APPENDIX 1.0-3

NOP Scoping Comments

NATIVE AMERICAN HERITAGE COMMISSION

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NAHC HEADQUARTERS
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West Sacramento,
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February 23, 2026

Vista Ezzati
City of Glendale
633 East Broadway
Room 103
Glendale CA 91206

Re: 2026020750 Star Mazda Vehicle Dealership Expansion Project, Los Angeles County

To Whom It May Concern:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that 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. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

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

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

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

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

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

SB 18

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

Some of SB 18's provisions include:

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

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

NAHC Recommendations for Cultural Resources Assessments

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

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
    a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
    b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
    a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
    b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
    c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@NAHC.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

From: Sargsyan, Sofi
To: Ezzati, Vista
Cc: Castillo, Allen
Subject: Fw: Notices
Date: Thursday, February 19, 2026 4:48:35 PM
Attachments: glendaleca_logo.png
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img_27136c17-a62b-459a-add6-559738164ff5.png

FYI- please see below.

Warmly,

Sofi Sargsyan | Administrative Specialist I/CDD
Community Development
633 East Broadway, 1st floor, Glendale, CA 91206
P: +1 (818) 937-8176
sosargsyan@GlendaleCA.gov | GlendaleCA.gov | Follow us!

From: Sarah Brunzell <Sarah.Brunzell@tataviam-nsn.us>
Sent: Thursday, February 19, 2026 4:46 PM
To: Sargsyan, Sofi <SoSargsyan@Glendaleca.gov>
Cc: THCP CRMD <crm@tataviam-nsn.us>
Subject: Re: Notices

You don't often get email from sarah.brunzell@tataviam-nsn.us. Learn why this is important

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Good afternoon,

The Cultural Resources Management Division of the Fernandeño Tataviam Band of Mission Indians has no questions or comments.

Kind regards,

Sarah Brunzell
Cultural Resources Management Division Manager

Tribal Historic and Cultural Preservation Department
Fernandeño Tataviam Band of Mission Indians
818-837-0794
1019 2nd Street, San Fernando, CA 91340
Native Sovereign Nation of Northern Los Angeles County

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Fernandeño Tataviam Band of Mission Indians
Proactively establishing entities to overcome systemic barriers:

From: Sargsyan, Sofi <SoSargsyan@Glendaleca.gov>
Sent: Thursday, February 19, 2026 3:00 PM
Subject: Notices

Some people who received this message don't often get email from sosargsyan@glendaleca.gov. Learn why this is important

[CAUTION] EXTERNAL Email. Exercise caution.

Hello,

Please see attached notice for Draft Environmental Impact Report for Star Mazda at 1401 S. Brand. If there are any questions or comments, please contact Vista Ezzati at vezzati@glendaleca.gov.

Warmly,

Sofi Sargsyan | Administrative Specialist I/CDD
Community Development
633 East Broadway, 1st floor, Glendale, CA 91206
P: +1 (818) 937-8176
sosargsyan@GlendaleCA.gov | GlendaleCA.gov | Follow us!

California Department of Transportation

DISTRICT 7
100 SOUTH MAIN STREET, SUITE 100 | LOS ANGELES, CA 90012
PHONE (213) 897-0362 | FAX (213) 897-0360 TTY 711
www.dot.ca.gov

March 12, 2026

Vista Ezzati, Principal Planner
Community Development Department
Planning Division
City of Glendale
633 East Broadway, Room 103
Glendale, CA 91206

RE: Star Mazda Vehicle Dealership Expansion Project
SCH # 2026020750
Vic. LA-5/PM 23.717, LA-2/PM 16.02
GTS # LA-2026-05028-NOP

Dear Vista Ezzati:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. The Project involves the construction of a new two-story, approximately 11,840-square-foot sales facility for the existing Star Mazda vehicle dealership, located in the southeastern portion of the site. It also includes the demolition of two existing structures: an approximately 8,600-square-foot showroom and service reception building in the northeastern area and an approximately 900-square-foot parts delivery and used sales manager's office adjacent to the parts facility near the center of the site. The redesigned parking layout would accommodate 66 spaces, including 18 standard spaces for customers, 18 tandem parking spaces designated for vehicle service, and 30 tandem parking spaces for vehicle display. Due to the site's proximity of less than half a mile from the Glendale Transportation Center and its designation as part of a High-Quality Transit Corridor, the applicant is seeking parking requirement relief under Assembly Bill 2097.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

https://opr.ca.gov/ceqa/#guidelines-updates

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Local Development Review (LDR) Safety Review Practitioner's Guidance, prepared in February 2024. For your review, please consider the SB 743 Implementation Resource at the following link when preparing the environmental document:

https://dot.ca.gov/programs/sustainability/sb-743/resources

From a Memo of Stantec dated February 24, 2023, for retail projects such as the proposed Project, a significant impact would occur if the project would result in a net increase in existing total citywide VMT. The City's guidelines contain criteria for screening land use projects from further VMT analysis. Retail projects that are 50,000 square feet or less can be presumed to have a less-than-significant transportation impact and would not require a detailed VMT analysis. The proposed Project consists of a new 32,570 square foot building. The Project square footage is less than 50,000 square feet; therefore, the Project can be presumed to have a less-than significant transportation impact. No further VMT analysis is required.

Further from the Memo, the proposed Project would result in a net increase of 5 AM peak hour trips, 6 PM peak hour trips, and 65 daily trips. Caltrans concurs that the proposed Star Mazda expansion would not require a detailed VMT analysis based on the City's screening criteria for retail projects of 50,000 square feet or less. Furthermore, the Project would generate a minimal amount of new peak hour or daily traffic which would have a nominal effect on the surrounding roadway network.

