

CITY OF GLENDALE

Star Mazda Vehicle Dealership Expansion Project Draft Environmental Impact Report SCH #: 2026020750

September 2026

PREPARED BY:
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STAR MAZDA VEHICLE DEALERSHIP EXPANSION PROJECT

Draft Environmental Impact Report
State Clearinghouse No. 2026020750

Prepared for:

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EXECUTIVE SUMMARY

INTRODUCTION

This Draft Environmental Impact Report (EIR) evaluates the potential environmental impacts associated with the Star Mazda Vehicle Dealership Expansion Project (Project). It is intended to serve as an informational document for public agency decision makers and the general public regarding the objectives and components of the proposed Project, its potential significant environmental impacts, and feasible mitigation measures and alternatives. The City of Glendale (City) is the lead agency under the California Environmental Quality Act (CEQA) and is responsible for preparing the Project's EIR (State Clearinghouse No. 2026020750). The City, as the lead agency, will review and consider the EIR in its decision to approve, conditionally approve, revise, or deny the proposed Project.

Should the Project be approved and the EIR certified, the City will consider and adopt a Mitigation Monitoring and Reporting Program (MMRP) to ensure implementation of the mitigation measures identified in this document. Furthermore, because the Project would result in an unmitigated significant environmental impact, the City will be required to adopt a Statement of Overriding Considerations supporting its actions.

The actions involved in the implementation of the Project are described in Section 2.0, Project Description. Other agencies that may have discretionary approval over the Project, or components thereof, are also described in Section 2.0.

ES.1 PROJECT LOCATION AND SETTING

The Project site is located at 1401 South Brand Boulevard in the City of Glendale and is located in the CA (Commercial Auto) Zone. The 1.26-acre site is bounded by West Los Feliz Road to the north, South Brand Boulevard to the east, West Laurel Street to the south, and a public alley to the west. The property is fully developed and currently operates as the Star Mazda vehicle dealership within the established "Brand Boulevard of Cars" commercial auto corridor.

ES.2 PROJECT DESCRIPTION

The Project involves the modernization and expansion of the existing Star Mazda dealership to meet contemporary Mazda corporate architectural, design, and branding standards. To accommodate the expansion, the Project would demolish approximately 9,500 square feet of existing structures, including the 1958 showroom and service reception building and an attached office/parts building.

A new two-story, approximately 11,840-square-foot showroom and office building would be constructed on the southern portion of the site, oriented toward South Brand Boulevard and West Laurel Street. The existing 17,315-square-foot service facility and 3,415-square-foot parts facility would remain and continue to provide service and parts operations. Upon completion, the total building floor area on the site would be approximately 32,570 square feet, representing a net increase of about 2,340 square feet.

ES.2.1 Project Objectives

In accordance with Section 15124(b) of the *State CEQA Guidelines*, an EIR must include a clearly written statement of objectives to help the Lead Agency develop a reasonable range of alternatives and to aid decision-makers in preparing findings or a statement of overriding considerations. The underlying purpose of the Project is to modernize and expand the existing Star Mazda dealership facilities to meet contemporary brand standards and operational demands while improving customer experience and site functionality, while appropriately recognizing and memorializing the site's mid-century architectural and commercial heritage and contributing to the City's ongoing economic vitality.

Specific objectives of the proposed Project include:

1. Modernize and upgrade the existing Star Mazda dealership to comply with current Mazda corporate architectural, design, and branding standards.

2. Optimize site utilization and operational efficiency by consolidating the showroom, service reception, and sales offices into a cohesive, state-of-the-art facility.

3. Enhance the customer retail and service experience by providing modern amenities, including a dedicated vehicle delivery studio, prominent display areas, and expanded customer lounge spaces.

4. Implement comprehensive sustainable building practices including rooftop solar installation and all electric building systems to conform to the latest California Green Building Standards Code (CALGreen) and applicable City of Glendale codes.

5. Reconfigure on-site circulation and surface parking to efficiently accommodate vehicle display, customer parking, and tandem service parking, while utilizing the parking relief provisions of Assembly Bill (AB) 2097 for developments in transit-rich areas.

6. Recognize and memorialize the mid-century commercial automotive heritage of the "Brand Boulevard of Cars" and the site's architectural history to the extent feasible given the Project's operational needs, including through documentation and public interpretive materials where physical retention is not feasible.

7. Strengthen the City of Glendale's economic base by retaining, modernizing, and expanding a major automotive retailer within the established "Brand Boulevard of Cars" commercial corridor, thereby generating increased local sales tax and property tax revenues to support municipal services, infrastructure, and public amenities.

ES.2.2 Requested Approvals

The City of Glendale is the Lead Agency for the Project under CEQA. The Project requires the following discretionary approvals and permits from the City and other agencies:

City of Glendale

- Design Review Board (DRB) approval for site planning, architectural design, massing, and landscaping.
- Demolition, grading, and building permits.
- Public Works encroachment permit for driveway relocation and other work within the public right-of-way.
- Tree removal permit pursuant to Glendale Municipal Code Chapter 12.40 (for affected street tree within the West Laurel Street public right-of-way).
- Certification of the Final EIR, adoption of the Mitigation Monitoring and Reporting Program, adoption of a Resolution of Findings in Support of a Statement of Overriding Considerations, and approval of the Project by the City decision making body (e.g., City Council or other designated body).

Other Agencies

- Los Angeles Regional Water Quality Control Board (RWQCB): approval of the Project's SUSMP/LID design and compliance with NPDES stormwater requirements.
- South Coast Air Quality Management District (SCAQMD): compliance with applicable rules and regulations, including Rule 403 (Fugitive Dust) and Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), as applicable.

Additional ministerial permits (e.g., utility connection permits, business licenses) may be required; however, these do not involve discretionary authority over environmental impacts and therefore are not considered CEQA discretionary approvals.

ES.3 SCOPE OF THE EIR

This Draft EIR addresses the potential environmental effects of the Project and alternatives to the Project. The scope of the Draft EIR includes issues identified by the City and raised by agencies and the general public in response to the scoping process and Notice of Preparation (NOP), as described below.

ES.3.1 Scoping Process

In compliance with the *State CEQA Guidelines*, the City has taken steps to maximize opportunities for the public to participate in the environmental process. An Initial Study (**Appendix 1.0-1**) was prepared to analyze the potential physical environmental impacts of the proposed Project and detail the potentially significant impacts that would be analyzed in greater detail in the Project's EIR. The Initial Study was circulated on February 19, 2026, for public review in conjunction with the Notice of Preparation (NOP). The NOP is available in Appendix 1.0-2. The IS/NOP was circulated to solicit comments and inform the public of the proposed Project. The proposed Project was described, potential environmental effects associated with implementation were identified, and agencies and the public were invited to review and comment on the IS/NOP. The review period for the IS/NOP closed on March 20, 2026.

At the time of preparation of this EIR, the City received five comment letters during the IS/NOP public review period. These included letters from The Glendale Historical Society, a qualified architectural historian, the California Department of Transportation (Caltrans) District 7, the Native American Heritage Commission (NAHC), and the Fernandeño Tataviam Band of Mission Indians. All comment letters received during the IS/NOP public review period are included in **Appendix 1.0-3**.

The following environmental issues were identified through the scoping process as having potential impacts associated with implementation of the Project and are addressed in this Draft EIR:

- 3.1, Cultural Resources
- 3.2, Hazards and Hazardous Materials

All other environmental issue areas were evaluated in the IS and determined to have less than significant impacts or no impacts. Those topics are summarized in **Section 5.0** and are not analyzed in detail in this Draft EIR.

ES.3.2 Areas of Controversy and Issues to be Resolved

Section 15123(b)(2) of the *State CEQA Guidelines* requires that an EIR summary identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public. During the 30-day NOP public scoping period (February 19, 2026, to March 20, 2026), the City received five comment letters from the following entities, and these letters are provided in **Appendix 1.0-3** of the Draft EIR:

- The Glendale Historical Society (TGHS)
- Francesca Smith (Qualified Architectural Historian)
- California Department of Transportation (Caltrans) District 7
- Native American Heritage Commission (NAHC)
- Fernandeño Tataviam Band of Mission Indians

Based on these comment letters and the environmental analysis conducted for this EIR, the key areas of controversy and issues to be resolved include:

- Historic resource preservation: The Project proposes demolition of the 1958 Mason and Muntz-designed showroom. The property was identified in the City's South Glendale Historic Resources Survey as individually eligible for listing in the Glendale Register of Historic Resources (assigned a California Historical Resource Status Code of 5S3, indicating that the resource appears eligible for local listing through survey evaluation). An earlier Historic Resource Evaluation prepared for the Project Applicant by Kaplan Chen Kaplan (March 2021, updated May 2022) concluded the property was not eligible for listing at any level, based on the loss of historic integrity from alterations to the showroom's glazed elevations. Because this conclusion diverged from the City's preservation planner and the historic resources survey findings, the Initial Study identified this divergence of expert opinion as requiring further analysis in the EIR. The Project's Historical Resource Assessment, prepared by ASM Affiliates (May 2026) (**Appendix 3.1**), independently re-evaluated the property, including a review of the Kaplan Chen Kaplan findings, and determined the property retains sufficient integrity in all seven aspects and is individually eligible for listing in the CRHR under Criterion 1 (association with important events reflecting broad patterns of local and regional history) and Criterion 3 (embodying the distinctive characteristics of Mid-Century Modern commercial architecture), and correspondingly eligible for the Glendale Register under local Criteria 1 and 3. Because of this eligibility, it qualifies as a CEQA historical resource that is associated with Mid-Century Modern commercial architecture along the "Brand Boulevard of Cars."

- Multimodal transportation and AB 2097: The Project proposes parking relief under Assembly Bill (AB) 2097. Questions related to multimodal transportation, pedestrian and bicycle activity, and transit use within the High-Quality Transit Corridor (HQTC), as requested by Caltrans.

These issues are addressed in the topic-specific sections of this EIR and inform the alternatives analysis and mitigation framework.

ES.4 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

This EIR provides detailed analysis for two environmental issue areas:

- 3.1, Cultural Resources (Historical Resources)
- 3.2, Hazards and Hazardous Materials (Accidental Release)

All other environmental issue areas (i.e., Aesthetics, Agriculture/Forestry Resources, Air Quality, Biological Resources, Cultural Resources [Archaeological Resources, Human Remains], Energy, Geology/Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials [Remaining thresholds] Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities/Service Systems, and Wildfire) were determined to have less than significant impacts or no impacts, as summarized in **Section 5.0** and documented in the Initial Study (**Appendix 1.0-1** to this Draft EIR).

The Project would result in one significant and unavoidable impact related to demolition of a historical resource, even after implementation of feasible mitigation measures. Hazards and hazardous materials impacts would be less than significant. **Table ES 1, Summary of Impacts and Mitigation Measures**, summarizes the environmental impacts, mitigation measures, and significance after mitigation for the fully analyzed topics.

Consistent with CEQA, the City will adopt the MMRP with the Final EIR and project approvals to ensure that required mitigation measures are implemented.

Table ES-1
Summary of Impacts and Mitigation Measures

Project Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance After Mitigation
Cultural Resources (Historic Resources)			
Impact CUL-1: The Project would cause a substantial adverse change in the significance of a historical resource by demolishing the 1958 showroom, sales offices, parts office, and warehouse buildings at 1401 South Brand Boulevard. The Project would also contribute to a cumulatively considerable loss of Mid-Century Modern commercial auto dealership buildings in South Glendale and along the Brand Boulevard of Cars.	Significant	**MM CUL-1:** Preparation of a historic level documentation package (HABS like), including archival quality photographs, a historical narrative, and copies of available plans, with copies provided to the City of Glendale, The Glendale Historical Society, and an appropriate archival repository. **MM CUL-2:** Preparation of onsite interpretive panels describing the history and architecture of the dealership and its role in the Brand Boulevard of Cars, using materials from MM CUL-1.	Significant and Unavoidable
Hazards and Hazardous Materials			
Impact HAZ 1: The Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials (e.g., demolition of older structures, historic subsurface features).	Less than significant	No mitigation measures are required	Less than significant

ES.5 ALTERNATIVES TO THE PROPOSED PROJECTS

In accordance with *State CEQA Guidelines* Section 15126.6, this EIR evaluates a reasonable range of alternatives that could feasibly attain most of the Project's basic objectives while avoiding or substantially lessening the significant environmental impacts of the Project. The alternatives analyzed in Section 4.0 are:

Alternative 1: No Project/No Build Alternative

The Project would not be constructed, and the existing 1958 showroom and associated buildings would remain in their current condition. No demolition or new construction would occur. This alternative would avoid the significant and unavoidable impact on historical resources.

Alternative 2: Partial Preservation Alternative

The 11,840-square-foot expansion would be adaptively integrated behind preserved primary façades of the 1958 showroom, including the tall glass panels, expressed post-and-beam construction, and modular brick elements along key elevations. This alternative is intended to substantially lessen the Project's impact on historical resources while still allowing some modernization and expansion.

Alternative 3: Full Preservation / Freestanding Expansion Alternative

The 1958 structure would be fully retained with no demolition, and the new 11,840-square-foot facility would be constructed as a freestanding building on the southern surface parking lot. The historic building would be repurposed for secondary dealership uses. This alternative is identified as the Environmentally Superior Build Alternative because it completely avoids demolition of the historical resource but conflicts with several core operational and circulation objectives.

ES.6 REVIEW OF THE DRAFT EIR

The Draft EIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and other interested parties in accordance with *State CEQA Guidelines* Section 15086. The Notice of Completion for the Draft EIR was also distributed as required by CEQA. During the 45-day public review period, the Draft EIR, including the technical appendices, will be available for review at the City of Glendale Community Development Department – Planning Division, 633 East Broadway, Room 103, Glendale, CA 91206, during the City's regular business hours, and on the City's website at:

https://www.glendaleca.gov/environmental

Written comments on the Draft EIR should be addressed to:

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

Upon completion of the 45-day public review period, written responses to all significant environmental issues raised will be prepared and made available for review at least 10 days prior to consideration of the Final EIR before the City decision-making body. These environmental comments and their responses will be included as part of the Final EIR for consideration by decision makers for the Project.

1.0 INTRODUCTION

1.1 PURPOSE OF THE EIR

This Environmental Impact Report (EIR) has been prepared to evaluate the potential environmental effects of the proposed Star Mazda Vehicle Dealership Expansion Project (Project) located in the City of Glendale, California (City). All discretionary projects within the State of California are required to undergo environmental review to determine the environmental impacts associated with implementation of the project in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the *State CEQA Guidelines* (California Code of Regulations, Title 14, Chapter 3, Section 15000 et seq.).

The City is the Lead Agency for the Project under CEQA. Based on the findings of the Initial Study prepared for the Project, the City determined that the Project could result in potentially significant impacts to the environment, particularly with respect to historic resources and hazards and hazardous materials, thereby requiring the preparation of an EIR. This Draft EIR is intended to inform City decisionmakers, responsible agencies, trustee agencies, and the general public of the potentially significant environmental effects of the Project, identify feasible mitigation measures to avoid or reduce those effects, and evaluate a reasonable range of alternatives to the Project.

Consistent with CEQA, this EIR is an informational document; it does not in itself approve or deny the Project. Instead, it discloses potential environmental impacts, mitigation measures, and alternatives so that the City's decisionmakers can consider environmental consequences alongside other policy and technical considerations prior to making a decision on the Project.

1.2 PROJECT SUMMARY

The Project Site is located at 1401 South Brand Boulevard in the City on an approximately 1.26-acre (54,853 square-foot) property within the Commercial Auto (CA) zone and designated Community Services Commercial by the City's General Plan. The Project Site is currently developed with the existing Star Mazda automobile dealership, including a showroom, service reception area, parts building, service bays, and associated paved parking and vehicle display areas.

The Project proposes the expansion and modernization of the existing Star Mazda dealership. To accommodate the expansion, the Project involves demolition of approximately 9,500 square feet of existing structures, including an approximately 8,600 square foot 1958 showroom and service reception building and an approximately 900 square foot parts/delivery and used car sales manager's office.

The Project would construct a new two story, approximately 11,840 square foot sales and office facility on the southern portion of the site at the corner of South Brand Boulevard and West Laurel Street and would reconfigure onsite circulation and parking while maintaining the existing service workshop. A detailed description of the Project, including site layout, access, parking, and operations, is provided in **Section 2.0, Project Description**, of this Draft EIR.

