial fans, along major channels, and downgradient of large reservoirs and water tanks.
- Goal 4:** Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses and social dislocation and other impacts resulting from fire hazards.

Policy 4-1: The City shall ensure to the extent possible that fire services, such as fire equipment, infrastructure, and response times, are adequate for all sections of the City.

Policy 4-2: The City shall require that all new development in areas with a high fire hazard incorporate fire resistant landscaping and other fire hazard reduction techniques into the project design in order to reduce the fire hazard.

Goal 5: Reduce threats to the public health and safety, and to the environment, from hazardous materials.

Policy 5-1: The City shall strive to reduce the potential for residents, workers, and visitors to Glendale to being exposed to hazardous materials and wastes.

Goal 8: Maintain a high level of emergency preparedness.

Policy 8-1: The City shall prepare for emergency response and recovery from natural and urban disasters, especially earthquake hazards.

South Glendale Community Plan

As adopted on July 31, 2018, the South Glendale Community Plan promotes an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work and invest in South Glendale. The South Glendale Community Plan serves to outline a vision for South Glendale's long-term physical development and community enhancement and provide strategies and specific implementing actions that will allow this vision to be accomplished. The South Glendale Community Plan also serves to establish a basis for judging whether specific development proposals and public projects are in harmony with Plan policies and standards and Direct City departments, other public agencies, and private developers to design projects that enhance the character of the community, taking advantage of its setting and amenities. Further, the South Glendale Community Plan serves to provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the Zoning Ordinance, design overlays, historic districts, Glendale Register nominations, historic resource surveys, development standards, the Capital Improvement Program, facilities plans and sustainability programs.

City of Glendale Zoning Ordinance

The regulation of land use through zoning is governed by the Zoning Ordinance.² The purpose of the ordinance is to consolidate and coordinate all zoning regulations and provisions into one comprehensive zoning ordinance. The objective of the Zoning Ordinance is to designate, regulate, and restrict the location and use of buildings, structures, and land to protect residential, commercial, and industrial and recreation/open space areas alike from harmful encroachment by incompatible uses. To achieve these objectives, the City is divided into zones of such number, shape, and area as may be deemed best suited to carry out these regulations and provide for their enforcement. The Zoning Ordinance also identifies the applications and processes involved in seeking specific development or planning entitlements,

2 City of Glendale Municipal Code, Title 30.

including historic districts. Additionally, the Zoning Ordinance outlines the rules for zoning interpretations.

San Fernando Road Corridor Redevelopment Project Area

In 1992, the Glendale Redevelopment Agency³ prepared and adopted the Redevelopment Plan for the San Fernando Road Corridor Redevelopment Project Area (the “Redevelopment Plan”). The Project site is located within the boundaries of the Redevelopment Plan, which includes 750 acres generally extending along the length of the San Fernando Road corridor and bounded by the I-5 Freeway and the Union Pacific Railroad/Metro Transportation Authority (UPRR/MTA) right-of-way to the west. The primary objective of the Redevelopment Plan is to eliminate and prevent the spread of blight and deterioration in the Redevelopment Plan.

ABx126 and AB1484 (collectively “The Dissolution Act”) eliminated redevelopment agencies in California effective February 1, 2012. The City elected to assume the power, duties, and obligations of the former Glendale Redevelopment Agency as the Glendale Successor Agency pursuant to the Dissolution Act. The Successor Agency⁴ is responsible for winding down the activities of the former Glendale Redevelopment Agency.

4.6.3 ENVIRONMENTAL SETTING

4.6.3.1 Existing Conditions

Existing Land Uses

The Project site includes approximately 424,453 square feet (SF) (or approximately 9.74 acres) along San Fernando Road in the Industrial Corridor of the west area of the City of Glendale. The Project site is easily accessible from the nearby State Route (SR-) 134 (Ventura) Freeway. The Project site is located approximately 500 feet from the 134 Freeway; the Project site is approximately 500 feet away from the San Fernando Road on and off-ramps to the 134 East Freeway; and the Project site is approximately 1,500 feet away from the Fairmont Avenue on and off-ramps to the 134 West Freeway.

The Project site is generally bounded by West Milford Street to the north, medium density residential uses to the east, mixed-use structures to the south, and San Fernando Road to the west. The Project site fronts San Fernando Road and Milford Avenue and has approximately 102 feet of frontage on West California Avenue, which is primarily used as vehicular access. The Project is served by multiple bus and shuttle lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles Department of Transportation (LADOT), and the City of Glendale Beeline along San Fernando

³ The Glendale Redevelopment Agency was created in 1972 for the purpose of improving, upgrading, and revitalizing areas within the City that had become blighted because of deterioration, disuse, and unproductive economic conditions. It was a legal and separate public body, with separate powers and a separate budget from the City.

⁴ The Successor Agency undertakes enforceable obligations and performs duties pursuant to the enforceable obligations in compliance with the Dissolution Act. The Successor Agency staff also serves as staff to the Oversight Board.

Road and SR-134. In the vicinity of the Project Site, existing bicycle routes are provided on Doran Street and Broadway.

The Project site is located in and subject to the General Plan. The General Plan designates the site as Mixed Use. The General Plan encourages flexibility for areas with the IMU designation in the range and type of services such facilities provide.⁵ The General Plan also states that light industrial uses may be compatible with residential uses in mixed use areas along San Fernando Road.⁶

The Project site is also located within the IMU zone (Industrial/commercial Mixed Use), which is consistent with the Project site's General Plan designation. The purpose of the IMU zone is to allow for a mix of industrial and commercial activities and provide for a full range of services to be located along industrial/commercial thoroughfares.⁷

The IMU zone allows soundstage-production and supporting office uses by right and does not impose a floor area ratio (FAR) restriction. The IMU zone does, however, restrict height to a maximum of 50 feet. The IMU zone requires 10-foot minimum corner cutoffs at the intersection of two streets (the Glendale Municipal Code [GMC] also requires an entrance to buildings at such intersections).⁸ The IMU zone also requires one tree for every six parking spaces (for surface parking only) to be planted and dispersed throughout surface parking areas. The IMU zone does not require any interior setbacks for properties that abut multi-family residentially zoned properties. However, the GMC requires a minimum five-foot wide landscaped buffer on properties adjacent to residentially zoned property regardless of required setbacks (as mentioned, in IMU zones there are no required interior setbacks).⁹

The Project site is also located in the San Fernando Corridor Redevelopment Agency Project Area (the "Redevelopment Area").¹⁰ As such, upon making the required findings, the Redevelopment Agency (in the event the Redevelopment Agency is suspended or eliminated, the review authority shall be by the City Council) or the Director of Community Development has the authority to allow exceptions to the minimum number of required parking spaces and parking standards in the Redevelopment Area (a Parking Exception).¹¹ The GMC does not consider compact spaces towards the parking requirement at all anywhere in the City, including the Redevelopment Area.

Parcels within the vicinity of the Project site are zoned IMU, Industrial/Commercial Residential Mixed-Use (IMU-R), and Medium Density Residential (R-2250). The IMU and IMU-R zones are mixed use industrial zones (that allow commercial uses, IMU-R zones also allow residential uses), and the R-2250 is a Medium Residential zone. Directly to the west of the Project site, separated by San Fernando Road is the City of

5 Glendale General Plan Amendment, No. 2004-01, Section 2.

6 Glendale General Plan Amendment, No. 2004-01, Section 3.

7 Glendale Municipal Code, Section 30.14.010.A.

8 GMC Section 30.14.030, Table 30.14-B.

9 GMC Section 30.14.030, Table 30.14-B, Note (4).

10 Pursuant to Assembly Bill x 126, the Dissolution Act, the Redevelopment Area is scheduled to sunset in 2034.

11 GMC Section 30.32.030 and GMC Section 30.32.070.A, Table 30.32-B.

Los Angeles. The properties to the west are zoned for industrial uses in the City of Los Angeles. IMU and IMU-R zoned properties line the north side of Milford Street to the north of the Project site. The IMU zoned parcels to the northwest across Milford Street contain a four-story, 50-foot high Public Storage building that abuts a one-story structure. The IMU-R parcels to the north of the Project site across Milford are characterized by one-story structures that contain auto related uses and a church.

Abutting the Project site to the east along Concord Street are R-2250 zoned parcels that are improved with one- and two- story residential multi-family buildings. As mentioned above, the IMU zone does not require any interior setbacks from multi-family residentially zoned parcels.

As mentioned above, a small sliver of approximately 102 feet of the Project site's southern portion fronts West California Avenue. This portion is currently utilized as surface parking. Directly abutting (to the east and west) of this southern portion are IMU zoned parcels that contain multi-family, commercial, and auto related uses. The multi-family uses located in the two IMU zoned parcels to the east of the Project site are legal nonconforming uses because the IMU zone does not allow residential uses. However, the two parcels to the east of the IMU multi-family parcels are zoned R-2250 and contain a single-family residence (abutting the IMU zone) and a two-story multi-family structure (on the corner of California Avenue and Concord Street). Across California Avenue are similarly zoned IMU parcels with legal nonconforming multi-family and single-family residences, and one-story commercial and auto related uses.

The properties located across West San Fernando Road and the railroad tracks in the City of Los Angeles are light industrial zoned properties that contain one- to two- story buildings with industrial uses. Golden Road Brewing and Trans Gas Propane are among some of the businesses located across the Project site in the City of Los Angeles.

4.6.4 ENVIRONMENTAL IMPACT ANALYSIS

4.6.4.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact related to land use and planning if it would:

- Threshold LU-1: Physically divide an established community?
- Threshold LU-2: Would the Project 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?

4.6.4.2 Methodology

The analysis of potential land use impacts considers consistency of the Project with adopted plans, policies, and ordinances that regulate land use on the Project site, including the compatibility of proposed uses with surrounding land uses. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning documents that

regulate land use or guide land use decisions pertaining to the Project site. CEQA Guidelines Section 15125(d) requires an EIR to discuss inconsistencies with applicable plans and evaluate whether a Project is inconsistent with such plans. Projects are considered consistent with General Plan provisions, zoning ordinances, and general SCAG policies if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The intent of the compatibility analysis is to determine whether the Project would be compatible with existing surrounding development in terms of land use, size, intensity, density, scale, and other physical and operational factors. The analysis addresses general land use relationships and urban form, based on a comparison of land use relationships in the area surrounding the Project site under conditions existing at the time the Notice of Preparation (NOP) was published to those that would occur with Project implementation.

4.6.4.3 Project Impacts

Impact LU-1: Physically divide an established community?

The Project would redevelop the following existing uses on the Project site: soundstage production studio, support uses and supporting offices, and mill/warehouse on the southern portion of the Project site; car storage and video production equipment storage and distribution (FreMantle) on the remaining northern portion of the site.

The Project would construct a new state of the art soundstage campus with production support uses and office uses. The Project site is occupied by ten existing buildings and related surface parking and loading areas.

As stated previously, the Project site is within the San Fernando Boulevard Commercial/Industrial Corridor as well as the Redevelopment Area. The Project would fit within the corridor and Redevelopment Area as a commercial use and improve upon the existing structure by demolishing and redeveloping the Project site into a brand-new production studio.

The uses surrounding the Project site include IMU, Industrial/Commercial Residential Mixed-Use (IMU-R), and Medium Density Residential (R-2250). IMU and IMU-R zoned properties line the north side of Milford Street to the north of the Project site, containing commercial uses and a church. Abutting the Project site to the east along Concord Street are R-2250 zoned parcels with multi-family residential uses. Directly east and west of the southern portion of the Project site fronting West California Avenue are IMU zoned parcels that contain multi-family, commercial, and auto related uses. The Project would not require a General Plan Amendment or zone change as it would redevelop an existing studio production spaces, offices, and warehouse facilities uses with a soundstage campus containing similar uses.

The Project applicant asks for a Parking Exception to allow the Project to eliminate the minimum landscaped setback area on the Parking Structure's southern, eastern, and northern sides in lieu of the five-foot landscaped setback GMC requirement. Applicant requests to provide landscaping along the perimeter and throughout the Property. This includes the five-foot landscape buffer along the eastern

boundary of the Project site, which abuts residential properties. The southern boundary would include a setback of 15'-7 7/8", a portion of which would be landscaped. These setbacks would comply with requirements in the GMC. The Project would not divide an existing residential area.

The proposed Project does not involve any site development that would physically divide any established community (residential, commercial, or industrial), neighborhood, or district in western Glendale. The Project site is located in an urbanized area surrounded by commercial, office, parking, and medium-to-high density residential uses. Access to the Project site would be provided by four separate entrances, Gates A through D with a "u" shaped rideshare entry and exit off San Fernando Road near Building 1. Gates A and B would be located on West Milford Street, abutting the east and west of Building 2. Gate C would be located on West California Avenue, which is the Property's current main access point. Gate D would be located on San Fernando Road near the Property's southwestern boundary and away from the rideshare entry and exit. All Gates would provide ingress and egress to the fire lane within the Project site, which would allow for vehicular circulation to all Buildings (including the Parking Garage) and the Surface Parking. The proposed Project would not introduce new infrastructure and the Project would replace existing studio production spaces, offices, and warehouse facilities on the same contiguous parcel. Impacts associated with physically dividing an established community (residential, commercial, or industrial) would be less than significant.

Therefore, the Project would not physically divide an established community.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Less than significant.

Impact LU-2: Would the Project 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?

Development of the Project would demolish the existing structures and the existing surface parking for the construction of a new soundstage campus containing four new structures. The Project would contain a total gross floor area of approximately 406,318 square feet, for a floor area ratio (FAR) of approximately 0.96 to 1. As noted above, the IMU zone allows soundstage-production and supporting office uses by right and does not impose an FAR restriction.

The Project's 114 surface parking spaces require a total of 19 trees. The Project instead would provide a total of 108 trees located mainly along the perimeter of the Project site, on Building 1, and throughout the Property. The Project will provide 69 trees on the Property, with 62 trees in the surface parking area concentrated to buffer the adjacent residential zone to the east and residential uses to the south. The remaining 7 on site trees would be located on Building 1's outdoor decks. At least 75 percent of the

proposed trees would have a 25-foot mature span, with the remaining trees having at least a 10-foot mature span. The Project does not strictly comply with the landscaping and tree dispersal requirements of the GMC. The Project would also include landscaping throughout the Project site, including upper-level roof deck landscaping. The Project would include 15,753 square feet of planting on the ground level, 1,737 square feet of planting on the outdoor decks, and 6,726 square feet of off-site streetscape planting. Landscaping would be located along the aforementioned landscape buffer, and the perimeter of the Project site.

The Project will provide 533 parking spaces (in both the Parking Garage and the Surface Parking) and 12 loading spaces, which would exceed the required eight loading spaces required by the GMC. The Project is required to provide 533 parking space per the GMC.

The Parking Garage provides 419 parking spaces. The first floor provides 43 parking spaces, the second floor provides 82 parking spaces, the third floor provides 80 parking spaces, the fourth floor provides 82 parking spaces, the fifth floor provides 79 spaces, and the sixth floor provides 54 spaces. The remaining 114 parking spaces would be located throughout the Project site within the Surface Parking areas. All 533 parking spaces would be standard size spaces and include 18 regular accessible spaces (including van accessible), 24 electric vehicle capable spaces, and 3 accessible electric vehicle capable spaces. The Project would provide 533 standard size parking spaces, the code required amount. All parking and loading would be accessed from the fire lane within the Project site connecting the various components of the Project site. The Parking Garage is accessed by a driveway located within the interior of the Project site near the Gate A entrance.

Access to the Project site would be provided by four separate entrances, Gates A through D with a “u” shaped rideshare entry and exit off San Fernando Road near Building 1. Gates A and B would be located on West Milford Street, abutting the east and west of Building 2. Gate C would be located on West California Avenue, which is the Property’s current main access point. Gate D would be located on San Fernando Road near the Property’s southwestern boundary and away from the rideshare entry and exit. All Gates would provide ingress and egress to the fire lane within the Project site, which would allow for vehicular circulation to all Buildings (including the Parking Garage) and the Surface Parking.

The following includes analysis based on the consistency of the Project with applicable regional and local laws, regulations, plans, and guidelines adopted for the purpose of avoiding or mitigating an environmental effect.

SCAG 2020-2045 RTP/SCS

Table 4.6-1: SCAG RTP/SCS Consistency Analysis provides an assessment of the Project’s consistency with 2020-2045 SCAG RTP/SCS goals. The analysis in these tables concludes that the Project would be consistent with the applicable 2020-2045 RTP/SCS goals.

TABLE 4.6-1
SCAG RTP/SCS CONSISTENCY ANALYSIS

2020 RTP/SCS Goals, Policies, and Strategies	Project Consistency
Goal 1: Encourage regional economic prosperity and global competitiveness.	Consistent. This RTP/SCS goal focuses on balancing plan objectives and improving regional economic development and competitiveness. This goal is directed at the RTP/SCS itself and, as such, is not applicable to the Project. Nonetheless, the Project would not adversely affect the ability of SCAG to align plan investments and policies with economic development and competitiveness. That being said, the Project contributes to this goal by advancing RTP/SCS policies, as discussed below, and contributing to City and regional economic development, including but not limited to, bolstering the role of the entertainment industry in the City as well as the Southern California region, and increasing employment within an existing Priority Growth Area (PGA) ¹² located along a transit corridor with access to both bus and rail transit. The Project would redevelop an existing production studio and support facilities with a soundstage campus containing similar uses. As such, the Project would be consistent with this goal.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent. This goal pertains to SCAG mobility and accessibility policies and does not apply to individual development projects. Nonetheless, the Project contributes to the achievement of this goal as an infill development within a portion of the SCAG region that is well served by existing and proposed transit and its location near existing major population centers. Specifically, the Project site is served by multiple bus and shuttle lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles Department of Transportation, and the Glendale Beeline along San Fernando Road and SR 134. The Project would enhance pedestrian, bicycle, and transit connections to promote a more transit-oriented development and walkability near the Project site. The Project would encourage walking, biking, and transit usage by providing bicycle parking and pedestrian connections from the Project site to the existing sidewalks along San Fernando Road, Milford Street, and California Avenue. Furthermore, mobility and accessibility would also be enhanced via implementation of the Project's plan for employees, production company staff, and site visitors to increase vehicle occupancy rates and improve the effectiveness of the local roadway system. The Project would also include fire lanes within the various components of the Project, which are approximately 26-45 feet in width and roughly bisects the property on two sides from north to south and also transects the property twice east to west and also transects the Property twice east to west. This would

12 Southern California Association of Governments (SCAG), "Priority Growth Areas (PGA)," accessed May 2022, <https://hub.arcgis.com/datasets/0da9bc5fba2d4b409c8f166166bf8888>. This is the Priority Growth Areas (PGAs) in the SCAG Region developed for Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). PGAs include High Quality Transit Areas, Transit Priority Areas, Job Centers, Livable Corridors, Neighborhood Mobility Areas, Spheres of Influence (outside of constrained areas).

TABLE 4.6-1
SCAG RTP/SCS CONSISTENCY ANALYSIS

2020 RTP/SCS Goals, Policies, and Strategies	Project Consistency
	provide sufficient emergency access to and from the Project site. As such, the Project would be consistent with this goal.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system	Consistent. This goal pertains to SCAG mobility policies and does not apply to individual development projects. Nonetheless, the Project assists in achieving this goal by enhancing pedestrian, bicycle, and vehicular access to the Project site and modifying the gateways to the Project site to include appropriate design considerations to ensure travel safety and reliability. These improvements would also be developed in consultation with Metro and Glendale Beeline and/or transit service providers, as appropriate, and constructed in compliance with applicable standards. As such, the Project would be consistent with this goal.
Goal 4: Increase person and goods movement and travel choices within the transportation system	Consistent. This goal pertains to SCAG regional transportation policies and does not apply to individual development projects. Nonetheless, the Project contributes to the achievement of this goal via the proximity of the Project site to multiple bus and shuttle lines, as well as Project support for the region's transportation investment and the sustainability of the regional transportation system. Specifically, the Project area is served by bus lines operated by Metro and Glendale Beeline, including Metro Local Line 94 and Glendale Beeline Route 12, which travel within the Study Area along San Fernando Road. As such, the Project would expand an existing major employment center close to the existing bus line stops. Furthermore, the Project's plans would provide options for sustainable transportation by including sufficient electric vehicle charging stations on site. As such, the Project would be consistent with this goal.
Goal 5: Reduce greenhouse gas emissions and improve air quality	Consistent. This goal pertains to SCAG energy-efficiency policies and does not apply to individual development projects. Nonetheless, the Project assists in achieving this goal. In the absence of any adopted, numeric threshold, the City evaluates the significance of the Project's potential GHG emissions consistent with CEQA Guidelines Section 15064.4(b)(2) which refer to applicable policies and/or regulations outlined in CARB's Climate Change Scoping Plan, SCAG's 2020- 2045 RTP/SCS, the City's Sustainable City Action Plan, the City's General Plan, or City Ordinance No. 5999. The Project would not conflict with any of the applicable policies and/or regulations outlined in these plans and as such would not result in impacts related to direct and indirect emissions of GHG emissions. Additionally, the Project would include 24 electric vehicle capable spaces and 3 accessible electric vehicle capable spaces to accommodate for alternatives to gas powered vehicles. As such, the Project would be consistent with this goal.
Goal 6: Support healthy and equitable communities	Consistent. Consistent with regulatory requirements, the Project would comply with applicable provisions of the California Green Building Standards Code. The goals of

TABLE 4.6-1
SCAG RTP/SCS CONSISTENCY ANALYSIS

2020 RTP/SCS Goals, Policies, and Strategies	Project Consistency
	the Green Building standard include protecting occupant health, improving employee productivity, and using resources more efficiently while reducing the overall impact to the environment. As such, the Project would be consistent with this goal.
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network	Consistent. Implementation of this goal is achieved in part by encouraging future development within existing urbanized areas and specifically within locations designated as high-quality transit areas (HQTAs). The Project site is located within a SCAG-designated HQTA. ¹³ The Project site is also located adjacent to Glendale Beeline Route 12 along San Fernando Road and within one-quarter mile of Metro Local Line 94 on San Fernando Road and West California Avenue. The proposed Project would provide convenient access to mass transit and opportunities for walking and biking as well as 533 parking spaces, including 24 electric vehicle capable spaces and 3 accessible electric vehicle capable spaces. As such, Project development is occurring at a site that advances the implementation of the land use patterns referenced by this goal.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	Not Applicable. This policy is directed towards SCAG to leverage the use of new transportation technologies using data-driven solutions. However, the proposed Project would be considered infill development within a HQTA which offers highly-efficient travel opportunities. The Project would be consistent with this policy. The Project site is also located adjacent to Glendale Beeline Route 12 along San Fernando Road and within one-quarter mile of Metro Local Line 94 on San Fernando Road and West California Avenue. The proposed Project would provide convenient access to mass transit and opportunities for walking and biking as well as 533 parking spaces, including 24 electric vehicle capable spaces and 3 accessible electric vehicle capable spaces.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options	Not applicable. The Project does not include development of residential housing. As such, the Project is not applicable to this goal.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats	Not applicable. This guiding policy sets a requirement for the protection of natural habitats and agricultural lands, which do not exist on the Project site. As such, the Project is not applicable to this goal.

Source: SCAG, 2020-2045 RTP/SCS ConnectSoCal. September 3, 2020.

<https://www.connectsocial.org/Documents/Adopted/fConnectSoCal-Plan.pdf>. Accessed May 2022.

City of Glendale General Plan

The City's General Plan sets forth the goals, policies, and directions the City will take in managing its future. It is the blueprint for development and a guide to achieving the long-term, citywide vision. **Table**

13 SCAG, "High Quality Transit Areas (HQTAs) (2045)", accessed May 2022, <https://gisdata-scanag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1/explore>.

4.6-2: Project Consistency with General Plan provides an assessment of the Project's consistency with the City's General Plan goals and policies. The analysis in these tables concludes that the Project would be consistent with the applicable General Plan goals and policies.

TABLE 4.6-2
PROJECT CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Project Consistency Land Use
<i>General</i>	
<i>Reinforce Glendale's image and community identity within the greater Los Angeles area metropolitan complex.</i>	No Conflict. The Project site consists of existing studio production spaces, offices, and warehouse facilities. The Project would be consistent with the City's image and community identity by redeveloping the existing site and creating a modern soundstage campus on a large parcel well suited to such uses. The Project would also include flex spaces, and production office uses. As such, the Project would not conflict with this policy.
<i>Promote development and improvement within the community capitalizing on the location of, and access to, Glendale as adjacent to the regional core.</i>	No Conflict. The Project is a large scale, state of the art, soundstage campus development located within the IMU zone. The Project will develop a 9.74-acre underutilized site with a soundstage campus, which would include Stages, Flex Spaces, and ancillary Production Office, intensifying the industrial uses on the Project site. Upon completion, the Project will attract top tiered entertainment industry companies to utilize the Project, which will encourage quality businesses to relocate to the City. The Project would also improve the Project site by demolishing the existing structures and providing the proposed uses in new state of the art buildings. This would further the primary objective of the Redevelopment Plan, which is to eliminate and prevent the spread of blight and deterioration in the Redevelopment Plan Area. As such, the Project would not conflict with this policy.
<i>Industrial</i>	
<i>Provide for the improvement of existing industrial districts through the addition of parking facilities, visual amenities, and the elimination of incompatible influents and blight.</i>	No Conflict. The Project would replace existing studio production spaces, offices, and warehouse facilities uses with production and soundstage uses that include supporting office uses, which is consistent with the General Plan's vision. The Project will introduce upgraded, state of the art production soundstage studios to industrially zoned land, preserving and expanding job creation on the Project site. Four levels of parking as well as Surface Parking would also be provided onsite as required by the Zoning Ordinance. The Project will add to the City's entertainment jobs base at a time when production space is in high demand all over the surrounding region. As such, the Project would not conflict with this policy.
<i>Circulation</i>	
<i>Develop clusters of uses which will facilitate the development of public transportation networks, decreasing dependence on the automobile.</i>	No Conflict. The Project site and vicinity is comprised of employment, industrial, and residential land uses served by transit stops, a bicycle network, and pedestrian infrastructure. There are adequate sidewalks lining the streets, crosswalks available at the intersections, and

TABLE 4.6-2
PROJECT CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Project Consistency
	several restaurants and other services within walking distance of the Project site. Additionally, the Project site is located within a HQTa which places employment uses within one half-mile of public transit uses. As such, the Project would not conflict with this policy.
<i>Economic</i>	
<i>Provide opportunities for the expansion of revenue producing industrial and commercial establishments within the parameters of other community goals.</i>	No Conflict. The Project is a large scale, state of the art, sound stage development located within the IMU zone. The Project will develop a 9.74-acre underutilized site with the Stages, Flex Spaces, and ancillary Production Office, intensifying the industrial uses on the Project site. Upon completion, the Project will attract top tiered entertainment industry companies to utilize the Project, which will encourage quality businesses to relocate to the City. The Project would also improve the existing site by demolishing the existing structures and providing the proposed uses in new state of the art buildings. The General Plan designates the site as Mixed Use. The General Plan encourages flexibility for areas with the IMU designation in the range and type of services such facilities provide. ¹⁴ The Project would be consistent with the City's General Plan.
<i>Circulation Element</i>	
Goal 2: Minimization of congestion, air pollution, and noise associated with motor vehicles.	
<i>Increase/support public and high occupancy vehicle transportation system improvements through mitigation of traffic impacts from new development.</i>	No Conflict. The Project is located within an identified HQTa, which offers highly-efficient travel opportunities. The Project would be consistent with this policy. The Project site is also located adjacent to Glendale Beeline Route 12 along San Fernando Road and within one-quarter mile of Metro Local Line 94 on San Fernando Road and West California Avenue. The proposed Project would provide convenient access to mass transit and opportunities for walking and biking as well as 509 parking spaces, including 24 electric vehicle capable spaces and 3 accessible electric vehicle capable spaces. Although the Project may intensify use of existing pedestrian, transit, and bicycle facilities, as well as vehicular traffic using San Fernando Road, Milford Street, and California Avenue, the magnitude of those travel modes are not anticipated to reach a level where any degradation, capacity constraint, or significant conflict would arise. As such, the Project would not conflict with this policy.
Goal 3: Reasonable access to services and goods in Glendale by a variety of transportation modes.	
<i>Encourage growth in areas and in patterns which are or can be well served by public transportation.</i>	No Conflict. The Project would contribute to and support the productivity and use of the nearby transit systems by providing employment near transit and retaining existing sidewalks adjacent to the Project site along San Fernando Road, Milford Street, and California Avenue. The Project also does not propose modifying, removing, or otherwise negatively affecting existing bicycle and pedestrian

14 Glendale General Plan Amendment, No. 2004-01, Section 2.

TABLE 4.6-2
PROJECT CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Project Consistency
	infrastructure. As such, the Project would not conflict with this policy.
Goal 4: Functional and safe streetscapes that are aesthetically pleasing for both pedestrians and vehicular travel.	
<i>Provide and maintain quality streetscape and pedestrian amenities (i.e. bus shelters, street trees, street furniture, wide sidewalks, etc.)</i>	No Conflict. As described above, the Project would encourage walking, biking, and transit usage by providing bicycle parking and pedestrian connections from the Project site to the existing sidewalks along San Fernando Road, Milford Street, and California Avenue. Pedestrian amenities such as street trees (including Yellow Trumpet Trees, Desert Willow Trees, Brisbane Box Trees and other ornamental and drought tolerant species) would be provided for a safer and more comfortable pedestrian environment. These measures would promote active transportation modes such as biking and walking. As such, the Project would not conflict with this policy.
Goal 5: Land use which can be supported within the capacity constraints of existing and realistic future infrastructure.	
<i>Balance land use/zoning with roadway capacity by establishing congestion thresholds and avoiding unacceptable levels of congestion from future development.</i>	No Conflict. The Project would develop a large scale, state of the art, soundstage campus development located within the Redevelopment Area. The Project will develop a 9.74-acre underutilized site with the Stages, Flex Spaces, and ancillary Production Office, intensifying the industrial uses on the Project site. The Project proposes the development of 406,318 square feet (sf) of gross floor area of studio and support uses in an HQT. The Project would align with the goals of SB 743 to reduce VMT by placing employment uses in close proximity to transit. In addition, as discussed in Section 4.8: Transportation , according to the City Transportation Impact Analysis (TIA) Guidelines, the Project would fall under criteria #4 of the five exclusionary criteria that would not require further VMT analysis for the proposed Project. As such, the Project would not conflict with this policy.
Historic Preservation Element	
Goal 1: Preserve historic resources in Glendale which define community character.	
<i>Policy 1-1: Encourage support for the importance of history and historic preservation.</i>	No Conflict. As discussed in Section 4.3: Cultural Resources , as part of the Historical Resources Assessment, ESA conducted an intensive survey of the Project site including the history, site development, construction, use, and later changes to the subject building and associated property (see Appendix B). As concluded in the Historical Resources Assessment, the existing buildings onsite do not appear to meet the thresholds of significance or integrity as applied to an industrial office and warehouse property type under any of the applicable criteria. As such, these buildings would not be considered a historic resource as defined by CEQA and the Project would not conflict with this policy.
<i>Policy 1-2: Recognize archaeological and historic resources as links to community identity.</i>	No Conflict. As stated previously, the existing buildings on site do not meet the requirements for a historic resource designation. Additionally, a Historic Preservation Services Memo was prepared by Sapphos Environmental (see Appendix B). As part of the Historic

TABLE 4.6-2
PROJECT CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Project Consistency
	<p>Preservation Services Memo, a historic resources survey was conducted for the proposed Project.¹⁵ The Historic Preservation Services Memo determined that, although the subject property may be associated with post-war industrial development of southwest Glendale, the businesses associated with the Project site did not significantly contribute to the history of Glendale. Numerous existing buildings on site were constructed following the post-war period, the use of the buildings has not been retained, and the primary office building has been substantially altered. Therefore, the Project site does not appear eligible for listing in a historical register. As such, the Project would not conflict with this policy.</p>
Noise Element	
Goal 1: Reduce noise impacts from transportation noise sources	
<i>Policy 1.3: Reduce transportation noise through proper design and coordination of routing.</i>	No Conflict. The Project site is located within the IMU zone and is surrounded by industrial and commercial uses as well as immediately adjacent to San Fernando Road. As discussed in Section 4.7: Noise , the construction and operation of the proposed Project would not result in significant noise level increases at sensitive receptors. As such, the Project would not conflict with this policy.
<i>Policy 1.5: Consider noise reduction measures when making revisions to the Circulation Element.</i>	No Conflict. As mentioned above, the Project site is located adjacent to industrial uses, residential uses, and San Fernando Road. Best management practices would be included to reduce any noise during construction of the Project such as performing construction activities only within the hours as specified by the GMC Chapter 8.36, Section 8.36.040. As such, the Project would not conflict with this policy.
Goal 3: Continue incorporating noise considerations into land use planning decisions	
<i>Policy 3.1: Ensure that land uses comply with adopted standards.</i>	No Conflict. The Project site is located adjacent to industrial uses, residential uses, and San Fernando Road. As discussed in Section 4.7 , the construction and operation of the proposed Project would not result in significant noise level increases at sensitive receptors. As such, the Project would not conflict with this policy.
<i>Policy 3.2 Encourage acoustical mitigation design in new construction when necessary.</i>	No Conflict. As stated in Section 4.7 , Project related noise would not exceed thresholds. Thus, the proposed Project would not result in a permanent increase in noise levels above ambient levels in the vicinity of the Project site. As such, the Project would not conflict with this policy.
Safety Element	
Goal 1: Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses and social dislocation and other impacts resulting from seismic hazards.	
<i>Policy 1-1: The City shall ensure that new buildings are designed to address earthquake hazards and shall</i>	No Conflict. The Project site is not located within an established Alquist Priolo Earthquake Fault Zone or

¹⁵ Historic Preservation Services Memo prepared by Sapphos Environmental, Inc. dated May 18, 2021 (Appendix B).