Due to the site's proximity to the Glendale Transportation Center and its location in a High-Quality Transit Corridor, the EIR should address ways to improve pedestrian, bicycle, and transit access, and explain how the requested parking relief under Assembly Bill 2097 promotes multimodal transportation and less reliance on single-occupant vehicles.

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator at (213) 269-1124 and refer to GTS # LA-2026-05028-NOP.

Sincerely,

Anthony Higgins

Anthony Higgins
Acting LDR Branch Chief

Cc: State Clearinghouse

Ezzati, Vista

From: Francesca Smith <smith-zzz@sbcglobal.net>
Sent: Monday, March 16, 2026 11:48 AM
To: Ezzati, Vista
Cc: Golanian, Roubik; Abajian, Suzie
Subject: Comments on Notice of Preparation of Draft Environmental Impact Report For Star Mazda Vehicle Dealership Expansion Project [1401 S. Brand Bl.]
Attachments: 1401 S Brand NOP Comments.pdf

Follow Up Flag: Follow up
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CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

Hi Vista,
I hope you are well. We are fine.
Please find my comment letter regarding the Notice of Preparation of a Draft Environmental Impact Report for 1401 S. Brand Bl., Star Mazda Vehicle Dealership Expansion Project attached to this message as a pdf file.
Please ensure that this letter is included in the Adminstartive Record for this project. Let me know if you have any questions or if any pages are mission at 818-421-2749.
Thanks very much.
Best wishes,
Francesca Smith

FRANCESCA SMITH
Qualified Architectural Historian

March 16, 2026

Ms. Vista Ezzati
City of Glendale
Community Development Department – Planning Division
633 East Broadway, Room 103
Glendale, CA 91206
sent via e-mail

RE: Comments on Notice of Preparation of Draft Environmental Impact Report For Star Mazda Vehicle Dealership Expansion Project [1401 S. Brand Bl.]

Dear Ms. Ezzati:

Thank you for the opportunity to comment on the important upcoming draft Environmental Impact Report (DEIR) referenced above. As a qualified architectural historian under the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, Professional Qualifications Standards, I have a number of comments.

The Initial Study for this project determined that preparation of an EIR was necessary. The Initial Study declares "Because there is divergent expert opinion [between the lead agency and the consultant] regarding the showroom building's possible historic status, the proposed demolition could cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5. Therefore, the Project may have a potentially significant impact, and this issue requires further analysis in the EIR" (E. Cultural Resources, page 13).

Presumptive Historical Resource under the California Environmental Quality Act
The 1401 S. Brand Bl. property was identified as historically significant in the City of Glendale-prepared South Glendale Historic Resources Survey as historically significant (2019). It was found locally eligible under the "Commercial Development: Post-World War II Commercial Development; Architecture & Design: Post-World War II Modernism: Mid-century Modern" context/theme (Appendix B, page 9). 1401 S. Brand Bl. was also identified under the sub-theme of "Auto-related commercial development; Mid-century Modern architecture" (ibid).

Based on these findings the subject property has "presumptive" historic significance under the California Environmental Quality Act (CEQA) and the California Public Resources Code. Because Glendale City Council adopted that survey, the subject property is "deemed significant pursuant to criteria set forth in subdivision (g) of section 5024.1, [and is] … presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant" (emphasis added, California Public Resources Code (PRC) section 5024.1). Because the subject property is

listed in a locally adopted survey of historical resources it has presumptive, likely historic significance.

Kaplan Chen Kaplan

To begin with, in the technical report it is not stated on whose behalf the Chen Kaplan Chen "1401 S. Brand Boulevard Glendale, California Historic Resource Evaluation" dated March 12, 2021 and updated May 26, 2022 (KCK and technical report or report) was prepared. It should be clearly stated that the report was prepared for the proposed project applicant. It makes a difference because in the report, a demonstrated and acute lack of objectivity is demonstrated by the consultants.

If the report were impartial, as it should be, none of this would matter. However, as is the usual scenario for this consultant, it was prepared to enable a property owner to raze buildings that the lead agency has identified as historically significant. The lead agency must insist that for the EIR, a thorough and entirely impartial peer review of the technical report and its findings are made by a consultant with demonstrated experience in Glendale identifying historic resources and who is well versed in the current requirements for listing in the Glendale Register.

It should be clearly noted to all decision makers and to the public that the consultants who prepared the "1401 S. Brand Boulevard Glendale, California Historic Resource Evaluation" dated March 12, 2021 and updated May 26, 2022 (technical report or report) have never been known to find a property in Glendale to be locally eligible. In Los Angeles KCK has provided similar services:

- **Hospital of the Good Samaritan, Nurses' Home-** In 2008, KCK cleared the 1923 Nurses' Home, which was designed by master architect Reginald D. Johnson for demolition. Johnson designed most of the other buildings in the hospital complex. In 2014, SurveyLA identified the entire hospital to be eligible for listing in the National and California Registers, as well for local landmark designation. Logic would dictate that the Nurses' Home would at the very least contribute to the historic significance of the larger historic district. *Demolished 2011.*
- **1850 N. Cherokee Av., Hollywood-** This 1939 Hollywood Regency style residential complex was found not to be historically significant by KCK. The 2009 report does not even mention the building's architectural style.[1] The property was rehabilitated and is now a boutique hotel.[2]
- **Brentwood School, East Campus-** The group of buildings that comprises East Campus was identified in SurveyLA as "an excellent and rare example of a 1930s private

[1] See https://cityclerk.lacity.org/onlinedocs/2009/09-0967_misc_5-14-09.pdf#:~:text=Kaplan%20Chen%20Kaplan%20conducted%20an%20historic%20resource,or%20the%20California%20Register%20of%20Historical%20Resources last accessed on March 10, 2026.