1.3 PROJECT APPROVALS REQUESTED

As defined by CEQA, a Lead Agency is the public agency with the principal responsibility for approving or denying a project. The City is the Lead Agency for consideration and approval of the Project and is responsible for preparing, circulating, and certifying the EIR and for making discretionary decisions on the entitlements listed below. The City will hold a public hearing to consider certification of the EIR. The City must certify the Final EIR before making its decision on the Project.

The Project would require permits and approvals prior to construction. These permits and approvals are identified below and may be subject to change as the project entitlement process proceeds:

- Design Review Board (DRB) approval for the proposed building and site design.
- Demolition, grading, and building permits.
- Public Works encroachment permit for any work within the public right-of-way.
- Tree removal permit pursuant to Glendale Municipal Code Chapter 12.40 (for one affected street tree within the West Laurel Street public right-of-way).
- Certification of the EIR and approval of the Project by the City of Glendale decision-making body.
- Additional ministerial permits (e.g., utility connections, business license), may be required prior to construction, but they do not involve discretionary authority over the Project's environmental impacts.

1.4 ENVIRONMENTAL REVIEW PROCESS

The environmental review process, as required under CEQA, is summarized below. The steps are presented in sequential order:

1. **Notice of Preparation (NOP)**. Immediately after deciding that an EIR is required, the lead agency files an NOP soliciting input on the EIR scope to "responsible," "trustee," and involved federal agencies; to the State Clearinghouse, if one or more state agencies is a responsible or trustee agency; and to parties

previously requesting notice in writing. A scoping meeting to solicit public input on the issues to be assessed in the EIR, while not always required, may be conducted by the lead agency.

2. **Draft Environmental Impact Report (Draft EIR).** The Draft EIR must contain a (1) table of contents or index, (2) summary, (3) project description, (4) environmental setting, (5) environmental impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts), (6) alternatives, (7) mitigation measures, (8) irreversible changes, and (9) organizations and persons consulted.

3. **Public Notice and Review.** The lead agency must prepare a Notice of Availability (NOA)/Notice of Completion (NOC) of an EIR as soon as it completes a Draft EIR. The NOA/NOC must be posted in the County Clerk's office (Public Resources Code Section 21092.3) and sent to anyone requesting it. The Draft EIR must be posted for a public review period of 45 days, unless a shorter period is approved by the State Clearinghouse (Public Resources Code Section 21091). Distribution of the Draft EIR through the State Clearinghouse is required.

4. **Final EIR.** A Final EIR must include (1) the Draft EIR or a revision thereof, (2) copies of comments received during public review, (3) a list of persons and entities commenting, and (4) responses to comments.

5. **Certification of Final EIR.** Prior to approving a project, the lead agency shall certify that (1) the Final EIR has been completed in compliance with CEQA, (2) the Final EIR was presented to the decision-making body of the lead agency, and (3) the decision-making body reviewed and considered the information in the Final EIR.

6. **Lead Agency Project Decision**. The lead agency may (1) disapprove a project because of its significant environmental effects; (2) require changes to a project to reduce or avoid significant environmental effects; or (3) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted.

7. **Findings / Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either (1) the project has been changed to avoid or substantially reduce the magnitude of the impact; (2) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or (3) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible. If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.

8. **Mitigation Monitoring and Reporting Program (MMRP).** When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.

9. **Notice of Determination.** An agency must file a Notice of Determination after deciding to approve a project for which an EIR is prepared. A local agency must file the notice with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA challenges.

1.4.1 Notice of Preparation and Initial Study

One of the primary objectives of CEQA is to enhance public participation in the planning process. Community members are encouraged to participate in the environmental review process, request to be notified of meetings and release of documents, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the lead agency. The environmental review process provides various opportunities for the public to participate through scoping, public review of CEQA documents, and public hearings.

In compliance with the *State CEQA Guidelines*, an NOP was posted with the Los Angeles County Clerk and the State Clearinghouse on February 19, 2026, to solicit comments from other agencies and inform the public of the Project. A copy of the NOP is available in **Appendix 1.0-2** of this Draft EIR. An Initial Study (IS) was prepared and circulated with the NOP to focus the EIR on topics identified as potentially significant. The IS is available in **Appendix 1.0-1** of this Draft EIR. The Project was described, potential environmental effects associated with Project implementation were identified, and agencies and the public were invited to review and comment on the IS/NOP. The IS/NOP review and comment period closed on March 20, 2026. A public scoping meeting was not held for this Project, as it is not strictly required under CEQA for a project of this scope. Consistent with *State CEQA Guidelines* Section 15125(a), for purposes of the environmental analyses in this Draft EIR, the Project baseline is defined as the existing physical environmental conditions on the Project Site at the time the NOP was published in February 2026.

1.4.2 Draft EIR

The Project has been made available on the City website in accordance with *State CEQA Guidelines* Section 15087. The Notice of Completion for the Draft EIR was also distributed as required by CEQA. During the 45-day public review period, the Draft EIR is available for review City's website at:

https://www.glendaleca.gov/environmental

Hard copies of the Draft EIR and technical appendices are also available for public inspection during regular business hours at the City of Glendale Community Development Department – Planning Division, located at 633 East Broadway, Room 103, Glendale, CA 91206.

Written comments on the Draft EIR may be submitted via:

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

E-mail: VEzzati@glendaleca.gov

Pursuant to *State CEQA Guidelines* Section 15088, the City will prepare written responses to comments received during the noticed comment period and include those responses in the Final EIR. The public will also be provided with opportunities to present oral and written comments at future hearings and meetings on the Project. The City may, but is not required to, provide written responses to comments submitted after the circulation period for the Draft EIR.

1.4.3 Final EIR and Certification

Following the close of the public review period on the Draft EIR, the City will prepare and publish a Final EIR, which will contain a summary of all written and recorded oral comments on the Draft EIR received during the public review period and written responses to those comments that raise environmental concerns, along with copies of the letters received, and any necessary revisions to the EIR. The Final EIR will be comprised of the Draft EIR, comments on the Draft EIR, and a list of persons, organizations, and public agencies that commented on the Draft EIR, response to comments, and any revisions to the Draft EIR. The Final EIR will be available for public review prior to consideration of certification of the document by the decision-makers. The City, in an advertised public meeting(s), will consider the documents and then, if found adequate, certify the Final EIR as completed in compliance with CEQA and the *State CEQA Guidelines*.

1.5 AREAS OF CONTROVERSY / ISSUES TO BE RESOLVED

Section 15123(b)(2) of the *State CEQA Guidelines* requires that an EIR summary identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public. During the 30-day NOP public scoping period (February 19, 2026, to March 20, 2026), the City received five comment letters from the following entities, and these letters are provided in **Appendix 1.0-3** of the Draft EIR:

- The Glendale Historical Society (TGHS)
- Francesca Smith (Qualified Architectural Historian)
- California Department of Transportation (Caltrans) District 7
- Native American Heritage Commission (NAHC)
- Fernandeño Tataviam Band of Mission Indians

Based on these comment letters and the environmental analysis conducted for this EIR, the key areas of controversy and issues to be resolved include:

- Historic resource preservation: The Project proposes demolition of the 1958 Mason and Muntz-designed showroom. The property was identified in the City's South Glendale Historic Resources Survey as individually eligible for listing in the Glendale Register of Historic Resources (assigned a California Historical Resource Status Code of 5S3, indicating that the resource appears eligible for local listing through survey evaluation). An earlier Historic Resource Evaluation prepared for the Project Applicant by Kaplan Chen Kaplan (March 2021, updated May 2022) concluded the property was not eligible for listing at any level, based on the loss of historic integrity from alterations to the showroom's glazed elevations. Because this conclusion diverged from the City's preservation planner and the historic resources survey findings, the Initial Study identified this divergence of expert opinion as requiring further analysis in the EIR. The Project's Historical Resource Assessment, prepared by ASM Affiliates (May 2026) (**Appendix 3.1**), independently re-evaluated the property, including a review of the Kaplan Chen Kaplan findings, and determined the property retains sufficient integrity in all seven aspects and is individually eligible for listing in the CRHR under Criterion 1 (association with important events reflecting broad patterns of local and regional history) and Criterion 3 (embodying the distinctive characteristics of Mid-Century Modern commercial architecture), and correspondingly eligible for the Glendale Register under local Criteria 1 and 3. Because of this eligibility, it qualifies as a CEQA historical resource that is associated with Mid-Century Modern commercial architecture along the Brand Boulevard of Cars.

- Multimodal transportation and AB 2097: The Project proposes parking relief under Assembly Bill (AB) 2097. Questions related to multimodal transportation, pedestrian and bicycle activity, and transit use within the High-Quality Transit Corridor (HQTC), as requested by Caltrans.

These issues are addressed in the topic-specific sections of this EIR and inform the alternatives analysis and mitigation framework.

1.6 ORGANIZATION OF THIS EIR

An Initial Study has been prepared pursuant to *State CEQA Guidelines* section 15063(c)(3), which states that an initial study may be used to focus an EIR on the effects of a proposed project that are determined to be significant. Please refer to **Appendix 1.0-1** of this Draft EIR for the Initial Study. The EIR is organized into the following sections so the reader can easily obtain information about the Project and its specific issues:

- **Executive Summary:** Provides a brief Project description; a summary of environmental impacts, mitigation measures, and level of significance after mitigation; and a summary comparison of Project alternatives.

- **Section 1.0, Introduction**: Describes the purpose of the EIR, the CEQA environmental review process, the scope of the document, its organization, and its intended uses.

- **Section 2.0, Project Description**: Provides a detailed description of the Project location, existing conditions, Project objectives, and proposed physical and operational characteristics.

- **Section 3.0, Environmental Impact Analysis**: Contains detailed environmental analysis for each resource area scoped into the EIR. Each subsection describes the environmental setting, regulatory framework, thresholds of significance, methodology, impact analysis, mitigation measures, and cumulative impacts.

- **Section 4.0, Alternatives**: Evaluates a reasonable range of alternatives to the proposed Project, including the No Project Alternative, and identifies the environmentally superior alternative in accordance with CEQA.

- **Section 5.0, Effects Found Not to Be Significant**: Summarizes environmental issue areas determined in the Initial Study to have no impact or a less-than-significant impact and therefore not analyzed in detail in this EIR.

- **Section 6.0, Other CEQA Considerations**: Discusses growth-inducing impacts, significant irreversible environmental changes, and significant and unavoidable impacts of the Project.

- **Section 7.0, References**: Lists the references used throughout the Draft EIR analysis.

- **Section 8.0, List of EIR Preparers**: Identifies the Lead Agency staff and consultants involved in the preparation of this EIR.

2.0 PROJECT DESCRIPTION

INTRODUCTION

This section of the Draft Environmental Impact Report (EIR) describes the existing Star Mazda Vehicle Dealership Expansion Project (Project) site and surroundings, discusses the Project site's regional location, and details surrounding land uses. It also includes a statement of the objectives sought by the Project and provides a detailed description of the Project's technical, economic, and environmental characteristics.

California Environmental Quality Act (CEQA) Guidelines Section 15124 state that a project description in an EIR must contain the following information: (1) the precise location and boundaries of the proposed project; (2) a statement of the objectives sought by the proposed project; (3) a general description of the project's technical, economic, and environmental characteristics; and (4) a statement briefly describing the intended uses of the EIR. The *State CEQA Guidelines* indicate that a project description should not supply extensive detail beyond that needed for evaluation and review of environmental impacts, but must contain sufficient specific information to serve as the foundation for the environmental analysis. The following project description fulfills these requirements and serves as the analytical baseline for this EIR.

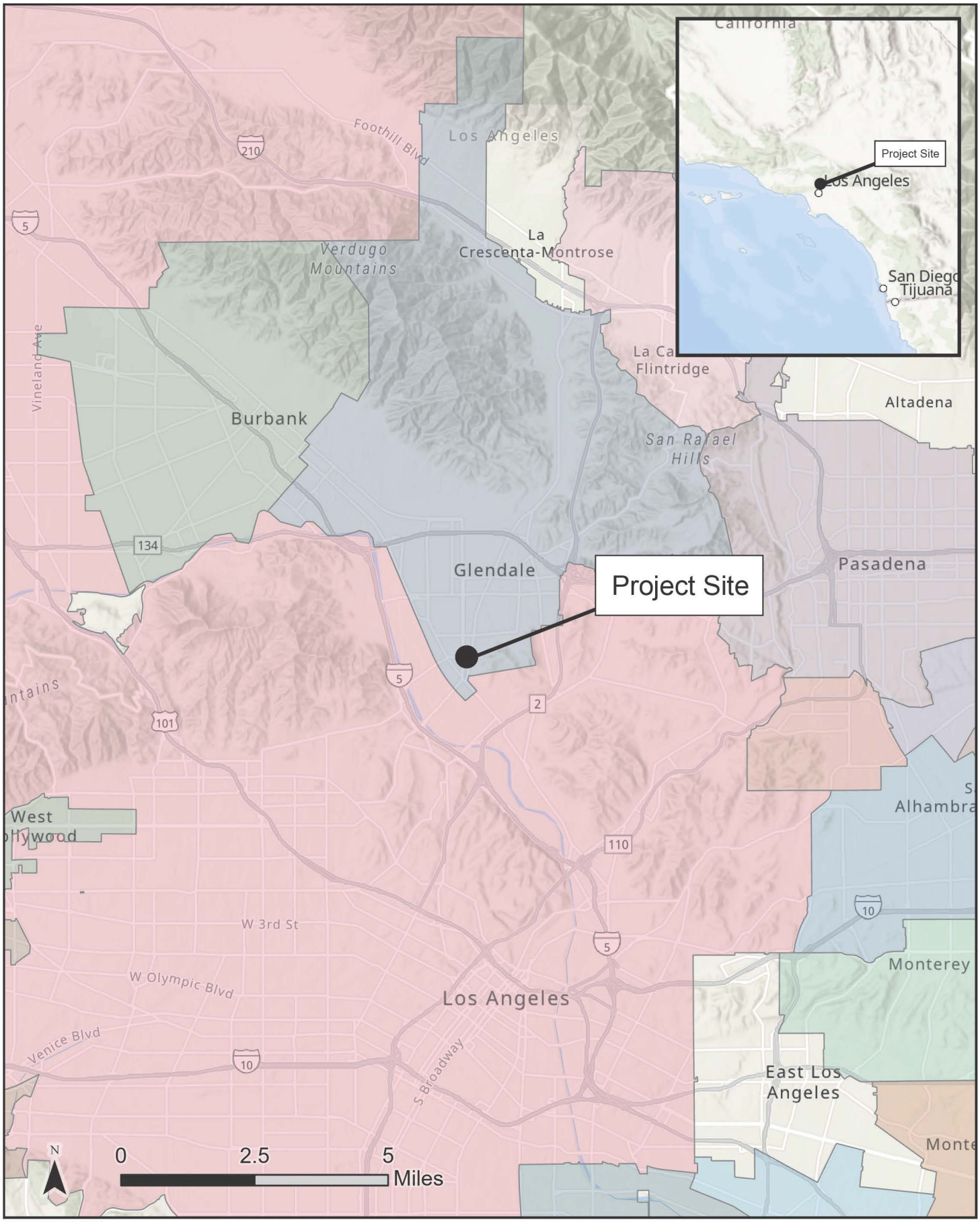
2.1 PROJECT LOCATION AND SITE CHARACTERISTICS

2.1.1 Regional Context

The City of Glendale (City) is located in the central portion of Los Angeles County, at the eastern edge of the San Fernando Valley. It is bordered by the City of Burbank to the west, the City of Pasadena to the east, and the City of Los Angeles to the south and north (see **Figure 2.0-1, Regional Context**). The City's northern boundary is defined by the Verdugo and the San Gabriel Mountains, which provide a natural backdrop and open space that distinguishes Glendale from more densely urbanized neighboring areas. Regional vehicular access is provided by State Route 134 which bisects the City east to west, by Interstate 210 to the north, State Route 2 to the east, and Interstate 5 to the west.

2.1.2 Project Location

The Project is located at 1401 South Brand Boulevard, on the southeast corner of the intersection of South Brand Boulevard and West Los Feliz Road (Project Site) in the CA (Commercial Auto) Zone. The Project Site is approximately 1.26 acres (54,853 square feet), generally rectangular, and is bounded by West Los Feliz Road to the north, South Brand Boulevard to the east, West Laurel Street to the south, and a 20-foot-wide public alley to the west (see **Figure 2.0-2, Aerial Photograph of the Project Site**).