TABLE 4.6-2
PROJECT CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Project Consistency
<i>promote the improvement of existing structures to enhance their safety in the event of an earthquake.</i>	designated Fault-Rupture Hazard Zone for surface fault rupture hazards. Additionally, the Project would include design guidelines provided by the California Building Code that address seismic hazards. Adherence to these guidelines would reduce impacts associated with earthquakes in areas identified as high risk. As such, the Project would not conflict with this policy.
<i>Policy 1-4: The City shall ensure that current seismic and geologic knowledge and State-certified professional review are incorporated into the design, planning and construction stages of a project, and that site-specific data are applied to each project.</i>	No Conflict. The Project includes design guidelines provided by the California Building Code that address geologic hazards, such as mudslides and erosion. Adherence to these guidelines will reduce impacts associated with these geologic hazards in areas identified as high risk. As such, the Project would not conflict with this policy.
Goal 2: Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses and social dislocation and other impacts resulting from geologic hazards.	
<i>Policy 2-1: The City shall avoid development in areas of known slope instability or high landslide risk when possible, and will encourage that developments on sloping ground use design and construction techniques appropriate for those areas.</i>	No Conflict. According to the City's General Plan Safety Element, the Project site is not located within an area that is susceptible to liquefaction. Overall, the proposed Project would comply with the California Building Code to avoid potential impacts related to seismic-related ground failure including liquefaction. There are no known landslides near the Project site nor is the site in the path of any known or potential landslides. As such, the Project would not conflict with this policy.
Goal 3: Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses, and social dislocation and other impacts resulting from flooding hazards.	
<i>Policy 3-1: The City shall investigate the potential for future flooding in the area and will encourage the adoption of flood-control measures in low-lying areas of alluvial fans, along major channels, and downgradient of large reservoirs and water tanks.</i>	No Conflict. The Project site is located in a Federal Emergency Management Agency (FEMA) designated flood Zone X, meaning that it is in an area of minimal flood hazard and the Project site is not located within a 100-year flood zone. ¹⁶ As such, the Project would not exacerbate or create the potential for future flooding in the area and would be designed in accordance with the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the Los Angeles Regional Water Control Board (LARWQCB). As such, the Project would not conflict with this policy.
Goal 4: Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses and social dislocation and other impacts resulting from fire hazards.	
<i>Policy 4-1: The City shall ensure to the extent possible that fire services, such as fire equipment, infrastructure, and response times, are adequate for all sections of the City.</i>	No Conflict. As mentioned previously, the Project proposes fire lanes within the various components of the Project, which are approximately 26-45 feet in width and roughly bisects the property on two sides from north to south and also transects the property twice east to west and also transects the Property twice east to west. This would provide adequate emergency access to and from the Project site. Additionally, the Project would include safety and design requirements as specified by the California Building Code such as sprinkler systems within

16 Federal Emergency Management Administration (FEMA), "Flood Map Service Center," <https://www.fema.gov/floodmaps/national-flood-hazard-layer>. Accessed May 2022.

TABLE 4.6-2
PROJECT CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Project Consistency
	each building and adequate emergency vehicle parking. As such, the Project would not conflict with this policy.
<i>Policy 4-2: The City shall require that all new development in areas with a high fire hazard incorporate fire resistant landscaping and other fire hazard reduction techniques into the project design in order to reduce the fire hazard.</i>	No Conflict. The Project is not located in an area classified as a Very High Fire Hazard Severity Zone (VHFHSZ) and would not exacerbate current risks of wildfire. The Project would adhere to Section 30.31.020 of the GMC relating to landscaping within the Industrial land use designation. As such, the Project would not conflict with this policy.
Goal 5: Reduce threats to the public health and safety, and to the environment, from hazardous materials.	
<i>Policy 5-1: The City shall strive to reduce the potential for residents, workers, and visitors to Glendale to being exposed to hazardous materials and wastes.</i>	No Conflict. A Phase I ESA of the Project site was conducted and determined that the Project site has been adequately investigated and did not identify new areas of environmental concern that have not been investigated (see Appendix C). The Phase I ESA stated the LARWQCB and the Office of Environmental Health Hazard Assessment (OEHHA) concluded the Project site is in a condition suitable for a No Further Action (NFA), conditioned on the recording of a commercial/industrial land use covenant (LUC). Furthermore, the existing geosynthetic clay lined (GCL) cap would be maintained during Project construction and operation and groundwater on the Project site would be subject to strict regulations by LARWQCB. As such, the Project would not conflict with this policy.
Goal 8: Maintain a high level of emergency preparedness.	
<i>Policy 8-1: The City shall prepare for emergency response and recovery from natural and urban disasters, especially earthquake hazards.</i>	No Conflict. The Project would not conflict with the City's established emergency response plan. The Project includes design guidelines that address seismic hazards and adherence to these guidelines would reduce impacts associated with natural disasters such as earthquakes. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. The Project would also include fire lanes within the various components of the Project, which are approximately 26-45 feet in width and roughly bisects the property on two sides from north to south and also transects the property twice east to west and also transects the Property twice east to west. As such, the Project would not conflict with this policy.

Source: City of Glendale General Plan.

South Glendale Community Plan

The Project has a South Glendale Community Plan land use designation of Industrial/Creative. The Industrial/Creative land use designation accommodates entertainment related uses, such as sound stages and various related craft trades. The Industrial/Creative designation applies to properties along and near San Fernando Road, which is also known as the creative corridor due to the many businesses along this corridor that support the movie industry. The Industrial/Creative land use designation includes the following typical characteristics:

1. Building heights vary from 1- to 6-stories.
2. New buildings that front the street with well defined entries.
3. Industrial and mixed-use buildings transition to adjacent commercial or residential zones by stepping down in height and/or providing a landscaped open space buffer.
4. Transitional areas that accommodate residential, mixed-use and adaptive reuse.
5. Large industrial buildings that provide “pedestrian-scaled” features or smaller masses that step down to the street.
6. Attractive landscaped public/semi-private outdoor space that is incorporated into front/side yards.
7. On-site pedestrian and vehicle paths defined and separated from one another by landscaping or different paving.
8. Parking that is provided on-street, in surface parking lots or within the building envelope away from view of the street.
9. Parking lots that are separated from the sidewalk by a well-landscaped setback area; large parking lots provide landscaped islands planted with canopy trees.
10. Streetscapes that consist of pedestrian-friendly sidewalks lined with street trees.
11. Streets that accommodate pedestrians, bicycles, transit and autos and include on-street parking and traffic calming features.

The Project would redevelop the following existing uses on the Project site: soundstage production studio, support uses and supporting offices, and mill/warehouse on the southern portion of the Project site; car storage and video production equipment storage and distribution (FreMantle) on the remaining northern portion of the site. The Project would construct a new state of the art soundstage campus with production support uses and office uses.

The Project includes three buildings and a parking garage. Building 1 would be a six-story structure fronting San Fernando Road and contains production offices, commissary space, 2 flex spaces and 1 mill space uses. Building 1 also offers outdoor decks. Building 2 is located to the east of the Building 1, fronts Milford Street and contains Stage, Stage support and Flex Space uses. Building 3 is located to the south of Building 2 and contains Stage and Stage support uses. The fourth building, the Parking Garage, is a six story structure which fronts San Fernando Road and West Milford Street. The Parking Garage is accessed by a driveway located within the interior of the Project site and contains 419 parking spaces. An additional 114 surface parking spaces located throughout the Project site.

Access to the Project site would be provided by four separate entrances, Gates A through D with a “u” shaped rideshare entry and exit off San Fernando Road near Building 1. Gates A and B would be located on West Milford Street, abutting the east and west of Building 2. Gate C would be located on West California Avenue, which is the Property’s current main access point. Gate D would be located on San Fernando Road near the Property’s southwestern boundary and away from the rideshare entry and exit. All Gates would provide ingress and egress to the fire lane within the Project site, which would allow for vehicular circulation to all Buildings (including the Parking Garage) and the Surface Parking. The Project’s various components are separated by a fire lane that ranges from approximately 26-45 feet in width and

roughly bisects the property on two sides from north to south and also transects the Property twice east to west. The fire lane also provides vehicular access to the Project's multiple components.

The Project instead would provide a total of 108 trees located mainly along the perimeter of the Project site, on Building 1, and throughout the Property. The Project will provide 69 trees on the Property, with 62 trees in the surface parking area concentrated to buffer the adjacent residential zone to the east and residential uses to the south. The remaining 7 on site trees would be located on Building 1's outdoor decks. At least 75 percent of the proposed trees would have a 25-foot mature span, with the remaining trees having at least a 10-foot mature span. The Project would also include landscaping throughout the Project site, including upper-level roof deck landscaping. The Project would include 15,753 square feet of planting on the ground level, 1,737 square feet of planting on the outdoor decks, and 6,726 square feet of off-site streetscape planting. Landscaping would be located along the landscape buffer, and the perimeter of the Project site.

GMC Zoning

The Project is zoned IMU (Industrial/Commercial Mixed Use). The City of Glendale General Plan designates the Project site as Mixed Use. The purpose of the IMU zone is to allow for a mix of industrial and commercial activities and provide for a full range of services to be located along industrial/commercial thoroughfares.¹⁷ The IMU zone allows for soundstage-production and supporting office uses by right and does not impose an FAR restriction. Therefore, the IMU zone is consistent with the Project's General Plan designation.

The Project Applicant is requesting the following variances due to the Project site's location and condition. Variances allow deviations from regulations on the basis of a general regulation that would produce a unique hardship for the property in question. The variances requested by the Project Applicant would be largely due to the existing site conditions and are explained further below.

Height Variance

GMC Section 30.14.030, Table 30.14-B restricts buildings to a 50-foot height maximum within the IMU zone. The Project mostly conforms to the maximum height requirement. The Project's proposed Building 2 and 3 would conform to the GMC height requirement of 50 feet. Due to existing site soil conditions associated with the GCL cap discussed previously and the ongoing obligation to maintain the GCL cap and limit soil disturbance in the GCL cap's general vicinity, Building 1 is proposed to reach up to 89 feet 6 inches in height to the top of the parapet (with mechanical screening height of up to 100 feet 9 inches). Building 1 would include production offices, commissary space, 2 flex spaces and 1 mill space uses, and each floor contain outdoor decks facing towards San Fernando and smaller outdoor decks facing east. The Parking Garage is proposed to reach up to 65 feet 6 inches to the top of the roof (up to 69 feet to the top of the parapet to accommodate rooftop equipment and required mechanical screening).

¹⁷ Glendale Municipal Code, Section 30.14.010.A.

Substantial excavation to accommodate below-grade structures is not physically feasible due to residual environmental contamination in subsurface soil that must not be disturbed. The Project site has been previously subject to environmental cleanup measures due to releases of hazardous substances affecting subsurface soil, soil vapor, and groundwater. While environmental remediation efforts have achieved levels suitable for regulatory case closure under a continued commercial/industrial land use scenario, the closure comes with certain conditions. One of the cleanup measures required the installation and continued maintenance of an underground geosynthetic clay line (GCL) cap, located on the west side of the Property, approximately 6 feet below ground surface (bgs) and directly beneath a portion of Buildings 1 and 3 and the Parking Garage. The GCL cap was installed to prevent direct contact with residual soil contamination beneath it and agreement to not disturb the GCL cap is a requirement of the regulatory oversight agency. While there is no significant risk of contact with soil in place beneath the GCL, the GCL cap cannot be removed or penetrated.¹⁸ Accordingly, the Applicant is precluded from excavation under Building 1 because such activity would necessarily penetrate the GCL cap. This physical hardship results in the need to place the Parking Garage above grade, or the Applicant would not otherwise be able to accommodate the GMC's required parking while simultaneously delivering a state of the art, world class soundstage production studio.

As such, the strict 50-foot height limitation within the Project's zoning places an unnecessary hardship on the Project site and a variance is required.

Landscaping and Tree Dispersal

GMC Section 30.32.160.B.1 and B.2 requires 5 percent of the interior parking lot area to be landscaped and for one tree to be planted for every 6 surface parking spaces (19 trees for the Project), evenly distributed throughout the parking lot. Instead of the 19 trees required to be planted in the Surface Parking area by the GMC, the Applicant is requesting to plant 69 trees along the Project site perimeter, on Building 1, and throughout the Project site. Additionally, the Applicant is requesting to provide less than 5% interior landscaping for the Surface Parking area and to provide landscaping along the perimeter of the Project site as well as on the rooftops. The intent of the GMC parking regulations is to provide for the general welfare and convenience of persons utilizing various uses within the city by providing suitable off-street parking and to create visually appealing parking lots.¹⁹ The proposed Surface Parking would not be within a single lot but disbursed in various parts of the Project site considering the location of the Project components. Due to the configuration of the fire lane, and the location of the Surface Parking on the proposed Project site, including landscaping or trees in between parking spaces would result in practical difficulties by not giving the vehicles enough space to maneuver. The Project does not strictly comply with the landscaping and tree dispersal requirements of the GMC. The Project will provide 69 trees on the Property, with 62 trees in the surface parking area concentrated to buffer the adjacent residential zone to the east and residential uses to the south. The remaining 7 on site trees would be located on Building 1's outdoor decks for passersby and workers to enjoy and to create a visually cohesive

¹⁸ Phase I Environmental Site Assessment. SCS Engineers. May 25, 2021. (see Appendix C).

¹⁹ GMC Section 30.32.010.

campus like setting. The proposed landscaping plan also creates a cohesive internal campus like feeling, which advances the GMC's objective to provide for the general welfare and convenience of person utilizing the sound stage uses. The IMU zone also does not require any interior setbacks for properties that abut R-2250 zones. However, the GMC requires a minimum five-foot wide landscaped buffer on properties adjacent to residentially zoned property regardless of required setbacks (as mentioned, in IMU zones there are no required interior setbacks).²⁰ The Project site abuts an R-2250 residential zone on its eastern boundary and the Project includes a 5'-0" wide landscape buffer.

Corner Entrance Requirement

GMC Section 30.14.030, Table 30.14-B states that the IMU zone requires 10-foot minimum corner cutoffs at the intersection of two streets and an entrance to buildings at such intersections in order to maintain visibility at the intersection and to provide architectural interest at corner locations.²¹ The Applicant is requesting relief from the entrance requirement as a corner entrance at the intersection of San Fernando Road and Milford Street is infeasible, however, the Project would adhere to the 10-foot corner cutoff at that intersection. The Applicant requests a deviation from the pedestrian entrance requirement because strict application would result in practical difficulties that are not consistent with the general purposes and intent of the ordinance. A pedestrian entrance to Building 1 at the intersection of San Fernando Road and Milford Street would constitute a security risk for a soundstage production studio. All access must be from gates A, B, C and D, all of which will be monitored and secured.

The purpose of the IMU development standard regulations are to allow IMU zoned properties to provide for a full range of goods and services to the community located along portions of industrial/commercial thoroughfares, in conformance with the General Plan.²² The General Plan's land use element states that mixed use development areas allow for combinations of commercial and industrial land uses depending on specific zoning district designations.²³ The Project is designed similarly to other sound stage production studios, where access to the studios must be through controlled checkpoints or gates. An entrance at the corner invites pedestrians and passersby to attempt to access the Property, which would go against safety protocols for this use. The use proposed on the site is therefore in conformance with the intent of the General Plan and the IMU zone, and strict application would result in a pedestrian entrance that does not serve the intended use. Furthermore, the Project provides four gated entrances that allow for adequate access to the interior of the Property. Those who have proper credentials would have no trouble accessing the Project through its four gated entrances located on San Fernando Road, California Avenue, and Milford Street.

20 GMC Section 30.14.030, Table 30.14-B, Note (4).

21 GMC Section 30.14.030, Table 30.14-B.

22 GMC Section 30.14.010.A.

23 General Plan Amendment No. 2006-05, Page 1.

Parking Spaces

The Project would replace the existing studio production spaces, offices, and warehouse facilities on site and be generally consistent with the light industrial use designation. The Project would replace dated and less efficient existing structures with modern structures for a soundstage campus development to be compatible with surrounding land uses with landscaping and improved circulation. As discussed previously, all proposed variances are consistent with the City's General Plan and General Plan amendments in addition to adhering to existing zoning for the site.

San Fernando Road Corridor Redevelopment Project Plan

The Project would revitalize an underutilized area within the Redevelopment Area. The Project site is designated as Mixed Use by the General Plan and zoned as IMU by the Zoning Map. The Industrial/Commercial Mixed Use designation encourages flexibility for areas designated as Industrial Mixed Use in the range and type of services such facilities provide²⁴ and it states that light industrial uses may be compatible with residential uses in mixed use areas along San Fernando Road.²⁵ Similarly, pursuant to Section 30.13.010(A) and Table 30.13-A of the City's Zoning Ordinance, a mix of industrial and commercial activities are allowed to provide for a full range of services to be located along the industrial/commercial thoroughfares. The IMU zone allows soundstage-production and supporting office uses by right and does not impose an FAR restriction. Therefore, the industrial/commercial development uses as proposed would be permitted under the existing General Plan and zoning designations. The Project proposes to upgrade the current soundstage-production uses and incorporate brand new production studios, auxiliary flex spaces, a parking structure and supporting production offices within the existing site.

The Project would also be consistent with the South Glendale Community Plan as it would conform to the Industrial/Creative land use designation.

As discussed above, the Project is consistent with applicable goals, policies, and related objectives in SCAG's 2020-2045 RTP/SCS, the City's General Plan, GMC Zoning, South Glendale Community Plan, and the Redevelopment Plan. Therefore, the Project would not 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. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Less than significant.

²⁴ Glendale General Plan Amendment No. 2004-01, Section 2.

²⁵ Glendale General Plan Amendment No. 2004-01, Section 3.

4.6.4.4 Cumulative Impacts

A cumulative impact analysis for land use evaluates whether impacts of a project and related projects, when taken as a whole, would have significant environmental impacts under the two land use thresholds. If the related projects identified in combination with the Project would result in a cumulatively significant impact, then the significance of the Project's incremental contribution to that cumulatively significant impact must be determined. As previously stated, Project implementation would be consistent with land uses within the Project area and compatible to its surrounding uses. As discussed previously, implementation of the Project, on its own, would not result in land-use incompatibilities or plan inconsistencies; thus, no significant land-use impacts would occur.

Section 4.0: Environmental Impact Analysis, includes a list of related projects identified within **Table 4.0-1**. All related projects consist of individual development projects that do not involve any site improvements that would combine to physically divide any existing community, neighborhood, or district in southern Glendale. All identified Citywide-related projects would be reviewed for consistency with adopted land-use plans and policies by the City. For this reason, related projects are anticipated to be consistent with applicable General Plan and Zoning Ordinances, or will be subject to an allowable exception, and further, would be subject to CEQA, mitigation requirements, and design review. Therefore, the Project in combination with related projects would not cause a cumulatively significant impact related to land use.

Level of Significance Before Mitigation

Upon implementation of regulatory requirements, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Compliance with local, State, and federal plans, policies, and programs would ensure impacts related to land use and planning would be less than significant.

4.7 NOISE AND VIBRATION

4.7.1 INTRODUCTION

This section evaluates the potential for the proposed Project to result in noise impacts within the Project Site and surrounding area. This evaluation uses procedures and methodologies as specified by the California Department of Transportation (Caltrans), the Federal Transit Administration (FTA), and the Federal Highway Administration (FHWA). Existing noise monitoring, roadway, construction noise, construction vibration, and operational modeling datasheets are included in **Appendix D** of this report.

4.7.1.1 Overview of Noise and Vibration

Noise Descriptors

Noise levels are measured using a variety of scientific metrics. As a result of extensive research into the characteristics of noise and human response, standard noise descriptors have been developed for noise exposure analyses. All noise levels provided in this analysis are for outdoor conditions, unless otherwise stated specifically to be interior noise levels.

A-Weighted Sound Pressure Level (dBA): The decibel (dB) is a unit used to describe sound pressure level. When expressed in dBA, the sound has been filtered to reduce the effect of very low and very high frequency sounds, much as the human ear filters sound frequencies. Without this filtering, calculated and measured sound levels would include events that the human ear cannot hear (e.g., dog whistles and low-frequency sounds, such as the groaning sounds emanating from large buildings with changes in temperature and wind). With A-weighting, calculations and sound-monitoring equipment approximate the sensitivity of the human ear to sounds of different frequencies.

Maximum Noise Level (Lmax): Lmax is the maximum or peak sound level during a noise event. The metric accounts only for the instantaneous peak intensity of the sound, and not for the duration of the event. As a vehicle passes by an observer, the sound level increases to a maximum level and then decreases. Some sound level meters measure and record the maximum or Lmax level.

Sound Exposure Level (SEL): SEL, expressed in dBA, is a time-integrated measure, expressed in decibels, of the sound energy of a single noise event at a reference duration of 1 second. The sound level is integrated over the period that the level exceeds a threshold. Therefore, SEL accounts for both the maximum sound level and the duration of the sound. The standardization of discrete noise events into a 1-second duration allows calculation of the cumulative noise exposure of a series of noise events that occur over a period of time.

Equivalent Continuous Noise Level (Leq): Leq is the sound level, expressed in dBA, of a steady sound that has the same A-weighted sound energy as the time-varying sound over the averaging period. Unlike SEL, Leq is the average sound level for a specified time period (e.g., 24 hours, 8 hours, 1 hour). Leq is

calculated by integrating the sound energy from all noise events over a given time period and applying a factor for the number of events. Leq can be expressed for any time interval; for example, the Leq representing an averaged level over an 8-hour period would be expressed as Leq(8).

Community Noise Equivalent Level (CNEL): CNEL, expressed in dBA, is the standard metric used in California to represent cumulative noise exposure. The metric provides a single-number description of the sound energy to which a person or community is exposed over a period of 24 hours similar to day-night average sound level (DNL). CNEL includes penalties applied to noise events occurring after 7:00 PM and before 7:00 AM, when noise is considered more intrusive. The penalized time period is further subdivided into an evening period (7:00 PM through 10:00 PM) with an addition of 5 dBA to measured noise levels and a nighttime period (10:00 PM to 7:00 AM) with an addition of 10 dB to measured noise levels. The evening weighting is the only difference between CNEL and DNL.

Groundborne Noise

Groundborne noise refers to noise generated by groundborne vibration. More specifically, groundborne noise is the low-frequency rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.¹ The relationship between groundborne vibration (discussed directly below) and groundborne noise depends on the frequency content of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, groundborne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a groundborne noise levels that is approximately 50 decibels lower than the velocity level. For groundborne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the groundborne noise level will be approximately 35 dB lower than the velocity level. For groundborne vibration that causes high-frequency noise (i.e., the vibration spectrum peak is greater than 60 Hz), the groundborne noise level will be approximately 20 dB lower than the velocity level.² Therefore, for typical buildings, the groundborne noise decibel level is lower than the groundborne vibration velocity level at low frequencies.

Groundborne Vibration

Groundborne vibration is the perceptible movement of building floors, rattling windows, and doors, shaking of items on shelves or walls, and rumbling sounds. The root mean square (RMS) amplitude of a motion over a 1-second period is commonly used to predict human response to vibration. The motion due to groundborne vibration is described in vibration velocity levels, measured in decibels referenced to 1 microinch per second, and expressed as vibration decibels (VdB). Groundborne vibration is not a common environmental problem, unlike roadway noise or transit noise. The vibration source levels for various

1 Federal Transit Administration (FTA). *Transit Noise and Vibration Impact Assessment Manual*. p. 112. September 2018. Accessed September 2021. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

2 United States Department of Transportation (USDOT). *FHWA Roadway Construction Noise Model Final Report*. January 2006. Accessed June 2022. https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf.

types of construction equipment would be based on data provided in Table 7-4 of the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*.

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration.

Effects of Noise on Humans

Human response to sound is highly individualized. Annoyance is the most common issue associated with community noise levels. Many factors influence the response to noise including the character of the noise, the variability of the sound level, the presence of tones or impulses, and the time of day of the occurrence. Additionally, non-acoustical factors, such as individual opinion of the noise source, the ability to adapt to the noise, the attitude towards the source and those associated with it, and the predictability of the noise, all influence the response to noise. These factors result in the reaction to noise being highly subjective, with the perceived effect of a particular noise varying widely among individuals in a community. The effects of noise can be grouped into three general categories.

Noise-induced hearing loss usually takes years to develop. Hearing loss is one of the most obvious and easily quantifiable effects of excessive exposure to noise. While the loss may be temporary at first, it can become permanent after continued exposure. When combined with hearing loss associated with aging, the amount of hearing loss directly due to the environment is difficult to quantify. Although the major cause of noise induced hearing loss is occupational, nonoccupational sources may also be a factor.

Noise can mask important sounds and disrupt communication between individuals in a variety of settings. This process can cause anything from a slight irritation to a serious safety hazard, depending on the circumstance. Noise can disrupt face-to-face communication and telephone communication, and the enjoyment of music and television in the home. Interference with communication has proved to be one of the most important components of noise-related annoyance.

Noise-induced sleep interference is one of the critical components of community annoyance. Sound level, frequency distribution, duration, repetition, and variability can make it difficult to fall asleep and may cause momentary shifts in the natural sleep pattern or level of sleep. It can produce short-term effects, with the possibility of more serious effects on health if it continues over long periods.

Annoyance can be defined as the expression of negative feelings resulting from interference with activities, as well as the disruption of one's peace of mind or the enjoyment of one's environment. The consequences of noise-induced annoyance are privately held dissatisfaction, publicly expressed complaints to authorities, and potential adverse health effects, as discussed previously.

Some common sounds on the dBA scale, relative to ordinary conversation, are provided in **Table 4.7-1: Common Sounds on the A-Weighted Decibel Scale**. As shown, the relative perceived loudness of sound doubles for each increase of 10 dBA, although a 10 dBA change corresponds to a factor of 10 in relative sound energy. Generally, sounds with differences of 3 dBA or less are not perceived to be noticeably different by most listeners.

Sound	Sound Level (dBA)	Subjective Evaluations
Near Jet Engine	140	Deafening
Threshold of Pain	130	
Rock music, with amplifier	120	
Thunder, snowmobile (operator)	110	Very Loud
Boiler shop, power mower	100	
Orchestral crescendo at 25 feet, noisy kitchen	90	
Busy street	80	Loud
Interior of department store	70	
Ordinary conversation, 3 feet away	60	Moderate
Quiet automobiles at low speed	50	
Average office	40	Faint
City residence	30	
Quiet country residence	20	Very Faint
Rustle of leaves	10	
Threshold of hearing	0	

Source: U.S. Department of Housing and Urban Development. *Aircraft Noise Impact - Planning Guidelines for Local Agencies*. 1972

Notes:

[1] Continuous exposure above 85 dB is likely to degrade the hearing of most people (hearing protection recommended).

[2] Range of Speech: 50 - 70 dB

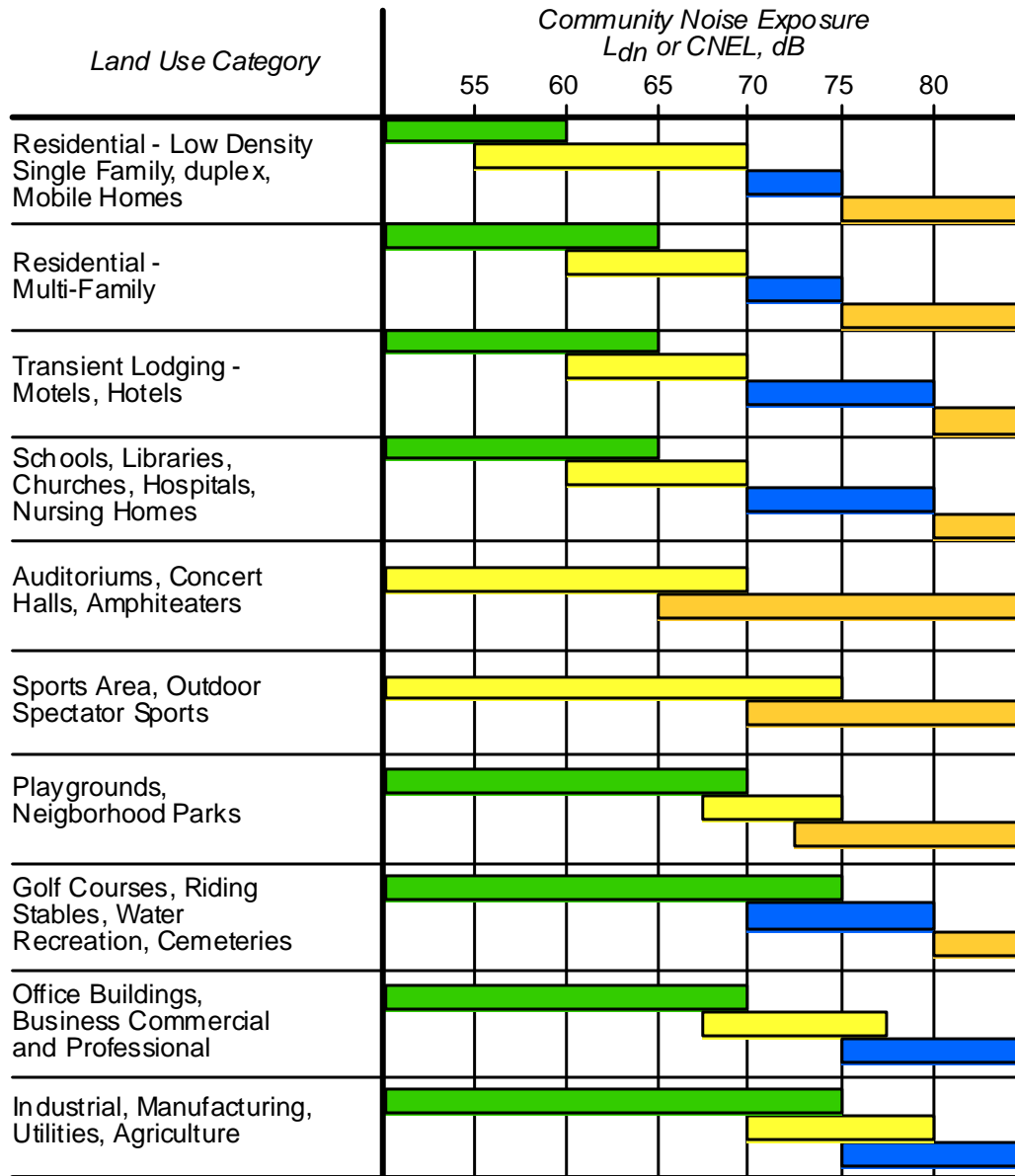
4.7.2 REGULATORY FRAMEWORK

4.7.2.1 State Regulations

The State of California has adopted noise compatibility guidelines for general land use planning as shown in **Figure 4.7-1: State Criteria for Noise Compatible Land Use**. The types of land uses addressed by the State and the acceptable noise categories for each land use are included in the *State of California General Plan Guidelines* guidance document, which is published and updated by the Governor's Office of Planning Research.³

3 Governor's Office of Planning and Research. *State of California General Plan Guidelines* (2017). http://www.opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf.

Table 1
Noise/Land Use Compatibility Table



INTERPRETATION



Normally Acceptable
Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal, conventional construction, without any special noise insulation requirements.



Conditionally Acceptable
New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.



Normally Unacceptable
New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.



Clearly Unacceptable
New construction or development should generally not be undertaken.

SOURCE: State of California, "General Plan Guidelines," 1998

FIGURE 4.7-1

The level of acceptability of the noise environment is dependent on the activity associated with the particular land use. In addition, Section 65302(f) of the California Government Code requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must (1) identify and appraise noise problems in the community, (2) recognize Office of Noise Control guidelines, and (3) analyze and quantify current and projected noise levels.

DHS's Office of Noise Control has established guidelines to provide communities with noise environments that it deems to be generally acceptable based on land-use categories. These guidelines serve as a primary tool for a city to use to assess the compatibility between land uses and outdoor noise. Noise exposure for single-family uses is normally acceptable when the noise level at exterior residential locations is equal to or below 60 dBA (CNEL or Ldn), conditionally acceptable when noise levels are between 55 to 70 dBA (CNEL or Ldn), and normally unacceptable when noise levels exceed 70 dBA (CNEL or Ldn). Some overlap exists between these categories as shown in **Figure 4.7-1**. These guidelines apply to noise sources such as vehicular traffic, aircraft, and rail movements.

The Department of Housing and Community Development has required that new residential units should not be exposed to outdoor ambient noise levels in excess of 65 dBA (CNEL or Ldn), and, if necessary, sufficient noise insulation must be provided to reduce interior ambient levels to 45 dBA. Within a 65 dBA exterior noise environment, interior noise levels are typically reduced to acceptable levels (to at least 45 dBA CNEL) through conventional construction, but with closed windows and fresh air supply systems or air conditioning.

Because typical noise attenuation within residential structures with closed windows is at least 20 dB, an exterior noise exposure of 65 dB CNEL is generally the noise land-use compatibility guideline for new residential dwellings in California. Because commercial and industrial uses are not occupied on a 24-hour basis, the exterior noise exposure standard for less-sensitive land uses generally is somewhat less stringent.

4.7.2.2 Local Regulations

City of Glendale Noise Element

The City of Glendale General Plan Noise Element is a comprehensive program for including noise management in the planning process. The Noise Element identifies noise sensitive land uses and noise sources and defines areas of noise impact for the purpose of developing programs. The Noise Element follows the State of California Governor's Office of Planning and Research General Plan Guidelines and State Government Code Section 65302(f) relating to general plan requirements.

The Noise Element provides recommended noise standards for use in assessing the compatibility of proposed land uses within the noise environment, and for use in developing city policies related to land

uses and acceptable noise levels. Although the Noise Element contains recommended noise standards, the document does not actually set those standards. Noise standards in Glendale are specified in the Building Code (i.e., indoor noise standard for non-single-family residential, achieved by regulating the use of building materials for new construction to ensure they block exterior noise) and the Noise Control Ordinance, which is identified in the Noise Element as the most effective method to control community noise from existing uses.