[2] See https://theprospecthollywood.com/about/ last accessed on March 10, 2026.

educational institution in Brentwood" (2013). The campus was found eligible for listing in the National and California Registers and as a City of Los Angeles Historic-Cultural Monument. In 2015, KCK prepared a report that enabled demolition of all buildings on the property.[3] *Demolished.*

- **3411-3455 W. 8th St., 765, 767 & 749 S. Harvard Bl.-** A Los Angeles Community Redevelopment Agency historic resources survey for Wilshire Center and Koreatown Recovery Redevelopment Area Survey identified 3411-3444 W. 8th St. as "Recognized as Historically Significant by Local Government… individually eligible for local listing or designation through survey evaluation (1995). KCK nevertheless concluded in 2019 that the Colonial Revival style complex at 3411-3455 W. 8th St. was not a historic resource. *Unknown outcome.*
- **1547 S. Wilton Place-** KCK found this 1905 Craftsman residence designed by master architect Charles F. Whittlesey to not be historically significant in 2019. The project was appealed by West Adams Heritage Association and Angeles Vista Neighbors. *Demolished.*

The same consultants' flawed evaluations in Glendale have consistently been challenged by The Glendale Historical Society (TGHS), qualified city staff and others. Those prior known evaluations are:

1-4 **Medical office buildings, 540, 607, 610 and 633 N. Central Av.-** Properties were found eligible for listing in California Register under criteria 1 and 3 as historic district contributors in "Historical Resources Technical Report," which supported the "Glendale Downtown Specific Plan Program Environmental Impact Report" adopted in 2006 and later amended. KCK found all four properties not eligible for local designation on behalf of developer. *Demolished.*

5 **Alexander's Market, 204 W. Wilson St.-** Identified as locally eligible in the "Historical Resources Technical Report," for "Glendale Downtown Specific Plan Program Environmental Impact Report" adopted in 2006 and later amended. Designed by celebrated architects Morgan, Walls & Clements. Consultants found the building not eligible for local designation on behalf of applicant. *Demolished.*

6 **3901 San Fernando Rd.-** KCK found the building not eligible for local designation on behalf of developer-applicant. Opposed by the Los Angeles Conservancy and TGHS, 2013. *Demolished.*

7 **510-512 W. Doran St.-** Consultants found the 1910 Transitional Craftsman building not eligible for local designation on behalf of applicant in 2014. Opposed by TGHS and overridden by lead agency. No review opportunity was afforded to the Historic Preservation Commission. *Building remains.*

8 **Levi Chubbuck Residence, 1420 Valley View Rd.-** Consultants found the building not eligible for local designation on behalf of applicant. No review opportunity was

[3] The KCK report contained only aerial photographs. Notably, no clear photographs of the evaluated buildings from grade were included.

afforded to the Historic Preservation Commission. Overridden by lead agency, 2016. *Demolished by owner without permits.*

9 **Wanda and Tom Bistagne Residence, 1766 Cielito Dr.** Opposed by TGHS, designed by notable architect, Robert L. Earl, AIA, 2023. Consultants did not identify architect and found the building not eligible for local designation on behalf of applicant.[4] No review opportunity was afforded to the Historic Preservation Commission. *Demolition approved but permit has expired.*

10-13 **North Glendale Methodist Church No. 2 "Tower of Light" and school, 1015 and 1018 N. Central Av. and 212-214 Farview Av.** Church designed by master architect, Harry Pierce, AIA with school buildings by local architects Edwin Shumate and Orr, Strange, Inslee & Senefeld. The consultants found the church building not eligible for local designation on behalf of the applicant but did not identify any architects and used the wrong name for church in their report (2024). No review opportunity was afforded to the Historic Preservation Commission. Opposed by members of the public including a qualified expert who identified it as a local historic district, found the name and other works by each of the architects and compared it to other such examples in Glendale. *Church demolished, school facilities not protected during ongoing years of construction and extreme changes in scope.*

Consequentially, at least eight buildings in Glendale have been demolished since 2013, through the predictable efforts of KCK. In most of these examples, like those in Los Angeles, the properties had already been identified as local historic districts (numbers 1-4) or as individually eligible for local designation (properties 4-9). No examples have been found where that KCK consultant has found any Glendale properties to be eligible for the local register. They provide consulting services in Glendale exclusively for property owners on whose behalf they prepare reports that enable demolition.

The Glendale Historical Society describes the professional reputation of Kaplan Chen Kaplan on their website:

> *KCK is infamous in the historic preservation community*, and it has to our knowledge never found a building in Glendale to be historic; *they are hired by property owners who want to demolish their buildings*. Thanks to their flawed evaluations, Glendale has lost several properties that had [previously] been identified as historic in professional and impartial surveys…" (emphasis added, TGHS. "Preservation Alerts: Status update for 1766 Cielito Dr." at https://glendalehistorical.org/preservation-alerts accessed on March 3, 2026).

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[4] Consultant applied the City of Los Angeles' registration criteria instead of the established and applicable Glendale historic contexts. They also failed to adequately consider the local importance of or the considerable achievements of the original owners, Wanda and Tom Bistagne. KCK misapplied more stringent National Register guidance for local eligibility findings and abjured the established reputation of the project designer, who later became an architect, making those compound errors their reasons for not finding it eligible for any historic designation (Kaplan Chen Kaplan 2022 and 2023).