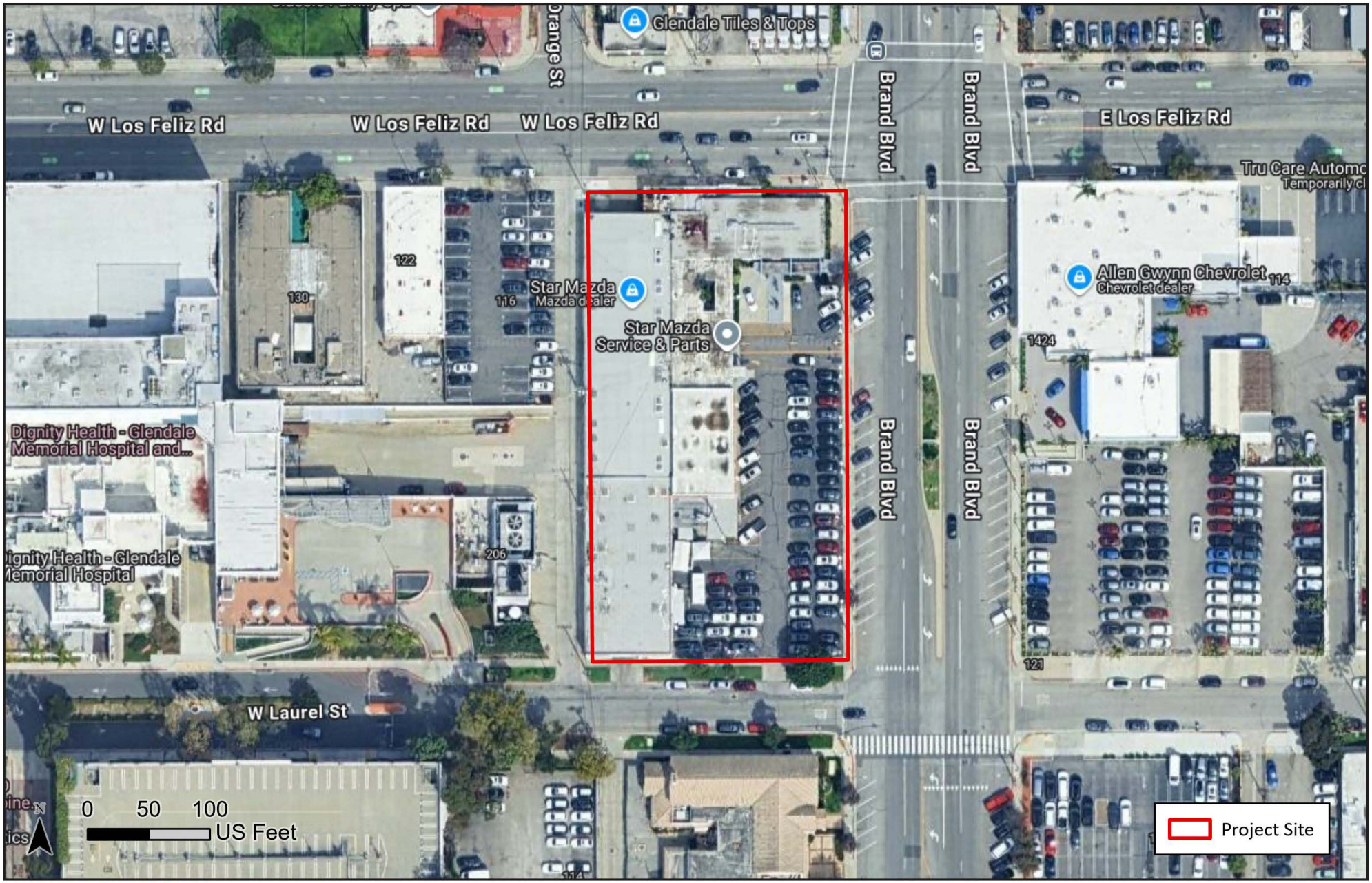
SOURCE: Esri, 2025

FIGURE **2.0-1**

IMPACT SCIENCES

Regional Context

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SOURCE: Google Earth, 2025; Esri, 2025

FIGURE **2.0-2**

Aerial Photograph of the Project Site

IMPACT SCIENCES

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The Project Site is located within a High-Quality Transit Area (HQTA). Both South Brand Boulevard and West Los Feliz Road are classified by the Southern California Association of Governments (SCAG) as High-Quality Transit Corridors (HQTCs). The Glendale Transportation Center, a major multi-modal transit hub, is located approximately 0.3 miles southwest of the Project Site, situating the Project within an area that is well-served by transit.

2.1.3 Existing Conditions and Surrounding Land Uses

The Project Site is fully developed and currently operates as the Star Mazda vehicle dealership. The Project Site contains an assemblage of connected one-story structures constructed over several decades, including: an approximately 8,600-square-foot showroom and service reception building located along the northern portion of the site (constructed in 1958), a 900-square-foot office and parts delivery building near the center of the site, a 17,315-square-foot service facility along the western boundary, and a 3,415-square-foot parts facility. Collectively, the existing buildings total approximately 30,230 square feet of floor area. The remainder of the Project Site is primarily paved with asphalt concrete for surface parking, vehicle inventory display, and drive aisles.

Topographically, the Project Site is relatively flat at an elevation of approximately 455 feet above mean sea level, and there are no aquatic features, sensitive natural communities, or native habitat present on-site. Vehicular access is currently provided via driveways along South Brand Boulevard, West Los Feliz Road, and West Laurel Street.

The Project Site is located within a heavily urbanized commercial corridor commonly referred to as the "Brand Boulevard of Cars," a long-established concentration of automobile dealerships in the City. Surrounding land uses include a vehicle rental agency and retail store to the north, Allen Gwynn Chevrolet to the east across South Brand Boulevard, an under-construction automated car wash to the south across West Laurel Street, and the Dignity Health Glendale Memorial Hospital campus immediately to the west. The site is zoned Commercial Auto (CA) and designated Community Services Commercial in the City's General Plan.

As further detailed in the Cultural Resources Section herein below, the existing showroom and service reception building fronting West Los Feliz Road was constructed in 1958 by the architectural firm of Mason and Muntz, exhibits characteristics of Mid-Century Modern commercial architecture, and has been evaluated in multiple historic resources studies.

2.2 PROJECT SITE HISTORY AND BACKGROUND

In the late 19th and early 20th centuries, the Project Site and surrounding areas predominantly consisted of single-family residential uses. As South Brand Boulevard evolved into a major commercial corridor and automotive sales hub, the Project Site transitioned to a commercial use. The property has operated continuously as an automobile dealership since the late 1940s, hosting various brands including Star Chrysler Jeep, Star Ford, Star Lincoln-Mercury, and currently Star Mazda.

Over time, the physical structures on the site have been expanded and modified to accommodate changing dealership operations and manufacturer requirements. Notably, the existing showroom and service reception building along West Los Feliz Road was constructed in 1958 and reflects a Mid-Century Modern "glass box" showroom typology that historically characterized portions of Brand Boulevard. Subsequent additions include the larger service facility along the western edge of the site and the parts facility, which together form the current dealership complex.

2.3 OBJECTIVES OF THE PROPOSED PROJECT

In accordance with Section 15124(b) of the *State CEQA Guidelines*, an EIR must include a clearly written statement of objectives to help the Lead Agency develop a reasonable range of alternatives and to aid decision-makers in preparing findings for a statement of overriding considerations. The underlying purpose of the Project is to modernize and expand the existing Star Mazda dealership facilities to meet contemporary brand standards and operational demands while improving customer experience and site functionality, while appropriately recognizing and memorializing the site's mid-century architectural and commercial heritage and contributing to the City's ongoing economic vitality.

Specific objectives of the proposed Project include:

1. Modernize and upgrade the existing Star Mazda dealership to comply with current Mazda corporate architectural, design, and branding standards.

2. Optimize site utilization and operational efficiency by consolidating the showroom, service reception, and sales offices into a cohesive, state-of-the-art facility.

3. Enhance the customer retail and service experience by providing modern amenities, including a dedicated vehicle delivery studio, prominent display areas, and expanded customer lounge spaces.

4. Implement comprehensive sustainable building practices including rooftop solar installation and all electric building systems to conform to the latest California Green Building Standards Code and applicable City of Glendale codes.

5. Reconfigure on-site circulation and surface parking to efficiently accommodate vehicle display, customer parking, and tandem service parking, while utilizing the parking relief provisions of Assembly Bill (AB) 2097 for developments in transit-rich areas.

6. Recognize and memorialize the mid-century commercial automotive heritage of the "Brand Boulevard of Cars" and the site's architectural history to the extent feasible given the Project's operational needs, including through documentation and public interpretive materials where physical retention is not feasible.

7. Strengthen the City of Glendale's economic base by retaining, modernizing, and expanding a major automotive retailer within the established "Brand Boulevard of Cars" commercial corridor, thereby generating increased local sales tax and property tax revenues to support municipal services, infrastructure, and public amenities.

These objectives inform the design of the Project and provide a framework for evaluating alternatives in **Section 4.0** of this Draft EIR.

2.4 PROJECT CHARACTERISTICS

The Project involves partial demolition of existing facilities and construction of a new, expanded showroom and office building to serve the Star Mazda dealership, along with associated site circulation, parking, and landscaping improvements. See **Figure 2.0-3, Project Site Plan**.

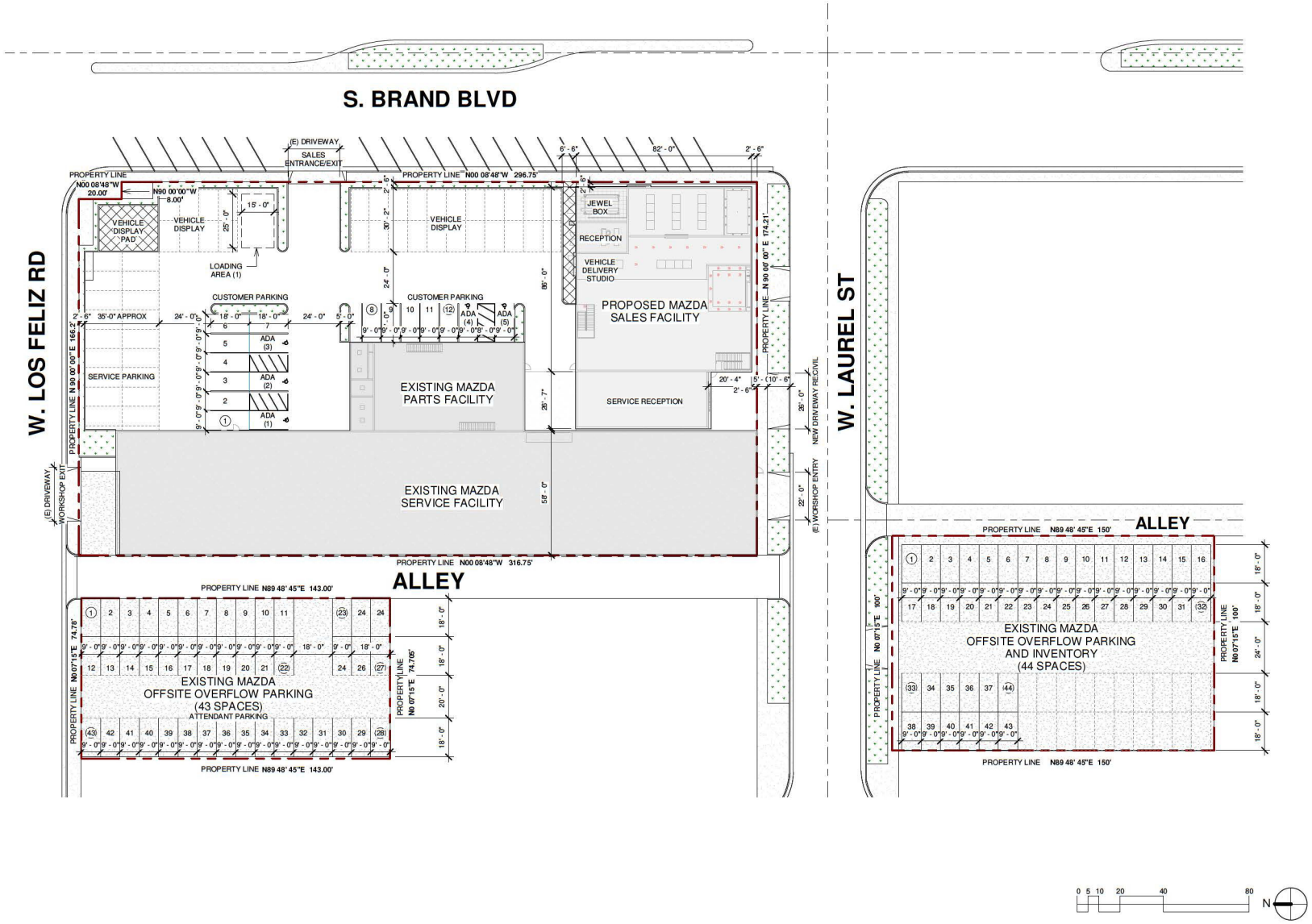
2.4.1 Demolition and Site Preparation

To accommodate the new facility, the Project would demolish the 8,600-square-foot showroom and service reception building (constructed in 1958) located along the northern portion of the site, as well as the attached 900-square-foot office and parts delivery building near the center of the site. In total, approximately 9,500 square feet of existing building area would be demolished.

The existing 17,315-square-foot service facility and the 3,415-square-foot parts facility would be retained and incorporated into the final site plan, continuing to function as the primary service and parts operations for the dealership. Demolition activities would also include removal of hardscaping and pavement within the footprint of the new building and reconfigured parking areas.

2.4.2 New Construction and Buildout Layout

The Project proposes construction of a new, two-story, approximately 11,840-square-foot showroom and office building (see **Figure 2.0-4, Building Elevations** and **Figure 2.0-5, Conceptual Rendering**).



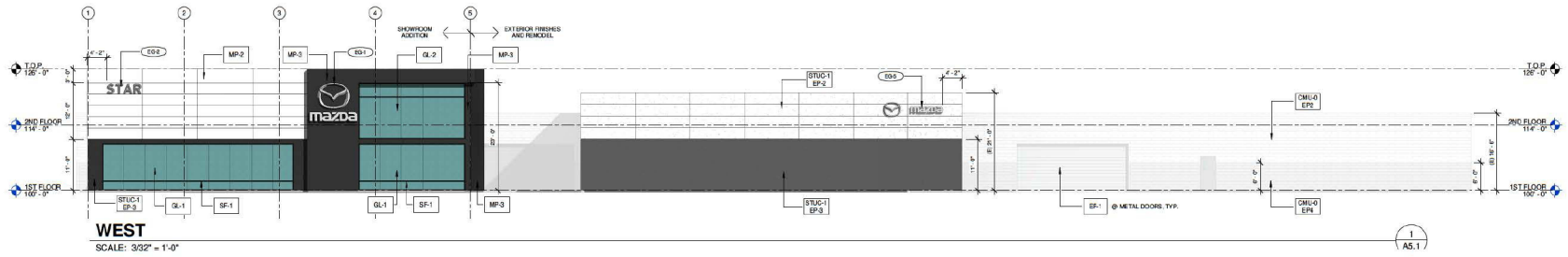
SOURCE: Wagner, 2026

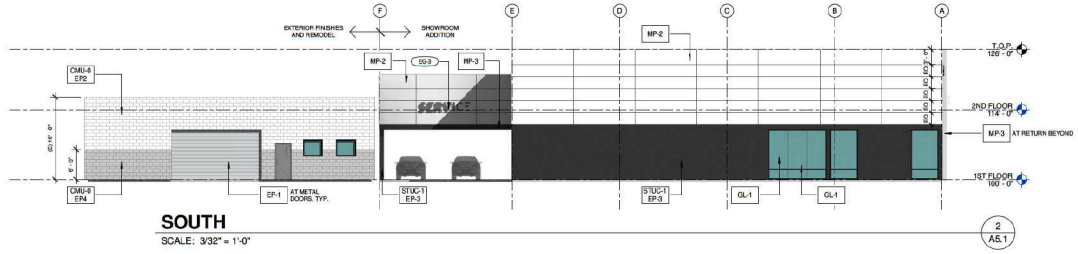
FIGURE **2.0-3**

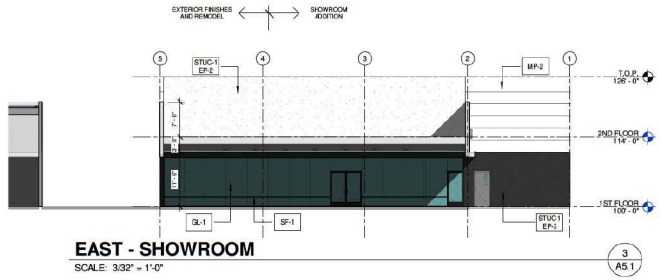
Project Site Plan

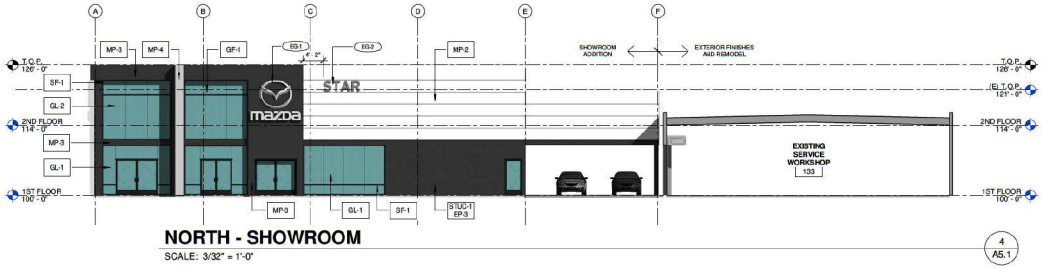
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SOURCE: CSDG, 2026

FIGURE **2.0-4**

Building Elevations



SOURCE: CSDG, 2026

FIGURE **2.0-5**

Conceptual Renderings

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The new structure would be located toward the South Brand Boulevard and West Laurel Street frontages, closer to the southern portion of the Project Site, and would serve as the primary customer-facing showroom and sales/administration area. Upon completion, total building area on the Project Site would be approximately 32,570 square feet, representing a net increase of about 2,340 square feet relative to existing conditions.