The Land Use Compatibility to Noise (refer to **Figure 4.7-1**) identifies the acceptable limit of noise exposure for various land-use categories within the City. Noise exposure for multifamily uses is “normally acceptable” when the CNEL at exterior residential locations is equal to or below 65 dBA, “conditionally acceptable” when the CNEL is between 60 to 70 dBA, and “normally unacceptable” when the CNEL exceeds 70 dBA. The Noise Element established an interior noise level standard for multifamily uses of 45 dBA CNEL or less. The interior and exterior noise standards established in the Noise Element are shown in **Table 4.7-2: Interior and Exterior Noise Standards**. Compliance of these standards would be incorporated by conditions of approval or environmental mitigation measures and evaluated as part of City Development Review and building permit plan check.

TABLE 4.7-2 INTERIOR AND EXTERIOR NOISE STANDARDS				
Land Use Categories		Noise Standard CNEL		
Categories	Uses	Interior	Exterior	
Residential	Single-Family	45 ^a	65 ^b	
	Multi-Family	45 ^a	65 ^c	
	Residential within Mixed Use	45 ^a	--	
Commercial	Hotel, Motel, Transient Lodging	45 ^a	--	
Institutional	Hospital, School Classroom, Church, Library	45	--	
Open Space	Parks ^d	--	65	

Notes:

[a] Applies to the *indoor* environment excluding bathrooms, toilets, closets, and corridors.

[b] Applies to the outdoor environment limited to the private yard of single-family residences (normally the rear yard).

[c] Applies to the patio area where there is an expectation of privacy (i.e., not a patio area which also serves as, or is adjacent to, the primary entrance to the unit).

[d] Only applies to parks where peace and quiet are determined to be of prime importance, such as hillside open space areas open to the public; generally would not apply to urban parks or active use parks.

Source: City of Glendale. General Plan. Noise Element. May 2007.

Noise Ordinance

Section 8.36.080 of the GMC prohibits construction between the hours of 7:00 PM on one day to 7:00 AM of the next day or from 7:00 PM on Saturday to 7:00 AM on Monday or from 7:00 PM preceding a holiday to 7:00 AM.

The most effective method to control community noise impacts from non-transportation noise sources is through application of the Community Noise Ordinance. Section 8.36.040 of the GMC provides presumed noise standards for various designated zones and are shown in **Table 4.7-3: Presumed Noise Standards**. Noise in excess of the presumed ambient (or actual ambient if it is less), plus 5 dBA, is a violation.

TABLE 4.7-3 PRESUMED NOISE STANDARDS		
Zone	Decibel	Time
Cemetery and residential (single family and duplex)	45 dBA	Nighttime
Cemetery and residential (single family and duplex)	55 dBA	Daytime
Residential (multifamily, hotels, motels, and transient lodgings)	60 dBA	Anytime
Central business district and commercial	65 dBA	Anytime
Industrial	70 dBA	Anytime

Source: City of Glendale. Glendale Municipal Code. Section 8.36.040: Presumed Noise Standards.

4.7.3 ENVIRONMENTAL SETTING

4.7.3.1 Existing Conditions

The predominant noise sources in the City, as in many other communities, come from mobile noise sources, including motor vehicles. A number of freeways and arterial roadways expose the City to significant noise levels. The Union Pacific Railroad along the west side of the City also contributes to the overall noise environment. Aircraft operating in the area are not a major contributor of noise in the area although helipads do have some contribution to overall noise. Industrial noise in the City is minimal and isolated from noise sensitive receptors. The noise environment in the City varies from the busy, high-density corridor along freeways and major arterials to the lower density, residential communities on the hillsides. Other sources of noise within the City are from non-transportation sources including commercial and construction activities.

Ambient Noise Levels

To assess the existing noise level environment, six (6) noise level measurements were taken at sensitive receiver locations in the Project study area during both the morning between 9:29 AM and 11:04 AM and afternoon between 1:40 PM and 2:58 PM. The existing ambient noise environment was determined by conducting noise measurements by sensitive receptors that would potentially be impacted by the Proposed Project.

The ambient noise results are provided in **Table 4.7-4: Existing Noise Measurements in Project Vicinity**, and their locations are shown in **Figure 4.7-2: Noise Monitoring Locations**. These measured noise levels represent day-to-day noise from sources near the Project site, including traffic along local streets. As shown, average ambient noise levels (Leq) during the morning ranged from 55.2 dBA at the northeast corner of the Project along Milford Street between State Street and Concord Street (Site 2) to a high of

62.0 dBA east of the Project Site along Concord Street between Milford Street and California Avenue (Site 4). Additionally, average ambient noise levels (Leq) during the afternoon ranged from 64.1 dBA at the southeast corner of the Project site along California Avenue between San Fernando Road and Concord Street (Site 3) to 70.5 dBA northeast of the Project site at the corner of Doran Street and Concord Street (Site 6).

TABLE 4.7-4
EXISTING NOISE MEASUREMENTS IN PROJECT VICINITY

Measurement Site	Location	Time Period	Leq-10 minute (dBA)
Site 1	Northeast of the Project site along Milford Street between State Street and Concord Street	9:29 AM - 9:39 AM	58.6
		1:40 PM - 1:50 PM	65.8
Site 2	Northeast corner of the Project site along Milford Street between State Street and Concord Street	9:42 AM - 9:52 AM	55.2
		1:51 PM - 2:01 PM	68.1
Site 3	Southeast corner of the Project site along California Avenue between San Fernando Road and Concord Street	10:38 AM - 10:48 AM	57.7
		2:21 PM - 2:31 PM	64.1
Site 4	East of the Project Site along Concord Street between Milford Street and California Avenue	9:59 AM - 10:09 AM	62.0
		2:07 PM - 2:17 PM	66.2
Site 5	Southeast of the Project Site along Concord Street between California Avenue and Salem Street	10:19 AM - 10:29 AM	60.4
		2:34 PM - 2:44 PM	64.4
Site 6	Northeast of the Project Site at the corner of Doran Street and Concord Street	10:54 AM - 11:04 AM	61.9
		2:48 PM - 2:58 PM	70.5

Source: Refer to **Appendix D** for noise measurement worksheets.

Surrounding Uses

As described in **Section 3.0: Project Description**, parcels within the vicinity of the Project site are zoned Industrial/Commercial Residential (IMU), Industrial/Commercial Residential Mixed-Use (IMU-R), and Medium Density Residential (R-2250). The residential uses around the site are considered sensitive receptors for noise. Noise monitoring was conducted around the site at the locations identified below where noise sensitive uses are located, as shown in **Figure 4.7-3: Noise-Sensitive Receptors**.

- Site 1: Located at approximately 735 Milford Street, surrounding uses include industrial and commercial uses to the west towards San Fernando Road and multi-family residential uses to the east.



North



West



South



East



SOURCE: Google Earth - 2022

FIGURE 4.7-2(a)



North



West



South



East

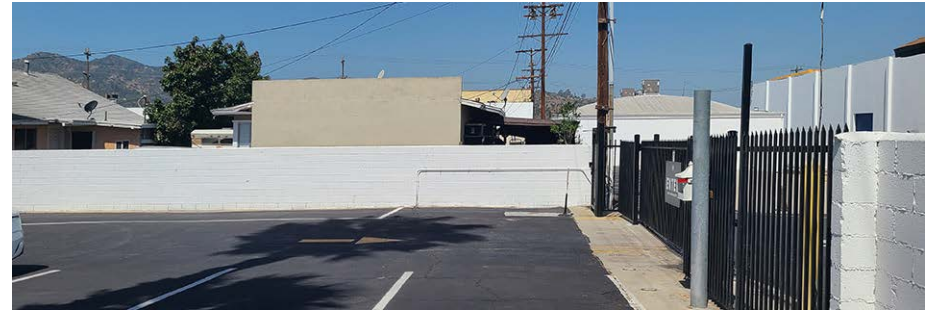


SOURCE: Google Earth - 2022

FIGURE 4.7-2(b)



North



West



South



East



SOURCE: Google Earth - 2022

FIGURE 4.7-2(c)



North



West



South



East



SOURCE: Google Earth - 2022

FIGURE 4.7-2(d)



North



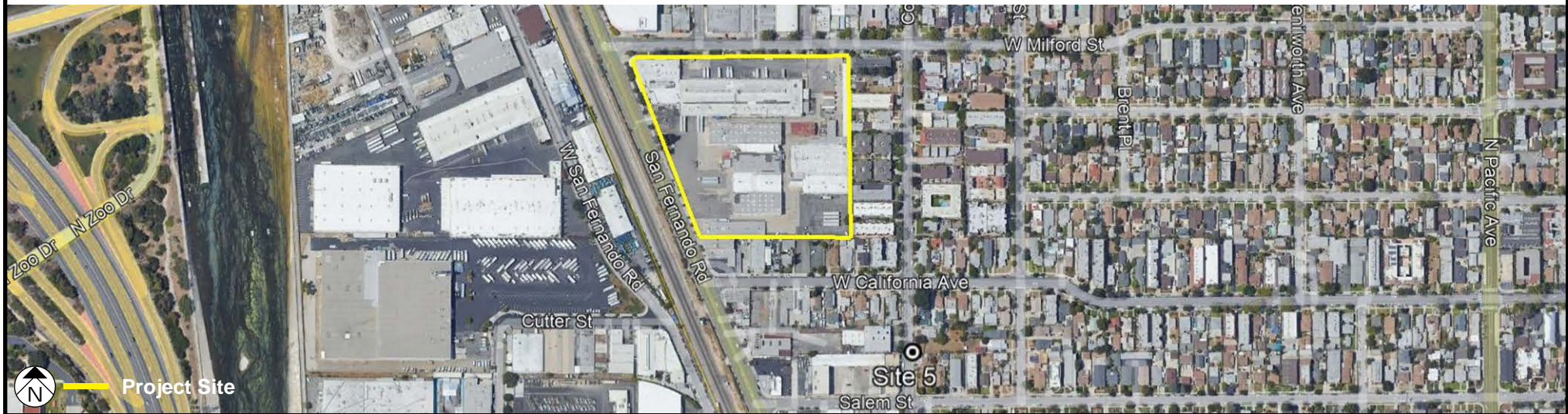
West



South



East



SOURCE: Google Earth - 2022

FIGURE 4.7-2(e)



North



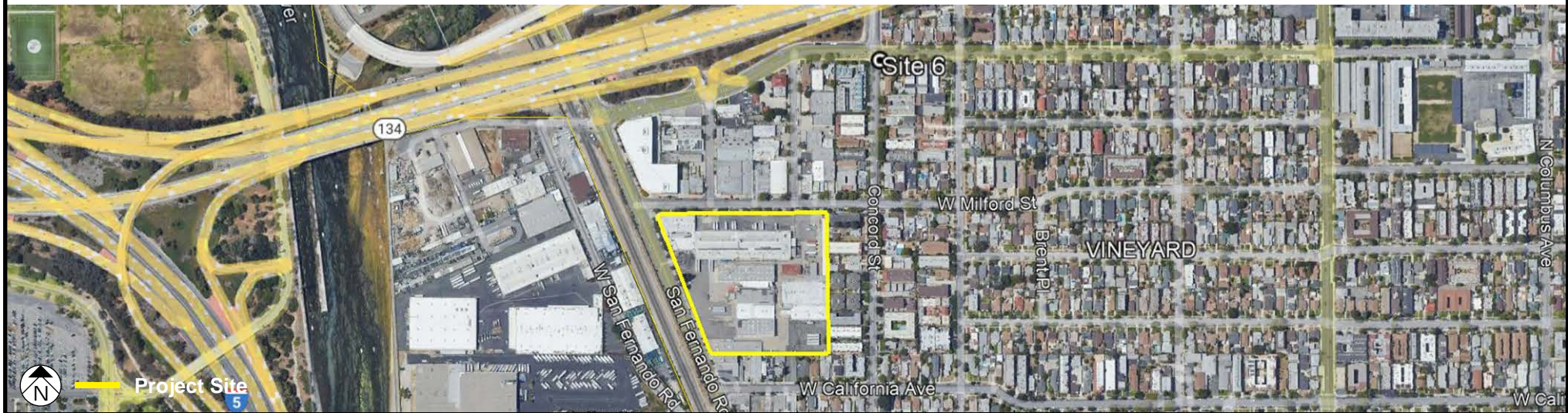
West



South

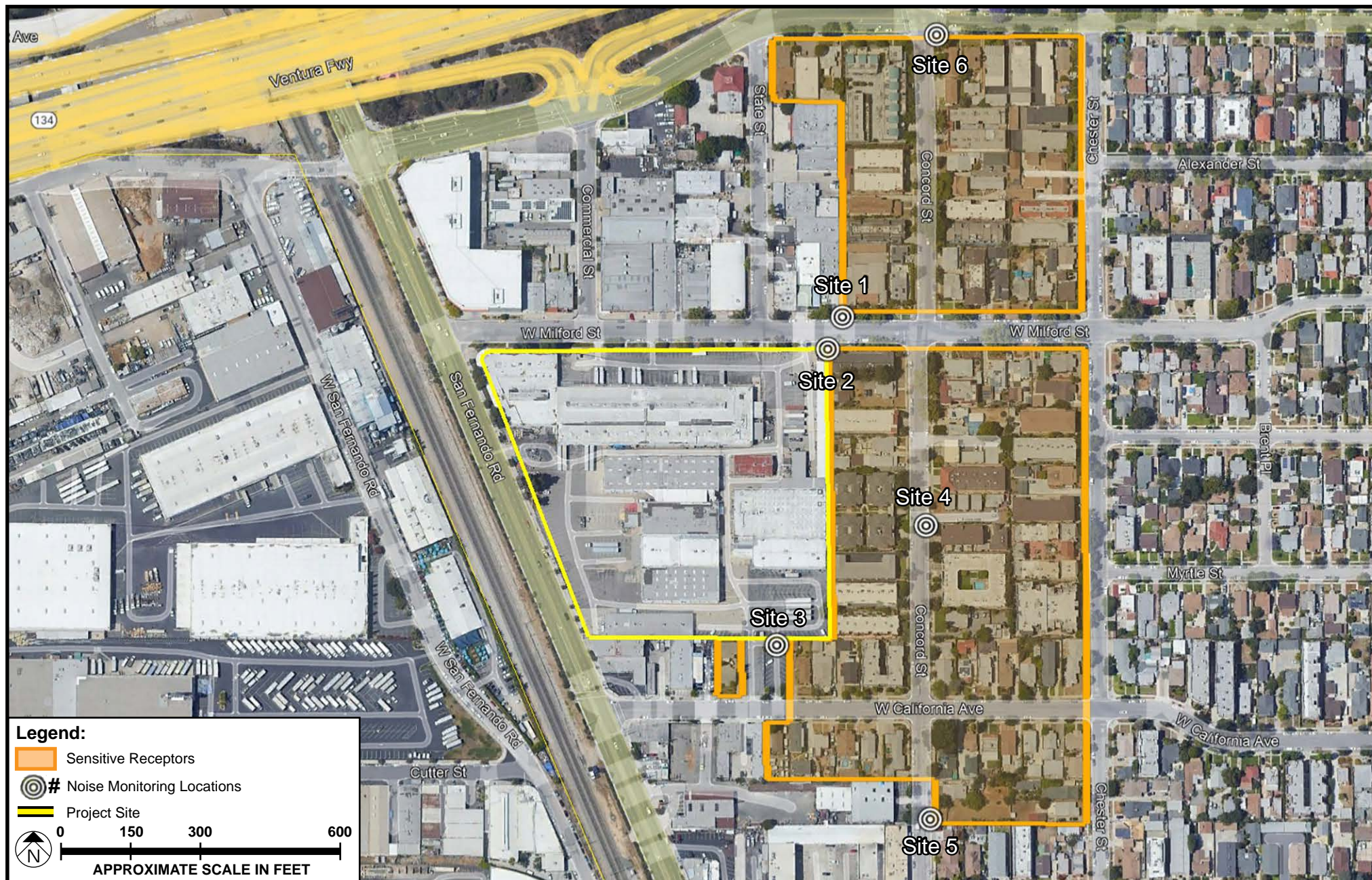


East



SOURCE: Google Earth - 2022

FIGURE 4.7-2(f)



SOURCE: Google Earth - 2022

FIGURE 4.7-3

- Site 2: Located at approximately 409 Concord Street, surrounding uses include industrial and commercial uses to the west towards San Fernando Road and multi-family residential uses to the east. Additionally, multi-family residential uses along Concord Street to the north and south.
- Site 3: Located at approximately 749 California Avenue, surrounding uses include industrial and commercial uses to the west along California Avenue towards San Fernando Road and multi-family residential uses along California towards the east.
- Site 4: Located at approximately 330 Concord Street, surrounding uses include multi-family residential uses along Concord Street to the north and south.
- Site 5: Located at approximately 723 Salem Street, surrounding uses include a mix of industrial and multi-family residential uses along Concord Street and multi-family residential uses along Salem Street towards the east.
- Site 6: Located at approximately 542 Concord Street, surrounding uses include a mix of industrial and commercial uses along Doran Street towards San Fernando Road and multi-family residential uses to the east along Doran Street.

Groundborne Vibration

Based on field observations, the primary source of existing ground-borne vibration in the vicinity of the Project site is vehicle traffic on local roadways. According to the Federal Transit Administration, typical road traffic-induced vibration levels are unlikely to be perceptible by people. Trucks and buses typically generate ground-borne vibration velocity levels of approximately 63 VdB (at a 50-foot distance), and these levels could reach 72 VdB when trucks and buses pass over bumps in the road. A vibration level of 72 VdB is above the 60 VdB level of perceptibility.

4.7.4 ENVIRONMENTAL IMPACT ANALYSIS

4.7.4.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a potentially significant impact related to noise and groundborne vibration if it would result in:

- | | |
|------------------|--|
| Threshold NOI-1: | Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. |
| Threshold NOI-2: | Generation of excessive groundborne vibration or groundborne noise levels. |

Construction Noise

The City's General Plan and Municipal Code do not establish numeric acceptable source noise levels or noise level increases at potentially affected receivers. Section 8.36.080 of the City's Municipal Code regulates construction noise and specifies restrictions from work occurring within certain time periods and specifies dBA limits. Goal 4 of the City's General Plan establishes policies and programs to change the permitted hours of construction to address concerns expressed by residents about disturbing noise from construction activities on the weekends. To evaluate whether the Project will generate a substantial periodic increase in short-term noise levels at off-site sensitive receiver locations, a construction-related noise level threshold is adopted from the Criteria for Recommended Standard: Occupational Noise

Exposure prepared by the National Institute for Occupational Safety and Health (NIOSH). A division of the U.S. Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the source. The construction related noise level threshold starts at 85 dBA for more than eight hours per day, and for every 3 dBA increase, the exposure time is cut in half. This results in noise level thresholds of 88 dBA for more than four hours per day, 92 dBA for more than one hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. For the purposes of this analysis, the lowest, more conservative construction noise level threshold of 85 dBA Leq is used as an acceptable threshold for construction noise at the nearby sensitive receiver locations. Since this construction-related noise level threshold represents the energy average of the noise source over a given time period, they are expressed as Leq noise levels. Therefore, the noise level threshold of 85 dBA Leq over a period of eight hours or more is used to evaluate the potential Project-related construction noise level impacts at the nearby sensitive receiver locations.

Additionally, with regard to increases above ambient noise levels, The FTA *Transit Noise and Vibration Impact Assessment Manual*⁴ provides a general noise assessment guideline to assess potential noise impacts during construction. According to the FTA, a 10 dBA change is subjectively heard as approximately doubling in loudness and can cause adverse response.⁵ As such, in addition the NIOSH Criteria, an increase of 10 dBA or more above morning and afternoon ambient noise levels would be considered significant.

Operational Noise

The City's General Plan Noise Element is used to establish satisfactory noise levels of significance for land uses within the City. As shown in **Figure 4.7-1**, the exterior noise level criteria for normally acceptable multi-family residential uses range between 50 to 65 dBA CNEL. Additionally, exterior noise level criteria for normally acceptable office buildings, business commercial and professional uses range between 50 to 70 dBA CNEL.

There is no completely satisfactory way to measure the subjective effects of noise or of the corresponding human reactions of annoyance and dissatisfaction. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment (ambient) to which one has adapted.

In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will typically be judged. As such, the Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that

4 Federal Transit Administration (FTA). *Transit Noise and Vibration Impact Assessment Manual*. September 2018. Accessed September 2021. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

5 California Department of Transportation. *Technical Noise Supplement*. September 2013. Accessed September 2021. <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>.

take into account the ambient noise level. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (i.e., CNEL). FICON identifies a readily perceptible 5 dBA or greater project-related noise level increase is considered a significant impact when the noise criteria for a given land use is exceeded. According to the FICON, in areas where the without project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be appropriate for most people. When the without project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance.

Groundborne Vibration

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Buildings founded on the soil near the construction site respond to these vibrations with varying results, ranging from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibrations at moderate levels, and slight damage at the highest levels.

There are no adopted City standards or thresholds of significance for vibration. Section 8.36.210 of the City's Municipal Code prohibits vibration to exceed the perception threshold at or beyond the property boundary of the source or at 150 feet from the source if on a public space or public right of way.

The peak particle velocity (PPV) is defined as the maximum instantaneous positive or negative peak of the vibration and is often used in monitoring of vibration because it is related to the stresses experienced by structures. The FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three-land use categories: (1) Category 1, High Sensitivity; (2) Category 2, Residential; and (3) Category 3, Institutional.

- Category 1 refers to buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes.
- Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals.
- Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference.

For purposes of this analysis, the human annoyance threshold for infrequent construction vibration events is 80 VdB for residences and buildings where people normally sleep and 83 VdB for institutional land uses with primarily daytime use.

4.7.4.2 Methodology

Noise Measurements

Noise measurements were collected pursuant to Section 8.36.030 of the City's Municipal Code related to decibel measurement criteria and the American National Standards Institute standard for general environmental noise measurement instrumentation. Random incidence microphones with windscreens were used, given the outdoor (i.e., free field) conditions of monitoring. The sound level averages were measured as A-weighted, slow-time-weighted (1-minute period) sound pressure level variables, commonly used for measuring environmental sounds. Sound levels presented in this report are in terms of dBA. Adhering to Section 8.36.030(d), ambient noise measurements were taken over a period of at least five minutes during the morning and afternoon periods.

Construction Noise

Construction within the Project site would occur over the following phases based on preliminary assumptions provided by the Applicant: (1) Demolition; (2) Grading; (3) Building Construction; and (4) Site Improvements (Paving and Architectural Coating). Additionally, overlaps would occur during the Building Construction and Site Improvement phases.

On-Site Construction Equipment

Construction activities typically generate noise from the operation of equipment within the Project Site that is required for the construction of various facilities. Noise impacts from on-site construction equipment, as well as the on-site staging of construction trucks, were evaluated by determining the noise levels generated by different types of construction activity and calculating the construction-related noise level at nearby noise-sensitive receptor locations. Actual construction noise levels would vary, depending upon the equipment type, model, the type of work activity being performed, and the condition of the equipment.

In order to calculate construction noise levels, hourly activity, or utilization factors (i.e., the percentage of normal construction activity that would occur, or construction equipment that would be active, during each hour of the day) are estimated based on the temporal characteristics of other previous and current construction projects. The hourly activity factors express the percentage of time that construction activities would emit average noise levels. Typical noise levels for each type of construction equipment were obtained from the FHWA Roadway Construction Noise Model.⁶

An inventory of construction equipment, including the number and types of equipment, which would be operating simultaneously within the Project Site was identified for each phase/component of construction and shown in **Table 4.7-5: Construction Equipment by Phase**. It is highly unlikely that all pieces of construction equipment identified in **Table 4.7-5** would operate simultaneously in any specific

⁶ USDOT. *FHWA Roadway Construction Noise Model Final Report*. January 2006. Accessed June 2022. https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf.

location during construction because equipment is generally operated only when needed and space constraints limit the equipment that can be used at any one time in a specific location. Therefore, this modeling is considered a conservative approach to calculate the maximum noise levels that would be generated.

TABLE 4.7-5
CONSTRUCTION EQUIPMENT BY PHASE

Construction Phase	Equipment Type	Quantity	Usage Hours (per day)	Noise Level at 50 feet (dBA Leq-1hour)	Calculated Average Noise Level (dBA Leq-1hour)
Demolition	Concrete/Industrial Saws	1	8	82.6	86.4
	Excavators	3	8	81.5	
	Rubber Tired Dozers	2	8	80.7	
Grading	Excavators	1	8	76.7	87.3
	Graders	1	8	81.0	
	Rubber Tired Dozers	1	8	77.7	
	Tractors/Loaders/Backhoes	3	8	84.8	
Building Construction	Cranes	1	7	72.6	88.8
	Forklifts	3	8	85.8	
	Generators	1	8	77.6	
	Tractors/Loaders/Backhoes	3	7	84.8	
	Welders	1	8	70.0	
Paving	Pavers	2	8	77.2	81.6
	Paving Equipment	2	8	77.2	
	Rollers	2	8	76.0	
Architectural Coating	Air Compressors	1	6	73.7	73.7

Source: FHWA Roadway Construction Noise Model (RCNM) version 1.1.

The calculated average noise levels provided in **Table 4.7-5** were inputted into the noise model SoundPLAN,⁷ which generates computer simulations of noise propagation from sources such as construction noise. SoundPLAN forecasts noise levels at specific receptors using sound power data and three-dimensional topographical data.

Construction noise levels have been calculated at each of the analyzed sensitive receptors as follows: (1) construction noise levels generated during each of the construction phases; and (2) construction noise levels during those periods when the three construction phases could potentially occur concurrently (building construction, paving, and architectural coating).

⁷ SoundPLAN model is in compliance with ISO 9613-2 standards for assessing attenuation of sound propagating outdoors and general calculation method.

Noise levels generated by on-site construction equipment can be reduced via specific noise control measures including the following: (1) muffler requirements; (2) equipment modifications that reduce noise levels; and (3) maintenance and operational requirements. These noise control measures can be used separately or in combination in order to reduce the noise levels generated by on-site construction equipment.

Most on-site construction-related noise originates from equipment powered by either gasoline or diesel engines. A large part of the noise emitted is due to the intake and exhaust portions of the engine cycle. Reducing noise from this source can be achieved via muffler systems. This noise control strategy would include the replacement of worn mufflers and retrofitting on-site construction equipment where mufflers are not in use. Using muffler systems on on-site construction equipment reduces construction noise levels by 10 dBA or more.⁸

Another effective method of diminishing noise levels associated with individual pieces of construction equipment is by modifying the equipment. Modifications such as the dampening of metal surfaces is effective in reducing on-site construction equipment noise levels. These modifications are typically done by the manufacturer or with factory assistance. Noise reductions of up to 5 dBA are achieved using dampening materials.⁹

Additionally, faulty or damaged mufflers, loose engine parts, rattling screws, bolts, or metal plates all contribute to increasing the noise level of on-site construction equipment. By regularly inspecting on-site construction equipment for these conditions and making adjustments to the equipment as necessary can also reduce noise levels generated by on-site construction equipment.

Construction Traffic Noise

The analysis of off-site construction traffic noise impacts focuses on: (1) identifying major roadways that may be used for construction worker commute routes or truck haul routes; (2) identifying the nature and location of noise-sensitive receptors along those routes; and (3) evaluating the traffic characteristics along those routes, specifically as related to existing traffic volumes.

Construction Equipment Vibration

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration.

8 Federal Highway Administration (FHWA). *Special Report—Measurement, Prediction, and Mitigation*. June 2017. https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm. Accessed June 2022.

9 FHWA. *Special Report—Measurement, Prediction, and Mitigation*.

Impacts due to construction activities were evaluated by identifying vibration sources (i.e., construction equipment), measuring the distance between vibration sources and surrounding structure locations, and making a significance determination.

For quantitative construction vibration assessments related to building damage and human annoyance, vibration source levels for construction equipment are taken from the FTA *Transit Noise and Vibration Impact Assessment Manual*.¹⁰ Building damage would be assessed for each piece of equipment individually and assessed in terms of peak particle velocity. Groundborne vibration related to human annoyance is assessed in terms of rms velocity levels.

The vibration source levels for various types of equipment are based on data provided by the FTA.

4.7.4.3 Project Impacts

Impact NOI-1: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

On-Site Construction Equipment

Noise from Project construction activities would be affected by the amount of construction equipment, the location of this equipment, the timing and duration of construction activities, and the relative distance to noise-sensitive receptors. Construction activities that would occur during the construction phases would generate both steady-state and episodic noise that would be heard both on and off the Project site. Each construction phase involves the use of different types of construction equipment and, therefore, has its own distinct noise characteristics. The Project would be constructed using typical construction techniques; no blasting or impact pile driving would be required.

The construction equipment reference noise levels provided in **Table 4.7-5**, are based on measured noise data compiled by the FHWA and would occur when equipment is operating under full power conditions. However, equipment used on construction sites typically operate at less than full power. The acoustical usage factor is the percentage of time that each type of construction equipment is anticipated to be in full power operation during a typical construction day. These values are estimates and will vary based on the actual construction process and schedule.

Construction equipment operates at its noisiest levels for certain percentages of time during operation. As such, equipment would operate at different percentages over the course of an hour.¹¹ During a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operated concurrently.

¹⁰ FTA. *Transit Noise and Vibration Impact Assessment Manual*.

¹¹ FHWA. "Traffic Noise Model." 2006.

To characterize construction-period noise levels, the average (hourly Leq) noise level associated with each construction stage was calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage. These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

The estimated construction noise levels were calculated for each of the analyzed receptors (refer to **Figure 4.7-3**) during each of construction phases in which construction equipment was assumed to be operating simultaneously. Given the physical size of the Project site and logistical limitations, and with the noise equipment located at the construction area nearest to the affected receptors collectively serve to result in a conservative impact analysis, this is considered a conservative evaluation because construction of the Project would typically use fewer pieces of equipment simultaneously at any given time as well as operating throughout the construction site (i.e., most of the time construction equipment would be operating at distances further away from the off-site receptors than that assumed in the forecasting of Project construction noise levels). As such, Project construction would often generate lower noise levels than reported herein. Additionally, estimated construction noise levels at each receptor were calculated during periods when the three construction phases could potentially occur concurrently.

Table 4.7-6: Maximum Noise Impacts Associated with On-Site Construction Activities presents the maximum noise impacts that are forecasted to occur at each of the receptor sites. As shown in **Table 4.7-6**, construction noise levels would range from a low of 49.0 dBA (Leq-8hour) during the architectural coating east of the Project site along Concord Street between Milford Street and California Avenue (Site 4) to a high of 84.7 dBA (Leq-8hour) during demolition activities northeast corner of the Project site along Milford Street between State Street and Concord Street (Site 2). Additionally, overlapping construction noise levels during the building construction and site improvement (paving and architectural coating) would range from 65.2 dBA (Leq-8hour) at Site 4 to a high of 84.0 dBA (Leq-8hour) at Site 2. Noise levels due to construction would not exceed the 85 dBA (Leq-8hour) threshold.

As mentioned previously, a 10 dBA change is subjectively heard as approximately doubling in loudness and can cause adverse response. As shown in **Table 4.7-6**, construction noise levels would result in increases of 10 dBA or more above morning and afternoon ambient noise levels at Sites 1 through 3. More specifically, maximum increases above morning and afternoon ambient noise levels would occur during concurrent and overlapping construction activities ranging between 9.1 dBA at Site 1 to 18.8 dBA at Site 2 above the morning ambient significance threshold and between 1.9 dBA at Site 1 to 5.9 dBA at Site 2 above the afternoon ambient significance threshold.

The City's General Plan Goal 4 encourages to enhance measures to control construction noise impacts. Consistent with this goal, **Mitigation Measure MM NOI-1** requires the use of optimal muffler systems on all equipment which would achieve a reduction of 10 dBA or more and a temporary noise barrier achieving a minimum of 5 dBA noise level reduction. Additionally, **Mitigation Measure MM NOI-1** would also require the following: (1) ensure all construction equipment is properly maintained such that no additional noise

due to worn or improperly maintained parts is generated; and (2) ensure all construction equipment incorporates features that dampen metal surfaces and minimize metal-to-metal contact such that a noise reduction of up to 5 dBA is achieved.¹² These combined measures would reduce construction noise levels by a minimum of 20 dBA. **Mitigation Measure MM NOI-1** would also result in additional reductions that have conservatively not been quantified for the purposes of this analysis. Specifically, **MM NOI-1** would require the following: (1) implement appropriate noise reduction measures when construction operations occur adjacent to off-site occupied residential areas; (2) locate staging areas on-site to maximize the distance between staging areas and off-site occupied residential uses; (3) implement feasible noise attenuation measures around stationary construction noise sources; and (4) use electric air compressors and similar power tools when feasible. Consequently, with implementation of **MM NOI-1**, construction noise levels would be further reduced to levels below the significance threshold of 85 dBA (Leq-8hour) and will not increase ambient noise levels by more than 10 dBA during both the morning and afternoon periods. As such, impacts related to construction noise would be less than significant with mitigation incorporated.

Off-Site Construction Traffic

Construction of the Project would require haul and vendor truck trips to and from the site to export soil and delivery supplies to the site. Trucks traveling to and from the Project Site would be required to travel along a haul route approved by the City. Proposed haul route includes heading north on San Fernando Road, east on Doran Street onto the Ventura Freeway 134 East toward Scholl Canyon Landfill. At the maximum, 236 worker trips per day and 101 vendor trips per day would occur during the building construction phase. Additionally, 2,500 total hauling trips (41 hauling trips per day) would occur during the grading phase.