As a historic preservation professional, I can assure you that earning notoriety for working *against* finding properties historically significant, is certainly not a common goal among reputable professionals. The late James Marston Fitch[5] who was an originator of the field of modern historic preservation in academia and a founder of the Columbia University Graduate School of Architecture, Planning & Preservation cautioned my graduate school class against ever making a case for a property to *not be* historically significant (1985).

His recommendation was that, where possible, we merely not speak up regarding the property in question if we believe it not to be significant. It was Fitch who wrote in his pivotal book on historic preservation that significant buildings were too often overlooked by "superficial examination and inadequate data" (*Historic Preservation: Curatorial Management of the Built World* 1982). In the reviewed KCK evaluations, they all too often overlook reasonably obvious information and prepare one-sided analyses. Examples of their superficial examination include not using the correct names of properties, not identifying their architects or builders or their bodies of work where applicable, not comparing properties to other like properties, not considering whether the property may contribute to a previously unidentified historic district, not evaluating properties within the appropriate local contexts, not applying established appropriate registration criteria, the list is seemingly endless. All of those described elements are standard procedure for evaluations by conscientious historians and architectural historians.

The consultant mentioned a site visit in February 2021, more than five years ago (page 2). Overlooking physical information was addressed by the late Frank Matero in 2025 when he said "Material evidence still matters" (Lynn Meskell. "A Life in Ruins: An Interview with Frank Matero").

It should be noted that of the numerous KCK reports prepared to justify demolition of buildings that have were previously identified as historically significant, few contain photographs of the buildings being considered. Like the evaluation of 1401 S Brand Bl., most of their reports have extremely blurry aerial photographs that present no useful information or facts. See also pages i-xvi of the tech report for the useless aerial photographs of the subject property.

Unfortunately, the applicants' consultants have made a tidy practice of preparing cases against historic significance for developers, although to be fair, they also prepare documentation- as mitigation to enable demolition of historic resources and properties. This established pattern should not be encouraged by the City of Glendale. For developers, it does not serve their purposes either, when preparation of Environmental Impact Reports are nonetheless required to clear their proposed projects.

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[5] Obituary. ***New York Times***. At https://www.nytimes.com/2000/04/12/arts/james-marston-fitch-90-architect-and-preservationist.html last accessed on March 10, 2025.

Alternatives

Because the subject property should be considered a historic resource in the draft and Final Environmental Impact Reports, an analysis of a suitable alternatives to the project including "no project" a different location and a preservation alternative will be required.

Regarding an alternative location, that must be considered if it is feasible and could avoid or lessen significant impacts on the historic resource. It need not be already owned by the project proponent as the lead agency has absurdly required the past (Comments on Draft Environmental Impact Report for the 1642 South Central Avenue Project, 2022).[6]

As the city was previously reminded, an alternative location would only need to be reasonably acquired, controlled, or accessed by the applicant. In determining whether an alternative location is reasonable, the lead agency would consider factors such as the site suitability, its economic viability, the availability of infrastructure, general plan consistency, and whether the applicant could reasonably acquire or control the alternative site.

For the expected alternatives analysis, it is recommended as well that a scenario be considered where the subject property buildings would be retained, rehabilitated and only necessary new, compatible buildings would be added to the property, using the current parking lot. Their design and planning would be undertaken by a qualified preservation architect (see "Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation," "Historic Architecture"[7]). The most visible and significant feature is the Showroom Building (A). Views toward the showroom building should be protected and retained on the north, south and west sides. A very simple diagram demonstrating this alternative is Figure 1 on page 7.

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[6] Regarding a different location or relocation of buildings being studied the City of Glendale misunderstands the fundamental concept. "Offsite… alternatives should have been more fully considered. Zoning, environmental conditions, and availability are obviously significant factors in evaluating offsite alternatives. To be analyzed in the DEIR, the offsite alternative must be "feasible," and it must be possible for the project proponent to acquire the property, *they need not already own the property*. The DEIR states [for Central Av project] 'This alternative is infeasible as neither the project applicant nor the City *owns or controls a relocation site or any other property near the Project site*" (emphasis added, page 4-5). While such an alternative location in Tropico would be preferable, it need not be located in that closely circumscribed area to be considered feasible. The Alternative Considered but Rejected section further states "The ability and cost of acquiring a suitable alternative site cannot be determined" neither of which can be suitable reasons for its rejection (pages 4-6 and -7)".

[7] At https://www.nps.gov/articles/sec-standards-prof-quals.htm last accessed on March 8, 2026.



Figure 1: Annotated aerial photograph of subject property. The red, dashed outline is the extant buildings which were identified in the technical report as Buildings A-F.
Building G is not included in the assemblage of contributing historic buildings because it has been relocated at least twice, within the property and has been altered too many times to retain adequate integrity. A more complete evaluation would be required to establish whether the building contributes to the established significance of the larger property.
The green transparent highlighted area is the area where additions may be possible. FAR was not considered in this brief analysis. Photograph from Los Angeles County Tax Assessor's Property Portal.

In Figure 1 above, the red, dashed outline includes Buildings A-F. Building G was not included in the assemblage of historic buildings because it has been relocated in 1960 and 1968 and has been altered too many times to retain adequate integrity of its original design, workmanship or materials. Its integrity of setting, feeling and location have been lost, but that issue should be considered in the EIR.

The green transparent highlighted area is the area where it may be possible to add new, low-rise buildings that would meet the project's goals. FAR has not been considered in this brief alternative suggestion.