The first floor (approximately 8,740 square feet, including the service reception) would house the main automobile showroom, reception lobby, customer lounge, a dedicated vehicle delivery studio, and multiple sales offices (see **Figure 2.0-6, First Floor Plan**). The second floor (approximately 3,100 square feet) would contain additional sales and administrative offices, a conference room, employee break room, and an enclosed mechanical/equipment area (see **Figure 2.0-7, Second Floor Plan**).

Table 2.0-1
Project Square Footage Summary

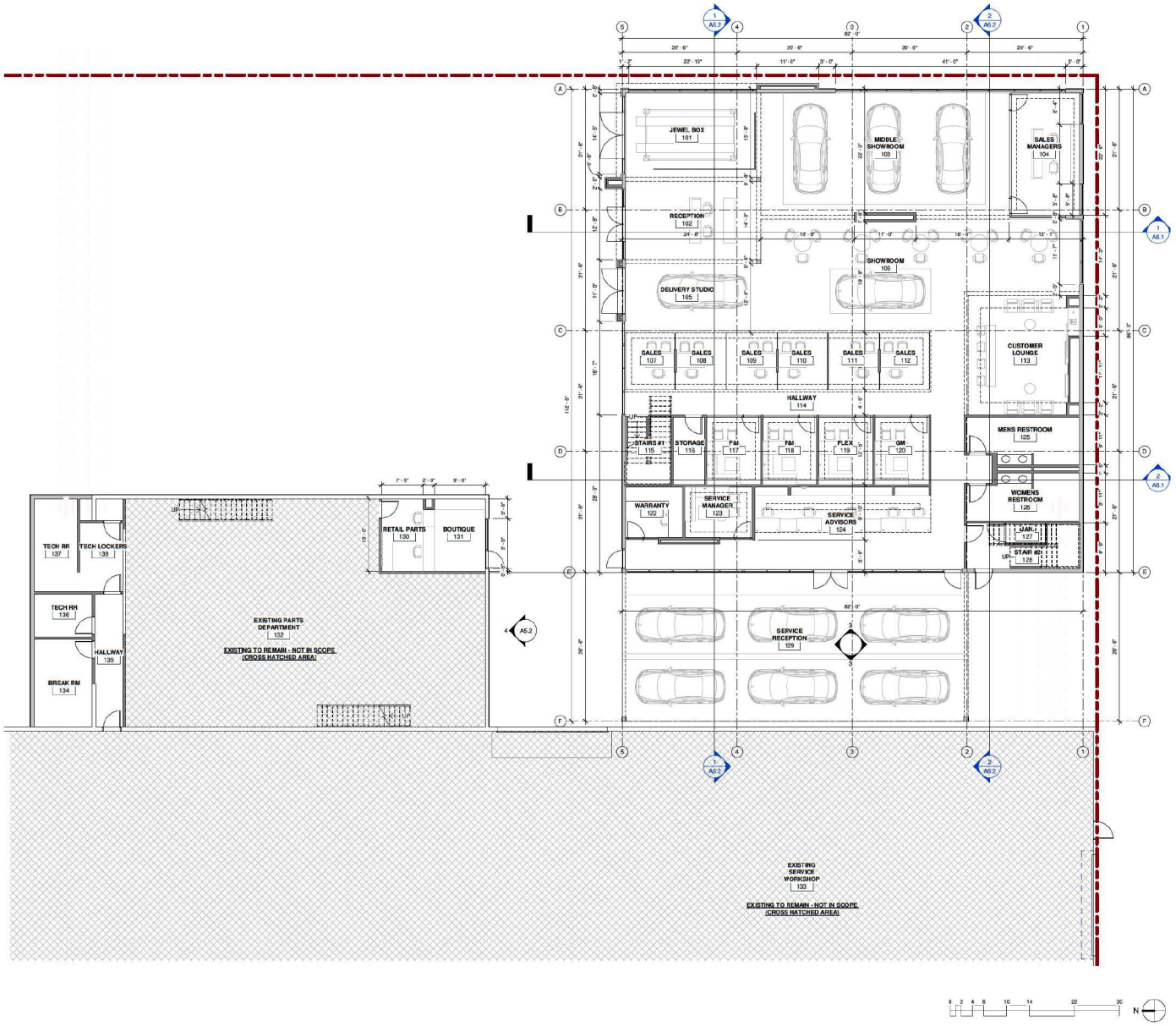
Components	Existing Square Feet	Proposed Square Feet
Showroom & Service Reception	8,600 (to be demolished)	8,740 (new first floor, incl. reception)
Parts Delivery / Office	900 (to be demolished)	0
Showroom Second Floor	0	3,100
Parts Facility	3,415 (to remain)	3,415 (to remain)
Service Facility	17,315 (to remain)	17,315 (to remain)
Total Floor Area	**30,230**	**32,570**
Net Area Increase	**--**	**+2,340**

Sources: Wagner Architecture Group, February 24, 2023.

2.4.3 Circulation, Access, and Parking

With implementation of the Project, the overall vehicular access strategy would remain similar to existing conditions. Driveways located along West Los Feliz Road and South Brand Boulevard would remain in their current configuration. One existing driveway on West Laurel Street, located near the southeast corner of the Project Site, would be relocated slightly west to accommodate the footprint of the new showroom building and associated parking/circulation. The relocation of this driveway would require the removal of one existing street tree.

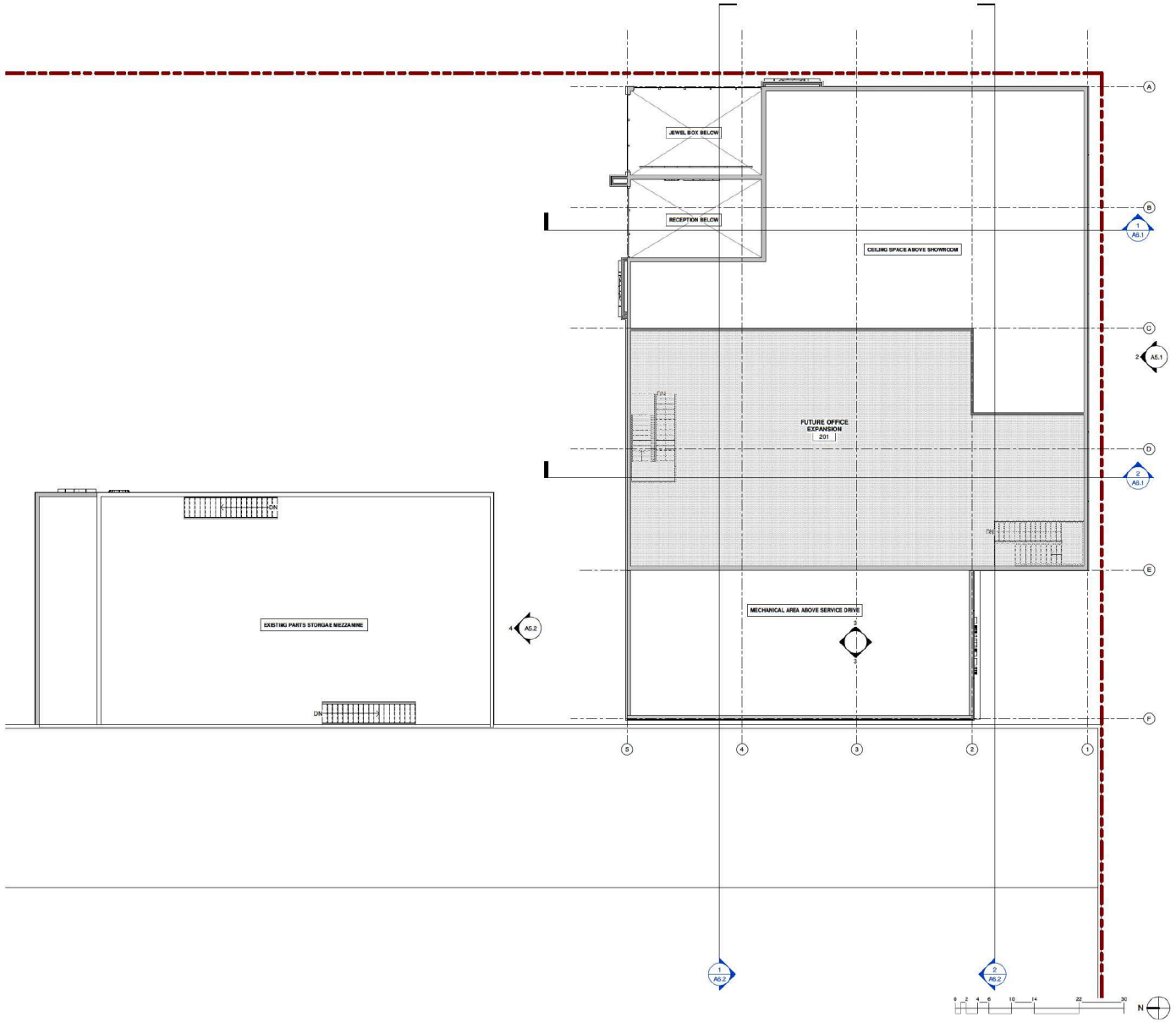
By utilizing the parking relief provisions of AB 2097, the Project limits oversupply of on-site parking. Since the Project Site is located within two HQTCs and within 0.5 miles of the Glendale Transportation Center, this parking design strategy encourages employees and customers to utilize the adjacent transit corridors, thereby actively promoting multimodal transportation and reducing reliance on single-occupant vehicles.



SOURCE: CSDG, 2026

FIGURE **2.0-6**

First Floor Plan



SOURCE: CSDG, 2026

FIGURE **2.0-7**

Second Floor Plan

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Apart from this relief, the Project would provide a total of 66 off-street parking spaces to meet operational needs. The reconfigured surface lot would include 18 standard spaces for customers and employees, 18 tandem spaces dedicated to vehicle service operations, and 30 tandem spaces used exclusively for vehicle display inventory. Furthermore, pedestrian rights-of-way (sidewalks) along South Brand Boulevard and West Laurel Street would be maintained and enhanced per City standards to ensure safe non-motorized access to the site.

Site circulation would be designed to maintain separate functional areas for customer parking, service intake, and vehicle display, while minimizing conflicts between customer, service, and delivery traffic.

2.4.4 Earthwork, Grading, and Stormwater

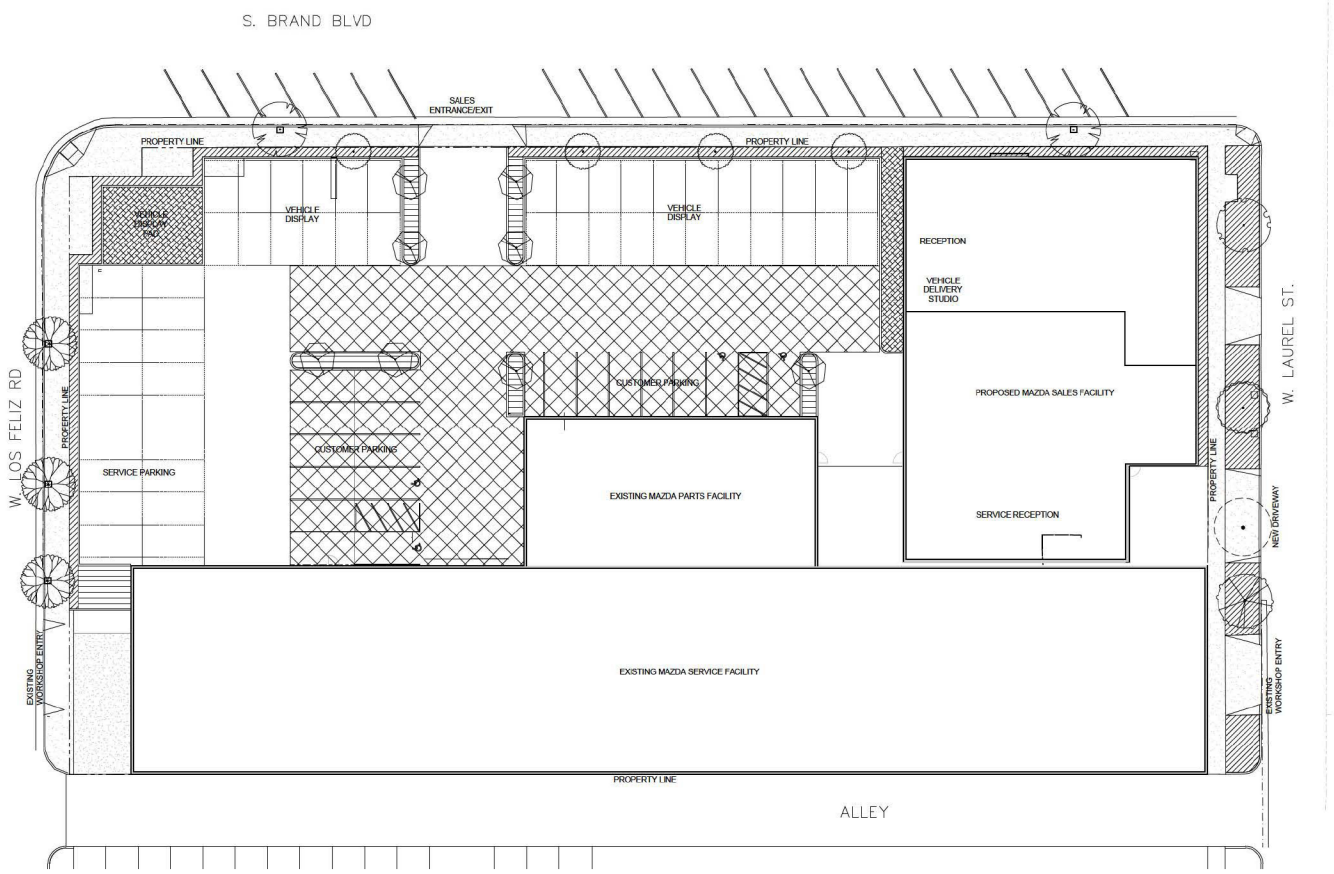
Site preparation would require grading and excavation to establish the new building pad, adjust on-site elevations, and construct stormwater management improvements. Based on preliminary grading plans, the Project would involve approximately 1,100 cubic yards of cut and 250 cubic yards of fill, resulting in a net export of approximately 850 cubic yards of soil to be hauled off-site to an appropriate receiving facility.