Noise associated with construction trips were estimated using the Caltrans FHWA Traffic Noise Model based on the maximum number of worker, vendor, and hauling trips in a day. 236 worker trips per day and 101 vendor trips per day would generate roadway noise levels of 52.4 dBA at a distance of 25 feet. The 41 hauling trips per day would generate roadway noise levels ranging from 53.4 dBA to 58.2 dBA at a distance of 25 feet, depending on the use of medium and heavy-duty trucks. Off-site construction noise levels would be below the existing ambient noise environment identified in **Table 4.7-4**. As such, off-site construction noise impacts would be less than significant.

Operation

The Project would introduce various stationary noise sources, including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. All Project mechanical equipment would be required to be designed with appropriate noise-control devices—such as sound attenuators, acoustics louvers, or sound screens/parapet walls—to comply with noise compatibility requirements provided in the GMC.

¹² FHWA. *Special Report—Measurement, Prediction, and Mitigation*.

TABLE 4.7-6
MAXIMUM NOISE IMPACTS ASSOCIATED WITH ON-SITE CONSTRUCTION ACTIVITIES

Location	Calculated Noise Level (Leq-8hour) by Construction Phase						NIOSH Significance Threshold	Exceeds NIOSH Threshold?	Morning Ambient Significance Threshold	Exceeds Morning Ambient Threshold?	Afternoon Ambient Significance Threshold	Exceeds Afternoon Ambient Threshold?
	Demolition	Grading	Building Construction	Paving	Architectural Coating	Concurrent						
Site 1	76.2	76.4	77.3	65.2	61.5	77.7	85	No	68.6	Yes	75.8	Yes
Site 2	84.7	81.5	82.7	77.8	66.9	84.0	85	No	65.2	Yes	78.1	Yes
Site 3	76.4	76.8	77.8	73.7	62.0	79.3	85	No	67.7	Yes	74.1	Yes
Site 4	63.7	64.2	64.8	53.6	49.0	65.2	85	No	72.0	No	76.2	No
Site 5	65.4	66.3	66.8	54.0	51.0	67.1	85	No	70.4	No	74.4	No
Site 6	64.1	64.9	65.5	52.3	49.7	65.8	85	No	71.9	No	80.5	No

Source: Refer to **Appendix D** for construction noise worksheets.

The stationary equipment would be required to comply with GMC Section 30.34.070, which establishes low-sound intensities from mechanical equipment. Therefore, operation of mechanical equipment on the Project building would not exceed the City's threshold of significance and impacts would be less than significant.

Mitigation Measures

The following mitigation measures have been identified to mitigate noise impacts:

MM NOI-1: The project applicant shall require that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels below the established thresholds:

- Construction equipment shall be equipped with exhaust muffler systems consistent with FHWA guidance.
- **All equipment shall be properly maintained in accordance with manufacturers' specifications** to assure that no additional noise due to worn or improperly maintained parts is generated consistent with FHWA guidance.
- Construction equipment shall have features that dampen metal surfaces and minimize metal-to-metal contact consistent with FHWA guidance.
- When construction operations occur adjacent to off-site occupied residential areas, construction equipment staging areas and stationary noise sources shall be located as far from those nearby receptors as possible, prohibit idling equipment, notify adjacent residences in advance of construction work, and install temporary acoustic barriers or noise blankets achieving a minimum reduction of 5 dBA around stationary construction noise sources. These barriers shall be made featuring weather-protected, sound-absorptive material on the construction-activity side of the noise barrier and must be installed in a location that completely blocks line-of-sight between the construction noise source and adjacent sensitive receptors.
- Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses as feasible during all phases of project construction.
- Use electric air compressors and similar power tools rather than diesel equipment, where feasible.
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes.
- Construction hours, allowable workdays, and the phone number of the job superintendent must be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent must investigate, take appropriate corrective action, and report the action taken to the reporting

party. Contract specifications must be included in the proposed Project construction documents, which must be reviewed by the City prior to issuance of grading permits.

Level of Significance After Mitigation

Implementation of **Mitigation Measure MM NOI-1** would provide noise abatement during construction near adjacent receptors. **Mitigation Measure MM NOI-1** requires the use of optimal muffler systems on all equipment which would achieve a reduction of 10 dBA or more and a temporary noise barrier achieving a minimum of 5 dBA noise level reduction. Additionally, **Mitigation Measure MM NOI-1** would also require the following: (1) ensure all construction equipment is properly maintained such that no additional noise due to worn or improperly maintained parts is generated; and (2) ensure all construction equipment incorporates features that dampen metal surfaces and minimize metal-to-metal contact such that a noise reduction of up to 5 dBA is achieved. This mitigation would be consistent with the City's General Plan Goal 4.4 which encourages to enhance measures to control construction noise impacts. These combined measures would reduce construction noise levels by a minimum of 20 dBA below the levels identified in **Table 4.7-6** as shown in **Table 4.7-7: Maximum Noise Impacts Associated with On-Site Construction Activities**.

In addition, **Mitigation Measure MM NOI-1** would also result in additional reductions that have conservatively not been quantified for the purposes of this analysis. Specifically, **MM NOI-1** would require the following: (1) implement appropriate noise reduction measures when construction operations occur adjacent to off-site occupied residential areas; (2) locate staging areas on-site to maximize the distance between staging areas and off-site occupied residential uses; (3) implement feasible noise attenuation measures around stationary construction noise sources; and (4) use electric air compressors and similar power tools when feasible. As such, impacts related to construction noise would be less than significant with mitigation incorporated.

Impact NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction

Construction activities can generate varying degrees of ground vibration, depending on the construction phase (e.g., grading) and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located near the construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels to low rumbling sounds and perceptible vibration at moderate levels.

TABLE 4.7-7
MAXIMUM NOISE IMPACTS ASSOCIATED WITH ON-SITE CONSTRUCTION ACTIVITIES

Location	Calculated Noise Level (Leq-8hour) by Construction Phase Concurrent Construction Activities	NIOSH Significance Threshold	Exceeds NIOSH Threshold?	Morning Ambient Significance Threshold	Exceeds Morning Ambient Threshold?	Afternoon Ambient Significance Threshold	Exceeds Afternoon Ambient Threshold?	Calculated Noise Level (Leq-8hour) by Construction Phase with Noise Mitigation	Exceeds Morning Ambient Threshold with Mitigation?	Exceeds Afternoon Ambient Threshold with Mitigation?
Site 1	77.7	85	No	68.6	Yes	75.8	Yes	57.7	No	No
Site 2	84.0	85	No	65.2	Yes	78.1	Yes	60.0	No	No
Site 3	79.3	85	No	67.7	Yes	74.1	Yes	59.3	No	No
Site 4	65.2	85	No	72.0	No	76.2	No	45.2	No	No
Site 5	67.1	85	No	70.4	No	74.4	No	47.1	No	No
Site 6	65.8	85	No	71.9	No	80.5	No	45.8	No	No

Source: Refer to **Appendix D** for construction noise worksheets.

Ground-borne vibration impacts due to proposed Project construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at potentially affected receptors, and comparing the proposed Project's vibration levels to the applicable vibration significance thresholds. Vibration levels were calculated based on the FTA published standard vibration velocities for various construction equipment operations.

As mentioned previously, there are no adopted City standards or thresholds of significance for vibration. Section 8.36.210 of the City's Municipal Code prohibits vibration to exceed the perception threshold at or beyond the property boundary of the source or at 150 feet from the source if on a public space or public right of way. As such, for purposes of this analysis, impacts would be considered significant if construction vibration levels exceed 80 VdB for residential and buildings where people normally sleep. **Table 4.7-8: Proposed Project Construction-Related Vibration Impacts** presents the construction vibration impacts associated with on-site construction in terms of human annoyance. As shown, the forecasted vibration levels due to on-site construction activities would not exceed the human annoyance threshold of 80 VdB for all sites surrounding the Project area during construction. As such, construction impacts related to vibration would be less than significant.

TABLE 4.7-8 PROPOSED PROJECT CONSTRUCTION-RELATED VIBRATION IMPACTS							
Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from Proposed Project Construction Equipment							
Location	Caisson Drilling	Jackhammer	Large Bulldozer	Loaded Trucks	Small bulldozer	Significance Threshold	Exceeds Threshold?
Site 1	73	65	73	71	43	80	No
Site 2	77	69	77	75	47	80	No
Site 3	64	56	64	63	35	80	No
Site 4	55	47	55	54	26	80	No
Site 5	47	38	47	45	17	80	No
Site 6	44	36	44	43	15	80	No

Source: Refer to **Appendix D** for construction vibration worksheets.

Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

There are no mitigation measures required and impacts would be less than significant.

4.7.4.4 Cumulative Impacts

The analysis of changes to the community noise environment based on cumulative conditions considers development of the proposed Project in combination with ambient growth and other development projects located near the Project area. The potential for cumulative noise impacts is primarily related

to the distance between each related project's stationary noise sources, as well as both the presence of existing structures in the Project area and the cumulative traffic that the cumulative development would add to the surrounding roadway network.

Noise

Noise, by definition, is a localized phenomenon and drastically reduces as distance from the source increases. As a result, only related projects, and growth in the general area of the Project site (within 500 feet) would contribute to cumulative noise impacts. Cumulative construction-noise impacts have the potential to occur when multiple construction projects in the local area generate noise within the same time frame and contribute to the local ambient noise environment. It is expected that, as with the Project, the related projects would implement noise reduction techniques such as mufflers, shields, and sound barriers, which would minimize any noise-related nuisances during construction. In addition, distance attenuation and intervening structures would further reduce construction noise levels and not result in noticeable increases. Therefore, the combined construction-noise impacts of related projects within 500 feet and the Project's contribution would not cause a significant cumulative impact.

With regard to stationary sources, cumulative significant noise impacts may result from cumulative development. Stationary sources of noise that could be introduced in the area by cumulative projects could include mechanical equipment, loading docks, and parking lots. Given that these projects would be required to adhere to the City's noise standards, all stationary sources would be required to have shielding or other noise-abatement measures so as not to cause a substantial increase in ambient noise levels. Moreover, due to distance, it is unlikely that noise from multiple cumulative projects would interact to create a significant combined noise impact. As such, it is not anticipated that a significant cumulative increase in permanent ambient noise levels would occur.

Vibration

Vibration impacts are generally less than significant when the receptor is more than 25 feet from the vibration source. Accordingly, there are no related projects anticipating construction concurrently with the Project that would also be within 25 feet of the sensitive receptors that could be affected by construction. As such, there would be no cumulative sources of construction vibration and cumulative impacts would be less than significant.

Level of Significance Before Mitigation

Upon implementation of regulatory requirements and **Mitigation Measure MM NOI-1**, impacts would be less than significant.

Mitigation Measures

MM NOI-1: The project applicant shall require that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels below the established thresholds:

- Construction equipment shall be equipped with exhaust muffler systems consistent with FHWA guidance.
- All equipment **shall be properly maintained in accordance with manufacturers' specifications** to assure that no additional noise due to worn or improperly maintained parts is generated consistent with FHWA guidance.
- Construction equipment shall have features that dampen metal surfaces and minimize metal-to-metal contact consistent with FHWA guidance.
- When construction operations occur adjacent to off-site occupied residential areas, construction equipment staging areas and stationary noise sources shall be located as far from those nearby receptors as possible, prohibit idling equipment, notify adjacent residences in advance of construction work, and install temporary acoustic barriers or noise blankets achieving a minimum reduction of 5 dBA around stationary construction noise sources. These barriers shall be made featuring weather-protected, sound-absorptive material on the construction-activity side of the noise barrier and must be installed in a location that completely blocks line-of-sight between the construction noise source and adjacent sensitive receptors.
- Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses whenever physically possible during all phases of project construction.
- Use electric air compressors and similar power tools rather than diesel equipment shall be used, whenever such equipment is available.
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes.
- Construction hours, allowable workdays, and the phone number of the job superintendent must be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent must investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications must be included in the proposed Project construction documents, which must be reviewed by the City prior to issuance of grading permits.

Level of Significance After Mitigation

Compliance with local, State, and federal plans, policies, and programs, and **Mitigation Measure MM NOI-1**, would ensure impacts related to noise would be less than significant.

4.8 TRANSPORTATION

4.8.1 INTRODUCTION

This section describes the existing transportation conditions, applicable laws and regulations associated with transportation, and analysis of the potential effects resulting from implementation of the Project. Information from the Transportation Analysis, prepared by Gibson Transportation Consulting dated March 2021 (Appendix E), is incorporated into this section.

4.8.2 REGULATORY FRAMEWORK

State, regional, and local laws, regulations, and policies pertaining to traffic and transportation in the Project area are summarized here. These provide the regulatory framework for addressing all aspects of transportation, planning, and infrastructure that would be affected by implementation of the Project.

4.8.2.1 State Regulations

Senate Bill 743

On September 27, 2013, California Governor Jerry Brown signed Senate Bill (SB) 743 into law that required that the California Governor's Office of Planning and Research (OPR) develop new California Environmental Quality Act (CEQA) guidelines that address traffic performance metrics. The primary goals of SB 743 are to:

1. Reduce greenhouse gas emissions and traffic-related air pollution;
2. Promote the development of a multimodal transportation system; and
3. Provide clean, efficient access to destinations. Per the legislation, **“automobile delay characterized solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment.”**

The Natural Resources Agency subsequently adopted CEQA Guidelines Section 15064.3. Under this guideline, vehicle miles traveled (VMT) was chosen as the most appropriate performance metric used to identify transportation impacts.

Assembly Bill 1358

Assembly Bill (AB) 1358, and the Complete Streets Act of 2008 require that cities and counties identify how they will provide for the routine accommodation of all users of roadways, including motorists, passengers, bicyclists, individuals with disabilities, seniors, and users of public transportation. Planning and building complete streets are one way that cities and counties can meet this requirement. A complete street is a transportation facility that is planned, designed, operated, and maintained to enable safe access for all roadway users. Passengers, bicyclists, motorists, and transit riders of all ages and abilities must be able to safely move along and across a complete street.

4.8.2.2 Regional Regulations

Southern California Association of Governments: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

Every four years, Southern California Association of Governments (SCAG) updates its RTP for the 191-city SCAG region.

In September 2020, SCAG's Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020-2045 RTP/SCS is a long-range visioning plan for the region's transportation system over the next 25 years that balances mobility and housing needs with economic, environmental, and public health goals. The 2020-2045 RTP/SCS includes over 4,000 transportation projects ranging from highway improvements, railroad grade-separations, bicycle lanes, new transit hubs, and replacement bridges to reduce bottlenecks, improve the efficiency of the region's network and expand the mobility choices for everyone in the six-county southern California region.

The 2020-2045 RTP/SCS groups its goals into four core categories—economy, mobility, environment, and healthy/complete communities. The plan explicitly addresses goals associated with housing, transportation technologies, equity and resilience reflecting enhanced importance of these topics in the region linking them to potential performance measures and targets.

The following ten goals are identified in the 2020-2045 RTP/SCS:

1. Encourage regional economic prosperity and global competitiveness
2. Improve mobility, accessibility, reliability, and travel safety for people and goods
3. Enhance the preservation, security, and resilience of the regional transportation system
4. Increase person and goods movement and travel choices within the transportation system
5. Reduce greenhouse gas emissions and improve air quality
6. Support healthy and equitable communities
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options
10. Promote conservation of natural and agricultural lands and restoration of habitats.

4.8.2.3 Local Regulations

Traffic Impact Analysis Guidelines

Under SB 743, cities can still ensure adequate operation of the transportation system in terms of transportation congestion measures related to vehicular delay and roadway capacity. As such, the City of Glendale continues to require congestion-related transportation analysis in the form of level of service (LOS) and mitigation projects through planning approval processes outside CEQA. This analysis will address traffic operations, safety issues and needed project design features related to a proposed land use project, as well as site access and internal circulation.

A local transportation analysis is required for projects generating at least 50 net-new peak hour vehicle trips, using ITE trip generation rates or local rates (if available).

City of Glendale General Plan

The following Glendale General Plan policies, goals and objectives located in the Circulation and Noise Elements are applicable to transportation and traffic.

Circulation Element

As part of the General Plan, the City adopted a Circulation Element in August 1998. The Circulation Element addresses the movement of people, goods, energy, water, sewage, storm drainage and communications.¹ The Circulation Element supports the City's October 1995 Strategic Plan which strives "to develop a multi-modal transportation system that efficiently facilitates the movement of people and goods both locally and regionally and is directly linked to other public policy objects."

Goals and policies applicable to transportation are identified below:

- | | |
|----------------|--|
| Goal 2: | Minimization of congestion, air pollution, and noise associated with motor vehicles. |
| | Policy: Increase/support public and high occupancy vehicle transportation system improvements through mitigation of traffic impacts from new development. |
| Goal 3: | Reasonable access to services and goods in Glendale by a variety of transportation modes. |
| | Policy: Encourage growth in areas and in patterns which are or can be well served by public transportation. |
| Goal 4: | Functional and safe streetscapes that are aesthetically pleasing for both pedestrians and vehicular travel. |
| | Policy: Provide and maintain quality streetscape and pedestrian amenities (i.e., bus shelters, street trees, street furniture, wide sidewalks, etc.). |
| Goal 5: | Land use which can be supported within the capacity constraints of existing and realistic future infrastructure. |

¹ City of Glendale, Planning and Public Works Divisions. Circulation Element of the General Plan. August 1998. Available at: <https://www.glendaleca.gov/government/departments/community-development/planning/city-wide-plans/circulation-element>. Accessed May 2022.

Policy: Balance land use/zoning with roadway capacity by establishing congestion thresholds and avoiding unacceptable levels of congestion from future development.

Land Use Element

The Land Use Element of the General Plan is based on a series of goals which indicate the purpose served by planning in Glendale. The plan proposals and implementation measures are devices to achieve these goals. Goals and policies applicable to transportation are identified below:

Goals — Circulation

- Develop clusters of uses which will facilitate the development of public transportation networks, decreasing dependence on the automobile.

Goals — Industrial

- Provide for the improvement of existing industrial districts through the addition of parking facilities, visual amenities, and the elimination of incompatible influences and blight.

Noise Element

Goal 1: Reduce noise impacts from transportation noise sources

Policy 1.3: Reduce transportation noise through proper design and coordination of routing

Policy 1.5: Consider noise reduction measures when making revisions to the Circulation Element.

Safety Element

Goal 8: Maintain a high level of emergency preparedness.

Policy 8-1: The City shall prepare for emergency response and recovery from natural and urban disasters, especially earthquake hazards.

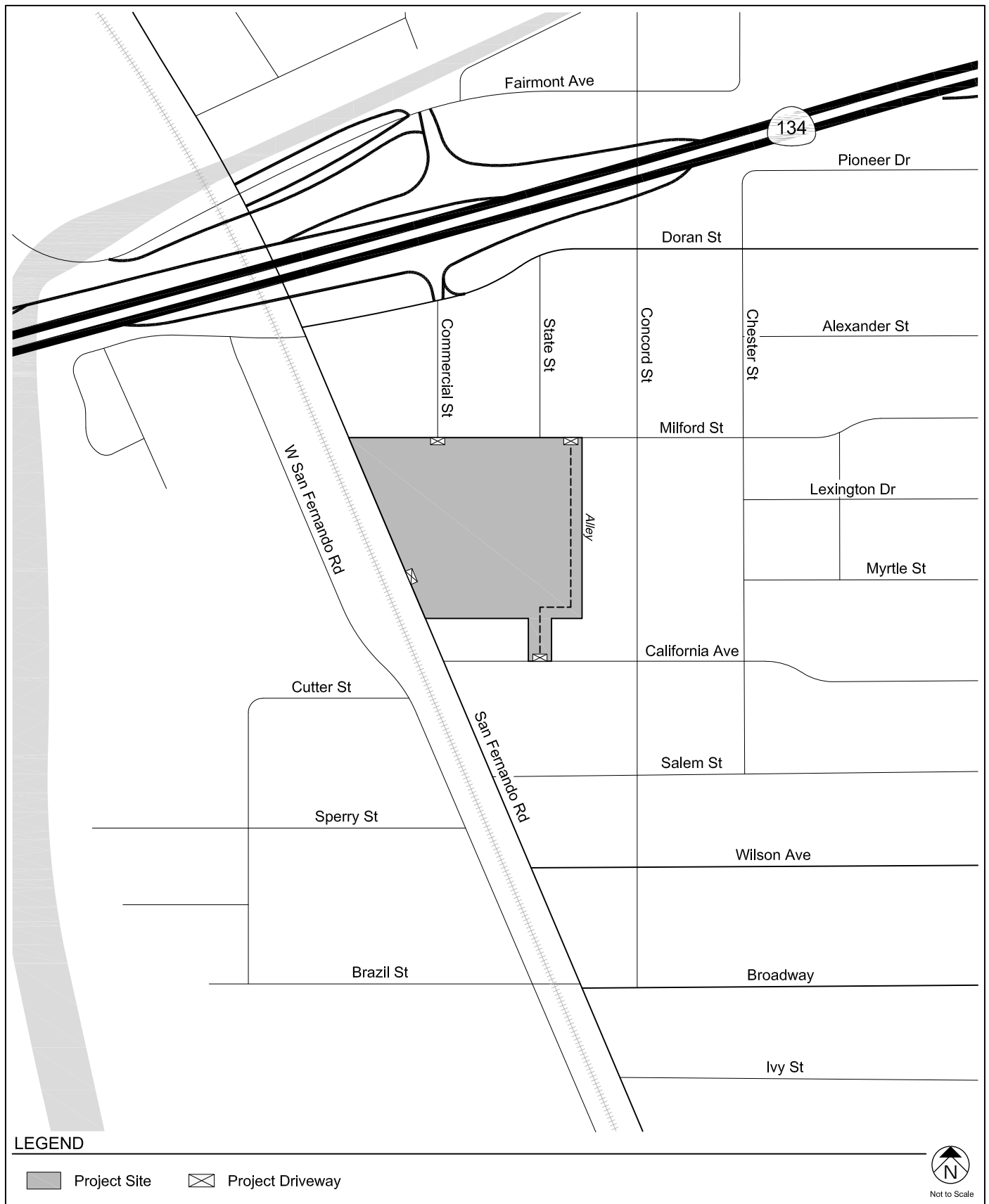
Goal 4: Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses and social dislocation and other impacts resulting from fire hazards.

Policy 4-1: The City shall ensure to the extent possible that fire services, such as fire equipment, infrastructure, and response times, are adequate for all sections of the City.

4.8.3 ENVIRONMENTAL SETTING

4.8.3.1 Existing Conditions

The Existing Conditions analysis includes an assessment of the existing public transit service, as well as pedestrian and bicycle circulation, which correspond with the year (2021) in the Transportation Analysis. The Project's study area, shown in **Figure 4.8-1: Project Study Area**, is generally bounded by Fairmont Avenue to the north, Chester Street to the east, Ivy Street to the south, and West San Fernando Road to the west (Study Area).



SOURCE: Gibson Transportation Consulting Inc. - August 2021; Meridian Consultants, LLC - 2022

FIGURE 4.8-1

Project Study Area

Existing Roadway System

Primary regional access to the Project site is provided by SR 134 and I-5. Major and Minor Arterials, and certain Urban Collector and Community Collector streets that serve the proposed Project area are described below and are shown in **Figure 4.8-2: General Plan Street Classifications**.

The major arterials providing regional and sub-regional access to the Study Area include San Fernando Road and Concord Street. The following is a brief description of the major streets in the Study Area and their classifications as defined in the Circulation Element:²

Roadways

San Fernando Road — San Fernando Road is a classified Major Arterial within the Study Area. It travels in the north-south direction and is located along the western boundary of the Project site. It generally provides two travel lanes in each direction with a center left turn lane and left-turn lanes at most intersections. Parking is generally available on the east side of the street within the Study Area.

Concord Street — Concord Street is a classified Urban Collector. It travels in the north south direction within the Study Area and is located east of the Project site. It generally provides one travel lane in each direction. Parking is generally available on both sides of the street within the Study Area.

Milford Street — Milford Street is a classified Local Street. It travels in the east-west direction within the Study Area and is located along the northern boundary of the Project site. It generally provides one travel lane in each direction. Parking is generally available on both sides of the street within the Study Area.

California Avenue — California Avenue is a classified Local Street within the Study Area. It travels in the east-west direction and is located along the southern boundary of the Project site. It generally provides one travel lane in each direction. Parking is generally available on both sides of the street within the Study Area.

Existing Public Transit Service

The Project site is located within a high-quality transit area (HQTa), as identified by the SCAG, Los Angeles County Metropolitan Transportation Authority (Metro), and the City Transportation Impact Analysis (TIA) Guidelines HQTa Map, as shown in **Figure 4.8-3: Existing High Quality Transit Areas**. As detailed in **Table 4.8-1** and **Figure 4.8-4: Existing Transit Service**, the Project area is served by bus lines operated by Metro and Glendale Beeline, including Metro Local Line 94 and Glendale Beeline Route 12, which travel within the Study Area along San Fernando Road.

² City of Glendale General Plan, Circulation Element, pg.2-6, Available at: <https://www.glendaleca.gov/home/showpublisheddocument/4497/635242143425530000>, Accessed September 2022.

Tables 4.8-2 and 4.8-3 summarize the total available capacity of the transit system that serves the Project site during the morning and afternoon peak hours, respectively, based on the frequency of service of each line, the standing capacity of each bus, and the average peak hour load in each direction. As shown, based on ridership data from April 2019 provided by Metro, the transit lines within a 0.25-mile walking distance of the Project site have available capacity for approximately 256 additional riders during the morning peak hour and 207 riders during the afternoon peak hour. No transit capacity data was readily available for Glendale Beeline, though this service would provide additional transit capacity not reported in **Tables 4.8-2 and 4.8-3**.

TABLE 4.8-1 EXISTING TRANSIT SERVICE						
Provider, Route, and Service Area	Service Type	Hours of Operation	Average Headway (min)			
			Morning Peak		Afternoon Peak	
<i>Metro</i>			<i>NB/EB</i>	<i>SB/WB</i>	<i>NB/EB</i>	<i>SB/WB</i>
94: Sun Valley - Downtown Los Angeles via San Fernando	Local	4:30 AM - 12:00 AM	16	15	16	17
<i>Glendale Beeline (GB)</i>			<i>NB/EB</i>	<i>SB/WB</i>	<i>NB/EB</i>	<i>SB/WB</i>
GB12: Glendale Transportation Center - Burbank Regional Intermodal Transportation Center via Central Ave & Brand Blvd	Local	6:00 AM - 9:30 AM 3:00 PM - 6:30 PM	30	26	30	26

Source: Gibson Transportation Consulting Inc., *Transportation Analysis for the 5426 San Fernando Studios, August 10, 2021, Appendix E.*

Notes:

NB: Northbound;

SB: Southbound;

EB: Eastbound;

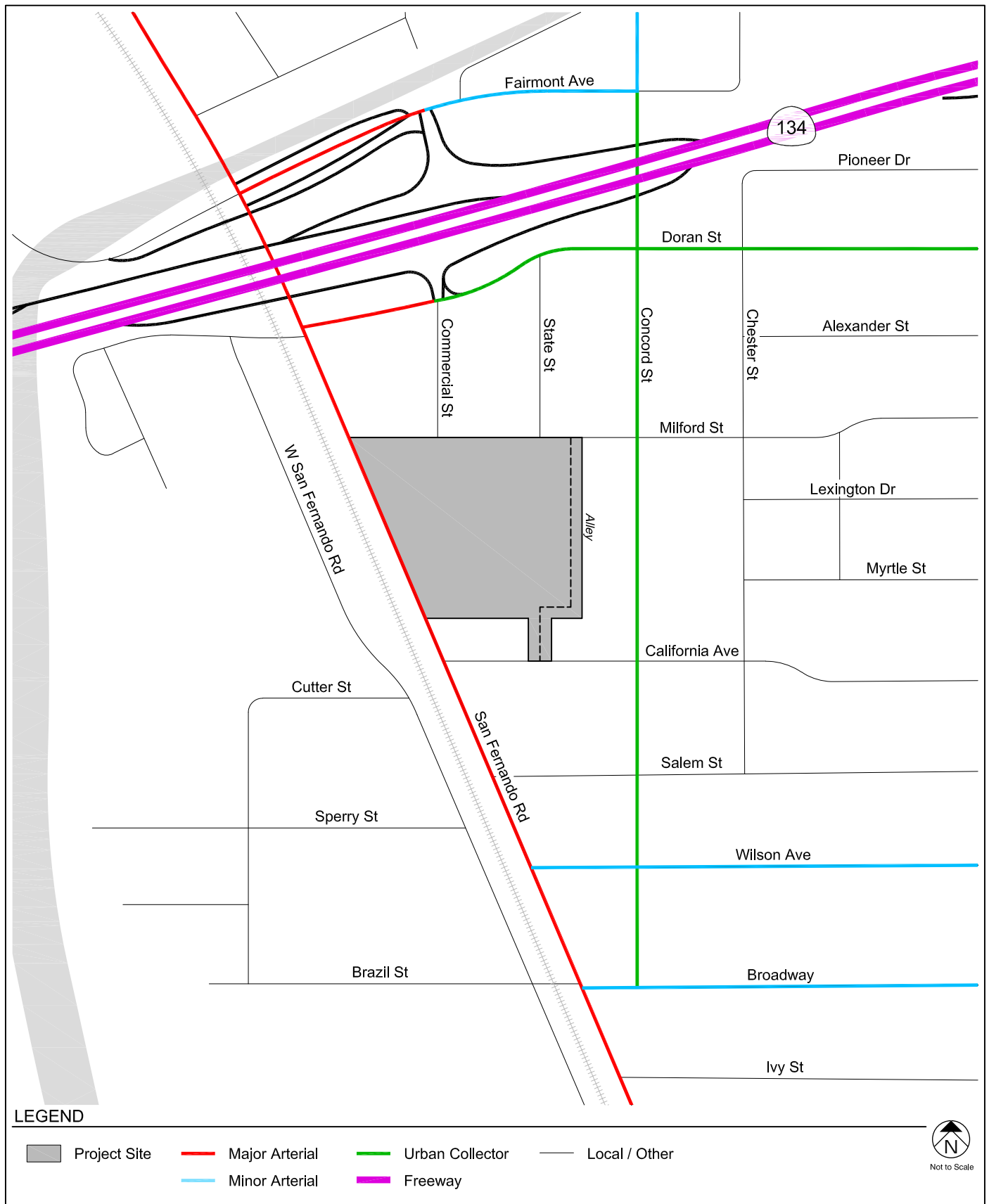
WB: Westbound

Metro: Los Angeles County Metropolitan Transportation Authority

GB: Glendale Beeline

AM Peak from 6 AM - 10 AM

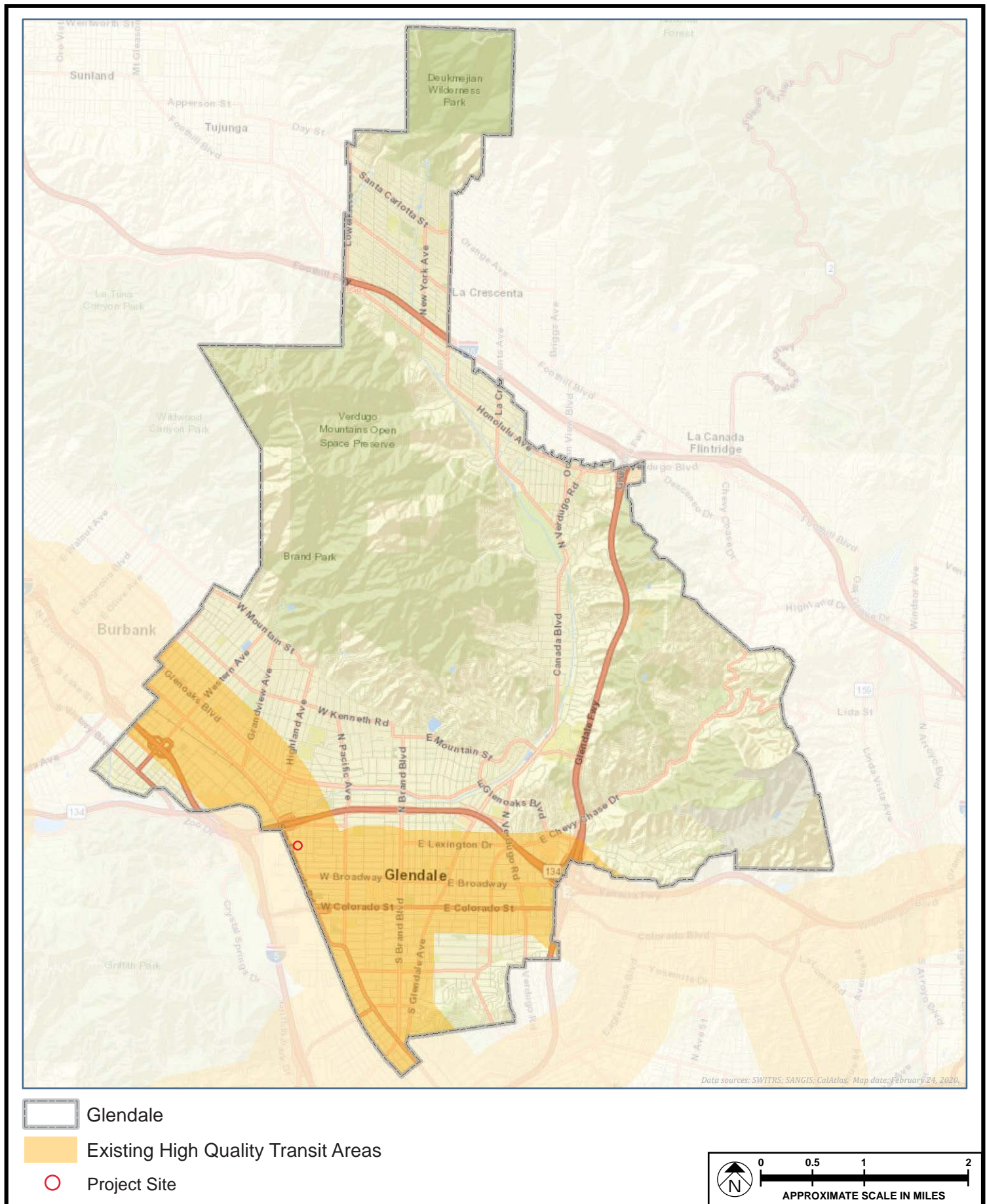
PM Peak from 3 PM - 7 PM



SOURCE: Gibson Transportation Consulting Inc. - August 2021; Meridian Consultants, LLC - 2022