An appropriate and thorough alternatives analysis will be crucial to this project and must include a preservation alternative that would retain the historic resource while accommodating the project's goals.

Evaluation

There are numerous serious errors and intentional oversights in the report's evaluation. One of the most important elements is that the report is unnecessarily complex and confusing. As an example, building permits in the report are not clearly described for each building. That is just one part of their chaotic methodology evaluating properties. The evaluator assigned letters to each building (A-G) however building permits in the report do not correspond to the report's assigned letters.

There is no clear record in the report that simply explains the dates of construction for each building. My best efforts to clarify this information is based on review of applicable building permits with field visits on March 8 and 9, 2026. See table prepared for this letter on page 8.

Bldg.	Use	Built Date	Notes from Building Permits
A	Showroom	1958	Mason & Muntz, architects for R & H Motors
B	Office	1964	An addition by J. P. Anderson, contractor for California Motors
C	Auto Storage & Service	1956	Thomas Jewell, CE for Tommie Vaughn Motors; fire damage repaired in 1967
D	Office & Service	1967	"7,000 SF… concrete block addition" by Mal Gianni & Associates for California Motors, Inc. Notably Mid-Century Modern in style
E	Service	1968	Mal Gianni & Associates Neoformalist in style
F	NA		
G	Used Cars	unknown, 1960 and 1968	Relocated in 1960 for California Motors and again in 1968

It should be noted that Buildings D and F were each designed by Mal Gianni & Associates. Gianni was a local architect whose work at the subject property and elsewhere was overlooked much like Don Muntz was in the report.

The building descriptions, combined with the dates of construction for each building are intentionally confounding in the technical report. Building descriptions are usually distinct from descriptions of development for good reason. They are separate components of an evaluation.

Pages 21-35 describe a confusing web of interconnected buildings that are further disordered by the use of dramatic verbs that are intended to imply chaos. The report presents an extremely confusing, nattering and unedited description of the physical relationship between Buildings A and B:

> *What would be* [?] the west elevation of Showroom Building A *merges* with other buildings. It has an *interior connection* to Office Building B2 which was added n [*sic*] 1964 *to the west and Service Building E to the south*. The Los Angeles County Assessor identifies four buildings on the site with the building dating from 1956 having 22,900 square [*sic*]. Today the Showroom Building A is partially *engulfed* and connected to other buildings, including Office Buildings B1 and B2 *and also connected to* Service Building C. These spaces have been *merged internally* and contain offices and support back of the house operations (emphases added, page 24).

Note this of this language is necessary: would be, merges, engulfed and the confounding "merged internally." This is not the first time that a building complex was expanded through the construction of additions or by adding abutting buildings. Buildings B1 and B2 are presented separately in the report. Building B is not two separate additions. Buildings E and F are also needlessly split into two. "Building E" is an open-air canopy with a flat roof with a few

kiosks or stalls with a roof that that connects to the architect-designed 1968 Parts and Service addition. The unnecessarily complex description in the report is intentional. It makes the subject property and its contributing buildings sound as though they were borne from a fiery tornado, a tragic hurricane, a horrific hailstorm or a tumultuous flood that somehow rendered the property to be not historically significant. "Buildings B1 and B2," as well as "Building E and F" were each built under single building permits. The main differentiations among those buildings are principally roof heights, which can vary in individual buildings. Presenting them as separate buildings in the report creates the impression of far more alteration and change than actually occurred, taking place at the subject property.



Figure 2: Annotated 2025 aerial of subject property showing years of construction, by building. North is oriented toward the top of the figure. Base photo Los Angeles County Tax Assessor's website.[8]

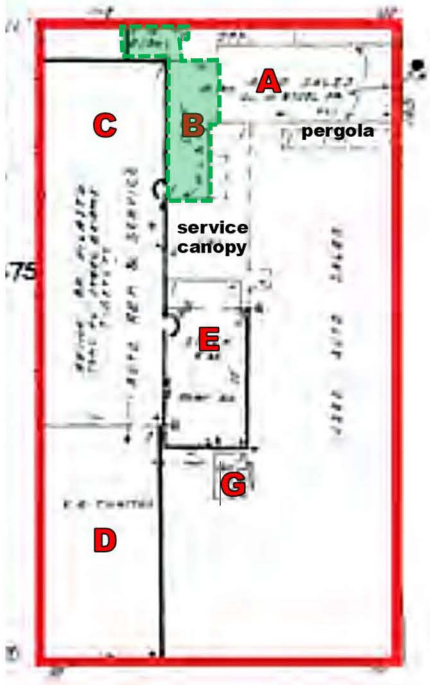


Figure 3: Annotated, excerpted Sanborn Fire Insurance Co. "Maps of Glendale, CA." (1970, sheet 168). Assigned building letters in red, image is enlarged by 250 percent from report.

Review of building permits, legible historic aerials at Los Angeles County Tax Assessor's website as well as the Sanborn Map in Figure 3 reveals that Building B is actually an addition

[8] At https://pol.pictometry.com/ipa/v1/ export_pdf. php? title=1401%20Assessor%20 Aerial&secondtitle =&footerurl=&footertxt=&data=%5B%7B%22width%22%3A483.99999805065585%2C%22height%22%3A399.99999973487223%2C%22month%22%3A%2205%22%2C%22day%22%3A%2209%22%2C%22year%22%3A%222025%22%2C%22url%22%3A%22https%3A//pol.pictometry.com/ipa/v1/export.php%3Ffile%3Dc86f400772ab0433c32e00f195991c2f.jpg%26type%3D0%22%7D%5D last accessed on March 1, 2026.

rather than a two-part building, as described in the tech report (see Figure 3). The image used as the base for Figure 3 in the report is illegible, as are the historic aerial photographs on pages i-xvii of the report. The subject property complex was completed by 1970, so pages viii-xvii are illegible, but worse provide no information of value.