To comply with Los Angeles Regional Water Quality Control Board (RWQCB) requirements and the City's stormwater regulations, the Project would implement Low Impact Development (LID) Best Management Practices (BMPs). Stormwater would be managed on-site through either a shallow infiltration system utilizing perforated pipes with pretreatment, or a stormwater capture and reuse system integrated with site landscaping, consistent with the Project's Standard Urban Stormwater Mitigation Plan (SUSMP).

2.4.5 Landscaping and Lighting

The Project proposes approximately 3,000 square feet of new landscaping, including approximately 2,320 square feet of perimeter landscaping and 680 square feet of interior landscaping within parking and circulation areas. At present, there are several mature trees located along the northern, eastern, and southern site boundaries. One existing street tree along West Laurel Street, an American Sycamore tree (*Platanus occidentalis*), would be removed to accommodate the relocated driveway. The American Sycamore tree is not a protected tree species.

To offset this street tree removal and enhance the streetscape, the Project would plant 11 new trees (proposed as Crape Myrtles, Bronze Loquats, and a replacement Sycamore) along street frontages and within the interior parking area. All tree removal and planting activities would be conducted in compliance with Chapter 12.40 (City Owned Trees) and Chapter 12.44 (Indigenous Trees) of the Glendale Municipal Code. See **Figure 2.0-8, Landscape Plan**.



SYMBOL	MATERIAL ITEM	TOTAL AREA
	TOTAL NON-DISPLAY/NON-STORAGE PARKING	8,860s.f.
	TOTAL DECORATIVE PAVING	922s.f.
	TOTAL PERIMETER LANDSCAPING	2,320s.f.
	TOTAL INTERIOR LANDSCAPING REQUIRED: 5% of interior parking 8,860 x .05=443sf 40% of interior landscaping to come from decorative paving: 443 x .40=177s.f.	680s.f.

EXISTING TREES TO REMAIN

SYMBOL	BOTANICAL NAME	COMMON NAME	LOCATION	SIZE (hxw)	COUNT
	Liquidamber styraciflua	Sweet Gum	W. Los Feliz Rd	30'x15'	3
	Pyrus calleryana	Flowering Pear	E. Laurel St	35'x15'	1
	Platanus occidentalis	Sycamore Tree	E. Laurel St	15'x10'	1
	Lagerstroemia indica	Crape Myrtle	S. Brand Blvd	25'x15'	2

EXISTING TREE TO BE REMOVED

SYMBOL	BOTANICAL NAME	COMMON NAME	LOCATION	SIZE (hxw)	COUNT
	Platanus occidentalis	Sycamore Tree	E. Laurel St	15'x10'	1

PROPOSED TREES

SYMBOL	BOTANICAL NAME	COMMON NAME	LOCATION	SIZE (hxw)	COUNT
	Lagerstroemia indica	Crape Myrtle	S. Brand Blvd	24" Box	4
	Platanus occidentalis	Sycamore Tree	E. Laurel St	24" Box	1
	Eriobotrya deflexa	Bronze Loquat	Interior	24" Box	8

0 8 16 32 48

SCALE: 1/16"=1'-0"

SOURCE: CSDG, 2026

FIGURE **2.0-8**

Landscape Plan

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New exterior lighting would be installed for security, vehicle display, and architectural highlighting of the new building. All lighting would be shielded and directed downward and inward to minimize light spillover onto adjacent properties and the public right of way, consistent with Section 30.30.040 of the Glendale Municipal Code.

2.5 PROJECT CONSTRUCTION

For purposes of environmental analysis, this EIR assumes a consolidated construction schedule of approximately 12 to 14 months, consistent with the construction duration used in the Initial Study and supporting technical analyses. Under this schedule, construction would begin following discretionary approvals and building permit issuance and would be completed such that Project operations could commence in 2028.

Construction would occur in the following general phases:

1. Demolition and debris removal (approximately 2–3 months): Demolition of approximately 9,500 square feet of existing structures and removal of associated surface asphalt and hardscape within the new building and reconfigured parking areas.

2. Grading and site preparation (approximately 1 month): Earthwork consisting of approximately 1,100 cubic yards of cut, 250 cubic yards of fill, and export of approximately 850 cubic yards of soil; trenching for utilities and installation of underground stormwater BMPs.

3. Building construction (approximately 8–9 months): Foundation work, structural framing, exterior cladding, roofing, and interior build-out of the new showroom and office building.

4. Paving and architectural coating (approximately 1 month): Final paving, striping, and application of interior and exterior architectural coatings.

Construction staging and equipment storage would occur entirely within the Project Site to the extent feasible. Construction activities would comply with the City of Glendale Noise Ordinance, which restricts allowable hours and days of construction.

2.6 DISCRETIONARY ACTIONS AND APPROVALS

The City of Glendale is the Lead Agency for the Project under CEQA. The Project requires the following discretionary approvals and permits from the City and other agencies:

City of Glendale

- Design Review Board (DRB) approval for site planning, architectural design, massing, and landscaping.
- Demolition, grading, and building permits.
- Public Works encroachment permit for driveway relocation and other work within the public right-of-way.
- Tree removal permit pursuant to Glendale Municipal Code Chapter 12.40 (for one affected street tree within the West Laurel Street public right-of-way).
- Certification of the Final EIR, adoption of the Mitigation Monitoring and Reporting Program, adoption of a Resolution of Findings in Support of a Statement of Overriding Considerations, and approval of the Project by the City decision making body (e.g., City Council or other designated body).

Other Agencies

- Los Angeles Regional Water Quality Control Board (RWQCB): approval of the Project's SUSMP/LID design and compliance with NPDES stormwater requirements.
- South Coast Air Quality Management District (SCAQMD): compliance with applicable rules and regulations, including Rule 403 (Fugitive Dust) and Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), as applicable.

Additional ministerial permits (e.g., utility connection permits, business licenses) may be required.

2.7 INTENDED USES OF THE EIR

This project-level EIR, prepared in accordance with Section 15161 of the *State CEQA Guidelines*, will serve as the primary source of environmental information for the City of Glendale (Lead Agency) and any responsible or trustee agencies when considering discretionary actions and approvals associated with the Project. In accordance with Public Resources Code Section 21002.1, the purpose of this EIR is to inform agency decision-makers and the general public of the potentially significant environmental impacts that could result from Project implementation, evaluate reasonable alternatives that could avoid or lessen those impacts, and identify mitigation measures to reduce significant environmental effects where feasible.

3.0 ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This chapter of the EIR evaluates the potential for the proposed Project to result in significant impacts on the environment. It provides the scope and methodology of the environmental analysis in conformance with the CEQA and the *State CEQA Guidelines*.

3.1 SCOPE OF THE ENVIRONMENTAL IMPACT ANALYSIS

In accordance with Section 15126 of the *State CEQA Guidelines*, this chapter provides an analysis of the direct, indirect, and cumulative environmental effects of the Project with respect to existing conditions at the time the Notice of Preparation (NOP) was published. The determination of whether an impact is significant is based on the physical baseline conditions established at the time of NOP publication (*State CEQA Guidelines* Section 15125(a)). The Project is evaluated in this EIR at a project level, in accordance with *State CEQA Guidelines* Section 15161.

Based on the findings of the February 2026 Initial Study prepared for the Project, the City of Glendale determined that an EIR is required. The following environmental resource areas were identified as having potentially significant impacts and are evaluated in detail in this chapter, in accordance with Appendix G of the *State CEQA Guidelines*:

- Cultural Resources
- Hazards and Hazardous Materials

Issues identified as having "No Impact" or a "Less Than Significant Impact" in the Initial Study are not evaluated further in this EIR; they are summarized in **Chapter 5.0, Effects Found Not to Be Significant**.

3.2 APPROACH TO ENVIRONMENTAL ANALYSIS

This chapter describes the environmental setting, regulatory framework, and potential impacts related to construction and operation of the Project for each environmental resource area evaluated in this EIR. The evaluation includes both a project level analysis and a cumulative impact analysis. Where potentially significant impacts are identified, feasible mitigation measures are recommended to avoid or substantially lessen those effects, and the analysis concludes with a determination of the level of impact significance remaining after implementation of mitigation.

3.2.1 Cumulative Impact Analysis Methodology

The cumulative analysis was prepared in accordance with Section 15130 of the *State CEQA Guidelines*, which requires an EIR to discuss cumulative impacts when the incremental effects of a project are cumulatively considerable. Cumulative impacts are defined as the environmental impacts of the Project evaluated in combination with other closely related past, present, and reasonably foreseeable future projects. "Cumulatively considerable" means that the incremental effects of the Project are significant when viewed in connection with the effects of other projects.

Section 15130(b)(1) of the *State CEQA Guidelines* provides that an adequate discussion of cumulative impacts may be based on either: (A) a list of past, present, and reasonably foreseeable future projects producing related or cumulative impacts; or (B) a summary of projections contained in an adopted local, regional, or statewide plan or related planning document.

Since the environmental resource areas evaluated in detail in this EIR (Cultural Resources and Hazards and Hazardous Materials) involve site-specific physical conditions or geographically bound historical trends, regional demographic projections (such as population or employment growth forecasts) do not provide a relevant baseline for cumulative effects. Therefore, the cumulative analyses in this chapter uses the "plan approach" (summary of projections) by relying on topic-specific local planning documents such as the *South Glendale Historic Context Statement* and the City of Glendale General Plan Safety Element (2025) to assess potential cumulative environmental effects.

If a combined cumulative effect is determined to be significant based on these planning documents, the analysis evaluates whether the Project's incremental contribution to that effect is cumulatively considerable. If the Project's contribution is determined to be less than cumulatively considerable, the EIR concludes that the Project would have a less than significant cumulative impact.

3.3 ORGANIZATION OF ENVIRONMENTAL ISSUE AREAS

The potential environmental issues associated with demolition, construction, and operation of the Project are addressed in the resource specific subsections of this chapter. Each subsection is organized using the following structure:

Environmental Setting

This subsection identifies and describes the existing physical environmental conditions of the Project site and vicinity specific to the resource being evaluated. In accordance with State CEQA Guidelines Section 15125(a), the description of the environmental setting establishes the "baseline condition" against which Project related impacts are compared. For this EIR, the baseline condition is established at the time the NOP was published in February 2026.

Regulatory Framework

This subsection summarizes the applicable federal, state, regional, and local laws, regulations, plans, and policies that govern the resource prior to Project implementation.

Impacts and Mitigation Measures

This subsection describes the environmental changes to existing physical conditions that may occur if the Project is implemented, evaluating these changes against established significance criteria. It includes both a project specific impact analysis and a cumulative impact analysis. Where significant or potentially significant impacts are identified, feasible mitigation measures are presented to avoid, minimize, or reduce the environmental effects.

Significance criteria have been developed for each environmental resource in accordance with Appendix G of the *State CEQA Guidelines* and any applicable local thresholds. For purposes of this EIR, impacts are categorized as follows:

- **No Impact:** The Project would have no impact on the environment for the issue area under consideration.
- **Less than Significant Impact:** Environmental impacts have been identified, but they do not exceed the thresholds of significance and do not require mitigation measures.
- **Less than Significant Impact with Mitigation Incorporated:** Environmental impacts have been identified that exceed thresholds of significance, but the incorporation of feasible mitigation measures would reduce the impact to a less than significant level.
- **Significant and Unavoidable Impact:** Direct, indirect, or cumulative impacts that cannot be reduced to a less than significant level, even with implementation of all feasible mitigation measures.

Significance Determination After Mitigation

This subsection concludes the analysis by describing the level of impact significance remaining after implementation of all recommended mitigation measures.

References

Sources relied upon for each environmental topic analyzed in this document are provided at the end of each section. Technical studies prepared for the Project are included in the appendices and cited in the relevant sections.

3.1 CULTURAL RESOURCES

INTRODUCTION

This section presents an overview of the existing cultural resource conditions within the boundaries of the Project Site and evaluates the potential impacts to cultural resources; specifically, historical resources. It describes the existing environmental setting, identifies the applicable regulatory framework, and provides a threshold analysis of potential direct and indirect impacts associated with the Project's construction and long-term operation. Mitigation measures are identified to reduce potentially significant impacts.

The following technical report was used in preparing this section and is incorporated by reference into this EIR:

- ASM Affiliates. *Historical Resource Assessment for the Car Dealership at 1401 South Brand Boulevard, Glendale, Los Angeles County, California*. May 2026. See **Appendix 3.1** of this Draft EIR.

The property at 1401 South Brand Boulevard was first identified as a potential historical resource in the City's South Glendale Historic Resources Survey, which found the property individually eligible for listing in the Glendale Register of Historic Resources and assigned it a California Historical Resource Status Code of 5S3. An earlier historic resource evaluation dated March 12, 2021 (updated May 26, 2022) by Kaplan Chen Kaplan concluded that the property at 1401 South Brand Boulevard was not eligible as a historical resource, a conclusion that conflicted with the historic resources survey and the City's preservation planning staff. A new historic resources assessment was prepared in May 2026 by ASM Affiliates, which independently corroborated and expanded upon the City's earlier historic resources survey findings, and now provides the current basis for the City's determination that the property is a historical resource under CEQA.

3.1.1 ENVIRONMENTAL SETTING

3.1.1.1 Ethnographic and Historical Background

At the time of European contact, the Los Angeles Basin and the Southern Channel Islands were inhabited by the Tongva, who later became known as the Gabrielino. The Gabrielino occupied an extensive territory that included present day Glendale and are considered one of the more powerful and populous tribal groups in California, with precontact estimates of more than 5,000 people living in 50 to 100 settlements. European contact with the Gabrielino first occurred in 1542 with the expedition of Juan Rodriguez Cabrillo, and Mission San Gabriel Arcángel was founded in Gabrielino territory in 1771.

During the Rancho Period, the area that includes the Project Site became part of Rancho San Rafael, granted to José María Verdugo in 1784. In the late nineteenth century, the southern and southwestern portions of modern day Glendale were part of the independent municipality of Tropico, which developed as a regional shipping hub for strawberries and other agricultural products. By 1904, the interurban railroad connected Tropico to Los Angeles, and Tropico was ultimately annexed into Glendale in 1918.

By the 1920s, the rail corridor and roadway network along Brand Boulevard had emerged as the City's commercial core. As the automobile supplanted the streetcar, automobile showrooms and related businesses began to locate along Brand Boulevard, establishing what became known as the "Brand Boulevard of Cars." Following World War II, automobile sales increased substantially, and Mid-Century Modern designers upgraded and remodeled existing dealerships with large glass display windows, modern signage, and streamlined detailing.

3.1.1.2 Site-Specific History and Architecture

The Project Site at 1401 South Brand Boulevard currently operates as the Star Mazda automobile dealership and comprises four connected buildings constructed between 1948 and 1968. The earliest documented building is a used-car sales office constructed in 1948 for Honest John Inc. In 1955, under Tommy Vaughn Motors, a 180-foot by 60-foot masonry block service building was constructed along the alley at the western edge of the property.

In 1958, the property was purchased by California Motors, a Ford dealership, which retained the architectural firm of Mason and Muntz to design a new showroom, sales offices, parts office, and warehouse. The Mid-Century Modern showroom opened in July 1958 and was described in a local media report as a "jewel box" encased in approximately 3,000 square feet of 12-foot high glass, utilizing post and beam construction and modular brick facades. The building featured expansive glazing oriented to Brand Boulevard and Los Feliz Road, simple rectilinear massing, and minimal ornamentation consistent with Mid-Century Modern commercial design.

In 1968, an auto body shop addition was designed by Mal Gianni & Associates, extending the complex and establishing the general site layout that remains extant today. Over subsequent decades, the dealership has carried various brands (including Ford, Chrysler/Jeep, and Mazda), but the overall configuration of the core buildings and the character defining elements of the 1958 Mason and Muntz showroom have remained largely intact.

3.1.1.3 Records Search Results

ASM conducted literature searches of the California Historical Resources Information System (CHRIS) at the South Central Coast Information Center (SCCIC) located at California State University, Fullerton, on February 12, 2025, to determine whether the Project Site and a one-mile radius around it had been previously subject to systematic survey as well as the presence or absence of previously documented cultural resources. The search included all records and documents on file with the SCCIC, as well as the Office of Historic Preservation (OHP) Historic Properties Directory. A total of 13 previous studies were identified within the one-mile records search radius, none of which intersect with the Project Site. All of these studies were related to infrastructure or commercial buildings. Moreover, a total of seven resources have been previously documented within the one-mile records search radius of the Project Site. Half of the resources are associated with the Southern Pacific Railroad Company. None of these resources intersect with the Project Site. Tables listing the previous studies and resources recorded within a one-mile radius of the Project Site are provided in Table 1 and Table 2 in ASM's report (**Appendix 3.1** of this Draft EIR).