FIGURE 4.8-2

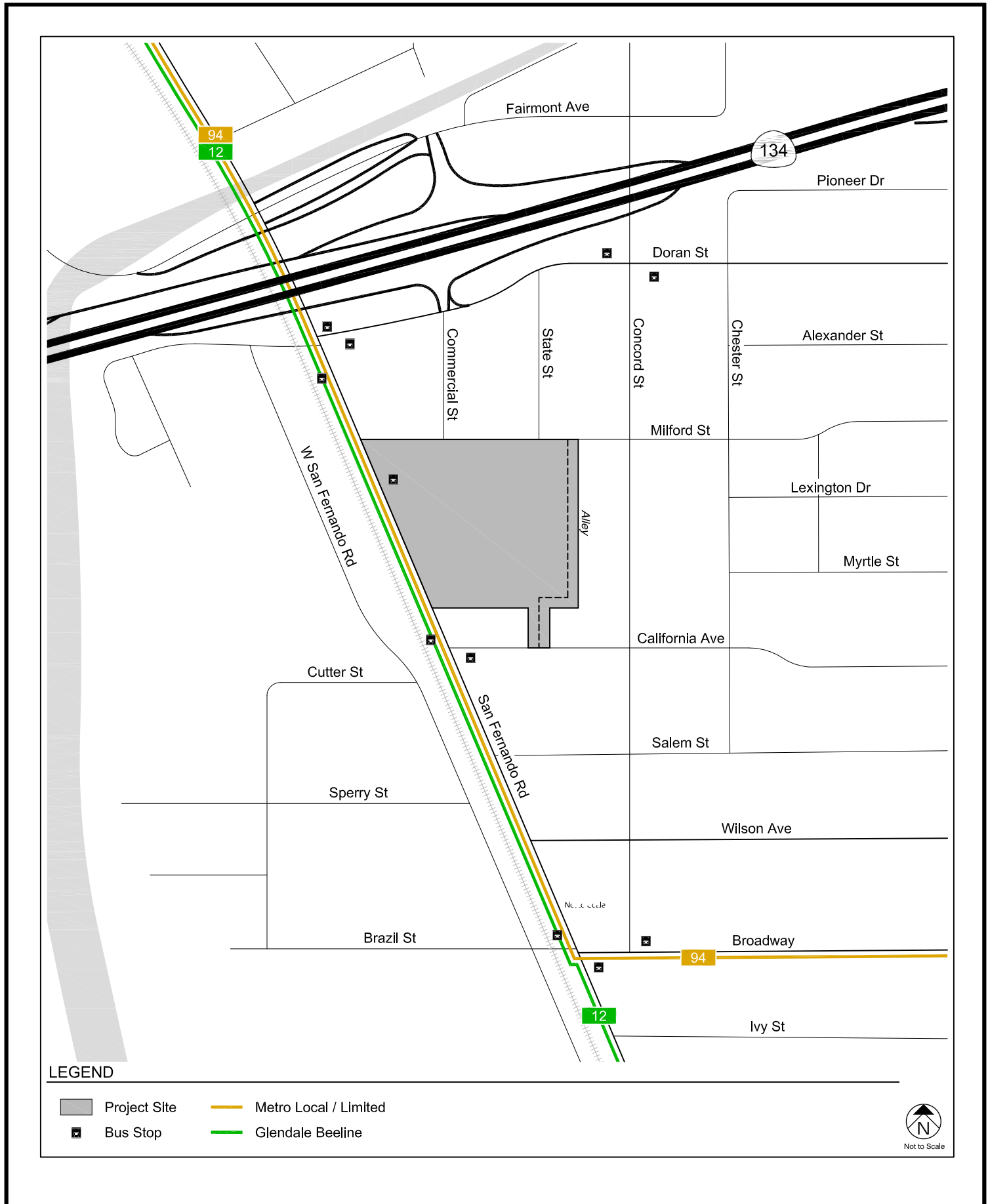
General Plan Street Classifications



SOURCE: Gibson Transportation Consulting Inc. - August 2021; Meridian Consultants, LLC - 2022

FIGURE 4.8-3

Existing High Quality Transit Areas



SOURCE: Gibson Transportation Consulting Inc. - August 2021; Meridian Consultants, LLC - 2022

FIGURE 4.8-4

Existing Transit Service

TABLE 4.8-2
TRANSIT SYSTEM CAPACITY IN STUDY AREA — MORNING PEAK HOUR

Provider, Route, and Service Area	Capacity per Trip ^a	Peak Hour Ridership ^b				Average Remaining Capacity per Trip		Remaining Peak Hour Capacity	
		Peak Load		Average Load					
		NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB
Metro Bus Service									
94: Sun Valley - Downtown Los Angeles via San Fernando	50	27	20	19	15	31	35	116	140
Total Remaining Transit System Capacity								256	

Source: Gibson Transportation Consulting Inc., *Transportation Analysis for the 5426 San Fernando Studios*, August 10, 2021, Appendix E.

Notes: No transit capacity data was readily available for the Glendale Beeline.

Metro: Los Angeles County Metropolitan Transportation Authority.

^a Capacity assumptions: Metro Regular Bus - 40 seated / 50 seated and standing.

^b Based on ridership data provided by Metro in 2019.

TABLE 4.8-3
TRANSIT SYSTEM CAPACITY IN STUDY AREA — AFTERNOON PEAK HOUR

Provider, Route, and Service Area		Capacity per Trip ^a	Peak Hour Ridership ^b				Average Remaining Capacity per Trip		Remaining Peak Hour Capacity	
			Peak Load		Average Load					
			NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB
Metro Bus Service										
94: Sun Valley - Downtown Los Angeles via San Fernando		50	24	30	19	24	31	26	116	91
Total Remaining Transit System Capacity									207	

Source: Gibson Transportation Consulting Inc., *Transportation Analysis for the 5426 San Fernando Studios*, August 10, 2021, Appendix E.

Notes: No transit capacity data was readily available for the Glendale Beeline.

Metro: Los Angeles County Metropolitan Transportation Authority.

^a Capacity assumptions: Metro Regular Bus - 40 seated / 50 seated and standing.

^b Based on ridership data provided by Metro in 2019.

Existing Bicycle System

Based on *City of Glendale Bicycle Transportation Plan*, the existing bicycle system in the Study Area consists of a limited coverage of bicycle paths (Class I), bicycle lanes (Class II), and bicycle routes (Class III).³ Bicycle paths are paved facilities physically separated from vehicle traffic and can be used by bicyclists. Bicycle lanes are a component of street design with dedicated striping and symbols on the roadway surface, separating vehicular traffic from bicycle traffic. Buffered bicycle lanes provide a painted flush buffer zone between a bicycle lane and adjacent travel lane. Bicycle routes are identified as bicycle-friendly streets where motorists and cyclists share the roadway and there is no dedicated striping of a bicycle lane. Bicycle routes are preferably located on Local, Collector, and lower volume Arterial Streets as part of a signed route or bicycle boulevard, which is typically applied on quiet streets such as residential neighborhoods. In the Study Area, existing bicycle routes are provided on Doran Street and Broadway.

Existing Pedestrian Facilities

The walkability of existing facilities is based on the availability of pedestrian routes necessary to accomplish daily tasks without the use of an automobile. These attributes are quantified by Walk Score and assigned a score out of 100 points. Based on proximity to other commercial businesses and cultural facilities, the walkability of the Study Area is approximately 65 points.⁴

The Study Area is comprised of employment, industrial, and residential land uses served by transit stops, a bicycle network, and sidewalk system. There are adequate sidewalks lining the streets, crosswalks available at the intersections, and several restaurants and other services within walking distance of the Project site.

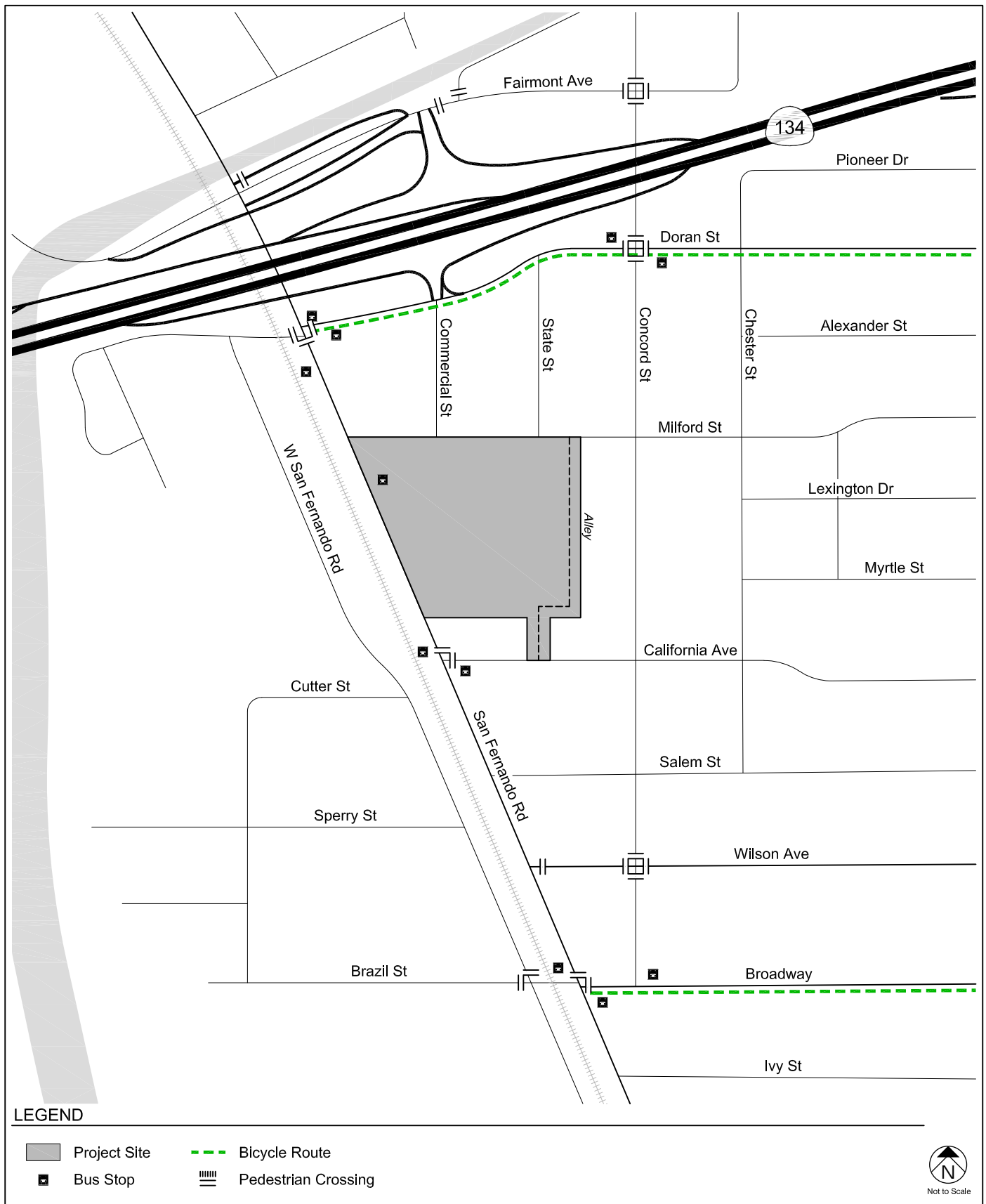
The sidewalks that serve as routes to the Project site provide proper connectivity and adequate widths for pedestrian crossings at intersections for a comfortable and safe pedestrian environment. The signalized intersection of San Fernando Road & California Avenue provides pedestrian facilities to limit illegal mid-block crossings to the Project site.

The intersection of San Fernando Road and California Avenue provides pedestrian signals, crosswalk striping, and Americans with Disabilities Act accessible ramps.

Figure 4.8-5: Existing Transportation Facilities and Figure 4.8-6: Existing Pedestrian Destinations within Study Area illustrate the existing crosswalk systems and the pedestrian destinations within the Study Area, respectively.

³ *City of Glendale Bicycle Transportation Plan* (September 2012), Ch. 5 Existing Conditions, accessed May 2022, <https://www.glendaleca.gov/home/showpublisheddocument/19862/635579469687200000>.

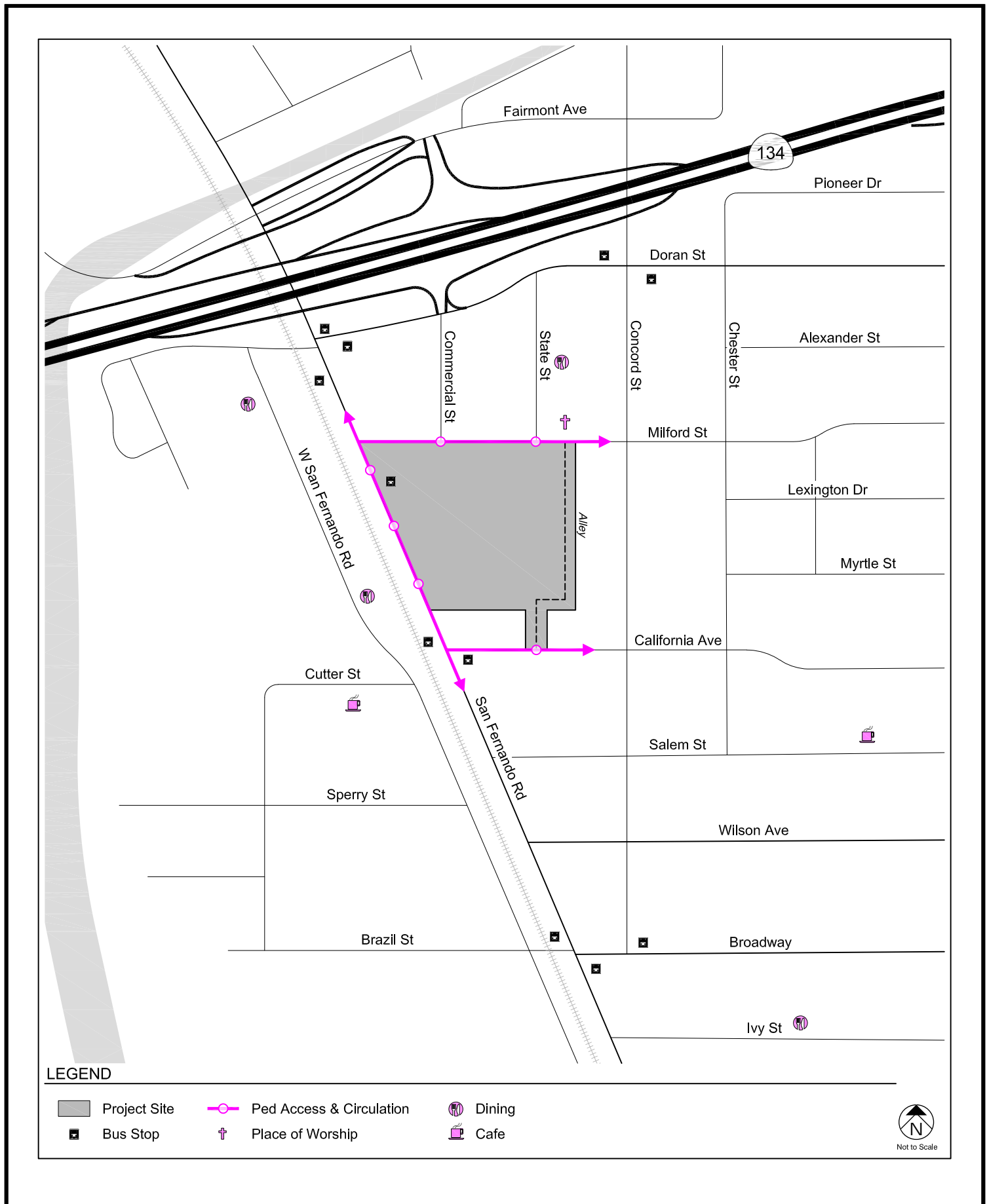
⁴ Walk Score (www.walkscore.com) rates the Project Site (5426 San Fernando Road) with a score of 65 out of 100 possible points (scores accessed on June 30, 2021). Walk Score calculates the walkability of specific addresses by taking into account the ease of living in the neighborhood with a reduced reliance on automobile travel, based on available walking routes to nearby amenities, population density, and road metrics (block lengths, intersections density).



SOURCE: Gibson Transportation Consulting Inc. - August 2021; Meridian Consultants, LLC - 2022

FIGURE 4.8-5

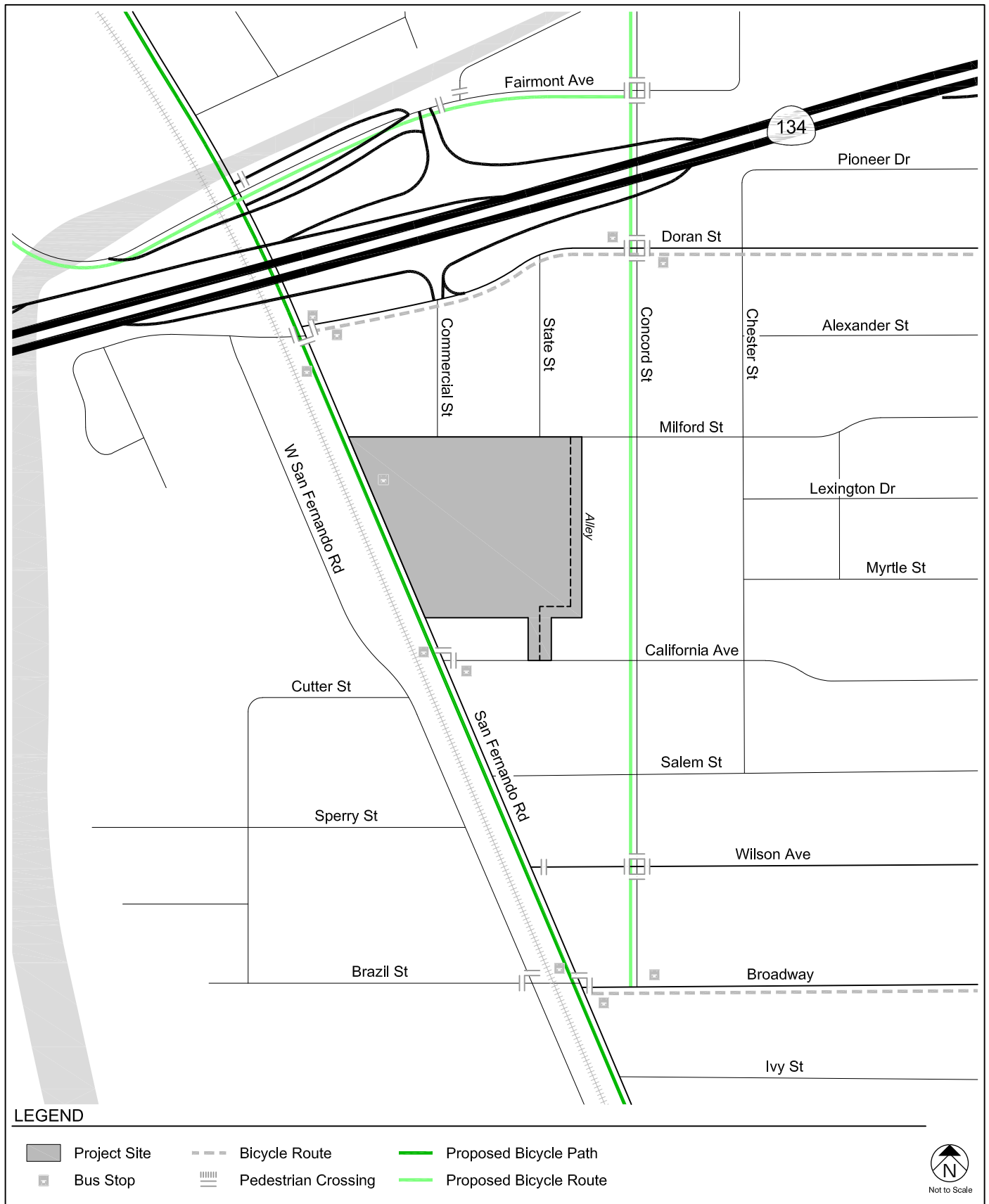
Existing Transportation Facilities



SOURCE: Gibson Transportation Consulting Inc. - August 2021; Meridian Consultants, LLC - 2022

FIGURE 4.8-6

Existing Pedestrian Destinations within Study Area



SOURCE: Gibson Transportation Consulting Inc. - August 2021; Meridian Consultants, LLC - 2022

FIGURE 4.8-7

Future Transportation Facilities

4.8.3.2 Future Conditions Without Project

The analysis of future conditions considered pedestrian, bicycle, transit, roadway, and intersection improvements via capital projects that are reasonably expected to be implemented prior to the buildout of the Project. The City has developed plans that identify future improvements to bicycle and pedestrian infrastructure in the Study Area. **Figure 4.8-7: Future Transportation Facilities**, shows the proposed future pedestrian and bicycle improvements.

4.8.3.3 Future Bicycle System Improvements

The Bicycle Transportation Plan identifies the City's vision for a more integrated bicycle network throughout the City, including within the Study Area. It proposes bicycle paths on San Fernando Road and bicycle routes on Fairmont Avenue west of Concord Street, and along Concord Street within the Study Area.⁵

4.8.3.4 Future Pedestrian Facilities Improvements

Glendale Citywide Pedestrian Plan outlines specific pedestrian projects for implementation throughout the City.⁶ There are no planned pedestrian improvements within the Study Area; therefore, no proposed pedestrian improvements from the City Pedestrian Plan have been assumed as part of the future conditions.

4.8.4 ENVIRONMENTAL IMPACT ANALYSIS

4.8.4.1 Thresholds of Significance

In accordance with appendix G of the state CEQA guidelines, the proposed project would have a significant impact related to transportation if it would:

Threshold T-1:	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and passenger facilities.
Threshold T-2:	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
Threshold T-3:	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
Threshold T-4:	Result in inadequate emergency access.

⁵ City of Glendale Bicycle Transportation Plan (September 2012), Ch. 5 Existing Conditions, accessed May 2022.

⁶ City of Glendale Pedestrian Plan (September 2017) accessed May 2022, <https://www.glendaleca.gov/government/departments/community-development/planning/plans-for-mobility/pedestrian-plan#:~:text=The%20Citywide%20Pedestrian%20Plan%20is,safety%2C%20and%20demand%20with%20Glendale.>

4.8.4.2 Methodology

On November 16, 2020, the City Council adopted updates to the City TIA Guidelines pursuant to the requirements of SB 743. While VMT is the preferred quantitative metric for assessing potentially significant transportation impacts under CEQA, it is noted that SB 743 does not prevent a city or county from using metrics such as LOS as part of the application of local general plan policies, municipal and zoning codes, conditions of approval, or any other planning requirements through a city's planning approval process; cities can still ensure adequate operation of the transportation system in terms of transportation congestion measures related to vehicular delay and roadway capacity. As such, the City of Glendale continues to require congestion-related transportation analysis through planning approval processes outside CEQA. The methodology and base assumptions used in this analysis were established in accordance with the City of Glendale TIA Guidelines.

Screening for CEQA Transportation Analysis – High Quality Transportation Area (HQTa)

Project Screening Analysis

Lead agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing. The following **Table 4.8-4** illustrates the five screening criteria pursuant to CEQA transportation analyses identified in Section 2.1.2 of the City TIA Guidelines. The Project must meet at least one of the five screening criteria in order to be exempt from conducting a Project-level VMT analysis. Should the Project meet one of these five screening criteria, a Project-level VMT analysis is not required per the City TIA Guidelines.⁷ As shown below, the Project would meet Criteria 4.

TABLE 4.8-4 TRANSPORTATION IMPACT ANALYSIS SCREENING – CEQA ANALYSIS	
City of Glendale Screening Criteria ^a	
<i>Criteria 1: Small Project Consideration</i>	Met By Project
Does the Project generate fewer than 145 net new daily vehicle trips?	No
Is the Project consistent with the General Plan land use designation?	Yes
VMT Analysis Exempted	No
<i>Criteria 2: Affordable Housing Provision</i>	
Does the Project provide 100% affordable housing?	No
VMT Analysis Exempted	No
<i>Criteria 3: Local-Serving Retail or Public Facility</i>	
Is the Project a retail project (less than 50,000 square feet)?	No

⁷ City of Glendale, *Transportation Impact Analysis Guidelines* (October 2020), Section 2.1.2 Project Screening, accessed May 2022, https://www.glendaleplan.com/_files/ugd/81c7a2_469b63477a8844388ff25df39e0167bc.pdf.

TABLE 4.8-4
TRANSPORTATION IMPACT ANALYSIS SCREENING — CEQA ANALYSIS

City of Glendale Screening Criteria^a

Is the Project a local-serving public facility? No

VMT Analysis Exempted No

Criteria 4: High-Quality Transit Area (HQTa)

Is the project located in an existing high-quality transit area?^b Yes

Does the Project have an FAR greater than 0.75? Yes

Does the Project follow parking guidelines that do not allow parking beyond minimum required by City Municipal Code? Yes

Is the Project consistent with the General Plan? Yes

Is the Project not replacing affordable housing? Yes

Does the Project contain transit-supportive uses? Yes

VMT Analysis Exempted Yes

Criteria 5: Low VMT Area

Is the Project located in a low VMT Area?^c No

VMT Analysis Exempted No

Source: Gibson Transportation Consulting Inc., *Transportation Analysis for the 5426 San Fernando Studios*, August 10, 2021, Appendix E.

Note:

^a Screening criterion from the City TIA Guidelines Section 2.1.2, Project Screening.

^b The Project is located in an existing High Quality Transit Area (HQTa) per City TIA Guidelines.

^c Low VMT area shown in City TIA Guidelines Attachment B: Office/Employment Project VMT Screening.

Furthermore, in accordance with OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA and CEQA Guidelines Section 15064.3, subdivision (b)(1), the City's TIA Guidelines state that all development projects within an HQTa are considered to have less than significant transportation impacts, excluding:

1. A project with a floor area ratio (FAR) of less than 0.75;
2. A project with more than the required number of parking spaces;
3. A project that is inconsistent with the General Plan's **land use designation for the site**;
4. A project that replaces affordable residential units with fewer, moderate- or high-income residential units;
5. A project without transit-supportive uses (such as residential, office, and/or retail).

As the Project is located within an HQTa and does not fall within the excluded projects listed above, the Project does not require a detailed VMT analysis.

4.8.4.3 Project Impacts

Impact T-1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Finally, any inconsistency with an applicable plan, ordinance or policy is only a significant impact under CEQA if the plan, ordinance, or policy was adopted for the purpose of avoiding or mitigating an environmental effect and if the inconsistency itself would result in a direct physical impact on the environment.

Table 4.8-5 provides an assessment of the Project's consistency with the City of Glendale's General Plan Elements. The analysis in the following table concludes that the Project would be consistent with the goals and policies outlined in the City's General Plan.

TABLE 4.8-5 PROJECT CONSISTENCY WITH GENERAL PLAN	
Goals and Policies	Project Consistency
Circulation Element	
<i>Goal 2: Minimization of congestion, air pollution, and noise associated with motor vehicles.</i>	
Increase/support public and high occupancy vehicle transportation system improvements through mitigation of traffic impacts from new development.	No Conflict. The Project is located within an identified HQTa, which offers highly-efficient travel opportunities, which is consistent with this policy. The Project site is also located within one-mile of bus routes Metro Local Line 94 and Glendale Beeline Route 12. The proposed Project would provide convenient access to mass transit and opportunities for walking and biking as well as 533 parking spaces which include 24 electric vehicle capable spaces and 3 accessible electric vehicle capable spaces. Although the Project may intensify use of existing pedestrian, transit, and bicycle facilities, as well as vehicular traffic using San Fernando Road, Milford Street, and California Avenue, the magnitude of those travel modes are not anticipated to reach a level where any degradation, capacity constraint, or significant conflict would arise. As such, the Project would not conflict with this goal.
<i>Goal 3: Reasonable access to services and goods in Glendale by a variety of transportation modes.</i>	
Encourage growth in areas and in patterns which are or can be well served by public transportation.	No Conflict. The Project would contribute to and support the productivity and use of the nearby transit systems by providing employment near transit and retaining existing sidewalks adjacent to the Project site along San Fernando Road, Milford Street, and California Avenue. The Project would encourage walking, biking and transit usage by providing bicycle parking and pedestrian connections from the Project site to the existing

TABLE 4.8-5
PROJECT CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Project Consistency
	sidewalks along San Fernando Road, Milford Street, and California Avenue. The Project also does not propose modifying, removing, or otherwise negatively affecting existing bicycle and pedestrian infrastructure. As such, the Project would not conflict with this goal.
<i>Goal 4: Functional and safe streetscapes that are aesthetically pleasing for both pedestrians and vehicular travel.</i>	
Provide and maintain quality streetscape and pedestrian amenities (i.e., bus shelters, street trees, street furniture, wide sidewalks, etc.).	No Conflict. Pedestrian amenities such as street trees (including Yellow Trumpet Trees, Desert Willow Trees, Brisbane Box Trees and other ornamental and drought tolerant species) would be provided for a safer and more comfortable pedestrian environment. These measures would promote active transportation modes such as biking and walking. As such, the Project would not conflict with this goal.
<i>Goal 5: Land use which can be supported within the capacity constraints of existing and realistic future infrastructure.</i>	
Balance land use/zoning with roadway capacity by establishing congestion thresholds and avoiding unacceptable levels of congestion from future development.	No Conflict. The Project would develop a large scale, state of the art, sound stage development located within the IMU zone. The Project will develop a 9.74-acre underutilized site with the Stages, Flex Spaces, and ancillary Production Office, intensifying the industrial uses on the Project site. The Project proposes the development of 406,318 square feet (sf) of studio and support uses in an HQT. The Project would align with the goals of SB 743 to reduce VMT by placing employment uses in close proximity to transit. In addition, as discussed in more detail below, the Project would fall under criteria #4 of the five exclusionary criteria that would not require further VMT analysis for the proposed Project. As such, the Project would not conflict with this goal.
Land Use Element	
<i>Circulation</i>	
Develop clusters of uses which will facilitate the development of public transportation networks, decreasing dependence on the automobile.	No Conflict. The Project site and vicinity is comprised of employment, industrial, and residential land uses served by transit stops, a bicycle network, and sidewalk system. There are adequate sidewalks lining the streets, crosswalks available at the intersections, and several restaurants and other services within walking distance of the Project site. Additionally, the Project site is located within a HQT which places employment uses within one half-mile of public transit uses. As such, the Project would not conflict with this goal.
<i>Industrial</i>	
Provide for the improvement of existing industrial districts through the addition of parking facilities, visual amenities, and the elimination of incompatible influents and blight.	No Conflict. The Project would replace existing production and soundstage uses that include supporting office uses and a warehouse, which is consistent with the General Plan's vision. The Project will introduce upgraded, state of the art production soundstage studios to industrially zoned land, preserving and expanding job creation on the Project site. The Project will add to the City's entertainment jobs base at a time when production space is in high demand all over the

TABLE 4.8-5
PROJECT CONSISTENCY WITH GENERAL PLAN

Goals and Policies	Project Consistency
	surrounding region. As such, the Project would not conflict with this goal.
Noise Element	
<i>Goal 1: Reduce noise impacts from transportation noise source</i>	
Policy 1.3: Reduce transportation noise through proper design and coordination of routing	No Conflict. The Project site is located within the IMU zone and is surrounded by industrial and commercial uses as well as immediately adjacent to San Fernando Road. As discussed in Section 4.5 Noise, the construction and operation of the proposed Project would not result in significant noise level increases at sensitive receptors. As such, the Project would not conflict with this policy.
Policy 1.5: Consider noise reduction measures when making revisions to the Circulation Element.	No Conflict. As mentioned above, the Project site is located adjacent to industrial uses and San Fernando Road. Best management practices would be included to reduce any noise during construction of the Project such as performing construction activities only within the hours as specified by the GMC Chapter 8.36, Section 8.36.040. As such, the Project would not conflict with this policy.
Safety Element	
<i>Goal 4: Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses and social dislocation and other impacts resulting from fire hazards.</i>	
Policy 4-1: The City shall ensure to the extent possible that fire services, such as fire equipment, infrastructure, and response times, are adequate for all sections of the City.	No Conflict. As mentioned previously, the Project proposes a fire lane throughout the various sound stages which would provide adequate emergency access within the Project site. Additionally, the Project would include safety and design requirements as specified by the California Building Code such as sprinkler systems within each building and adequate emergency vehicle parking. As such, the Project would not conflict with this policy.
<i>Goal 8: Maintain a high level of emergency preparedness.</i>	
Policy 8-1: The City shall prepare for emergency response and recovery from natural and urban disasters, especially earthquake hazards.	No Conflict. The Project would not conflict with the City's established emergency response plan. The Project includes design guidelines that address seismic hazards and adherence to these guidelines would reduce impacts associated with natural disasters such as earthquakes. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. As such, the Project would not conflict with this policy.

Source: City of Glendale General Plan.

The Project is consistent with the goals and policies contained in the City's General Plan.

Mitigation Measures

Mitigation measures are not required.