The exhaustive discussion of Buildings B1 and B2, Building E and Building F as separate buildings overlooks the fact that the subject property complex looks much like it did in July 1958.

The top panel in Figure 4 below is a photograph that clearly depicted the appearance of the original complex to be nearly identical to its current appearance (Figure 6 on page 11).

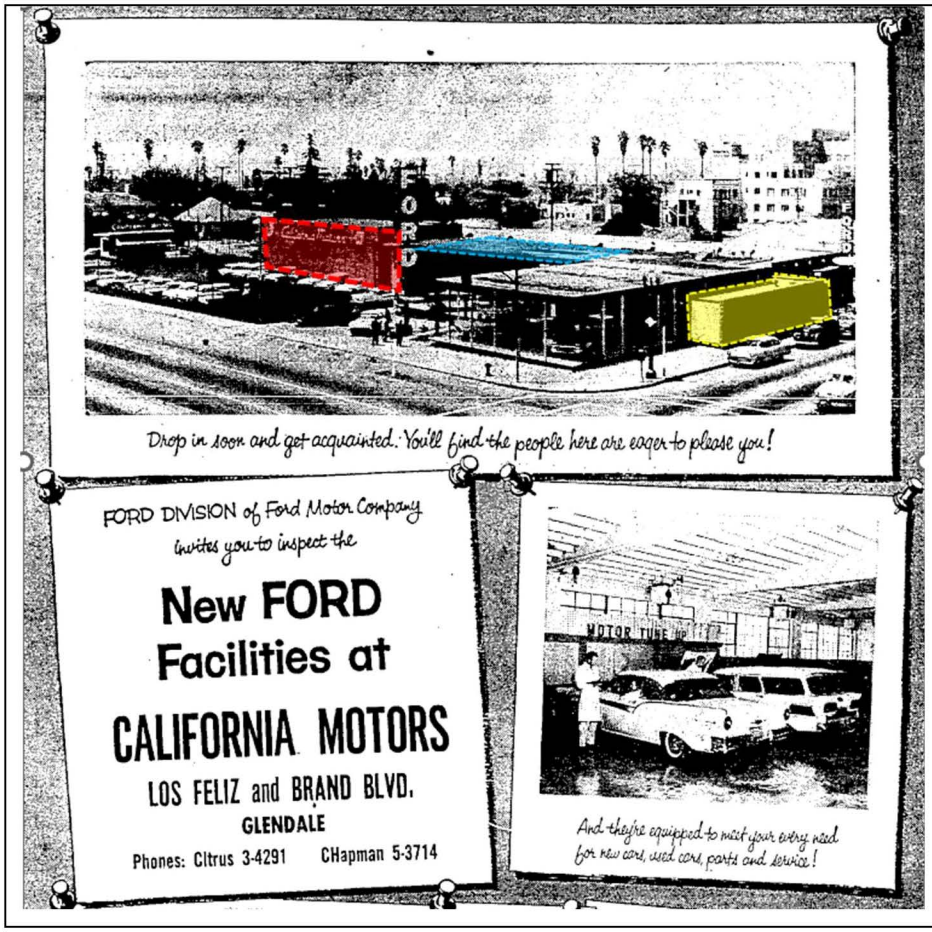


Figure 4: Display advertisement of subject property compound in 1958 (view southwest). The excerpted, annotated ad clearly shows what the consultant called part of Building B1 (in yellow outline) as an extant part of the Showroom (Building A) in 1958. Their Building E (blue outline) looks much like the flat extended canopy that exists today. The façade of "Building F" in is shown in red. *Los Angeles Times*, July 27, 1958: A20.

There is a recessed doorway in north exterior wall the Office (Building B) facing Los Feliz Boulevard, that clearly shows a visible difference in brick color between the Showroom (Building A) and the Office. When the Office was built in 1964, exterior the demising wall on the north side was clad in a different color brick than the earlier Showroom (Figure 5 on page 11).

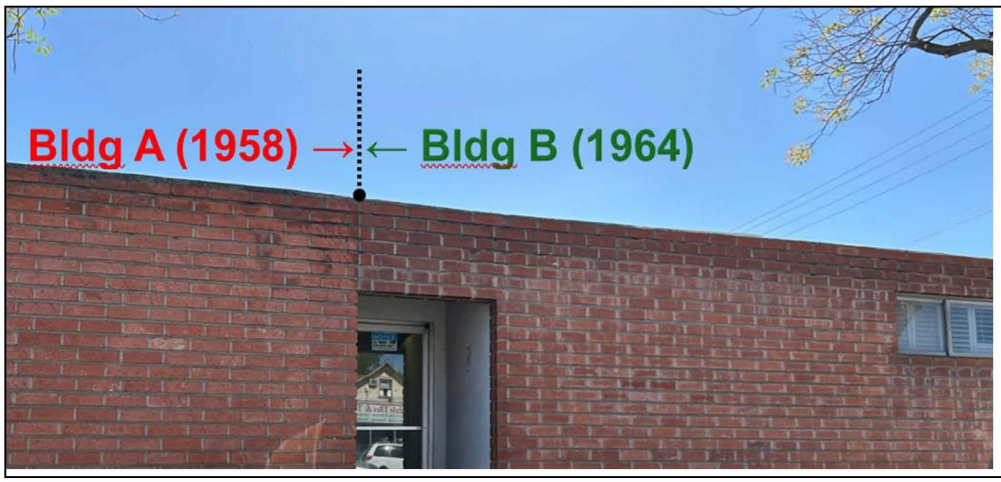


Figure 5: Detail photograph of the north wall of Building A (left) where it meets Building B. View southwest of Building B recessed entrance. Note the difference in brick veneer colors, as well as the seam or joint where the two walls meet. March 8, 2026.