3.1.2 REGULATORY FRAMEWORK

Historic resources are regulated at the federal, state, and local levels as discussed below.

3.1.2.1 Federal

The National Register of Historic Places (National Register), administered by the National Park Service, recognizes properties significant at the national, state, or local level. Listing provides recognition and may qualify properties for preservation incentives. However, listing does not restrict private property owners from actions they may otherwise take with respect to their property.

The National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of their undertakings on historic properties through the Section 106 review process. Because the Project does not involve federal funding, permits, or land, Section 106 does not apply.

No properties listed or eligible for listing in the National Register are located within or adjacent to the Project Site. Therefore, federal regulations governing historic properties are not applicable to the Project.

3.1.2.2 State

California Environmental Quality Act (CEQA)

Under CEQA, public agencies must consider the effects of their actions on "historical resources." Pursuant to Public Resources Code Section 21084.1 and *State CEQA Guidelines* Section 15064.5, a project that may cause a substantial adverse change in the significance of a historical resource is considered to have a significant effect on the environment. Historical resources include properties listed in, or formally determined eligible for listing in, the California Register of Historical Resources (CRHR), as well as local landmarks and resources identified in historical surveys as eligible for listing. The Project Site satisfies both bases for historical resource status. The Project Site was evaluated in the South Glendale Historic Resource Survey (2019) and was identified as being individually eligible for listing in the Glendale Register of Historic Resource (Historic Resource Status Code 5S3, indicating that the resource appears eligible for local listing or designation through survey evaluation); it therefore is considered a historic resource under CEQA. In addition, the Project's Historical Resource Assessment, prepared by ASM Affiliates (May 2026) (**Appendix 3.1**), independently determined the property is formally eligible for listing in the CRHR under Criterion 1 (association with important events reflecting broad patterns of local and regional history) and Criterion 3 (embodying the distinctive characteristics of Mid-Century Modern commercial architecture), providing an independent basis for historical resource status under *State CEQA Guidelines* Section 15064.5. A substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that its significance is materially impaired. *State CEQA Guidelines* Section 15126.4(b) provides that impacts to historical resources resulting from alterations or adaptive reuse may generally be considered mitigated to less than significant if the work is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. However, the physical demolition of a historical resource cannot be mitigated to a less than significant level.

California Register of Historical Resources

The CRHR is an authoritative guide for identifying historical resources in California and protecting them from substantial adverse change. Eligibility criteria parallel those of the National Register and include:

- Criterion 1 – Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California of the United States;
- Criterion 2 – Associated with the lives of persons important to local, California or national history;
- Criterion 3 – 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; and

- Criterion 4 – Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Resources listed in or formally determined eligible for the National Register, CRHR Historical Landmarks, and certain California Points of Historical Interest are automatically included in the CRHR. Local landmarks and resources identified in surveys may also be considered eligible. Historical resources eligible for listing in the CRHR must also retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. For the purposes of eligibility, integrity is defined as the authenticity of a historical resource's physical identity. To retain historic integrity, a property must possess several, and usually most, of the following seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association.

3.1.2.3 Local

City of Glendale General Plan

Historic Preservation Element

The City's Historic Preservation Element establishes policies and programs intended to identify, protect, and preserve Glendale's historic and cultural resources, including buildings, structures, districts, and archaeological sites that reflect the city's architectural, social, and cultural history. The element provides a framework for integrating historic preservation into land use planning and development review processes in order to maintain Glendale's historic character while accommodating appropriate growth and redevelopment.

- 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 1-7: Encourage the preservation and maintenance of historic landscaped areas.
    - Policy 1-8: Encourage the preservation of individual historic resources and historic thematic and historic geographic districts.
    - Policy 1-11: Ensure protection of historic resources through enforcement of existing codes.

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 (GMC). According to Section 15.20.020 of the GMC, an "historic resource" means a resource that is historically or archaeologically significant in the cultural, architectural, archaeological, tribal, 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 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 GMC, the Glendale Historic Preservation Commission (HPC) "shall consider and recommend to the City Council additions to and deletions from the Glendale Register of Historic Resources (GRHR); 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 Historic Preservation Ordinance (Ord. No. 5110) created the GRHR, 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 ordinance also establishes criteria for designation or deletion of historic resources to or from the GRHR.

City of Glendale Municipal Code

Chapter 15.20.050 of the City of Glendale Municipal Code states that upon recommendation of the HPC, City Council shall consider and make findings for additions of designated historic properties to the GRHR. According to GMC 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:

1. The resource is identified with important events in national, state, or city history, or exemplifies significant contributions to the broad cultural, political, economic, social, tribal, or historic heritage of the nation, state, or city, and retains historic integrity;

2. The resource is associated with a person, persons, or groups who significantly contributed to the history of the nation, state, region, or city, and retains historic integrity;

3. The resource embodies the distinctive and exemplary characteristics of an architectural style, architectural type, period, or method of construction; or represents a notable work of a master designer, builder or architect whose genius influenced his or her profession; or possesses high artistic values, and retains historic integrity; or

4. The resource has yielded, or has the potential to yield, information important to archaeological prehistory or history of the nation, state, region, or city, and retains historic integrity.

The Project Site was evaluated in the South Glendale Historic Resource Survey (2019) and was identified as being individually eligible for listing in the GRHR (California Historic Resource Status Code 5S3) under Criteria 1 and 3, above, and also as retaining sufficient historic integrity to convey its significance. It is therefore a historic resource as defined in GMC Chapter 15.20.020. Properties listed on the Glendale Register, or identified as eligible under these criteria, are treated as historic resources for purposes of CEQA.

3.1.3 ENVIRONMENTAL IMPACTS

3.1.3.1 Thresholds of Significance

Based on Appendix G of the *State CEQA Guidelines*, the Project would have a significant impact on cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- Disturb any human remains, including those interred outside of dedicated cemeteries.

Impacts related to archaeological resources and human remains (the second and third thresholds, respectively) were determined in the Initial Study (**Appendix 1.0-1** to this Draft EIR) to be less than significant. These issues are addressed in **Section 5.0, Effects Found Not to be Significant** and are not analyzed further in this section.

3.1.3.2 Methodology

ASM conducted an architectural resource field survey to document the property on March 27, 2025. The survey was conducted by an architectural historian who meets the Secretary of the Interior's (SOI) Professional Qualification Standards. During the survey, multiple photographs were taken of the building exterior to document the existing conditions of 1401 South Brand Boulevard and take detailed field notes. The building's plan, architectural features, and condition were noted.

ASM reviewed any prior recommendations of eligibility within City or County surveys and historic context statements related to the evaluation, such as the South Glendale Historic Context Statement (Historic Resources Group [HRG] 2019), the South Glendale Historic Resources Survey (HRG 2019, which had previously identified the Project Site as individually eligible for listing in the Glendale Register of Historic Resources under California Historic Resource Status Code 5S3), other relevant historic context statements, and design guidelines and architectural descriptions prepared for the City of Glendale and other agencies. As part of this comprehensive independent evaluation, ASM also reviewed a prior Historic Resource Evaluation prepared for the Project by Kaplan Chen Kaplan (March 2021, updated May 2022), which had previously concluded the property was not a historical resource, to address divergent expert opinions regarding the Project Site's historic status.

ASM then conducted additional research to fully develop the history of the property through original architectural plans provided by the City, building permit records, assessor parcel records, and newspaper searches. Research was conducted using online digital archives, digital records requests, and in person with the City of Glendale Community Development Department. Incorporating this background research, ASM developed a general and site-specific history and analyzed the building's significance within the appropriate themes defined by existing historical contexts.

The City of Glendale, as Lead Agency, reviewed the public comment letters from Francesca Smith (a qualified architectural historian) and Ingrid Wilcox (board member of The Glendale Historical Society) submitted during the Initial Study/Notice of Preparation scoping period (see **Appendix 1.0-3** of this Draft EIR to review comment letters in their entirety). The historical data and architectural significance highlighted in these letters are consistent with the research findings and significance determinations established in the May 2026 ASM assessment utilized for this EIR.

3.1.3.3 Impact Analysis

Impact CUL-1 **Cause a substantial adverse change in the significance of a historical resource as defined in *State CEQA Guidelines* Section 15064.5.**

The proposed Project would demolish the 1958 showroom, sales offices, parts office, and warehouse buildings in their entirety to construct a new facility. *State CEQA Guidelines* Section 15064.5 defines a substantial adverse change in the significance of a historical resource to include physical demolition that materially impairs the significance of the resource.

The Project's Historical Resource Assessment (**Appendix 3.1**) evaluated the property at 1401 South Brand Boulevard for potential eligibility as a historical resource at the local and state level. The property was found eligible under CRHR Criterion 1 and GRHR Criterion 1, as a rare remaining example of a mid-20th century commercial automobile dealership that reflects post-World War II commercial development along the "Brand Boulevard of Cars," with a period of significance of 1948–1969.

Under CRHR Criterion 3 and GRHR Criterion 3, the 1958 Mason and Muntz designed showroom, offices, and warehouse were determined to embody the distinctive characteristics of Mid-Century Modern commercial architecture in the City. Specifically, the 1958 showroom was designed as a highly visible "jewel box" encased in 12-foot-high glass to showcase automobiles to passing motorists. Character-defining features that convey this significance include its single-story, L-shaped plan at the corner of Los Feliz Road and Brand Boulevard, expressed steel post-and-beam construction, flat roof with wide overhanging eaves, a flat canopy suspended from a steel frame, and modular brick facades, as well as the long brick parts/warehouse volume and intact 1950s/1960s service buildings framing the alley frontage.

The Historical Resource Assessment concluded that the property retains a high degree of integrity in all seven aspects (i.e., location, design, setting, materials, workmanship, feeling, and association) and, therefore, constitutes a historical resource for purposes of CEQA. The property remains in its original South Glendale auto-row setting, continues to function as an auto dealership, and retains the key spatial relationships between showroom, parts/warehouse, and service buildings identified in the South Glendale Historic Context Statement as character-defining for this property type.

Demolition of the character-defining 1958 building complex would result in the complete, physical loss of an eligible historical resource and its ability to convey the property's historical and architectural significance as a rare surviving post-World War II auto dealership. This complete removal of the resource's physical characteristics would result in a substantial adverse change in the significance of a historical resource. Accordingly, the Historical Resource Assessment report recommends documentation and interpretive measures to record the historical resource and provide public access to information about its history and architectural significance, as further detailed in **Mitigation Measures MM CUL-1** and **MM CUL-2** below. Consistent with *State CEQA Guidelines* Section 15093, implementation of Mitigation Measures **MM CUL-1** and **MM CUL-2**, and issuance of any permit authorizing demolition of the historical resource, would occur only after the City certifies this EIR, approves the Project, and adopts a Statement of Overriding Considerations addressing the Project's significant and unavoidable impact to historical resources. However, because the physical demolition of a historical resource cannot be mitigated to a less than significant level under *State CEQA Guidelines* Section 15064.5(b), Project impacts would be significant and unavoidable even with implementation of all feasible mitigation.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

MM CUL-1 **Historic-Level Documentation.** Prior to the issuance of a demolition permit for the 1958 showroom, sales offices, parts office, and warehouse buildings at 1401 South Brand Boulevard, the property owner shall retain an Architectural Photographer and Historian and/or Architectural Historian who meets the SOI's Professional Qualifications Standards who shall prepare a Historic American Buildings Survey (HABS) Historic Documentation Package (Package) for the historical resource slated for demolition. The Package shall include photographs and descriptive narrative. Documentation will draw upon primary- and secondary-source research including available studies prepared for the project. Documentation shall be prepared consistent with HABS Level II standards (large-format

photography and written data; measured drawings not required). The documentation shall consist of the following:

- Photographs: Documentation shall follow the Photographic Specification–Historic American Building Survey guidelines, including a sufficient number of archival quality, large-format photographs (minimum 4-inch by 5-inch black-and-white film negatives, produced with perspective-correcting equipment consistent with current HABS photography specifications) to fully document the exterior and interior of the buildings and their architectural elements. Photographs shall include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). The contributing buildings within the historic complex that are proposed to be demolished shall be a focus of the photographic documentation. Figures shall include a legible location map, site plan and sketch plan. Any historic photographs shall also be included as figures in the written reports as long as the images are in the public domain or a signed copyright release form can be obtained.

- Descriptive and Historic Narrative: The Historian or Architectural Historian shall prepare a written historical narrative and report completed according to HABS Guidelines for Preparing Written Historical Descriptive Data and HABS Historical Report Guidelines. The narrative history shall follow the HABS Short Format and include sections on name, location, statement of significance, architectural description, physical history, historical context, architectural information and description of the exterior and interior, and sources of information. In accordance with HABS Guidelines, as many primary documents should be referenced as possible. Original or early architectural plans, if extant, shall be included as figures in the historical report document following HABS standards. The report shall be provided on 8 ½ inch x 11-inch archivally stable paper (25 percent cotton bond or better), and an electronic copy of the completed report (in Microsoft Word and PDF format) shall also be submitted to the City of Glendale for its records.

- Historic Documentation Package Submittal: The Project Applicant shall submit the final HABS documentation package to the City of Glendale for review and approval prior to the issuance of a demolition permit. Upon City approval, three hard copies of the final HABS documentation package shall be produced. One copy shall be permanently archived with the City of Glendale, one donated to The Glendale Historical Society, and the third copy (which must include the original photo negatives) submitted to the Library of Congress through the National Park Service. If the Library

of Congress declines to accept the submission, the third copy shall be archived with another appropriate public institution approved by the City.

MM CUL-2 **Interpretative Materials.** Prior to the issuance of a Certificate of Occupancy, the Project Applicant shall design and install a series of interpretive panels providing an overview of the history and design of the Mason & Muntz designed automobile dealership at 1401 South Brand Boulevard, with contextual reference to the historic Brand Boulevard of Cars drawn from existing published historic context documents (e.g., the South Glendale Historic Context Statement) rather than new original research. Photographs of all extant contributing buildings and structures as documented through the HABS process and with historic photographs (if available) shall be included on the panel where available and where copyright permissions can be obtained. This includes the following contributing buildings and structures: Showroom, offices, parts building, service buildings, and the small used car sales office. The panels shall be located in or near the location of the new construction in a publicly accessible area on the Project Site and provide documentation of the views to and from the original buildings prior to construction. The interpretive panels shall remain installed and legible for the life of the Project, and the property owner shall be responsible for maintaining the panels in good, legible condition; any damaged or deteriorated panel shall be repaired or replaced within 90 days of notice from the City. The design, content, and placement of interpretive panels shall be reviewed and approved by the City of Glendale prior to installation.

Level of Significance After Mitigation

Implementation of **Mitigation Measures MM CUL-1** and **MM CUL-2** would provide a high level of documentation of the historical resource and would enhance public understanding of the site's history and architectural significance. However, documentation, interpretive displays, and outreach do not avoid or substantially lessen the loss of the physical resource itself. Thus, as the Project would demolish the 1958 Mid-Century Modern building complex that conveys the property's historical significance, the substantial adverse change to the historical resource cannot be reduced to a less than significant level. Impacts would be significant and unavoidable.

3.1.4 CUMULATIVE IMPACTS

The geographic context for the cumulative analysis of historical resources is the City of Glendale, with particular emphasis on the South Glendale commercial corridors, including the "Brand Boulevard of Cars." As established in **Section 3.0** of this Draft EIR, the cumulative methodology utilizes a "Plan Approach" (*State CEQA Guidelines* Section 15130(b)(1)(B)). However, because regional demographic projections are not applicable to the evaluation of architectural resources, this cumulative analysis relies on the trend data and historical evaluations formalized in the *South Glendale Historic Context Statement* (2014) and the *South Glendale Historic Resources Survey* (2018).

These adopted planning documents identify mid-20th century commercial properties, specifically Mid-Century Modern auto dealerships, as a highly distinct but diminishing resource type within the City. Due to their location along primary transit and commercial corridors, these properties are subject to intense, ongoing redevelopment pressures. Consistent with this characterization, the Project's Historical Resource Assessment specifically notes that "many of the dealerships constructed during the period of significance for [this] theme in Glendale are no longer extant," corroborating the diminishing character of this resource type identified in the adopted planning document.