Level of Significance after Mitigation

There are no mitigation measures required and impacts would be less than significant.

Impact T-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

According to CEQA Guidelines Section 15064.3,

Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

Transit priority areas (TPAs) in Glendale are identified based on the California PRC definitions for major transit stops⁸ or high-quality transit corridors.⁹ CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop or an existing stop along a high quality transit corridor will have a less-than-significant impact on VMT.¹⁰ As stated above, the City's TIA Guidelines, in accordance with *OPR Technical Advisory on Evaluating Transportation Impacts in CEQA*, states that all development projects within an HQTa are considered to have less than significant transportation impacts, excluding:

1. A project with a floor area ratio (FAR) of less than 0.75;
2. A project with more than the required number of parking spaces;
3. A project that is inconsistent with the General Plan's **land use designation for the site**;
4. A project that replaces affordable residential units with fewer, moderate- or high-income residential units;
5. A project without transit-supportive uses (such as residential, office, and/or retail).

As the Project would be considered a HQTa and does not fall within the excluded projects listed above, the Project does not require a detailed VMT analysis.

As discussed in Section 4.8.3, above, the Project site is located within an HQTa; therefore, per the City TIA Guidelines, a 5% transit/HQTa reduction was applied to account for transit usage and walk-in arrivals

⁸ A "major transit stop" is defined as 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 major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (CA Public Resources Code, Section 21064.3).

⁹ "High-quality transit corridor" (HQTc) means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours (CA Public Resources Code, Section 21155).

¹⁰ Governor's Office of Planning and Research (December 2018), pg. 13, accessed May 2022, https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

from surrounding neighborhoods and adjacent commercial developments. Activities on the Project site will include brand new production sound stages, production office uses, flex spaces, and above ground and surface parking. These activities will include pre-production and post-production activities and related administrative functions. The Project site may operate up to 24 hours per day, with filming activities occurring at any time of the day and any day of the week, including evenings and weekends. Although peak activities at the Project site may not occur concurrently with typical commuter peak travel periods, the Transportation Analysis assessed the worst-case scenario by assuming that the peak Project activities align with commuter peak hours.

As shown in **Table 4.8-6** the existing uses with transit/HQTA reductions generate 344 net daily trips, including 47 net morning peak hour trips (36 inbound, 11 outbound) and 49 net afternoon peak hour trips (13 inbound, 36 outbound) and the Project with transit/HQTA reductions generates 3,012 net daily trips, including 254 net new morning peak hour trips (208 inbound, 46 outbound) and 300 net new afternoon peak hour trips (72 inbound, 228 outbound). After accounting for the removal of the existing warehouse use on site, the Project is anticipated to generate a net increase of 2,668 daily trips, including 207 net new morning peak hour trips (172 inbound, 35 outbound) and 251 net new afternoon peak hour trips (59 inbound, 192 outbound), as summarized in **Table 4.8-6**.

TABLE 4.8-6 PROJECT TRIP GENERATION ESTIMATES								
Trip Generation Rates ^a								
Land Use	Rate	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Studio Production Office (General Office) ^a	Per ksf	9.74	86%	14%	1.16	16%	84%	1.15
Stage ^b	Per ksf	5.91	63%	37%	0.20	40%	55%	0.57
Studio Support Space ^b	Per ksf	4.14	65%	35%	0.61	45%	55%	0.57
Warehousing	Per ksf	^d	77%	23%	^d	27%	73%	^d
Trip Generation Estimates								
Land Use	Size	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
<i>Proposed Project</i>								
Studio Production Office (General Office)	185.268 ksf	1,805	185	30	215	34	179	213
<i>Transit/HQTA Reduction</i>	<i>5%</i>	<i>(90)</i>	<i>(9)</i>	<i>(2)</i>	<i>(11)</i>	<i>(2)</i>	<i>(9)</i>	<i>(11)</i>
Stage	221.704 ksf	1,310	28	16	44	38	57	95
<i>Transit/HQTA Reduction</i>	<i>5%</i>	<i>(66)</i>	<i>(1)</i>	<i>(1)</i>	<i>(2)</i>	<i>(2)</i>	<i>(3)</i>	<i>(5)</i>
Studio Support Space	13.574 ksf	56	5	3	8	4	4	8
<i>Transit/HQTA Reduction</i>	<i>5%</i>	<i>(3)</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
Total - Proposed Project		3,012	208	46	254	72	228	300
<i>Existing Site</i>								
Warehousing ^d	200.000 ksf	362	38	11	49	14	38	52

TABLE 4.8-6
PROJECT TRIP GENERATION ESTIMATES

<i>Transit/HQTA Reduction</i>	5%	(18)	(2)	0	(2)	(1)	(2)	(3)
Total [-] Existing Site		344	36	11	47	13	36	49
Net New Trips		2,668	172	35	207	59	192	251

Source: Gibson Transportation Consulting Inc., *Transportation Analysis for the 5426 San Fernando Studios*, August 10, 2021, Appendix E.

Notes:

$ksf = 1,000$ square feet

Daily $-T = 1.58 (X) + 45.54$

AM Peak Hour $-T = 0.12 (X) + 25.32$

PM Peak Hour $-T = 0.12 (X) + 27.82$

$T =$ Average Vehicle Trips

$X =$ Gross Leasable Area (ksf)

[a] Studio Production Office rate based on General Office Building (Land Use 710) rate from Trip Generation, 10th Edition, Institute of Transportation Engineers, 2017.

[b] Rate based on empirical rate from Transportation Study for the NBC Universal Evolution Plan Environmental Impact Report, Gibson Transportation Consulting, Inc. and Raju Associates, Inc., March 2010.

[c] Per the City of Glendale's Transportation Impact Analysis Guidelines, the Project Site is located within an existing High Quality Transit Area (HQTA); therefore, a 5% transit/HQTA reduction is applied to account for transit usage and walking visitor arrivals from the surrounding neighborhoods and adjacent commercial developments.

[d] Trip generation rate based on the best-fit curve formula listed in the Trip Generation Manual, 10th Edition for the Warehousing land use.

Furthermore, the Project is located within an HQTA and as shown in **Table 4.8-4**, the Project meets Criterion #4. The Project, therefore, is not required any further VMT analysis pursuant to the City's TIA Guidelines.

Provided below is a detailed description of how the Project meets Criterion 4:

1. The Project is in an HQTA as shown in Figure 4.8-3.
2. The Project would have a FAR density of approximately 0.96 to 1.
3. Section 30.22.050 of the Glendale Municipal Code (GMC) identifies the off-street parking requirements of various land uses and the required off-street parking ratio for all developments proposed within the City. The off-street parking requirement for the Project was calculated based on the GMC rate for industrial uses. Per Table 30-32-D of the GMC, industrial uses, which include sound stages and support facilities, may provide vehicular parking at a rate of 2.0 spaces per 1,000 sf for the first 25,000 sf of floor area, 1.5 spaces per 1,000 sf for the second 25,000 sf of floor area, and 1.25 spaces per 1,000 sf for any floor area over 50,000 sf. As detailed in Table 5, the Project would be required to provide 533 parking spaces. With a supply of 533 parking spaces, the **Project's** proposed parking supply would meet the GMC industrial use parking requirement.
4. The General Plan presents a long-term vision for the City's transportation system and balances the region's future mobility needs with economic, environmental, and public health goals. As addressed above in Table 4.8-5, the Project encourages a variety of transportation options and is consistent with the General Plan goals of preserving the quality of life in the City's communities, minimizing

congestion, air pollution, and noise associated with motorized vehicles, providing access to service and goods in the City by a variety of transportation modes, and developing land uses that can be supported within the capacity constraints of existing and realistic future infrastructure. The Project would encourage walking, biking and transit usage by providing employment near transit and pedestrian connections from the Project site to the existing sidewalks along San Fernando Road, Milford Street, and California Avenue. Pedestrian amenities such as street trees would be provided for a safer and more comfortable pedestrian environment. Although the Project may intensify use of existing pedestrian, transit, and bicycle facilities, as well as vehicular traffic using San Fernando Road, Milford Street, and California Avenue, the magnitude of those travel modes are not anticipated to reach a level where any degradation, capacity constraint, or significant conflict would arise. As such, the Project is consistent with the goals contained in the General Plan. The Project's proposed uses are also allowed by-right under both the General Plan and the Project site's zoning designation. The Project's proposed FAR would also comply with the zoning designation permissible FAR. The Project's use and intensity, therefore, is consistent with the General Plan.

5. The Project would not replace any existing low-income housing as only warehouse uses exist on the Project site.
6. The Project would contribute to and support the productivity and use of the nearby transit systems by providing employment near transit and retaining existing sidewalks adjacent to the Project site along San Fernando Road, Milford Street, and California Avenue. The Project also does not propose modifying, removing, or otherwise negatively affecting existing bicycle and pedestrian infrastructure. As described above, the Project would encourage walking, biking and transit usage by providing bicycle parking and pedestrian connections from the Project site to the existing sidewalks along San Fernando Road, Milford Street, and California Avenue. Pedestrian amenities such as street trees would be provided for a safer and more comfortable pedestrian environment. These measures would promote active transportation modes such as biking and walking.

Based on the above evaluation and as shown in **Table 4.8-4**, the Project meets the VMT exemption screening criteria for a project located in an HQT, which qualifies the Project for a VMT analysis exemption. Therefore, no further VMT analysis is required, and no significant transportation impact is anticipated with development of the Project.

Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant.

Mitigation Measures

Mitigation measures are not required.

Level of Significance after Mitigation

There are no mitigation measures required and impacts would be less than significant.

Impact T-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Project would develop a soundstage campus, which would include studio and support (including office) uses along San Fernando Road between Milford Street and California Avenue. The Project would provide multiple pedestrian entry points for employees and visitors along San Fernando Road, Milford Street, and California Avenue. The Project would provide a total of 533 parking spaces (in both the Parking Garage and the Surface Parking) and 12 loading spaces. The Parking Garage would include 419 parking spaces in a six-level, above grade parking structure and 114 parking spaces located throughout the Project site within surface lots and parking aisles (Surface Parking). Access to the Project site would be provided by four separate entrances, Gates A through D with a “u” shaped rideshare entry and exit off San Fernando Road near Building 1. Gates A and B would be located on West Milford Street, abutting the east and west of Building 2. Gate C would be located on West California Avenue, which is the Property’s current main access point. Gate D would be located on San Fernando Road near the Property’s southwestern boundary and away from the rideshare entry and exit. All Gates would provide ingress and egress to the fire lane within the Project site, which would allow for vehicular circulation to all Buildings (including Building 1’s Parking Garage) and the Surface Parking.

Operation of the proposed Project would be similar to the existing site and no major changes to the existing geometric design would be included. As such, the Project would not have a significant impact on geometric design hazards or incompatible uses on-site. Impacts would be less than significant.

Mitigation Measures

Mitigation measures are not required.

Level of Significance after Mitigation

There are no mitigation measures required and impacts would be less than significant.

Impact T-4: Would the project result in inadequate emergency access?

According to the County of Los Angeles Disaster Route maps, San Fernando Road located adjacent to the Project site, is a designated Secondary Disaster Route.¹¹

Construction

Construction activities, associated with future development, may result in temporary construction barricades or other obstructions that would impede emergency access; however, future development projects that involve any work within a public ROW would be subject to review and approval from the Public Works Department, which requires coordination to inform police and fire departments of potential obstructions or street closures. The Project would also not conflict with the City’s established emergency

¹¹ County of Los Angeles, Department of Public Works, “Disaster Route Maps by City,” accessed May 2022, <https://pw.lacounty.gov/dsg/disaster/routes/city.cfm>.

response plan. The Project includes design guidelines that address seismic hazards and adherence to these guidelines would reduce impacts associated with natural disasters such as earthquakes. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. The Project would not result in inadequate emergency access during construction.

Operation

Operation of the proposed Project would not alter existing emergency access routes and would provide adequate access for the proposed Project. The Project's various components would be separated by a fire lane that ranges from 26-45 feet in width and roughly bisects the property on two sides from north to south and also transects the property twice east to west. The fire lane provides adequate emergency access within the Project site.

The Office of Emergency Services is tasked with coordinating disaster operations within the City. *Glendale General Plan* Safety Element Goal 8, Policy 8-1, Program 8-1.1 is directly related to emergency services; Program 8-1.1 encourages the update of disaster preparedness and recovery plans, as necessary. Adherence to Goal 8, and related policies and programs, in the Safety Element of the Glendale General Plan would reduce impacts associated with an emergency response plan or emergency evacuation plan. This impact is considered less than significant, and no mitigation is required.

Mitigation Measures

Mitigation measures are not required.

Level of Significance after Mitigation

There are no mitigation measures required and impacts would be less than significant.

4.8.4.4 Cumulative Impacts

A cumulative impact analysis for transportation evaluates whether impacts of a project and related projects, when taken as a whole, would have significant environmental impacts under the transportation thresholds. If the related projects identified in combination with the Project would result in a cumulatively significant impact, then the significance of the Project's incremental contribution to that cumulatively significant impact must be determined. As previously stated, Project implementation would be consistent with the City's *TIA Guidelines*. As discussed previously, implementation of the Project, on its own, would not result in significant VMT impacts.

Section 4.0: Environmental Impact Analysis, includes a list of related projects identified within **Table 4.0-1**. All related projects consist of individual development projects that do not involve any site improvements that would combine to create transportation impacts. As discussed above, the Project is located within an HQTa and satisfies screening Criteria 4 in the City's *TIA Guidelines* and thus is not required further VMT analysis. Therefore, the Project is not anticipated to result in a significant CEQA

transportation impact. Per the City's TIA Guidelines, "If a land use project (or a component of a mixed-use project) is screened out of requiring a detailed existing VMT analysis (per Section 2.1.2) or if it falls below the existing VMT thresholds outlined in Table 2 and does not trigger a project impact, it would also result in less than significant cumulative impacts."¹²

For these reasons, the Project would not contribute to significant cumulative transportation impacts.

Level of Significance Before Mitigation

Upon implementation of regulatory requirements, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Compliance with local, State, and federal plans, policies, and programs would ensure impacts related to transportation would be less than significant.

12 City of Glendale, *Transportation Impact Analysis Guidelines* (October 2020), Section 2.1.3.4, Cumulative Impacts.

5.0 ALTERNATIVES

5.1 INTRODUCTION

This section of the EIR provides a comparative analysis of the merits of alternatives to the Project pursuant to Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines, as amended. The purpose of the alternatives analysis is to provide information on potentially feasible ways to avoid or minimize any significant effects of a proposed Project.

The identification and analysis of alternatives to a proposed project is a fundamental aspect of the environmental review process under CEQA. Public Resources Code Section 21002 states, in part: “it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” In addition, Public Resources Code Section 21002.1(a) states: “The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.”

CEQA Guidelines Section 15126.6(a) provides the following guidance regarding an EIR’s discussion of alternatives:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.

CEQA Guidelines Section 15126.6(b) emphasizes the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts attributable to a proposed project, “even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” CEQA Guidelines Section 15126.6(f) further directs that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a “no project” alternative and CEQA Guidelines Section 15126.6(f)(2) requires the evaluation of alternative location(s)

for a proposed project, if feasible. Based on the alternatives analysis, CEQA Guidelines Section 15126.6(e)(2) requires an EIR to designate an environmentally superior alternative. If the environmentally superior alternative is the No Project Alternative, then the EIR must identify an environmentally superior alternative among the other alternatives. CEQA Guidelines Section 15126.6(d) states:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project... If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed Project. As such, the focus of the evaluation is on those environmental resources for which the proposed Project may have potential impacts.

According to the CEQA Guidelines, an EIR need only examine in detail those alternatives that could feasibly meet most of the basic objectives of the Project. The objectives for the San Fernando Soundstage Campus Project (Project) are as follows:

1. Provide production space to assist the City of Glendale, the greater Los Angeles region, and the state of California to retain entertainment jobs.
2. Contribute to the retention and revitalization of manufacturing and processing uses, along the San Fernando Road Corridor, a high quality transit corridor, which will encourage public transit use.
3. Optimize development potential of a designated industrial mixed-use site.
4. Consolidate production office, soundstage, and other production support uses on a single site to reduce traffic.
5. Locate higher intensity production office uses away from residentially zoned land east of the site which separate prevent divisions in established communities.
6. Provide adequate surface parking opportunities which will minimize soil disturbance of soils containing residual contamination.
7. Maximize solar power production capacity of the site.

5.2 SIGNIFICANT IMPACTS OF THE SAN FERNANDO SOUNDSTAGE CAMPUS PROJECT

In accordance with Section 15126.6(b) of the CEQA Guidelines, the alternatives in this section have been selected to provide additional information on ways to avoid or substantially lessen the significant impacts

of the Project as identified and described in **Section 4.0: Environmental Impact Analysis** of this Draft EIR.

Table 5.0-1: Environmental Impact Summary presents a summary of findings for each topic analyzed in this EIR for the proposed Project. As shown, the only significant impact identified for the Project is the potential for significant noise effects during construction. Measures are identified to mitigate this impact to less than significant. After construction is complete, no significant impacts are identified for occupancy and use of the Project.

TABLE 5.0-1 ENVIRONMENTAL IMPACT SUMMARY			
Topic	Potentially Significant Impact?	Mitigated to Less than Significant?	Unavoidable Significant Impact?
Aesthetics	No	N/A	N/A
Air Quality	No	N/A	N/A
Cultural Resources	No	N/A	N/A
Greenhouse Gas Emissions	No	N/A	N/A
Hazards and Hazardous Materials	Yes	Yes	N/A
Land Use	No	N/A	N/A
Noise	Yes	Yes	N/A
Transportation	No	N/A	N/A

5.3 SELECTION OF ALTERNATIVES FOR ANALYSIS

According to the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. The CEQA Guidelines indicate that the range of alternatives included in this discussion should be sufficient to allow decision makers a reasoned choice. The alternative discussion should provide decision makers with an understanding of the merits and disadvantages of these alternatives.

The analysis in **Section 4.0: Environmental Impact Analysis** of this EIR does not identify any significant impacts that would result from occupancy and use of the proposed Project. Temporary noise impacts during construction would be significant but would be less than significant with implementation of the identified mitigation measures.

While the proposed Project will not result in significant impacts, the City reviewed and identified alternatives for analysis to comply with the requirements of Section 15126.6 of the CEQA Guidelines.

5.4 ALTERNATIVES CONSIDERED BUT NOT EVALUATED IN DETAIL

Section 15126.6(c) of the CEQA Guidelines states that an EIR should briefly describe the rationale for selecting the alternatives to be discussed and the reasons for eliminating alternatives from detailed consideration in an EIR. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic Project objectives, infeasibility, or inability to avoid or substantially reduce significant environmental impacts. Two alternatives to the proposed Project were initially considered but determined to be infeasible for the reasons discussed below and are not evaluated in detail.

5.4.1 Alternative Site

An alternative site would involve the development of the Project at a different location. Given that neither the Project applicant nor the City of Glendale owns or controls any other property in the vicinity of the Project site, the ability of the applicant to find and purchase an alternative site on which to develop the Project is considered speculative. In addition, the development of an alternative site may not be able to meet the Project objectives. Lastly, the development of the same uses at a different location could result in long term and cumulative impacts related to incompatible land uses, and long term and cumulative transportation impacts related to VMT should an alternative site be located outside of a High Quality Transportation Area (HQTa). Thus, the selection of an alternative site would not avoid many of the significant impacts. As indicated in CEQA 15126.6(c), *“among factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”* The relocation of the Project to an alternative site would not be feasible because the ability of the applicant or the City to obtain an alternative site of the size necessary to accommodate the project is both difficult and speculative and because development on an alternative site would not necessarily avoid or substantially lessen any of the significant effects of the Project. For these reasons, this alternative is not evaluated in detail.

5.4.2 Design Alternative

The Design Alternative considers development of certain components of the Project below grade to reduce the height of Buildings 1 and 4, the two buildings proposed along San Fernando Road. Specifically, the parking structure in Building 1, and Flex Space, commissary, and kitchen in Building 4 would be built below grade to reduce the height of these buildings to 50 feet. The location of the buildings would not change, and the Project would contain approximately 406,318 SF of gross floor area.

This alternative would require excavation for subterranean construction on the western portion of the site that would disturb the geosynthetic clay liner (GCL) cap installed as part of the remediation of soil contamination on the site. While environmental remediation efforts reduced the amount of contamination to levels suitable for regulatory case closure for commercial and industrial land uses, this closure came with certain conditions. One of these conditions required, the installation and maintenance of the underground GCL cap, located on the west side of the Property, approximately 6 feet below the

ground surface and directly beneath portions of Buildings 1 and 3 and proximate to Building 4. The GCL cap was installed to prevent direct contact with residual soil contamination beneath it and agreement to not disturb the GCL cap is a requirement of the regulatory oversight agency.

The excavation required to accommodate these components of the Project below grade would result in potentially significant impacts related to hazards and hazardous materials by disturbing the GCL cap. In addition, temporary construction impacts would increase because of the need to excavate the western portion of the site and export this soil off the site. Depending on the amount of contamination in soil excavated and exported, this soil might have to be treated as hazardous waste for purposes of transport and disposal. While this alternative would accommodate the proposed studio and support facilities, it would result in addition impacts which may be significant. For these reasons, this alternative is not evaluated in detail.

5.5 ALTERNATIVES EVALUATED IN DETAIL

As discussed, no significant impacts from occupancy and use of the proposed Project were identified. Temporary noise impacts during construction would be significant but would be less than significant with implementation of the identified mitigation measures.

The City of Glendale identified several alternatives for analysis in this EIR to determine if these alternatives could avoid or substantially lessen the significant impacts of the Project and meet the basic Project objectives. Alternatives that would reduce the intensity or duration of construction activities would reduce temporary noise impacts during construction. In addition to the No Project Alternative, two additional alternatives were identified that would redevelop the Project site with different building configurations, which would reduce the intensity and duration of construction activities and temporary noise during construction while feasibly meeting most of the following objectives for the Project as identified in **Section 3.0: Project Description**:

1. Provide production space to assist the City of Glendale, the greater Los Angeles region and the state of California to retain entertainment jobs.
2. Contribute to the revitalization of manufacturing land along the San Fernando Road Corridor, a high-quality transit corridor, which will encourage public transit use.
3. Optimize development potential of a designated industrial mixed-use site.
4. Provide production office, soundstage and other production support uses on a single site which consolidation of related uses will reduce traffic.
5. Locate higher intensity production office uses away from residentially zoned land east of the site which separate prevent divisions in established communities.
6. Provide adequate surface parking opportunities which will minimize soil disturbance of soils containing residual contamination.
7. Maximize solar power production capacity of the site.

The following alternatives were identified for purposes of comparative analysis to provide additional information on ways the effects of the Project on the environment could be lessened or avoided:

- Alternative 1 - No Project/No Development
- Alternative 2 - Commercial Use Alternative
- Alternative 3 - Reduced Intensity

Section 15126.6 (e) (1) requires the evaluation of the specific alternative of “no project” to be evaluated along with its impact. In addition to the “no project” alternative, two additional alternatives were identified for purposes of comparative analysis to provide additional information on ways the effects of the Project on the environment could be lessened or avoided:

The Commercial Use would develop four-story commercial buildings on the site, as compared to the Project, which would include the development of six and four-story buildings along with one-story studio buildings. By not including any buildings taller than 4-story, the intensity and duration of construction activities and temporary noise during construction, which is the only significant impact identified for the Project before mitigation, would be reduced. Measures are identified to reduce temporary noise impacts during construction to a less than significant level.

The Reduced Intensity Alternative would include only entertainment production studio and related support space in buildings with a height of 50 feet or less. By not including the 4 and 6-story buildings included in the Project, this alternative would also reduce the duration of construction activities and temporary noise during construction.

The Commercial Use Alternative would meet the objectives of the Project to contribute to the revitalization of manufacturing land along the San Fernando Road Corridor, a high-quality transit corridor, which will encourage public transit use; optimize development potential of a designated industrial mixed-use site; provide adequate surface parking opportunities which will minimize soil disturbance of soils containing residual contamination and maximize solar power production capacity of the site.

The Reduced Intensity Alternative would redevelop the site with entertainment studio facilities and would meet the majority of the project objectives.

5.5.1 Alternative 1 – No Project / No Development Alternative

Consideration of the No Project/No Development Alternative is required by Section 15126(2)(4) of the CEQA Guidelines. As required by the CEQA Guidelines, the analysis must examine the impacts which could occur if the site is left in its present condition, as well as what may 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.

Under the No Project/No Development Alternative, the Project site would not be developed with the new proposed studio facilities and would remain as currently developed. The existing buildings on the site are currently used for storage and as entertainment production studios.

5.5.1.1 *Aesthetics*

As there would be no new development or changes to the existing buildings and site improvements with the No Project Alternative, there would be no changes to existing scenic vistas, public views, or the existing visual characteristics of the site. As the proposed Project would not result in any significant aesthetic impacts, the No Project Alternative would not avoid or substantially lessen any significant aesthetic impacts.

5.5.1.2 *Air Quality*

With the No Project Alternative, no emissions from construction activities would occur. As the proposed new studio facilities would not be developed, no emissions would be generated from operation of these new facilities. As the proposed Project would not result in any significant air quality impacts, the No Project Alternative may lessen new construction and operations related emissions but would not avoid or substantially lessen any significant air quality impacts.

5.5.1.3 *Cultural Resources*

There would be no changes to the existing buildings and site improvements with the No Project Alternative. As none of the buildings on the site have been determined to be historic resources, this alternative would not avoid or substantially lessen any significant impacts to historic resources. While there is no information indicating the Project site contains any subsurface cultural resources, construction of the Project will involve disturbance and grading activities which may inadvertently encounter subsurface resources, although this is not likely due to prior excavation activities and installation of the geosynthetic clay liner (GCL) at the site. Mitigation measures are identified to avoid the potential for significant impacts to any cultural resources that may be encountered during construction activities. The No Project Alternative would avoid this potential impact, but as this potential impact is not significant, this alternative would not avoid or substantially lessen a significant impact on cultural resources.

5.5.1.4 *Greenhouse Gas Emissions*

No change in greenhouse gas emissions (GHG) would occur with the No Project Alternative as construction of the new production studios would not occur and there would be no changes to the existing uses and associated activities. The GHG emissions associated with construction and operation of the proposed Project would be less than significant and, for this reason, the No Project Alternative would not avoid or substantially lessen any significant GHG impacts.

5.5.1.5 Hazards and Hazardous Materials

No changes to the existing buildings and site characteristics would occur with the No Project Alternative. Past uses resulted in the contamination of soil on the site which has been remediated to reduce contamination to levels acceptable for continued use of the site by commercial and industrial uses. One of the cleanup measures requires the installation and maintenance of a geosynthetic clay liner (GCL) on the west side of the Property, approximately 6 feet below the ground surface to prevent direct contact with residual soil contamination beneath. This GCL cap would be preserved by both the proposed Project and the No Project Alternative. For this reason, the No Project Alternative would not avoid or substantially lessen any significant impacts related to hazards and hazardous materials.

5.5.1.6 Land Use

No changes to the existing use of the site would occur with the No Project Alternative. The site is currently developed with industrial and commercial buildings being used for storage and as production studios. The proposed Project would development the site with new entertainment production studios and support facilities. Both the existing buildings and uses, as well as the proposed Project, would be consistent with the General Plan land use designation and IMU zoning for the site. Neither the Project nor the No Project Alternative would result in any significant land use impacts, and, for this reason, the No Project Alternative would not avoid or substantially lessen any significant impacts related to land use and planning.

5.5.1.7 Noise

No new construction would occur on the Project site with the No Project Alternative and the existing buildings and uses would remain. No temporary noise or groundborne vibration impacts from construction would occur. The Project, as proposed, would incrementally increase long-term, traffic-related, and operational noise levels. However, these operational noise impacts would not be significant. The No Project Alternative would therefore, avoid or substantially lessen any significant noise impacts that would result from the proposed Project.

5.5.1.8 Transportation

The Project as proposed would incrementally increase long-term, traffic levels and vehicle miles traveled (VMT). The No Project Alternative would not result in any increase in long-term, traffic levels and VMT. The Project would not result in any significant transportation impacts and the No Project Alternative would not avoid or lessen significant transportation impacts in comparison to the proposed Project for this reason.

5.5.2 Alternative 2 – Commercial Use Alternative

The Commercial Use Alternative would include demolition of the existing buildings and site improvements and develop four (4) new 3-story buildings with a height of 45 feet containing 588,100 square feet of space and a parking structure as shown in **Figure 5.1: Commercial Use Alternative**. Each of these buildings would contain 2 levels of office space over ground floor retail commercial space.

ALTERNATIVE SITE PLAN: RETAIL OVER PARKING WITH CENTRAL PARKING GARAGE

RETAIL AND OFFICE

Building A = 173,000 SF

Retail = 57,670 SF

Office = 115,330 SF

Building B = 166,600 SF

Retail = 55,530 SF

Office = 111,070 SF

Building C = 117,300 SF

Retail = 39,100 SF

Office = 78,200 SF

Building D = 131,200 SF

Retail = 43,730 SF

Office = 87,470 SF

Total Retail Area = 196,030 SF

Total Office Area = 392,070 SF

Total Building Area = 588,100 SF

PARKING (Gross)

5 level above grade parking structure over

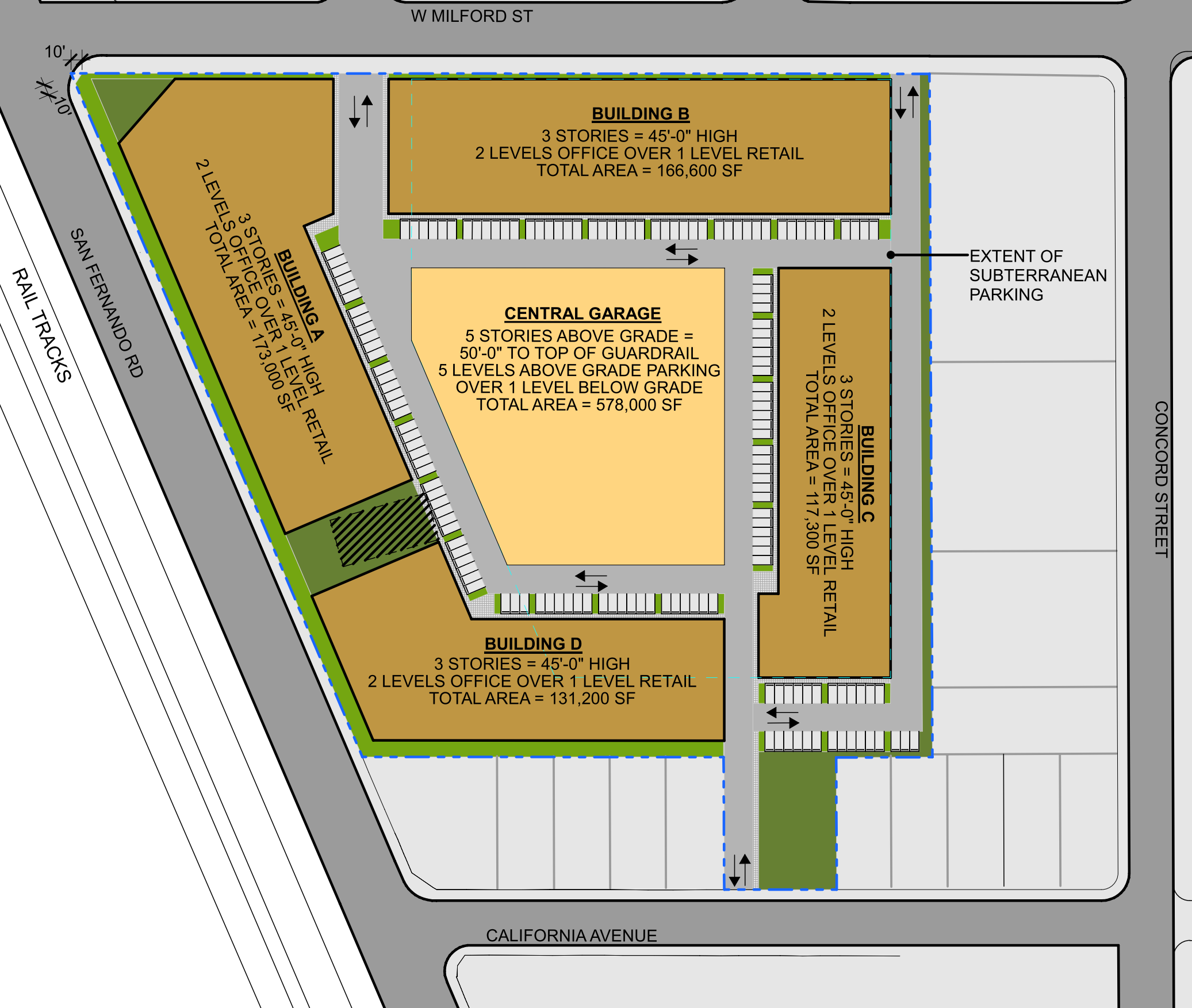
1 level subterranean parking

Total = 578,000 SF

SITE

Site Improvements + Driveways + Drive Aisles +

Setbacks + Surface Parking + Landscape = **148,000 SF**



SOURCE: RELATIVITY ARCHITECTS - 2022, Meridian Consultants - 2022

FIGURE 5.1

The total amount of office area would be 393,070 square feet and the total amount of retail area would be 196,030 square feet. Parking would be provided in a parking structure located centrally between the buildings with a height of 50 feet containing 5 levels of above grade parking and 1 level of subterranean parking. Access to the site would be provided by two driveways on W. Milford Street and one driveway on California Avenue.