So, as previously described, the consultants falsely describe the 1964 Office addition (Building B) obscuring the floor-to-ceiling storefront on the Showroom (Building A, top photo, page 23 of technical report). The report asserts incorrectly that "Six of the original Glazed bays (to the west) have been obscured by the addition of an office/wall structure" (page 23). That addition, Building B precisely abuts the west side of Building A as shown in Figure 3 (page 9) and Figure 5 above.

Building A was constructed with a lower, brick-clad portion of the building at the north side as part of the original design see (Figure 4 in yellow on page 9 and Figure 5 on right side, page 10).

In their evaluation, the consultants remarkably missed the fact that the other automobile dealerships in Glendale dating from the Post-War Period described in the South Glendale Survey no longer exist. So not only was the subject property already identified as Glendale Register-eligible in the 2018 survey, but it is more importantly the *only* remaining example of its type and style in Glendale.

To bolster their error-laden conclusion, the report further states:

> An important feature of the mid-century dealership was detached signs that were freestanding, a dominant element that served as a giant billboard and included the automobile brand's corporate logo. Over the decades the signs have changed to represent the automobile brand that was sold – and those logos communicated the current design and technology of each period. None of the original signage from the 1950s or any other earlier era remains on the property (page 42).
>
> In addition, there are many permits for signs on the property to reflect changes in ownership and automobile sales franchises. There are no signs remaining on the property from the period when the 1958 showroom was opened (19)

None of the original signs from the 1950s or any *other earlier era* remains on the property. It is not uncommon for a property to have different owners over a nearly seven-decade timespan. Why would a Mazda dealership use the original 1958 "FORD" blade signs? Those signs no

longer exist, and more importantly would have advertised a brand that is not the user. In "Preservation Brief 25: The Preservation of Historic Signs," the National Park Service directs how to appropriately add new signs to historic buildings in several fundamental, non-prescriptive principles. There is no requirement that an automobile dealership that has represented several car brands in the past nearly 70 years be made to reuse no-longer-extant that represented an entirely different manufacturer. If the signs existed, they may have been reused, but the original signs no longer exist, so the point is moot and more importantly it does not disqualify the complex from being historically significant.



Figure 6: Present-day photograph of 1401 S. Brand Bl. with each of the buildings shown in Figure 4. View west. Subject property in color for clarity. March 9, 2026.

Comparison of Figures 4 (on page 10) and 6 (above) reveals that the subject property has changed very little since 1958, when the dealership opened and certainly since 1968, when the last building was completed.

I sincerely appreciate the opportunity to comment of the Notice of Preparation [for the] Draft Environmental Impact Report For Star Mazda Vehicle Dealership Expansion Project [1401 S. Brand Bl]. An effective EIR should ensure that this project would not result in demolition of the historic resource. The proposed project and the applicant's technical report must have impartial, adequate and complete environmental review to ensure that whatever the future project is can move forward without sacrificing our shared past.

It is hoped these comments and my brief peer review will assist staff, the EIR preparers and decision-makers in understanding why the property at 1401 S. Brand Bl. property is so important to our community. Please ensure that this letter is included in the Administrative Record. Thank you for your consideration.

Sincerely,

Francesca Smith

Francesca Smith

cc: Suzie Abajian, PhD, City Clerk
Roubik Golanian, Acting Community Development Director, City Manager

Ezzati, Vista

From: Ingrid Wilcox <ingrid.wilcox@glendalehistorical.org>
Sent: Friday, March 20, 2026 3:28 PM
To: Ezzati, Vista
Cc: Platt, Jay; Mnatsakanyan, Ani; Abajian, Suzie; Golanian, Roubik
Subject: Comment on Notice of Preparation of Draft Environmental Impact Report For Star Mazda Vehicle Dealership Expansion Project located at 1401 S. Brand Blvd.
Attachments: Appendix B, pg. 9.pdf; pg.133 Glendale Historic Context .pdf

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email was delivered from the Internet. Do not click links, open attachments, or reply if you are unsure as to the sender.

City of Glendale
Community Development Department – Planning Division
633 East Broadway, Room 103
Glendale, CA 91206
Attn: Vista Ezzati, Principal Planner

Dear Ms. Ezzati,

It has come to the attention of the Glendale Historical Society that the Star Mazda Dealership located at 1401 Brand Blvd should be considered for the Glendale Historic Register.

The 2018 South Glendale Survey identified the property, 1401 S Brand, in Appendix G - Historic Resources Survey, Appendix B Property Table on pg. 9 as 5S3. Designating that the property was recognized as historically significant by the local government.
Please see the attachment below.

It was also described in Appendix I, Historic Context Statement on pg. 133 under the theme Auto Row and the Brand Boulevard of Cars.
Please see the attachment below.

The property is the only high-style Mid-Century automobile dealership remaining in Glendale. The showroom is International style from the late 1950's and the brick service building is Neoformalist in style and was completed in 1968.
The dealership's significance is its direct association with the development of the Brand Blvd of Cars and the commercial development of Glendale. As well as being a rare remaining example of Mid-Century Modern and Neoformalist styles of architecture.