The proposed Project involves the total demolition of the 1958 Mason and Muntz-designed dealership building. When viewed in connection with past demolitions and probable future redevelopment projects that would similarly impact mid-century commercial resources, the Project would contribute to the ongoing, regional loss of Mid-Century Modern commercial auto dealership buildings along Brand Boulevard. Since this specific property type is becoming increasingly rare within the geographic context area, the Project's contribution to this established trend represents a cumulatively considerable incremental effect.

Accordingly, cumulative impacts to historical resources would be significant and unavoidable, and the Project's contribution to that cumulative impact would be cumulatively considerable.

3.1.5 REFERENCES

ASM Affiliates. *Historical Resource Assessment for the Car Dealership at 1401 South Brand Boulevard, Glendale, Los Angeles County, California.* May 2026. **Appendix 3.1**.

City of Glendale. Historic Preservation Element of the General Plan. Adopted September 1997. Available at https://www.glendaleca.gov/government/departments/community-development/development-services/historic-preservation/historic-preservation-ordinances-and-general-plan-element.

City of Glendale. *Glendale Municipal Code, Chapter 15.20 (Historic Preservation).* Available at https://www.glendaleca.gov/government/departments/community-development/development-services/historic-preservation/historic-preservation-ordinances-and-general-plan-element.

Historic Resources Group. *South Glendale Historic Context Statement.* Prepared for the City of Glendale. May 2014. Available at https://www.glendaleca.gov/home/showpublisheddocument/30399/638620984416200000

Historic Resources Group. *South Glendale Historic Resources Survey.* Prepared for the City of Glendale. December 2018. Available at https://www.glendaleca.gov/home/showpublisheddocument/42130/636517182520430000

3.2 HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section presents an overview of existing conditions related to hazards and hazardous materials within the Project Site and evaluates potential impacts associated with Project construction and operation. The analysis is based in part on the following technical reports:

- Waterstone Environmental, Inc. Phase I Environmental Assessment Report. May 15, 2019. See **Appendix 3.2-1** of this Draft EIR.
- Waterstone Environmental, Inc. Hoist Removal Report. June 4, 2021; and City of Glendale Fire Department. Hoist Removal Closure Letter, Permit No. FHGP2102080. February 16, 2022. See **Appendix 3.2-2a** and **Appendix 3.2-2b** of this Draft EIR.
- Waterstone Environmental, Inc. Clarifier Replacement Report. June 4, 2021; and City of Glendale Fire Department. Clarifier Removal Closure Letter, Permit No. FPG-017995-2024. October 1, 2024. See **Appendix 3.2-3a** and **Appendix 3.2-3b**, respectively, of this Draft EIR.
- Waterstone Environmental, Inc. Results of Additional Phase II Sampling. February 3, 2025. See **Appendix 3.2-4** of this Draft EIR.
- Waterstone Environmental, Inc. Second Round Indoor Air and Soil Vapor Sampling Letter Report. August 29, 2025. See **Appendix 3.2-5** of this Draft EIR.

3.2.1 ENVIRONMENTAL SETTING

3.2.1.1 Existing Conditions

In accordance with *State CEQA Guidelines* Section 15125(a), the following describes the physical environmental baseline conditions of the Project Site as they existed at the time the NOP was published in February 2026. The Project Site is currently developed and has been operating as an automobile dealership since 1948. Existing structures include an approximately 8,600 square-foot showroom/service reception building originally constructed in 1958, a 900 square-foot office and parts delivery building (originally constructed in 1948), a 17,315 square-foot service facility along the western boundary, and a 3,415 square-foot parts facility.

3.2.1.2 Subsurface Features and Investigations

Due to previous and ongoing auto related uses on the Project Site, a Phase I Environmental Site Assessment (ESA) was prepared to determine the potential for contamination to exist on the site. The 2019 Phase I ESA identified several historic and existing features of environmental concern, including:

- Historic underground storage tanks (USTs) that were historically used to store waste oil and parts cleaner solution,
- Two clarifiers (underground concrete structures designed to intercept and separate oil, grease, and solids from service bay wastewater before it enters the municipal sewer),
- Several in-ground hydraulic lifts (also referred to as hoists, which are below-grade mechanical systems used to elevate vehicles for undercarriage service),
- A former spray paint booth (permitted in 1976) located in the southern portion of the service area, which used spraying and dipping solvents and is a likely historical source of chlorinated solvent releases to the southern clarifier area,
- Above-ground storage tanks (ASTs) and parts washing equipment throughout the service area, including a self-contained parts washer of unknown solvent type located in the southeast portion of the service area, and
- Waste storage areas, including miscellaneous unlabeled drums (5 to 55 gallons) observed throughout the service area for temporary storage of waste oil and other fluids, and municipal waste trash bins located adjacent to the service area.

In response to the recognized environmental conditions (RECs) identified in the Phase I ESA, Waterstone Environmental, Inc. (Waterstone) subsequently conducted multiple Phase II subsurface investigations (2019–2025) involving soil, soil vapor, and indoor air sampling to evaluate whether releases of volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), and total petroleum hydrocarbons (TPH) had occurred and to characterize potential vapor intrusion risk.

VOCs are chemical compounds typically found in automotive solvents and degreasers, including tetrachloroethylene (PCE) and related chlorinated solvents historically associated with parts-cleaning and degreasing activities at the site. PCBs are highly stable industrial chemicals that may be present in hydraulic hoist fluids used in vehicle lift systems. TPH is associated with fuels and motor oils from vehicle servicing operations, underground storage tanks, and clarifier leakage. These compounds are of concern because prolonged exposure above regulatory thresholds can pose risks to human health.

PCE is classified as a likely human carcinogen by the U.S. Environmental Protection Agency (EPA) and is associated with liver and kidney effects and neurological impacts at elevated concentrations. Benzene, a component of TPH and motor fuels, is a known human carcinogen. PCBs are classified as probable human carcinogens and are associated with immune, reproductive, and developmental effects. The primary pathway of concern at the Project Site is vapor intrusion, which is the migration of subsurface chemical vapors upward through soil and into the indoor air of overlying buildings. Vapor intrusion testing is discussed in Section 3.2.1.4, below.

3.2.1.3 Hoist and Clarifier Removal

Two inground hoists located in the northern portion of the service area were removed on March 30, 2020, under permit FHGP2102080, issued by the Glendale Fire Department. Removal was conducted under the on-site oversight of the Glendale Fire Department Certified Unified Program Agency (CUPA) inspector, with soil confirmation sampling collected beneath each hoist at a depth of approximately 8 feet below ground surface (bgs). The hoists were removed pursuant to the recommendations of the 2019 Phase I ESA, which identified them as RECs due to the potential for hydraulic oil releases into surrounding soils. The hoists and associated hydraulic fluids were removed and transported off-site for recycling and disposal; and since hydraulic hoist fluids used in equipment of this era had the potential to contain PCBs, soil samples collected beneath the former hoist locations were specifically analyzed for PCBs. No PCBs were detected in either sample. Limited impacted soil was excavated and disposed of off-site. The Glendale Fire Department CUPA issued a final hoist closure letter on February 16, 2022, confirming that requirements for permanent closure had been met (**Appendix 3.2-2b**).

A clarifier located at the southern end of the service area was identified in 2019 as the likely source of petroleum-related impacts in soil and elevated VOCs in soil vapor at nearby sampling locations. Pre-remediation soil vapor sampling conducted adjacent to the clarifier detected PCE concentrations substantially above the commercial soil vapor screening level, confirming the clarifier as the primary source of subsurface contamination at the Project Site. In March 2021, the southern clarifier was removed and replaced with a new clarifier, and impacted soil surrounding the clarifier was excavated, totaling approximately 51 tons, properly manifested, and transported off-site for disposal at a permitted receiving facility. Soil confirmation sampling following excavation indicated that impacted soil had been successfully removed, with final confirmation samples at or below commercial screening levels. The Glendale Fire Department CUPA issued a final clarifier closure letter on October 1, 2024, confirming that the removal and cleanup met applicable regulatory requirements (**Appendix 3.2-3b**).

3.2.1.4 Soil Vapor and Indoor Air Quality

Following the clarifier and hoist removals, additional Phase II investigations were conducted in 2024 and 2025 to evaluate residual VOC concentrations in soil, soil vapor, and indoor air. These investigations served three primary objectives: (i) to evaluate current VOC concentrations in soil vapor following the 2021 source removal activities; (ii) to evaluate the vertical extent of VOC impacts in the area of the southern clarifier to assess potential threats to groundwater; and (iii) to evaluate potential vapor intrusion risk specifically within the footprint of the proposed Project.

The 2024 and 2025 sampling confirmed that overall soil vapor concentrations on the Project Site have decreased significantly since the previous 2019 Phase II sampling and 2021 hot spot removal activities. While PCE and other VOCs remain detectable in some soil vapor probes, maximum concentrations are below the site-specific commercial soil vapor screening levels calculated using a site-specific attenuation factor of 0.003 (a scientific metric used by regulatory agencies that accounts for the natural dilution of vapors as they migrate from the subsurface, through the building's concrete foundation, and into the indoor breathing zone).

Furthermore, paired sub-slab soil vapor and indoor air sampling conducted beneath and within the parts building (which is representative of the proposed new showroom addition area) demonstrated that vapor intrusion is not occurring at levels of concern and that indoor air quality is consistent with background commercial conditions. The 2024 and 2025 investigations represent the completion of the multi-season sampling program recommended by Waterstone following source removal. Based on these multiple rounds of sampling and the completion of regulatory-approved cleanup activities, Waterstone concluded that no additional remediation or vapor mitigation measures are required to safely support the proposed Project.

3.2.1.5 Potential Hazardous Materials in Buildings

Hazardous building materials such as asbestos-containing materials (ACMs) and lead-based paint (LBP) may be present in older structures. Because the showroom and service reception building was constructed in 1958, prior to federal restrictions on many ACMs and LBP, it is likely that some building components to be demolished contain these materials.

3.2.2 REGULATORY FRAMEWORK

Hazardous materials and wastes are defined and regulated by multiple federal, state, and local agencies to protect human health and the environment.

3.2.2.1 Federal and State

At the federal and state level, the U.S. Environmental Protection Agency (U.S. EPA), Occupational Safety and Health Administration (OSHA), California Environmental Protection Agency (Cal/EPA), and the Department of Toxic Substances Control (DTSC) administer laws governing the storage, handling, transportation, and cleanup of hazardous materials and wastes. For construction activities, Cal/OSHA sets requirements for the disturbance of asbestos-containing construction materials under California Code of Regulations (CCR) Title 8, Section 1529, and for lead under CCR Title 8, Section 1532.1.

The South Coast Air Quality Management District (SCAQMD) Rule 1403 regulates asbestos emissions from demolition and renovation activities, including notification, survey, and work practice requirements.

3.2.2.2 Local

City of Glendale Fire Department (Certified Unified Program Agency)

At the local level, the Glendale Fire Department serves as the Certified Unified Program Agency (CUPA) responsible for hazardous materials business plans, UST regulation, and site closure oversight within the City of Glendale. Glendale also enforces applicable building and fire codes governing hazardous materials storage and handling at commercial sites such as auto dealerships.

City of Glendale General Plan

The City of Glendale General Plan includes goals, policies, and standards related to the exposure of hazardous materials in the City as set forth in the Safety Element. The Safety Element (2025) provides the framework to reduce risks associated with a range of environmental and human-caused hazards that may pose a risk to life and property. The Safety Element states the following relevant goals and policies:

Goal 6: Reduce threats to the public health and safety, and to the environment, from hazardous materials.

Policy 6-1: Limiting exposure of hazardous materials and waste. The City shall strive to reduce the potential for residents, workers, and visitors to Glendale to being exposed to hazardous materials and wastes.

Program 6-1.3: The City shall evaluate the potential impacts related to hazardous materials during the environmental review process for new buildings or businesses where the production, use, storage, transport or disposal of hazardous materials is proposed. Potential impacts shall be fully mitigated.

Policy 6-1.5: Reduction or elimination of hazardous materials. The City shall encourage residents and businesses to reduce or eliminate the use of hazardous materials. This includes encouraging residents to buy toxic substances in only the amount needed to do the job, or better yet, to use safer non-toxic alternate products that do not pose a threat to the environment.

3.2.3 ENVIRONMENTAL IMPACTS

3.2.3.1 Thresholds of Significance

Based on Appendix G of the *State CEQA Guidelines*, the Project would result in a significant impact related to hazards and hazardous materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 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;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- 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;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

As determined in the Initial Study, all but the second threshold listed above related to hazards and hazardous materials (including routine transport, use, or disposal; proximity to schools; listed hazardous materials sites; airport hazards; interference with emergency response plans; and exposure to wildland fire) were found to have no impact or a less than significant impact (**Appendix 1.0-1** to this Draft EIR). Those issues are addressed in **Section 5.0, Effects Found Not to Be Significant** and are not analyzed further in this section.

3.2.3.2 Methodology

The analysis of hazards and hazardous materials in this section is based on a review of the site-specific Phase I and Phase II Environmental Site Assessments, as well as remediation closure reports, prepared for the Project by Waterstone Environmental, Inc. (2019–2025). These reports are provided in **Appendix 3.2** of this Draft EIR.

To determine the potential for the Project to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, the analysis evaluates two primary phases of Project implementation:

Demolition and Structural Abatement: The methodology assesses the age of the existing structures slated for demolition (specifically the 1958 showroom) to evaluate the probability of encountering and releasing ACMs and LBP. The analysis assumes that the Project would strictly adhere to mandatory, existing regulatory frameworks governing the abatement of these materials (e.g., Cal/OSHA and SCAQMD Rule 1403)

Subsurface Earthwork and Construction: The methodology relies on the empirical data gathered during the 2024 and 2025 Phase II soil vapor and indoor air sampling events. Recent contaminant concentrations detected beneath the proposed building footprint are compared against established regulatory screening levels (including commercial soil vapor screening thresholds) to determine whether ground-disturbing activities or future occupancy would result in a significant exposure risk. Since the previous hazards (in-ground hoists and clarifiers) were removed under the direct oversight of the Glendale Fire Department CUPA, the analysis utilizes the formal closure letters issued by the CUPA as substantial evidence that historical localized contamination has been adequately remediated.

3.2.3.3 Impact Analysis

Impact HAZ-1 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.

Construction Impacts

Demolition of the existing 1958 showroom, office, and portions of the service reception building could disturb ACMs and LBP, potentially exposing construction workers or the public to these hazardous materials if not properly managed. However, the Project would be required to comply with existing federal, state, and local regulations, including SCAQMD Rule 1403 and Cal/OSHA asbestos and lead regulations (CCR Title 8, Sections 1529 and 1532.1).

These regulations require pre-demolition asbestos and lead surveys by certified professionals, preparation of abatement plans where ACMs or LBP are present, use of licensed abatement contractors, engineering controls and containment, air monitoring as applicable, and disposal of removed materials at approved facilities. Compliance with these mandatory requirements would ensure that demolition of ACM or LBP containing materials does not create a significant hazard to workers or the public.

With respect to subsurface conditions, extensive Phase II investigations and source removal actions have already been completed at the site. The inground hoists and leaking southern clarifier were removed in 2020–2021 under CUPA oversight. Impacted soils surrounding the clarifier and its associated piping were excavated, while confirmation sampling verified the soil beneath the hoists was clean and required no subsurface excavation. Final closure letters were issued by the Glendale Fire Department in 2022 (hoists) and 2024 (clarifier). Subsequent 2024 and 2025 soil vapor and indoor air sampling confirmed that residual VOC concentrations, including PCE, are below applicable commercial screening levels and that vapor intrusion is not occurring. Multiple rounds of soil vapor sampling beneath and adjacent to the proposed new showroom footprint similarly indicate that a vapor mitigation system is not necessary.

Given the regulatory closures and current subsurface data, grading and excavation for the new facility are not expected to encounter significant contamination or result in reasonably foreseeable upset or accident conditions involving hazardous material releases. Accordingly, construction--related impacts would be less than significant.

Operational Impacts

Following construction, the Project would continue to operate as an automobile dealership, similar to existing conditions. Hazardous materials associated with dealership operations such as motor oil, lubricants, fuels, cleaning solvents, and other automotive fluids would continue to be used and stored on-site. These materials are already subject to hazardous materials business plan requirements, secondary containment, fire code standards, and regular inspections by the Glendale Fire Department CUPA.