5.5.2.1 Aesthetics

The heights of buildings in Alternative 2 would be 45 feet for the 3-story commercial buildings and 50 feet for the parking structure located in the central portion of the site. The proposed Project includes two studio buildings with a height of 50 feet on the eastern portion of the site and two buildings containing production office, production flex space, and parking with heights of 66 and 82 feet on the western portion of the site along San Fernando Road. The Project site does not contain any scenic resources and the proposed buildings will not have a substantial adverse effect on any publicly available scenic vistas or adversely affect the visual character of the site and the surrounding area. The Project would not result in any significant aesthetics impacts and the No Project Alternative would not avoid or lessen significant aesthetic impacts in comparison to the proposed Project for this reason.

5.5.2.2 Air Quality

Construction activities for the Commercial Use Alternative would be similar to those of the Project on a daily basis. As with the Project, the emissions resulting from Alternative 2 would not exceed daily thresholds recommended by the South Coast Air Quality Management District (SCAQMD). Impacts during construction would be less than significant for Alternative 2 without the implementation of mitigation.

The commercial uses included in this alternative would increase vehicle miles traveled (VMT) to a greater degree than the proposed Project. The results presented in **Table 5.0-2: Maximum Daily Operational Emissions** are compared to the SCAQMD-established operational significance thresholds.

TABLE 5.0-2 MAXIMUM DAILY OPERATIONAL EMISSIONS							
Source	VOC	NOx	CO	SO2	PM10	PM2.5	
	pounds/day						
Mobile	28	7	59	<1	<1	<1	
Area	22	<1	51	<1	<1	<1	
Total	50	8	110	<1	<1	<1	
Existing	7	2	12	0	0	0	
Net Total	43	6	98	<1	<1	<1	
SCAQMD Mass Daily Threshold	55	55	550	150	150	55	
Threshold exceeded?	No	No	No	No	No	No	

Source: See **Appendix A** for air quality emissions.

Notes: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

As shown in **Table 5.0-2**, this alternative would generate additional daily operational emissions of volatile organic compounds (VOC), oxides of nitrogen (NOX), carbon monoxide (CO), sulfur oxides (SOX), and particulate matter less than 10 microns in diameter (PM10) and 2.5 microns in diameter (PM2.5) when compared to the Project but would remain under SCAQMD significant thresholds.

5.5.2.3 Cultural Resources

Construction of the Commercial Use alternative would involve demolition, grading and excavation, and building construction activities similar to the proposed Project. This alternative would result in more ground-disturbing and excavation activities than the Project to construct one level of subterranean parking in the center of the site, which could increase the potential to encounter subsurface cultural resources that may be present in this portion of the site. Monitoring of excavation and grading activities would mitigate this potential impact. As such, Alternative 2 would not avoid or substantially lessen a significant cultural resources impact. Neither the proposed Project nor this alternative would result in any significant impacts to cultural resources.

5.5.2.4 Greenhouse Gas Emissions

The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Nor have SCAQMD, OPR, CARB, or any other State or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. CEQA Guidelines Section 15064.4 states that using a model or methodology to quantify greenhouse gas emissions and/or relying on a qualitative analysis or performance-based standards is suitable for analyzing GHG emissions. This alternative would generate a similar amount of GHG emissions during construction as the Project. Construction activity impacts are relatively short in duration, so they contribute a relatively small portion of the total lifetime GHG emissions of a project.

As shown in **Table 5.0-3: Operational GHG Emissions**, the Commercial Use Alternative is estimated to generate a net total of 2,144 MTCO₂e per year, which is greater than the 1,571 MTCO₂e per year that would be generated by the proposed Project.

TABLE 5.0-3 OPERATIONAL GHG EMISSIONS	
Source	Unmitigated MTCO ₂ e per year
Mobile	251
Area	24
Energy	2,779
Water	242
Waste	178
Refrigerants	<1
Total	3,475
Existing	1,331
Net Total	2,144

Source: See **Appendix A** for greenhouse gas emissions.

5.5.2.5 Hazards and Hazardous Materials

The LARWQCB and OEHA concluded the Project site was in a condition after completion of remediation activities to receive a No Further Action (NFA) determination regarding soil and groundwater contamination on the site. The NFA determination required the recording of an environmental land use covenant (LUC) limiting the uses on site to commercial/industrial land uses, maintenance of the previously installed GCL cap, and that groundwater on the Project site not be extracted for drinking water use unless adequate treatment as approved by the LARWQCB is provided.

Both this alternative and the Project would require the disturbance of soils for the development of the Project. This alternative would include excavation in the central portion of the site to accommodate a one level of subterranean parking. This would not result in any disturbance of the GCL cap, which is located on the western portion of the site. Neither the proposed Project nor this alternative would result in any significant impacts related to hazards and hazardous materials.

5.5.2.6 Land Use and Planning

This alternative would include development of four (4) new commercial buildings containing 393,070 square feet of office area and 196,030 square feet retail for a total of 588,100 square feet of space and a parking structure. The four (4) new commercial buildings would be 3-stories with a height of 45 feet with each building containing 2 levels of office space over ground floor retail commercial space. The parking structure will have 5 levels of above grade parking and 1 level of subterranean level and have a height of 50 feet. The building heights under Alternative 2 would comply with City of Glendale Municipal Code, which restricts buildings to a 50-foot height maximum within the IMU zone. The uses included in this alternative and the proposed Project are allowed in the IMU zone.

This alternative would not conflict with the goals, objectives, or policies of the Glendale General Plan or Glendale Municipal Code (GMC). Neither the proposed Project nor this alternative would result in any significant land use and planning impacts.

5.5.2.7 Noise

Development activities associated with the Project and this alternative during construction, such as earthmoving, and construction of on-site infrastructure would involve the use of heavy equipment, such as backhoe, dozer, loaders, concrete mixers, forklifts, and cranes that would generate temporary noise during construction that would represent significant noise impacts. The Commercial Use Alternative would reduce the duration of construction, which would lessen the temporary noise levels during construction. While reduced, temporary noise impacts during construction would remain significant with this alternative. Measures are identified to mitigate temporary noise impacts during construction to less than significant for the Project would also reduce the temporary noise impacts during construction for this alternative to less than significant.

Long-term operational noise generated by traffic under this alternative would increase compared to the Project. The Project would not result in any substantial increase in roadway noise levels. This alternative

would result in an increase of noise levels on roadway segments adjacent to the Project site because of the increase in the amount of traffic generated by this alternative. For this reason, this alternative would not avoid nor substantially lessen a significant noise impact.

5.5.2.8 *Transportation*

This alternative would generate approximately 10,658 daily trips.¹

The proposed Project would generate approximately 3,012 daily trips. Alternative 2 would increase the number of operational average daily trips to and from the Project site relative to the proposed Project. As such, operational transportation impacts under this alternative would be greater than those experienced under the Project. Therefore, Alternative 2 would not avoid nor substantially lessen transportation impacts.

5.5.3 *Alternative 3 – Reduced Intensity*

The Reduced Intensity Alternative considers development of the entire 9.74-acre site with a reduced intensity of entertainment studio buildings. This alternative would include demolition of existing buildings, site improvements, and develop new studio facilities with a parking structure on the site, as shown in **Figure 5.2: Reduced Intensity Alternative**. This alternative presents another configuration for the proposed studio and flex space and maintains the studios in the center of the site for efficiency. This alternative does not include any production office space. The flex space would be located along the eastern edge of the site. This alternative provides the parking in separate 3 level parking structure on San Fernando Road with the support and mill space on the corner of San Fernando Road and Milford. This alternative would include 30,100 square feet of support and mill uses and 225,060 square feet of studio uses, for a total of 255,160 square feet. The support uses include 22,008 square feet of support/storage and mill space on the northwest corner of the site and 8,092 square feet of support space located along the eastern portion of the site. The studio uses include eight 24,008 square foot stages located in the central portions of the site and three 15,628 square foot flex stages. Parking would be provided in a three-level above ground parking structure along San Fernando Road and would include 10,000 square feet of on the first floor of the parking structure for a Base Camp, totaling 104,586 square feet. The buildings containing the flex stage space and support space the uses located along the eastern portion of the site would have a height of 50 feet.

5.5.3.1 *Aesthetics*

With this alternative, the height of structures along San Fernando Road would be reduced by 40 feet in comparison to the proposed Project while the buildings located along eastern edge of the site would have height of 50 feet. The 25-foot-tall building on the corner of San Fernando Road and Milford Street would be retained and used for support/storage and mill uses. The parking structure along San Fernando Road would have a height of 40 feet.

¹ See Appendix E for Trip Information.

SITE PLAN

Support
Support / Storage & Mill = 22,008 sf
Support 01 = 4,046 sf
Support 02 = 4,046 sf
Total = 30,100 sf

Studios
Stage 1 + 2 = 41,072 sf
Stage 3 +4 = 41,072 sf
Stage 5 + 6 = 48,016 sf
Stage 7 +8 = 48,016 sf
Flex/ unreal stage 9 = 15,628 sf Flex/ unreal stage
10 = 15,628 sf Flex/ unreal stage 11 = 15,628 sf
Total = 225,060 sf

Building Grand Total = 255,160 sf

Parking
3 Story Parking Garage = 94,586 sf
Base Camp = 10,000 sf
Total = 104,586 sf

Site
Driveways, Drive
Aisles + Setbacks = 11,957 sf



SOURCE: RELATIVITY ARCHTECTS - 2022, Meridian Consultants - 2022

FIGURE 5.2

The height of the buildings containing eight studio stages in the central portion of the site would be 50 feet. The buildings containing flex stages and support space uses located along the eastern portion of the site would have a height of 50 feet.

The Project includes buildings with heights of 82 and 66 feet along San Fernando Road and the southwestern edge of the site with the sound stage buildings located in the central portion of the site and along the eastern edge of the site having heights of 50 feet. The maximum permitted height in the IMU zone is 50 feet. Both the Project and this alternative would require the approval of a variance to allow building with heights greater than 50 feet. With the Project, the taller buildings would be located along San Fernando Road while this alternative includes buildings with a height of 50 feet along the eastern edge of the site adjacent to residential uses. The impacts of this alternative on the visual character of the area would not be greater in this regard compared to the Project.

5.5.3.2 Air Quality

Construction activities would be similar with this alternative and the proposed Project on a daily basis. As with the Project, the increase in emissions resulting from construction of this alternative would not exceed daily thresholds recommended by the South Coast Air Quality Management District (SCAQMD).

The estimated operational emissions for this alternative presented in **Table 5.0-4: Maximum Daily Operational Emissions**, below, are compared to the SCAQMD-established operational significance thresholds.

TABLE 5.0-4 MAXIMUM DAILY OPERATIONAL EMISSIONS						
Source	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
	pounds/day					
Mobile	4	1	8	<1	<1	<1
Area	8	<1	16	<1	<1	<1
Total	12	1	24	<1	<1	<1
Existing	7	2	12	<1	<1	<1
Net Total	5	(1)	12	<1	<1	<1
SCAQMD Mass Daily Threshold	55	55	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Source: See **Appendix A** for air quality emissions.

Notes: CO = carbon monoxide; NO_x = nitrogen oxide; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns.

As shown in **Table 5.0-4**, this alternative would generate daily operational emissions of volatile organic compounds (VOC), oxides of nitrogen (NOX), carbon monoxide (CO), sulfur oxides (SOX), and particulate matter less than 10 microns in diameter (PM₁₀) and 2.5 microns in diameter (PM_{2.5}) below the thresholds of significance recommended by the SCAQMD.

Implementation of the Project would not expose sensitive receptors near roadway intersections to substantial pollutant concentrations. This alternative would generate a lower amount of vehicular traffic to and from the Project site during the AM and PM peak-hour periods as the proposed Project. The Project and this alternative would result in similar impacts with regard to exposure to sensitive receptors to pollutant concentrations. Both this alternative and the Project generate similar levels of emissions, which would be less than significant.

5.5.3.3 Cultural Resources

Construction of this alternative would involve demolition, grading and excavation, and building construction activities similar to those associated with the proposed Project. Impacts related to cultural resources would be less than significant with both this alternative and the proposed Project.

5.5.3.4 Greenhouse Gas Emissions

As shown in Table 5.0-5: Operational GHG Emissions, below, Alternative 3 is forecasted to generate a net total of 699 MTCO₂e per year which is less than the 1,571 MTCO₂e per year that would be generated by the proposed Project.

TABLE 5.0-5 OPERATIONAL GHG EMISSIONS	
Source	Unmitigated MTCO ₂ e per year
Mobile	33
Area	8
Energy	1,711
Water	170
Waste	99
Refrigerants	11
Total	2,030
Existing	1,331
Net Total	699

Source: See Appendix A for greenhouse gas emissions.

The GHG emissions generated by the proposed Project and this alternative would not result in significant impacts.

5.5.3.5 Hazards and Hazardous Materials

The LARWQCB and OEHA concluded the Project site was in a condition after completion of remediation activities to receive a No Further Action (NFA) determination with regard to soil and groundwater contamination on the site. The NFA determination required the recording of an environmental land use covenant (LUC) limiting the uses on site to commercial/industrial land uses, maintenance of the

previously installed GCL cap, and that groundwater on the Project site not be extracted for drinking water use unless adequate treatment as approved by the LARWQCB is provided.

Both this alternative and the Project would require the disturbance of soils for the development of the Project. Neither the proposed Project nor this alternative would result in any significant impacts related to hazards and hazardous materials because excavation associated with either the proposed Project or this alternative would not occur in the site area subject to the GCL cap and NFA.

5.5.3.6 Land Use and Planning

This alternative would include 30,100 square feet of support and mill uses and 225,060 square feet of studio uses, for a total of 255,160 square feet and includes a 3-story parking structure with 10,000 square feet of on the first floor for a base camp. The buildings containing the flex stages, support space, and office uses located along the eastern portion of the site would have a height of 50 feet. All buildings would comply with City of Glendale Municipal Code 50-foot height maximum within the IMU zone. The land uses under this alternative would not change.

This alternative would not conflict with the goals, objectives, or policies of the Glendale General Plan or Glendale Municipal Code (GMC). Neither the proposed Project nor this alternative would result in any significant land use and planning impacts.

5.5.3.7 Noise

Development activities associated with the Project and Alternative 3 during construction, such as earthmoving, and construction of on-site infrastructure would involve the use of heavy equipment, such as backhoe, dozer, loaders, concrete mixers, forklifts, and cranes. Under either the Project or Alternative 3, these construction equipment sources would cause significant temporary noise impacts.

The Reduced Intensity Alternative would reduce the duration of construction, which would lessen the temporary noise levels during construction. While reduced, temporary noise impacts during construction would remain significant with this alternative. Measures are identified to mitigate temporary noise impacts during construction to less than significant for the Project would also reduce the temporary noise impacts during construction for this alternative to less than significant.

Long-term operational noise generated by traffic under this alternative would increase compared to the Project. The Project would not result in any substantial increase in roadway noise levels. This alternative would result in a decrease in the noise levels on roadway segments adjacent to the Project site because of the increase in the amount of traffic generated by this alternative. For this reason, this alternative would not avoid nor substantially lessen a significant noise impact.

5.5.3.8 *Transportation*

This alternative would generate approximately 1,382 trips, less than the 3,012 daily trips generated by the Project.²

Neither this alternative nor the proposed Project would result in significant transportation impacts.

5.5.4 *Environmentally Superior Alternative*

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify an environmentally superior alternative among those evaluated in an EIR. Of the alternatives considered in this section, the No Project/No Development Alternative is environmentally superior to the other alternatives because this alternative would avoid the significant and unavoidable impacts identified for the Project.

According to the CEQA Guidelines, if the No Project/No Development Alternative is identified as the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Of the other alternatives considered, the No Project/No Development Alternative would be considered environmentally superior, as it would avoid all impacts of the Project as proposed. However, no significant impacts would be avoided as all the impacts of the Project are less than significant. For this reason, no significant impacts would be avoided or substantially lessened by the No Project Alternative.

Of the other alternatives evaluated, the Commercial Use Alternative would include the development of four-story buildings on the site, as compared to the Project, which would include the development of a six-story building on the site. This change in the configuration of new buildings on the site would reduce the duration of construction and associated temporary noise during construction when compared to the Project, but not to a less than significant level. Temporary noise during construction is the only significant impact identified for the Project without mitigation. Measures identified to reduce temporary noise impacts during construction would reduce these impacts to less than significant for both the Project and this alternative. Because this alternative would include a greater total amount of development and this development would be for commercial uses, other impacts, such as air quality, greenhouse gas and transportation impacts, would be greater with this alternative than with the Project.

The Reduced Intensity Alternative would incrementally reduce air quality, greenhouse gas and transportation impacts when compared to the proposed Project but would not include the production office space included in the proposed Project. This alternative also would also involve less development on the site, which would reduce the duration of construction and associated temporary noise during construction when compared to the Project, but not to a less than significant level. Temporary noise during construction is the only significant impact identified for the Project without mitigation. Measures identified to reduce temporary noise impacts during construction would reduce these impacts to less than significant for both the Project and this alternative. Because the Reduced Intensity Alternative

² See Appendix E for Trip Information.

would reduce some impacts, it is considered the environmentally superior alternative. The Reduced Intensity Alternative would not include the amount of soundstage and production space, or any of the production office space included in the proposed Project and for this reason, would not meet the project objectives to the same degree as the proposed Project. The Reduced Intensity Alternative would not optimize the development potential of a designated industrial mixed-use site and also would not consolidate production office, soundstage and other production support uses on a single site. Consolidating these complementary studio uses on a single site will reduce traffic that would be generated if these studio uses are on separate sites.

6.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

6.1 INTRODUCTION

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines requires an EIR to briefly describe any possible significant effects that were determined not to be significant and were, therefore, not discussed in detail in the EIR. In accordance with Section 15063(a) of the CEQA Guidelines, the City conducted preliminary analysis of the potential environmental effects of the Project by preparing an Initial Study. The City determined through the preliminary analysis in the Initial Study that the Project does not have the potential to result in significant impacts related to the following environmental topics: Agricultural and Forestry Resources, Biological Resources, Energy, Geology and Soils, Hydrology and Water Quality, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. A summary of the preliminary analysis for these topics is provided below:

6.2 AGRICULTURE AND FORESTRY RESOURCES

Would the project convert Prime Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The Project site and surrounding area are characterized by features typical of the urban landscape and include industrial, commercial, and residential uses. No Farmland, agricultural land, or related operations are found in the area or on the Project site. Implementation of the Project would not involve changes that could result in conversion of Farmland to non-agricultural uses because there are no agricultural uses or Farmland in proximity to the Project site. Therefore, there would be no conversion of Prime Farmland, Unique Farmland, or Farmlands of Statewide Importance to non-agricultural use. No impact to agricultural resources would result.

Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The Project site and surrounding area are currently zoned for urban development. No portion of the Project site is zoned for agricultural uses, nor do any such uses exist within the city under the current General Plan and zoning. Specifically, the Project site is currently zoned Industrial/ Mixed Use (IMU), which is intended for urban land uses. Therefore, no conflict with zoning for agricultural uses or a Williamson Act contract would occur, and no impact to agricultural resources would result.

Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The Project site and surrounding area are currently zoned for urban development. There is no existing zoning for forestland or timberland in the City of Glendale. Specifically, the Project site is currently zoned Industrial/ Mixed Use (IMU), which is intended for urban land uses. No forestland exists within the

City of Glendale. Therefore, no conflict with zoning for forest land, timberland, or timberland zoned Timberland Production would occur, and no impact to forestry resources would result.

Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The Project site contains existing commercial and industrial buildings, and surface parking. There is no existing zoning of forestland in the City of Glendale and no forestland exists within the City of Glendale. As such, the Project would not result in the loss of forest land, nor result in the conversion of forest land to non-forest use. No impacts would occur.

Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

There is no farmland or forest land in the vicinity of the Project site, as the area is highly urbanized and developed with commercial uses. No farmland or forest land would be converted to non-agricultural or non-forest uses under the Project. No impact would occur.

6.3 AIR QUALITY

Would the project create objectionable odors affecting a substantial number of people?

During Project construction, certain pieces of construction equipment could emit odors associated with exhaust. However, odors emitted from certain pieces of construction equipment would dissipate quickly and be short-term in duration. Odors resulting from spray coating applications of paint and related materials during construction would be regulated by SCAQMD Rule 481. This rule imposes equipment and operational restrictions during construction for all spray painting and spray coating operations. Compliance with SCAQMD rules and permit requirements would ensure that no objectionable odors are created during construction. Therefore, impacts from odors during construction would be less than significant.

The Project would develop additional urban uses on the Project site, similar to uses already existing in the surrounding area, and it does not include uses that would generate significant objectionable odors. Operation of the Project would involve the disposal of refuse. This refuse would be disposed of in outdoor trash receptacles and could generate occasional odors, pending regular collection and ultimate disposal into a sanitary landfill. However, Project-generated refuse would be disposed into appropriate garbage collection containers, which would be covered and enclosed as required by the City of Glendale. Additionally, garbage collection containers would be emptied on a regular basis in compliance with City of Glendale regulations for the collection of solid waste. As a result, impacts from odors would remain less than significant.

6.4 BIOLOGICAL RESOURCES

Would the project 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 Game or U.S. Fish and Wildlife Service?

The majority of the local area has been developed or landscaped and supports largely non-native plant communities and species. Therefore, only a limited number of plant species that flourish in urban environments, none of which are considered Rare or Endangered, can be found on the Project site. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist on the Project site nor within the surrounding area. No impact would occur.

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

As identified in the City's General Plan Open Space and Conservation Element, the open space within the City includes five recognizable plant communities, including chaparral, southern oak woodland, southern oak riparian woodland, coastal sage scrub, and alluvial scrub.¹ The Project site and the surrounding area are completely developed and disturbed. No riparian habitat or sensitive natural community is located in the surrounding area or on the Project site. Therefore, no impact would occur.

Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The Project site is neither in proximity to, nor does it contain, wetland habitat or a blue-line stream. The nearest wetland resources include the Verdugo Wash located approximately a quarter mile north of the Project site and the Los Angeles River is located approximately a quarter mile west of the Project site. These waterways would not intersect the Project site. Therefore, Project implementation would not have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (CWA), through direct removal, filling, hydrological interruption, or other means. No impact would occur.

Would the project 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?

The local area consists of established, highly urbanized, and developed properties. The Project site and the immediate area are almost entirely paved, or otherwise developed, and do not contain native resident, migratory species, or native nursery sites. As the Project site is located in an urban area of the City, the proposed Project would not interfere substantially with the movement of any native resident,

¹ City of Glendale General Plan, Open Space and Conservation Element, <https://www.glendaleca.gov/government/departments/community-development/planning/city-wide-plans/open-space-and-conservation-element>. Accessed August 2021.

migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, nor impede the use of native wildlife nursery sites. In addition, there are no wildlife migration corridors in the Project area. No impact would occur.

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Glendale Municipal Code, Chapter 12.44 Indigenous Trees, contains guidelines for the protection and removal of indigenous trees. These trees are defined as any Valley oak, California live oak, Scrub Oak, Mesa Oak, California bay, and California sycamore, which measures 6 inches or more in diameter breast height (DBH). Furthermore, the Glendale Municipal Code, Chapter 12.40 City Street Trees, contains guidelines for the preservation and protection of city street trees.² No native or indigenous trees are located on the Project site and implementation of the Project would not conflict with any local policies or ordinances protecting biological resources. The proposed Project would also comply with the Glendale Municipal Code, Chapter 12.40, for street trees. Thus, no impact would occur.

Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The Project site and the surrounding area have been developed and heavily affected by past activities. No adopted Habitat Conservation Plan or Natural Conservation Plan exists for the Project site or immediate area.³ Consequently, implementation of the Project would not conflict with the provisions of any adopted conservation plan. Thus, no impact would occur.

6.5 ENERGY

Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The proposed Project would meet all applicable energy conservation standards. As a production studio and supporting uses project, the proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction. Impacts would be less than significant.

Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

The proposed Project would meet all applicable energy conservation standards. As a production studio and supporting uses project, the proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

² City of Glendale Municipal Code, Ch 12.40.

³ California Department of Fish and Wildlife (CDFS) "BiosViewer," <https://wildlife.ca.gov/Data/BIOS>. Accessed August 2021.

6.6 GEOLOGY AND SOILS

Would the project expose people or structures to 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?

The Project site is not located within an established Alquist-Priolo Earthquake Fault Zone or designated Fault-Rupture Hazard Zone for surface fault rupture hazards.⁴ The nearest Fault-Rupture Hazard Zone for active faults with evidence of surface rupture is the York Boulevard Fault, which is located approximately 1 mile south of the Project site. Based on the available geologic data, active or potentially active faults with the potential for surface fault rupture are not known to be located directly beneath, or projecting toward, the Project site.⁵ Therefore, the potential for surface rupture as a result of fault plane displacement during the design life of the Project is less than significant.

Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

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, or potentially active, in the Southern California area. 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. Compliance with applicable building codes, including the International Building Code (IBC) and California Building Code (CBC), would minimize structural damage to buildings and ensure safety in the event of a moderate or major earthquake. Therefore, impacts related to strong seismic ground shaking would be less than significant.

Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction is a seismic phenomenon in which loose, saturated, fine-grained granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs as a result of three general conditions: (1) shallow groundwater; (2) low-density, fine, clean sandy soils; and (3) high-intensity ground motion. Studies indicate that saturated loose and medium dense, near-surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential.

According to the City's General Plan Safety Element, the Project site is not located within a mapped liquefaction hazard zone.⁶ According to the Natural Resources Conservation Service Web Soil Survey, the

4 City of Glendale, *General Plan Safety Element*, 2003, Plate P-1, <https://www.glendaleca.gov/home/showpublisheddocument/4551/635242148319870000>. Accessed September 2022.

5 California Department of Conservation, California Geological Survey, "Earthquake Zones of Required Investigation," <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed September 2022.

6 City of Glendale, *General Plan Safety Element*, 2003, <https://www.glendaleca.gov/home/showpublisheddocument/4551/635242148319870000>. Accessed September 2022.

Project site consists primarily of Urban land-Tujunga-Typic Xerorthents, sandy substratum complex, and 0 to 2 percent slopes.⁷ Soils within the Project site are generally sandy soils found within alluvial fans and flood plains. The potential for hazards, such as liquefaction, are considered low. The proposed Project would comply with the California Building Code to avoid potential impacts related to seismic-related ground failure, including liquefaction. Therefore, impacts related to liquefaction would be less than significant.

Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The topography of the Project site and its immediate built environment is relatively flat and, thus, devoid of any distinctive landforms. There are neither known landslides near the Project site nor is the Project site in the path of any known or potential landslides. Therefore, impacts related to landslides would be less than significant.

Would the project result in substantial soil erosion or the loss of topsoil?

Construction activity associated with Project development may result in wind- and water-driven erosion of soils due to grading activities, if soil is stockpiled or exposed during construction. However, this impact is considered short-term in nature since the site would be covered with pavement and landscaping upon completion of construction activity. Further, as part of the Project, the applicant would be required to adhere to conditions under the National Pollutant Discharge Elimination System (NPDES) Permit set forth by the Regional Water Quality Control Board (RWQCB), and prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) to be administered throughout Project construction, pursuant to Glendale Municipal Code (GMC) Section 13.42.060. The SWPPP would incorporate Best Management Practices (BMPs) to ensure that potential water quality impacts from water driven erosion during construction would be reduced to less than significant. In addition, the applicant would be required to adhere to SCAQMD Rule 403—Fugitive Dust, which would further reduce the impact related to soil erosion to less than significant.

Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The relatively flat topography of the Project site precludes both stability problems and the potential for lurching, which is earth movement at right angles to a cliff or steep slope during ground shaking. As previously discussed, the potential for hazards, such as landslides and liquefaction, is considered low. Liquefaction may also cause lateral spreading. For lateral spreading to occur, the liquefiable zone must be continuous, unconstrained laterally, and free to move along gently sloping ground toward an unconfined area. However, if lateral containment is present for those zones, then no significant risk of

⁷ USDA, Natural Resources Conservation, "Web Soil Survey," <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed August 2021.

lateral spreading will be present. Since the liquefaction potential at the Project site is low, earthquake-induced lateral spreading is not considered to be a significant seismic hazard at the site.

Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface that can result in a gradual lowering of the ground level. No regional subsidence as a result of groundwater pumping has been reported in Glendale area. Therefore, the potential for ground collapse and other adverse effects, due to subsidence, to occur on the Project site is considered low.

In order to minimize damage due to geologic hazards, Project design and construction would comply with applicable building codes, including the IBC and CBC, and incorporate the recommendations presented in the soils engineering report prepared for the Project site. Therefore, impacts related to exposure to hazards including landslides, lateral spreading, subsidence, liquefaction, and collapse would be less than significant.

Would the project be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life or property?

The soils underlying the Project site and surrounding area are considered to have a low expansion potential. According to the Natural Resources Conservation Service Web Soil Survey, the Project site consists primarily of Urban land-Tujunga-Typic Xerorthents, sandy substratum complex, and 0 to 2 percent slopes.⁸ Soils within the Project site are generally sandy soils found within alluvial fans and flood plains. These soils are typically in the low to moderately low range for shrink-swell (e.g., expansion). Therefore, impacts related to expansive soil would be less than significant.

Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Septic tanks or alternative waste disposal systems would not be used in the Project. The Project would connect to and use the existing sewage conveyance system. The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, where sewers are not available for the disposal of wastewater. Therefore, no impact would occur.

Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project site is completely underlain with older Quaternary soil and paleontologically-sensitive rock formations may be present at relatively shallow depths that could be encountered during excavation activities. As the Project would include import/export of approximately 20,000 cy of soil, there is a possibility that during earthmoving activities, a previously unknown paleontological resource could be identified, and impacts would be potentially significant.

8 USDA, Natural Resources Conservation, Web Soil Survey, <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed August 2021.

Mitigation would include a qualified paleontologist observing grading activities in excavations that may impact older Quaternary deposits or the marine Pliocene Fernando Formation in order to salvage and catalogue fossils. The Paleontologist shall establish procedures for paleontological resources surveillance and would establish, in cooperation with the contractor, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of the fossils.

Impacts would be less than significant with mitigation.

6.7 HYDROLOGY AND WATER QUALITY

Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Grading activities associated with construction will temporarily increase the amount of suspended solids from surface flows derived from the Project site during a concurrent storm event due to sheet erosion of exposed soil. In addition, during excavation and grading, contaminated soils may be exposed and/or disturbed; this could impact surface water quality through contact during storm events. Contamination material that may come in contact with surface water could include lead, polychlorinated biphenyls, and petroleum hydrocarbons. The applicant is required to satisfy all applicable requirements of the NPDES Program and Chapter 13.29, Storm Water and Urban Runoff Pollution Prevention Control, and Standard Urban Storm Water Mitigation Plan (SUSMP) of the Glendale Municipal Code, at the time of Project construction to the satisfaction of the City of Glendale Public Works Department. These requirements include preparation of a SWPPP containing structural treatment and source control measures appropriate and applicable to the Project. The SWPPP will incorporate BMPs by requiring controls of pollutant discharges that utilize best available technology economically achievable (BAT) and best conventional pollutant control technology (BCT) to reduce pollutants. Examples of BAT/BCT that may be implemented during site grading and construction could include straw hay bales, straw bale inlet filters, filter barriers, and silt fences. Preparation of the SWPPP is incorporated as a Project design feature. Implementation of BMPs would ensure that Los Angeles RWQCB water quality standards are met during Project construction activities. Therefore, no impact during construction would occur.

Following buildout of the Project site, the Project would increase the intensity of activities on the site and would likely result in an increase in pollutant sources. Common concerns include the potential deposition of pollutants generated by motor vehicle use on Project roadways and parking areas, and the maintenance and operation of landscaped areas. Stormwater quality is generally affected by the length of time since the last rainfall, rainfall intensity, urban uses of the area, and quantity of transported sediment. Typical urban water quality pollutants usually result from motor vehicle operations, oil and grease residues, fertilizer/pesticide uses, human/animal littering, careless material storage and handling, and poor property management. The majority of pollutant loads are usually washed away during the first flush of the storm occurring after the dry-season period.

These pollutants have the potential to degrade water quality. However, the quality of runoff from the Project site would be subject to Section 402(p) of the CWA under the NPDES program. Under the NPDES Municipal Permit No. CAS004001, development projects have responsibilities to ensure that their pollutant loads do not exceed total maximum daily loads for downstream receiving waters.

Development projects are required by the Glendale Municipal Code to submit and then implement a SUSMP containing design features and BMPs appropriate and applicable to the Project. The purpose of the SUSMP is to reduce post-construction pollutants in stormwater discharges. One of the requirements of the SUSMP is that the Project retain on-site water runoff from the first 0.75 inches of a 24-hour rain event. Prior to issuance of any grading or building permits, the City must approve the SUSMP. Preparation of the SUSMP is incorporated as a Project design feature. Potential water quality impacts of the Project would be less than significant through the preparation of the SUSMP and implementation of the BMPs, as specified in the NPDES Permit. Therefore, impacts related to water quality and stormwater discharge would be less than significant.

Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Currently, the City utilizes water from Glendale Water and Power (GWP), which relies on some local groundwater supplies. Consequently, implementation of the Project would result in additional development that could indirectly require an increased use of groundwater through the provision of potable water by GWP. Groundwater to be consumed within Glendale would be utilized according to current plans and projections for GWP groundwater supplies. As a result, Project implementation would not substantially deplete groundwater supplies. In addition, the groundwater basins are governed by City of Los Angeles v. City of San Fernando, et al., and the Basin Watermaster is vested with the responsibility to monitor and account for any groundwater extraction within the vicinity of the Project, with sustainability as a goal. Further, the Project would not extract groundwater on an operational basis.

The Project site is currently developed with 100 percent impervious surfaces and, therefore, does not serve as a primary area of groundwater recharge within the San Fernando or Verdugo Basins, which are both located within the City of Glendale. In addition, impervious surfaces would remain with implementation of the Project. Consequently, impacts related to groundwater extraction and recharge are considered less than significant.

Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner which would:

- ***result in substantial erosion or siltation on or off site;***
- ***substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;***
- ***create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or***
- ***impede or redirect flood flows?***

The Project site is served by an existing storm water collection and conveyance system. Since the Project site is currently developed with 100 percent impervious surfaces, the quantity of runoff would not change substantially with Project development. As part of the SUSMP, the Project would be required to retain the first 0.75 inches of rainfall during a 24-hour rain event. All subsequent runoffs would continue to be conveyed via streets and gutters to storm drain locations around the Project site. As a result, the Project would not require any substantial changes to the existing drainage pattern of the site or the area, nor would it affect the capacity of the existing storm drain system. Furthermore, as discussed above, the SWPPP would incorporate BMPs by requiring controls of pollutant discharges that utilize BAT and BCT to reduce pollutants. In addition, in accordance with Chapter 13.42, Storm Water and Urban Runoff Pollution Prevention Control and Standard Urban Storm Water Mitigation Plan of the Glendale Municipal Code, a SUSMP containing design features, and BMPs to reduce post-construction pollutants in storm water discharges, would be submitted and implemented as part of the Project. Consequently, impacts are considered to be less than significant.

The Project site is located in a Federal Emergency Management Agency (FEMA) designated flood Zone X, meaning that it is in an area of minimal flood hazard and the Project site is not located within a 100-year flood zone.⁹ As such, the Project would not place housing within a 100-year flood hazard area nor result in structures being constructed that would impede or redirect flood flows.¹⁰ The Project would not be subject to flooding and would not impede or redirect flood flows. Therefore, no impact would occur.

Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The Project site is not within a coastal area and is not located near any large enclosed or semi-enclosed bodies of water. Therefore, tsunamis (seismic sea waves) are not considered a significant hazard at the site. In addition, the site is not located downslope of any large bodies of water that could adversely affect the site in the event of earthquake-induced seiches, which are wave oscillations in an enclosed or semi-enclosed body of water. The Project would not be located within designated tsunami or seiche zones. The Project would not be located within a 100-year flood hazard area. Therefore, no impact

⁹ Federal Emergency Management Administration (FEMA), "Flood Map Service Center," <https://www.fema.gov/flood-maps/national-flood-hazard-layer>. Accessed September 2021.

¹⁰ City of Glendale, *General Plan Safety Element*, 2003, <https://www.glendaleca.gov/home/showpublisheddocument/4551/635242148319870000>. Accessed September 2022.

related the release of pollutants due to Project inundation by a flood hazard, tsunami, or seiche would result from implementation of the Project.

Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The Project would comply with all provisions of the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the LARWQCB, including the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. The proposed Project would also comply with applicable NPDES and City requirements, which would include the use of BMPs during construction of the proposed Project, as detailed in a SWPPP and in the City's LID ordinance. Impacts from construction and operation of the proposed Project would be less than significant.

6.8 MINERAL RESOURCES

Would the project 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?

The Project site and surrounding area are characterized by features typical of the urban landscape and include commercial, industrial, and residential uses. The Project site is not within an oil drilling district, State-designated oil field, or surface mining district.¹¹ The Project site is not located within a Mineral Resource Zone 2 (MRZ-2) Area. As such, the implementation of the Project would not result in the loss of availability of a known mineral resource. Therefore, no impacts would occur.

Would the project 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?

The Project site and surrounding area are characterized by features typical of the urban landscape and include commercial, industrial, and residential uses. The Project site is not within an oil drilling district, State-designated oil field, or surface mining district.¹² The Project site is not located within a Mineral Resource Zone 2 (MRZ-2) Area. The Project site is not designated as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, no impacts would occur.

11 City of Glendale General Plan, Open Space and Conservation Element, <https://www.glendaleca.gov/government/departments/community-development/planning/city-wide-plans>. Accessed August 2021.

12 City of Glendale General Plan, Open Space and Conservation Element, <https://www.glendaleca.gov/government/departments/community-development/planning/city-wide-plans>. Accessed August 2021.

6.9 NOISE

For a project located within 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, would the project expose people residing or working in the project site to excessive noise levels?

The Project site is not within the vicinity of a private airstrip. The Project site is neither located within an airport land use plan nor is it located within 2 miles of a public airport or public use airport. The closest public airport, or public use airport, to the Project site is the Burbank-Glendale-Pasadena Airport, located approximately 5.5 miles to the northwest. Consequently, no impacts associated with excessive airport noise levels would result.

6.10 POPULATION AND HOUSING

Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The proposed Project does not include any residential uses and would not be expected to result in new population growth in the City, as the number of housing units in the city does not change due to the Project.

In the short term, the Project would generate temporary construction employment opportunities. Project construction would occur over several phases with the Building Construction Phase having a peak number of 220 construction workers (see **Appendix A**). There would be fewer workers in other phases of Project construction. There are approximately 152,083 construction workers within Los Angeles County.¹³ Given the size of the existing construction workforce in Los Angeles County, it is expected that the majority of the temporary construction jobs created by the Project will be filled by local construction workers. For this reason, the temporary construction jobs created by the Project are not likely to result in direct population growth in the City.

The Project is proposed to meet the current demand for entertainment production space in the region. The *SCAG 2020 RTP/SCS Demographics and Growth Forecast* includes population, housing, and employment projections for the SCAG region. SCAG estimates the Arts, Entertainment, and Recreation industry will see a 36.4 percent increase in the number of jobs over the 2016 to 2045 period.¹⁴ The entertainment industry was estimated to employ 367,293 people in Los Angeles County in 2021.¹⁵ The Project will production space for individual productions on a short-term rental basis and will not have

13 Southern California Association of Governments (SCAG), Los Angeles County 2019 Local Profile, <https://scag.ca.gov/data-tools-local-profiles>, accessed March 2023.

14 Southern California Association of Governments (SCAG). *2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*. "Demographics and Growth Forecast Technical Report." Table 7. Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579. Accessed September 2022

15 The Otis College of Art and Design. "2023 Otis College Report on the Creative Economy." Available at: <https://www.otis.edu/creative-economy>. Accessed March 2023.

any permanent employees for this reason. During operation, the Project would be able to accommodate approximately 1,713 employees.¹⁶ Because the Project will not have any permanent employees onsite and given the large number of existing employees in the entertainment industry in Los Angeles County, it is not expected the Project will induce much additional growth in the employment industry in Los Angeles County or indirectly increase the demand for housing in the City of Glendale or surrounding communities.

The Project site is located within an urban area and is currently served by existing circulation and utility infrastructure, no major extension of infrastructure is required as part of the proposed Project. Minor improvements to the City's existing electrical distribution system would be required to provide the amount of power needed by the proposed Project. See description of project-related electrical distribution improvements in **Section 6.14** herein below. Glendale Water and Power (GWP) would construct these improvements to existing distribution facilities in the immediate vicinity of the Project site. These improvements would not create add capacity to accommodate additional growth in the vicinity of the Project site. Therefore, impacts would be less than significant.

Would the project displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere?

No residential dwelling units currently exist on the Project site. Therefore, no housing or residential populations would be displaced by development of the Project and the construction of replacement housing elsewhere would not be necessary. No impact would occur.

6.11 PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities:

- ***Fire Protection?***

The Glendale Fire Department (GFD) provides comprehensive emergency services for the City of Glendale, including fire, rescue, and emergency medical services, as well as fire prevention and code enforcement functions. Fire Station No. 21, located at 421 Oak Street, approximately 1.2 miles southeast of the Project site, would serve as the first-in station responder in the event of an emergency. The GFD responds to more than 90 percent of the emergency calls within 6 minutes of receiving the call at dispatch.¹⁷ The City has reported that with an increase in population, the fire departments have been attending to more medical emergency calls compared to fire calls. However, the City has gained the highest rating possible from the Insurance Services Offices for the number of fire stations strategically

¹⁶ Employee generation factors based on TVC 2050 Project Draft EIR, State Clearing House Number: 2021070014.

¹⁷ City of Glendale General Plan, Safety Element, <https://www.glendaleca.gov/government/departments/community-development/planning/city-wideplans/safety-element>. Accessed January 2023.

placed within City, which provide exceptional levels of response.¹⁸ The number of sworn and non-sworn fire personnel staffed in the City includes 271 members, with at least 50 sworn members are on duty 24 hours per day.¹⁹ With an estimated current population of 196,512 residents,²⁰ the proposed Project does not add additional residents and would not affect the fire personnel-to-resident ratio of 1.4 fire personnel to 1,000 residents. The proposed Project does not result in any population and housing growth, given the proposed and current commercial uses on the Site, and no new facilities would be required. Compliance with the applicable Fire Code and the Building Code provisions determines a project's impact on fire services. The project will be required to meet all code provisions. As a result, the project can be adequately served by existing public services and is not anticipated to result in substantial adverse impacts. The overall need for fire protection services is not expected to substantially increase and impacts would be less than significant.

○ **Police Protection?**

Police protection services would be provided by the Glendale Police Department (GPD). The closest station to the Project site is located at 131 North Isabel Street, approximately 1.7 miles to the east. The GPD responds to Priority 1 calls, the highest priority call for GPD, within 5 minutes of receiving the call.²¹ With an estimated current population of 196,512 residents,²² the proposed Project does not add additional residents and would not affect the police personnel-to-resident ratios. The proposed Project does not result in any population and housing growth, given the proposed and current commercial uses on the Site. As such, service ratios would not be affected by the proposed Project and no new facilities would be required. Thus, police protection to the Project site would remain similar to existing operations and impacts on police protection would be less than significant.

○ **Schools?**

School services for the Project are provided by the Glendale Unified School District (GUSD). Pursuant to Section 65995, the Project applicant is required to pay school impact fees to the GUSD based on the current fee schedule for developments prior to the issuance of building permit. The proposed Project would not impact current GUSD operating capacities, as the proposed use would not generate an increased demand of these uses. As such, no impacts on schools would occur.

18 City of Glendale General Plan, "Safety Element," <https://www.glendaleca.gov/government/departments/community-development/planning/city-wideplans/safety-element>. Accessed January 2023.

19 City of Glendale, Fire Department, "Administration," <https://www.glendaleca.gov/government/departments/fire-department/administration>.

20 United States Census, American Community Survey, 2021: ACS 5-Year Estimates Subjects Table, "DP05 ACS Demographic And Housing Estimates," <https://data.census.gov/table?q=Glendale+city,+California&g=1600000US0630000&tid=ACSDP5Y2021.DP05>, accessed March 2023.

21 Glendale Police Department, "Calls for Service Average Response Times by Priority," <https://www.glendaleca.gov/home/showpublisheddocument/69930/638114409390700000>, accessed March 2023.

22 United States Census, American Community Survey, 2021: ACS 5-Year Estimates Subjects Table, "DP05 ACS Demographic And Housing Estimates," <https://data.census.gov/table?q=Glendale+city,+California&g=1600000US0630000&tid=ACSDP5Y2021.DP05>, accessed March 2023.

- **Parks?**

In accordance with the requirements of the City of Glendale Municipal Code (Ordinance No. 5575 and Resolution No. 07-164), the project applicant will be required to pay the Development Impact Fee to the City. The current fee schedule is \$6.50 per square foot of commercial uses. Payment of the full fair share Development Impact Fee is considered full mitigation of any project impact on existing parks and recreational facilities. Project construction and operation would occur within the Project site and would not impact parks within the vicinity of the Project. As such, no impacts would occur.

- **Other Public Facilities?**

The Project site does not include sheriff, fire, school, parks, or other public facilities, such as libraries. In accordance with the requirements of the City of Glendale Municipal Code (Ordinance No. 5575 and Resolution No. 07-164), the project applicant will be required to pay the Development Impact Fee to the City. Payment of the full fair share Development Impact Fee is considered full mitigation of any project impact on library facilities, services, and collections. The proposed Project would not result in adverse physical impacts associated with the provision of a new or physically altered government building or library. As such, there would be no impact to other public facilities resulting from implementation of the proposed Project. No additional analysis of this topic in the EIR is needed.

6.12 RECREATION

Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The proposed Project would redevelop an existing production studio and support facilities with similar uses that would not generate a substantial increase in demand for existing park or recreational facilities. The project applicant will be required to pay the Development Impact Fee to the City. Payment of the impact fee is considered full mitigation of any project impact on park and recreational facilities. Therefore, the proposed Project would have a less than significant impact to park and recreational facilities.

Would the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

The proposed Project does not include recreational facilities. The Project is not anticipated to create a significant demand on park facilities that would require the construction or expansion at existing recreational facilities. Therefore, no growth-related impacts to recreational resources would occur.

6.13 TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either 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 that is:

- ***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), or***
- ***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. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

The proposed Project would redevelop an existing production studio and support facilities with similar uses. The Project site is located in an urbanized area of the City. Given the developed nature of the site and the area, impacts related to tribal cultural resources would be less than significant.

6.14 UTILITIES AND SERVICE SYSTEMS

Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water, drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

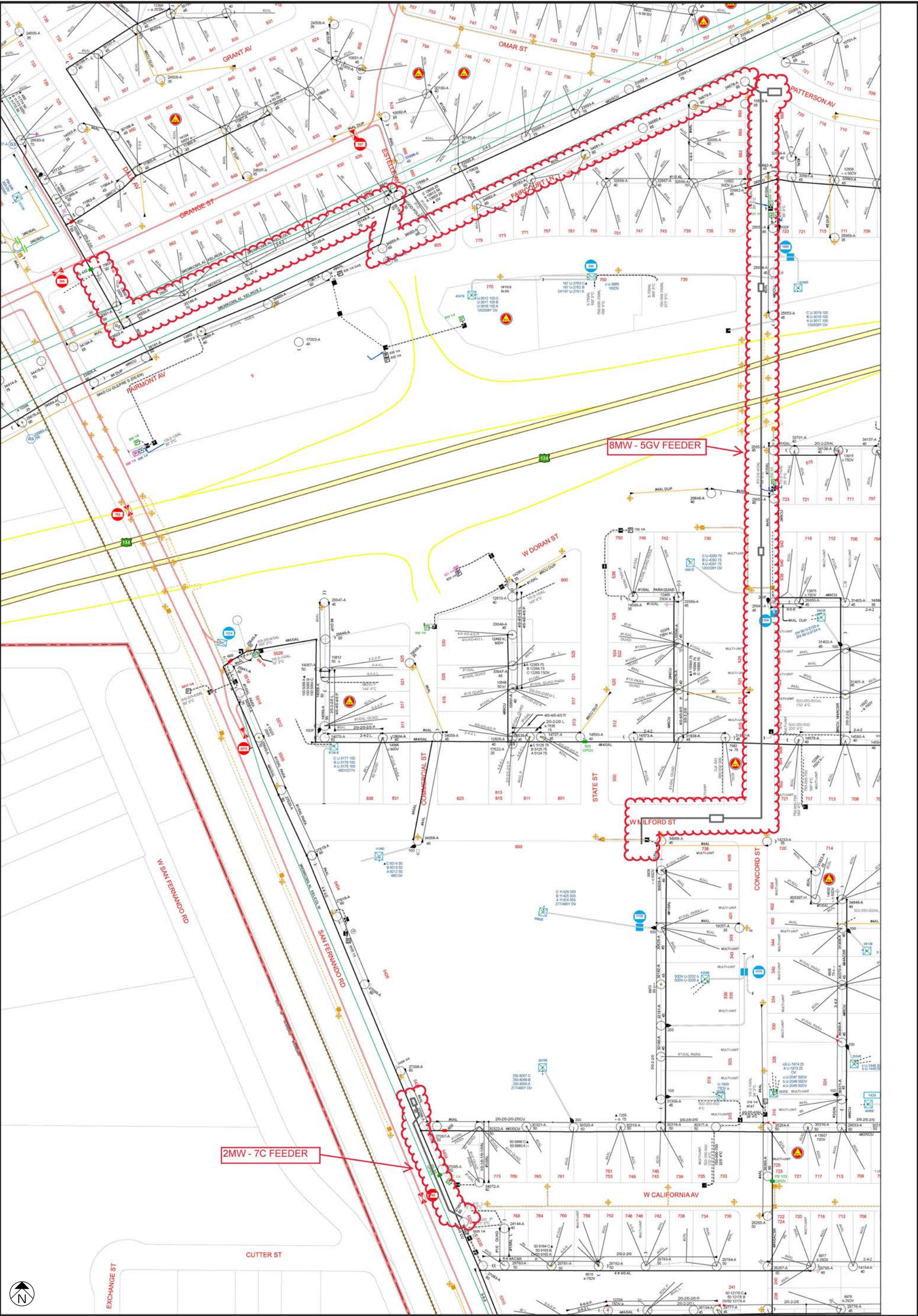
The proposed Project would redevelop an existing production studio and support facilities with similar uses. Glendale Water and Power (GWP) will make minor improvements to the City's existing electrical distribution system to provide up to 10 megawatts of power to the Project site to meet the needs of the proposed Project, as seen in **Figure 6.1: GWP 10 Megawatt Electrical Distribution System**. GWP will rebuild the power poles on Faircourt Lane and install overhead conductors from San Fernando Road to Concord Street, install 1700 feet of conduit and four vaults on Concord and Milford Streets, and 200 feet of conduit on San Fernando Road to bring power from the power pole at northeast corner of the California Avenue and San Fernando Road to a new pull box in front of the Project site. These improvements to existing electrical distribution facilities would occur in existing, improved public right-of-way and would not result in any potential significant impacts for this reason.

Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

No new sources of water supply, such as groundwater, are required to meet the Project's water demand. Water serving the Project would be treated by existing extraction and treatment facilities, and no new facilities, or expansion of existing facilities, would be required. Therefore, no impact would occur.

Would the project result in a determination by the wastewater treatment provider which 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?

The Applicant would be required to adhere to conditions under the NPDES Permit set forth by the RWQCB, and prepare and submit a SWPPP to be administered throughout Project construction. The applicant would be required to satisfy all applicable requirements of Chapter 13.42 of the City's Municipal Code relating to the Stormwater and Urban Runoff Pollution Prevention Control (SUSMP). Prior to the issuance



SOURCE: City of Glendale - 2022

FIGURE 6.1

of building permits, the Project applicant would be required to satisfy the requirements related to the payment of fees and/or the provisions of adequate wastewater facilities. The Project would comply with the waste discharge prohibitions and water quality objectives established by the Los Angeles RWCQB. Therefore, no impact would occur.

Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The proposed Project would redevelop an existing production studio and support facilities with similar uses. Per CALGreen, 65 percent of construction and demolition waste must be diverted from landfills. As such, at least 65 percent of all construction and demolition debris from the site would be diverted. Additionally, CALGreen requires 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing to be reused or recycled. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, the project would not generate solid waste in excess of State or local standards, in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant.

Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

The Project would comply with federal, State, local management, and reduction statutes and regulations related to solid waste. Per CALGreen, 65 percent of construction and demolition waste must be diverted from landfills. As such, at least 65 percent of all construction and demolition debris from the site would be diverted. Additionally, CALGreen requires 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing to be reused or recycled. The Project would be consistent with the applicable regulations associated with solid waste. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant.

6.15 WILDFIRE

Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The Project is not located in or near a State Responsibility Area of land classified as Very High Fire Hazard Severity Zone.²³ Furthermore, the Project would not impair an adopted emergency response plan or emergency evacuation plan as the Project site is not located near a non-compliant access road as depicted in the City's Safety Element.²⁴ Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for

23 CalFire, Fire and Resource Assessment Program (FRAP), "Fire Hazard Severity Zone Viewer," <https://egis.fire.ca.gov/FHSZ/>. Accessed August 2021.

24 City of Glendale General Plan, Safety Element, Ch. 4 Fire Hazards, Plate 4-3.

patrons, employees, and residents. Project site access and circulation plans would be subject to review and approval by the GFD. No impact would occur.

Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The Project is not located in or near a State Responsibility Area of land classified as Very High Fire Hazard Severity Zone.²⁵ The Project is located on relatively flat land and would not change or exacerbate current risks of wildfire or pollutant concentrations from a wildfire. No impact would occur.

Would the project 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 to the environment?

The Project is not located in or near a State Responsibility Area of land classified as Very High Fire Hazard Severity Zone.²⁶ The Project would not require the installation of infrastructure that may exacerbate fire risk. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Project site access and circulation plans would be subject to review and approval by the GFD. No impact would occur.

Would the project 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?

The Project is not located in or near a State Responsibility Area of land classified as Very High Fire Hazard Severity Zone.²⁷ The Project is located on relatively flat land. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Project site access and circulation plans would be subject to review and approval by the GFD. The Project would not 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. No impact would occur.

25 CalFire, Fire and Resource Assessment Program (FRAP), "Fire Hazard Severity Zone Viewer," <https://egis.fire.ca.gov/FHSZ/>. Accessed August 2021.

26 CalFire, Fire and Resource Assessment Program (FRAP), "Fire Hazard Severity Zone Viewer," <https://egis.fire.ca.gov/FHSZ/>. Accessed August 2021.

27 CalFire, Fire and Resource Assessment Program (FRAP), "Fire Hazard Severity Zone Viewer," <https://egis.fire.ca.gov/FHSZ/>. Accessed August 2021.

7.0 OTHER CEQA SECTIONS

This section considers and discusses other topics identified in the *CEQA Guidelines*, including the potential for the Project to induce growth, and the identification of irreversible impacts.

7.1 GROWTH-INDUCING IMPACTS

7.1.1 Introduction

Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines, as amended, requires an EIR to include a discussion of the ways in which a project could directly or indirectly foster economic growth, population growth, or the construction of additional housing in the surrounding environment that may result in impacts on the environment. This discussion should address projects that would remove obstacles to population growth and consider any characteristics of a project which may encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively. This section of the *CEQA Guidelines* emphasizes that growth in an area should not be considered beneficial, detrimental, or of little significance. The section discusses the potential for the proposed Project to induce additional growth in accordance with this section of the *CEQA Guidelines*.

In general terms, a project may foster spatial, economic, or population growth in a geographic area if it results in the following:

- Remove an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area).
- Create economic expansion or growth (e.g., construction of additional housing, changes in revenue base, employment expansion, etc.).
- Involve a precedent-setting action (e.g., an innovation, a change in zoning or general plan designation).
- Develop or encroach into an isolated, or adjacent, undeveloped or open space area.

7.1.1.1 *Remove an Impediment of Growth*

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area, or the lack of essential public services (e.g., water service), while planning impediments may include restrictive zoning and/or general plan designations.

The proposed Project is located in an established and developed industrial and commercial corridor supported by existing infrastructure located along San Fernando Road at the western edge of the City of Glendale. This corridor is designated for industrial and commercial development by the City's General Plan and Zoning. The proposed Project is an entertainment production studio, which is a use allowed by the existing General Plan and Zoning designations.

Development of the Project would not require any major improvement or expansion of infrastructure that would remove an impediment to growth in the area around the Project site. Glendale Water and Power (GWP) will modify the existing electrical distribution in the immediate vicinity of the Project site to provide sufficient power to meet the needs of the Project. These improvements will include

modifications to the existing electrical overhead distribution system and installation of new electric substructures, as well as underground wiring, in Concord Street and San Fernando Road to provide electrical service. GWP will also rebuild the power poles on Faircourt Lane for 12 kV operation and install overhead conductors from San Fernando Road to Concord Street, as well as install 1,700 feet of conduit and four vaults on Concord and Milford Streets to provide eight megawatts of power to the Project site. Additionally, GWP will also install 200 feet of conduit on San Fernando Road to bring power from the power pole at the northeast corner of the Project site at California Avenue and San Fernando Road. These improvements will provide an additional two megawatts of power to the Project site, provide a total of ten megawatts of power to meet the needs of the Project, and these improvements will be limited to electrical distribution facilities in the immediate vicinity of the Project site, which would not create additional capacity that could induce additional growth.

7.1.1.2 *Economic Growth*

The second criterion for considering potential for a project to induce additional growth is economic considerations. The Project proposes to redevelop a site with new entertainment studio to support the needs of the entertainment sector in the greater Los Angeles region for additional production facilities.

The *SCAG 2020 RTP/SCS Demographics and Growth Forecast* includes population, housing, and employment projections for the SCAG region. SCAG estimates the Arts, Entertainment, and Recreation industry will see a 36.4 percent increase in the number of jobs over the 2016 to 2045 period.¹ The entertainment industry was estimated to employ 367,293 people in Los Angeles County in 2021.²

SCAG projects that total future employment within the City of Glendale will grow from 117,000 jobs in 2016 to an estimated 125,900 employees by 2045.³

In the short term, the Project would generate temporary construction employment opportunities. Project construction would occur over several phases with the Building Construction Phase having a peak number of 220 construction workers (see **Appendix A**). There would be fewer workers in other phases of Project construction. There are approximately 152,083 construction workers within Los Angeles County.⁴ Given the size of the existing construction workforce in Los Angeles County, it is expected that the majority of the temporary construction jobs created by the Project will be filled by local construction workers. For

1 Southern California Association of Governments (SCAG). *2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*. "Demographics and Growth Forecast Technical Report." Table 7. Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579. Accessed September 2022.

2 The Otis College of Art and Design. "2023 Otis College Report on the Creative Economy." Available at: <https://www.otis.edu/creative-economy>. Accessed March 2023.

3 Southern California Association of Governments (SCAG). *2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*. "Demographics and Growth Forecast Technical Report." Table 14. Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579. Accessed September 2022.

4 Southern California Association of Governments (SCAG), "Los Angeles County 2019 Local Profile," <https://scag.ca.gov/data-tools-local-profiles>, accessed March 2023.

this reason, the temporary construction jobs created by the Project are not likely to result in direct population growth in the City.

The Project is proposed to meet the current demand for entertainment production space in the region. The Project will provide production space for individual productions on a short-term rental basis and will not have any permanent employees for this reason. The Project would accommodate up to approximately 1,713 employees when all of the production space is in use.⁵ As discussed previously, the entertainment industry in Los Angeles County employed approximately 368,000 employees. Because the Project will not have any on-site permanent employees, and given the large number of existing employees in the entertainment industry in Los Angeles County, it is not expected the Project will induce much additional growth in the entertainment industry in Los Angeles County or indirectly increase the demand for housing in the City of Glendale or surrounding communities. In addition, the 1,713 employment opportunities associated with the Project would be consistent with the growth in employment in Glendale as forecast by SCAG.

7.1.1.3 Precedent-Setting Action

A proposed Project may also induce additional growth, if it would involve the approval of a precedent-setting action, such as a general plan amendment or zone change that could have implications for other properties, or that could make it easier for other properties to develop.

The Project site is designated as Industrial/Commercial Mixed Use (IMU) and zoned IMU, as well. The *General Plan* encourages flexibility for areas with the IMU designation, as does the IMU zoning. The IMU zoning allows soundstage-production and supporting office uses by right. The Project proposes new production studio and office buildings. This use is consistent with the zoning and general plan land use designation for this area.

The Project, as proposed, includes requests for variances from some IMU zone development standards and a parking exception to allow development of the Project. Variances are permitted by the GMC when the strict application of the provisions of any such ordinance would result in practical difficulties or unnecessary hardship inconsistent with the general purposes and intent of the zoning ordinance. The Project includes a request to allow Building 1 to exceed the height limit in the IMU zone because of the need to maintain the Geosynthetic Clay Cap, located approximately 6 feet below the ground surface, which contains existing soil contamination that hinders the ability to construct subterranean parking and other facilities on the site. Approval of variances from the requirement to provide a certain percentage of the required landscaping in surface parking areas, and to provide an entrance to the building at the corner of San Fernando Road and Milford Street, are also requested. Approval of a parking exception would allow a small number of the required parking space to be compact spaces to accommodate a

5 Employee generation factors based on *TVC 2050 Project Draft EIR*, State Clearing House Number: 2021070014.

required fire lane on the site. These actions are not precedent setting, as the GMC allows for this type of relief from applicable development standards when the required findings justify these exceptions.

For these reasons, approval of these requests would not represent precedent setting actions that could result in more growth in this area.

7.1.1.4 *Develop or encroach into undeveloped or open space areas*

As discussed above, the project would involve the redevelopment of an existing developed site in an urbanized area. The Project site is surrounded by similar industrial and commercial development in an area planned and zoned for these uses by the City of Glendale. The Project would not, therefore, involve development of undeveloped or open space areas.

7.2.1 Conclusion

The Project would not result in the removal of an impediment to growth, nor involve the approval of a precedent setting actions that could result in additional growth in the area that the Project site is located in. The employment opportunities that would be associated with the Project would be consistent with the SCAG forecasts. In addition, the proposed Project would neither cause growth (i.e., new employment) nor accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project buildout, as the proposed Project would be consistent with the adopted employment, housing, and population policies of SCAG's 2020-2045 RTP/SCS and the City's *General Plan*. Therefore, the proposed Project's job growth is not considered growth-inducing, though the Project would create additional space for entertainment production within the City. The Project would redevelop an existing, developed property with uses consistent with the City's plans and would not involve the development of undeveloped or open space areas. For these reasons, the potential for the Project to induce additional growth is considered low and the potential for additional environmental impacts to result from additional growth is considered less than significant.

7.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the *CEQA Guidelines* states that use of nonrenewable resources during the initial and continued phases of a project may be irreversible if a large commitment of these resources makes their removal, indirect removal, or non-use thereafter unlikely. This section of the environmental impact report (EIR) evaluates whether the Project would result in the irretrievable commitment of resources, or would cause irreversible changes in the environment. Also, in accordance with Section 15126.2 of the *CEQA Guidelines*, this section identifies any irreversible damage that could result from environmental accidents associated with the Project.

7.2.1 Irreversible Commitment of Resources

Implementation of the Project would include the development of four new buildings containing: (1) ten production sound stage studios, (2) three flex spaces (individually, a Flex Space), production office space and commissaries (located in one structures, the Production Office), (3) various support spaces (both Flex Space support and Stage support), (4) an above-grade parking garage that contains most of the Project's required parking (Parking Garage), and (5) related surface parking lot (Surface Parking). The construction and operation of the Project would contribute to the incremental depletion of resources, including renewable and non-renewable resources. Resources, such as lumber and other forest products, are generally considered renewable resources. Such resources would be replenished over the lifetime of the Project. For example, lumber supplies are increased as seedlings mature into trees. As such, the development of the Project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources over the life of the Project.

Non-renewable resources, such as natural gas, petroleum products, asphalt, petrochemical construction materials, steel, copper, other metals, and sand and gravel are considered to be commodities that are available in a finite supply. The processes that created these resources occur over a long period of time. Therefore, the replacement of these resources would not occur over the life of the Project. To varying degrees, the aforementioned materials are all readily available and some materials, such as asphalt, sand, or gravel, are abundant. Other commodities, such as metals, natural gas, and petroleum products, are also readily available, but they are finite in supply given the length of time required by the natural process to create them.

The proposed Project would meet all applicable energy conservation standards. As a production studio and supporting uses project, the proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Glendale Water and Power (GWP) will make minor improvements to the City's existing electrical distribution system to provide up to 10 megawatts of power to the Project site to meet the needs of the proposed Project. GWP will rebuild the power poles on Faircourt Lane and install overhead conductors from San Fernando Road to Concord Street, install 1700 feet of conduit and four vaults on Concord and Milford Streets, and 200 feet of conduit on San Fernando

Road to bring power from the power pole at the northeast corner of the California Avenue and San Fernando Road to a new pull box in front of the Project site. Therefore, the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during construction and operation.

The demand for all such resources is expected to increase regardless of whether or not the Project is developed. Increase in population within the State would directly result in the need for more retail, commercial, and residential facilities, in order to provide the needed services associated with this growth. If not consumed by this Project, these resources would likely be committed to other projects in the region intended to meet this anticipated growth. Furthermore, the investment of resources in the Project would be typical of the level of investment normally required for a commercial/industrial use of this scale.

7.2.2 Irreversible Environmental Changes

Irreversible, long-term environmental changes associated with the Project would include a change in the visual character of the site as a result of the development of a new production studio on the site. Additional irreversible environmental changes would include the increase in local and regional vehicular traffic, and the resultant increases in air, greenhouse gas, and noise emissions generated by this traffic. Design features have been incorporated into the Project that would minimize the effects of the environmental changes associated with the development of the Project to the maximum degree feasible. In addition, the Project site is an urban site already and the implementation of the Project would improve this location of the City. Even with this being the case, the Project would result in short-term noise impacts during construction; long-term off-site noise impacts due to increased vehicle trips; short-term air quality and GHG emissions impacts from mobile sources during construction; and long-term air quality and GHG emissions impacts from on- and off-site mobile sources. None of these impacts are significant.

7.2.3 Potential Environmental Damage from Accidents

The Project proposes no uniquely hazardous uses and its operation would not be expected to cause environmental accidents that would affect other areas. The Project site is located within a seismically-active region and would be exposed to ground shaking during a seismic event. Conformance with the regulatory provisions of the City of Glendale, the California Building Code (CBC), and all other applicable building codes pertaining to construction standards, would minimize, to the extent feasible, damage and injuries in the event of such an occurrence. Because development of the Project would require the removal of all the existing building foundations and paved parking areas located on the Project site, these materials could cause health and safety problems to on-site construction workers and the community. Federal, State, and local regulatory procedures included in this EIR would be implemented as part of the Project. Following these regulatory procedures, the potential for impacts would be reduced to a less than significant level.

8.0 ORGANIZATIONS AND PERSONS CONSULTED

LEAD AGENCY

City of Glendale

Planning Division

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Mark Berry, Deputy Director of Community Development/Economic Development
Jay Platt, Principal Planner
Aileen Babakhani, Planner

Public Works Department

Pastor Casanova, T.E., Principal Traffic Engineer

Office of the City Attorney

Gillian van Muyden, Chief Assistant City Attorney

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Carrie Chasteen

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Richard Gibson, LEED Green Associate
Janet Ye, EIT

SCS Engineers

Justin Rauzon, R.E.P.A., Project Manager
Tyler Watkins, Project Professional

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