Also of note is that the City acknowledges that there are differing opinions. See page 13 in the Initial Study:
“A Historic Resource Evaluation, dated March 12, 2021, and updated on May 26, 2022, was prepared for this project by Kaplan Chen Kaplan (see Appendix A to this Initial Study). The evaluation determined that there are no historic resources on the property, and it would not be eligible for designation at the Local, State, or Federal level. The existing vehicle showroom and service reception building, which was built in 1958, was evaluated in the City of Glendale's 2017 South Glendale Historic Resources Survey and assigned a California Historical Resource (CHR) Status Code of 5S3, indicating that it appears eligible for listing in the Glendale Register of Historic Resources. The survey finds the property to be eligible for listing in the Glendale Register because it is a rare example of a remnant auto dealership from the 1950s, and it is a good example of Mid-century Modern commercial architecture in South Glendale. The character-defining features of the original design include the single-story height, expressed steel post-and-beam construction with brick masonry, L-shaped plan with simple massing and asymmetrical composition, flat roof, glass curtain walls, and a flat canopy suspended from a steel frame. The survey also identifies that the property retains the integrity of location, design, setting, materials, workmanship, feeling, and association. The City's preservation planner supports this finding. Because there is divergent expert opinion regarding the showroom building's possible historic status, the proposed demolition could cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5. Therefore, the Project may have a potentially significant impact, and this issue requires further analysis in the EIR.”

The Glendale Historical Society supports this property's historic significance being strongly reconsidered and recommends that preservation alternatives be considered in the required alternatives analysis.

Sincerely,
Ingrid E Wilcox
Preservation Action Committee
The Glendale Historical Society

1401	S	Brand	Blvd	1958	Palmer Lincoln Mercury; California Motors	Mason, Muntz & Associates		Mid-century Modern			PERMIT: 1950, Toilet room added to R.& H. Motors Inc, by architect Raymond Jones. PERMIT: 1955, Storage building addition for owner Tommie Vaughn Motors. No architect listed. PERMIT: 1958, Sales and service of automobiles building for California Motors; Architect listed as Mason and Muntz and contractor as Peter Kiewit and Son.	N/A	Palmer Lincoln Mercury dealership in 1957. Los Feliz Ford by 1984 per Los Angeles Times Ads. California Motors (1958, Mason, Muntz & Associates218) at 1401 S. Brand Boulevard is an example of a postwar automobile dealership design. Opened in July of 1958, the post-and-beam Mid-Century Modern style display room was a "jewel box" building "encased in 3,000 square feet of twelve-foot high glass." The $500,000 new facility enabled the company to consolidate all of its previously scattered facilities at one location ("Agency Opens New Facilities," Los Angeles Times, July 27, 1958). Vernon-based Mason, Muntz & Associates consisted of partners C. Keith Mason and Donald D. Muntz 1916-unknown), AIA. Their partnership lasted from 1951-1965. They are best known for their commercial and institutional work including a research lab for Shell Oil Company (1957) and Charles MacLay High School (1959). Muntz was educated at USC and worked under architect Hugh Gibbs.	5S3	Commercial Development: Post-World War II Commercial Development; Architecture & Design: Post-World War II Modernism: Mid-century Modern	Auto-related commercial development; Mid-century Modern architecture

Route 66 traveled through Glendale along Colorado Street. As a result, a small cluster of motels developed in the 1500 block of E. Colorado in South Glendale. The best extant example of this commercial cluster is the brick Ranch-style Rio Motel, constructed in 1948 and located at 1515 E. Colorado. The Mid-century Modern Astro Motel (1963) at 326 E. Colorado Street is another example of roadside architecture in South Glendale. Its folded-plate roof, bold signage, and L-shaped plan with plentiful parking attracted passing motorists.

Brand Boulevard of Cars

After World War II, new car sales began in 1945, launching a period of unprecedented consumer growth indicated in part by the quadrupling of American car sales during the period between 1946 and 1955. Dealerships everywhere took pains to upgrade their showrooms and reintroduce consumers to the automobile. Most employed Mid-century Modern architecture to convey modern technology and styling. The dealerships featured large glass windows and distinctive signage for roadside visibility.

Post-war automobile showrooms included the R &H Motors Showroom, (1947, John Lautner; demolished) on Colorado Street, and California Motors (1958, Mason, Muntz & Associates) at 1401 S. Brand Boulevard.[287] Opened in July of 1958, the post-and-beam, Mid-century Modern style display room was a "jewel box" building "encased in 3,000 square feet of twelve-foot high glass."[288] The $500,000 new facility enabled the company to consolidate all of its previously scattered facilities at one location. Cadillac Modern Motors (demolished), designed by Heinsbergen Decorating Company at 1225 S. Brand Boulevard, was featured in the fall 1960 issue of *Architectural Digest*.



The ultramodern Modern Motors circa 1960 at 1225 S. Brand Boulevard (Heinsbergen Decorating Company) as featured in *Architectural Digest* in 1960. Photograph: Maynard L. Parker. Source: The Huntington Library Photo Archives.



R&H Motors (1947, John Lautner) on Colorado Street. Photo: Julius Shulman. Source: the J. Paul Getty Trust, The Getty Reseach Institute, Los Angeles.

[287] Vernon-based Mason, Muntz & Associates consisted of partners C. Keith Mason and Donald D. Muntz (1916-unknown), AIA. Their partnership lasted from 1951-1965. They are best known for their commercial and institutional work including a research lab for Shell Oil Company (1957) and Charles MacLay High School (1959). Muntz was educated at USC and worked under architect Hugh Gibbs.
[288] "Agency Opens New Facilities," *Los Angeles Times*, July 27, 1958.