The Project represents an expansion and modernization of an existing dealership rather than a fundamentally new or more hazardous industrial use. Modern building systems, storage facilities, and spill containment features designed to current code requirements would further reduce the potential for accidental releases relative to older facilities. Ongoing compliance with applicable hazardous materials regulations and permit conditions would ensure that operational use and storage of hazardous materials do not create a significant hazard to the public or the environment. Accordingly, operational impacts would be less than significant.

Level of Significance Before Mitigation

Less than significant.

Mitigation Measures

No mitigation required.

Level of Significance After Mitigation

Less than significant.

3.2.4 CUMULATIVE ANALYSIS

The geographic context for cumulative hazards and hazardous materials impacts is the City of Glendale. Cumulative impacts could occur if the Project's incremental contribution to hazards, combined with those of other past, present, and reasonably foreseeable projects, would result in a significant cumulative effect.

Construction and operation of the Project, along with other developments in Glendale, would involve the use, handling, and disposal of hazardous materials and could encounter contaminated soils or building materials during redevelopment. However, hazards and hazardous materials issues are largely site specific and localized, and all projects are subject to the same stringent federal, state, and local regulatory framework governing hazardous materials management, ACM and LBP disturbance, contaminated soil handling, and site closure.

For this Project, past subsurface RECs (hoists and clarifier) have been removed, associated localized contamination has been remediated, and the locations closed by the Glendale Fire Department CUPA pursuant to the state's Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (California Health & Safety Code Section 25404 *et seq.*), and current soil vapor and indoor air data indicate no significant ongoing vapor intrusion concerns; Waterstone has concluded that no further investigation or remediation is required. As a result, the Project would not substantially increase cumulative exposure to hazardous materials. Its incremental contribution to cumulative hazards and hazardous materials impacts would, therefore, not be cumulatively considerable. Accordingly, cumulative impacts related to hazards and hazardous materials would be less than significant.

3.2.5 REFERENCES

City of Glendale. Safety Element of the General Plan. Adopted 1976, updated 2003 and 2025. Available at https://www.glendaleca.gov/home/showpublisheddocument/78932/638845589871830000.

City of Glendale Fire Department. Clarifier Removal Closure Letter, Permit No. FPG-017995-2024. October 1, 2024. **Appendix 3.2-3b**.

City of Glendale Fire Department. Hoist Removal Closure Letter, Permit No. FHGP2102080. February 16, 2022. **Appendix 3.2-2b**.

South Coast Air Quality Management District (SCAQMD). Rule 1403: Asbestos Emissions from Demolition/Renovation Activities. Available online at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf.

State of California. California Code of Regulations (CCR), Title 8, Section 1529. Asbestos. Available online at: https://www.dir.ca.gov/title8/1529.html.

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Waterstone Environmental, Inc. Clarifier Replacement Report, Star Mazda, 1401 South Brand Boulevard. June 4, 2021. **Appendix 3.2-3a**.

Waterstone Environmental, Inc. Hoist Removal Report, Star Mazda, 1401 South Brand Boulevard. June 4, 2021. **Appendix 3.2-2a**.

Waterstone Environmental, Inc. Phase I Environmental Assessment Report, 1401 S. Brand Boulevard. May 15, 2019. **Appendix 3.2-1**.

Waterstone Environmental, Inc. Results of Additional Phase II Sampling for the Subject Property Located at 1401 S. Brand Blvd., Glendale, California. February 3, 2025. **Appendix 3.2-4**.

Waterstone Environmental, Inc. Second Round Indoor Air and Soil Vapor Sampling Letter. **Appendix 3.2-5**.

4.0 ALTERNATIVES

INTRODUCTION

CEQA requires that an EIR describe a range of reasonable alternatives to a proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant environmental effects of the project. The EIR must also evaluate the comparative merits of the alternatives (*State CEQA Guidelines* Section 15126.6(a)).

The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The *State CEQA Guidelines* specify that an EIR need not consider every conceivable alternative; rather, the alternatives must be limited to those that would avoid or substantially lessen the project's significant effects while attaining most of the project's basic objectives.

4.1 PROJECT OBJECTIVES

As stated in **Section 2.0, Project Description**, the primary underlying purpose of the Project is to modernize and expand the existing dealership facility to meet contemporary brand standards and operational demands, while appropriately recognizing and memorializing the site's mid-century architectural and commercial heritage and contributing to the City's ongoing economic vitality. The specific objectives of the proposed Project are to:

1. Modernize and upgrade the existing Star Mazda dealership to comply with current Mazda corporate architectural, design, and branding standards.

2. Optimize site utilization and operational efficiency by consolidating the showroom, service reception, and sales offices into a cohesive, state-of-the-art facility.

3. Enhance the customer retail and service experience by providing modern amenities, including a dedicated vehicle delivery studio, prominent display areas, and expanded customer lounge spaces.

4. Implement comprehensive sustainable building practices including rooftop solar installation and all electric building systems to conform to the latest California Green Building Standards Code and applicable City of Glendale codes.

5. Reconfigure on-site circulation and surface parking to efficiently accommodate vehicle display, customer parking, and tandem service parking, while utilizing the parking relief provisions of Assembly Bill (AB) 2097 for developments in transit-rich areas.

6. Recognize and memorialize the mid-century commercial automotive heritage of the "Brand Boulevard of Cars" and the site's architectural history to the extent feasible given the Project's operational needs, including through documentation and public interpretive materials where physical retention is not feasible.

7. Strengthen the City of Glendale's economic base by retaining, modernizing, and expanding a major automotive retailer within the established "Brand Boulevard of Cars" commercial corridor, thereby generating increased local sales tax and property tax revenues to support municipal services, infrastructure, and public amenities.

4.2 SELECTION OF ALTERNATIVES

Based on the environmental impact analysis presented in **Chapter 3.0** of this Draft EIR, the proposed Project would result in a significant and unavoidable impact on cultural resources (historical) due to the demolition of the 1958 showroom, sales offices, parts office, and warehouse buildings, which collectively constitute an eligible historical resource under CEQA. Impacts related to hazards and hazardous materials would be less than significant, and all other environmental issues (including standard compliance procedures for tribal cultural resources and inadvertent discoveries) were determined in the Initial Study to be less than significant or to have no impact. Since *State CEQA Guidelines* Section 15126.6 requires the alternatives analysis to focus on avoiding or substantially lessening a project's significant environmental effects, the alternatives selected for evaluation in this EIR are specifically designed to reduce the Project's significant and unavoidable impact to the historical resource.

4.2.1 Alternatives Considered but Rejected from Further Analysis

State CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency's determination. An alternative may be rejected from detailed consideration if it fails to meet most of the basic project objectives, is deemed infeasible, or does not avoid or substantially lessen a significant environmental impact.

Alternative Location

CEQA requires that an alternative location be considered if it would avoid or substantially lessen any of the significant effects of the project (*State CEQA Guidelines* Section 15126.6(f)(2)).

The City considered an "Alternative Location" scenario where the Star Mazda dealership would relocate to a different, vacant commercial property within the City to construct a new facility, thereby leaving the 1958 Mason and Muntz-designed building at the Project Site intact.

This alternative was rejected from further analysis for several reasons. First, the Project Applicant does not own or control another parcel within the City that is large enough (approximately 1.25 acres) and suitably zoned (Commercial Auto) to accommodate this existing or expanded dealership. Acquiring a new site in the highly constrained Glendale real estate market would be financially infeasible. Second, the "Brand Boulevard of Cars" is a specific, established automotive retail corridor, and relocating the dealership outside of this corridor would place the business at a severe competitive disadvantage, failing the fundamental operational objectives. Finally, relocating the dealership would not guarantee the preservation of the 1958 building. If the applicant vacates the property, the Project Site would likely be sold to another developer who would face the same redevelopment pressures, potentially resulting in the demolition of the historical resource regardless. Since an alternative location is economically infeasible, fails the core operational objectives, and does not definitively avoid the cultural resource impact, it was rejected from further detailed evaluation.

4.2.2 Alternatives Selected for Analysis

Since the only significant and unavoidable impact associated with the Project is the loss of a historical resource, the alternatives analyzed in this section focus on scenarios that would avoid or substantially lessen demolition of the character-defining features of the 1958 Mason & Muntz designed building complex.

This EIR evaluates the following three alternatives:

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Partial Preservation Alternative
- Alternative 3: Full Preservation / Freestanding Expansion Alternative

Each alternative is described and evaluated below, followed by identification of the environmentally superior alternative.

4.3 ANALYSIS METHODOLOGY

Each alternative selected for analysis is evaluated in sufficient detail to allow decision makers to determine whether its overall environmental impacts would be less than, similar to, or greater than the impacts of the proposed Project, as required by *State CEQA Guidelines* Section 15126.6(d). The alternatives analysis need not be presented at the same level of detail as the impact analyses for the proposed Project; rather, it must be sufficient to permit a reasoned comparative evaluation.

This section includes: (1) an analysis of whether each alternative would avoid or substantially lessen any of the significant environmental impacts associated with the proposed Project; (2) an evaluation of the extent to which each alternative would meet the basic Project objectives; and (3) a comparative summary of impacts across all environmental issue areas, culminating in the identification of the environmentally superior alternative consistent with *State CEQA Guidelines* Section 15126.6(e)(2).

4.4 ALTERNATIVE 1: NO PROJECT/NO BUILD ALTERNATIVE

4.4.1 Description of the Alternative

State CEQA Guidelines Section 15126.6(e) requires evaluation of a "No Project" alternative. The purpose of analyzing a No Project alternative is to allow decision-makers to compare the environmental effects of approving the proposed Project with the effects of not approving the Project.

Under Alternative 1, the proposed Project would not be approved. The existing Star Mazda dealership would continue to operate in its current configuration. No demolition would occur, and no new 11,840 square-foot showroom and office building would be constructed. The existing 1958 showroom and attached structures would remain in their current state, and the surface parking configuration would not be altered.

4.4.2 Comparative Impact Analysis

Cultural Resources

Under Alternative 1, the 1958 showroom building and associated structures would not be demolished or altered. Because no physical changes to the historical resource would occur, the resource would be preserved in its current condition. Alternative 1 would therefore avoid the significant and unavoidable cultural resources impact associated with the proposed Project, resulting in no impact to historical resources.

Hazards and Hazardous Materials

Because Alternative 1 involves no demolition, grading, or new construction, it would not create any risk of accidental release of hazardous materials (such as ACMs or LBP) during construction. Operational hazards would remain identical to existing conditions, which are regulated under existing CUPA and fire code requirements. Impacts would remain less than significant and would be incrementally less than those of the proposed Project due to the absence of construction activities.

4.4.3 Relationship to Project Objectives

Alternative 1 would fail to meet the Project's basic objectives. **Table 4.0-1, Alternative 1 Relationship to Project Objectives**, provides a detailed comparison of Alternative 1 against the established Project Objectives.

Table 4.0-1
Alternative 1 Relationship to the Project Objectives

	Project Objective	Relationship to the Objective
1.	Modernize and upgrade the existing Star Mazda dealership to comply with current Mazda corporate architectural, design, and branding standards.	**Not met.** The facility would remain in its existing state and would completely fail to implement the required corporate architectural and branding upgrades.
2.	Optimize site utilization and operational efficiency by consolidating the showroom, service reception, and sales offices into a cohesive, state-of-the-art facility.	**Not met.** Operations would remain fragmented across the existing older buildings, failing to achieve state-of-the-art operational consolidation.
3.	Enhance the customer retail and service experience by providing modern amenities, including a dedicated vehicle delivery studio, prominent display areas, and expanded customer lounge spaces.	**Not met.** No new customer amenities, lounge expansions, or dedicated delivery studios would be constructed.
4.	Implement comprehensive sustainable building practices including rooftop solar installation and all electric building systems to conform to the latest California Green Building Standards Code and applicable City of Glendale codes.	**Not met.** The existing older buildings lack modern energy-efficient infrastructure. No rooftop solar or electrification retrofits are proposed under existing conditions.
5.	Reconfigure on-site circulation and surface parking to efficiently accommodate vehicle display, customer parking, and tandem service parking, while utilizing the parking relief provisions of Assembly Bill (AB) 2097 for developments in transit-rich areas.	**Not met.** The existing parking and site circulation layout would remain entirely unchanged.
6.	Recognize and memorialize the mid-century commercial automotive heritage of the "Brand Boulevard of Cars" and the site's architectural history to the extent feasible given the Project's operational needs, including through documentation and public interpretive materials where physical retention is not feasible.	**Met.** Alternative 1 involves no demolition or alteration of the 1958 building complex, the site's mid-century commercial automotive heritage and architectural history would be preserved in their original physical form. Since physical retention of the character-defining features is fully feasible under this alternative, the documentation and interpretive mechanisms that are part of this objective are unnecessary, and the underlying goal of recognizing and memorializing the site's heritage is achieved more completely through actual preservation than through any documentation-based alternative.

Project Objective	Relationship to the Objective
7. Strengthen the City of Glendale's economic base by retaining, modernizing, and expanding a major automotive retailer within the established "Brand Boulevard of Cars" commercial corridor, thereby generating increased local sales tax and property tax revenues to support municipal services, infrastructure, and public amenities.	**Partially met.** The existing Star Mazda dealership would continue to operate at the site, retaining the automotive retailer within the "Brand Boulevard of Cars" corridor and preserving the associated baseline sales tax and property tax contributions. However, because no modernization or expansion would occur, Alternative 1 would not generate the increased local sales tax and property tax revenues anticipated from the Project's expanded and modernized facility.

The environmental effects of Alternative 1 are included in **Table 4.0-4, Comparison of Alternatives to the Project**, below.

4.5 ALTERNATIVE 2: PARTIAL PRESERVATION ALTERNATIVE

4.5.1 Description of the Alternative

Under Alternative 2, the proposed Project would be redesigned to retain and incorporate the primary character-defining features of the 1958 Mason & Muntz-designed showroom that establish its significance as a Mid-Century Modern auto dealership. Specifically, this alternative would preserve the following elements:

- The tall panels of glass set in metal frames along the showroom frontage.
- The expressed post-and-beam construction of the showroom.
- The modular brick façades located on the east façade of the parts building/service entrance and the north façade of the showroom offices.

Under the proposed Project, the 1958 structures at the northern end of the site are demolished to accommodate surface parking, while the new 11,840-square-foot facility is constructed at the southern end. Under Alternative 2, the new expansion would instead be shifted to the north and adaptively integrated into and behind the existing historic footprint. New two-story elements would be set back or located behind the preserved Mid-Century Modern façades to maintain the historic streetscape appearance along South Brand Boulevard and West Los Feliz Road, leaving the southern portion of the site available for surface parking.

4.5.2 Comparative Impact Analysis

Cultural Resources

Alternative 2 is specifically designed to reduce the severity of the Project's impact on historical resources. By preserving the tall glass panels, post-and-beam structural expression, and modular brick façades, this alternative would retain key features that convey the building's historical and architectural significance.

If the adaptive reuse and new construction are designed and implemented in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, Alternative 2 could substantially lessen, and potentially reduce to a less than significant level, the cultural resources impact associated with the proposed Project. At a minimum, preservation of these character-defining features and sensitive design of the additions would materially reduce the magnitude of the significant and unavoidable impact identified for the proposed Project.

Hazards and Hazardous Materials

Alternative 2 would still require partial demolition, interior renovation, and grading to construct the expanded two-story facilities behind and around the preserved façades. As with the proposed Project, construction workers could be exposed to ACMs and LBP during renovation of the 1958 structure, but these activities would be subject to Cal/OSHA, SCAQMD, and CUPA regulations that govern safe disturbance, abatement, and disposal.

Subsurface conditions and operational hazardous materials use would be essentially the same as for the proposed Project: historic subsurface sources have already been remediated and closed, residual VOCs are below commercial screening levels, and dealership operations would remain regulated by CUPA. Accordingly, hazards and hazardous materials impacts under Alternative 2 would remain less than significant, similar to the proposed Project.

4.5.3 Relationship to Project Objectives

Alternative 2 would meet the Project objectives only partially. **Table 4.0-2, Alternative 2 Relationship to Project Objectives**, provides a detailed comparison of Alternative 2 against the established Project Objectives.

Table 4.0-2
Alternative 2 Relationship to the Project Objectives

	Project Objective	Relationship to the Objective
1.	Modernize and upgrade the existing Star Mazda dealership to comply with current Mazda corporate architectural, design, and branding standards.	**Partially met.** Mazda's corporate design program typically requires specific, uniform façade treatments, signage placement, and material finishes across the primary customer-facing frontage to ensure brand consistency across dealership locations. While the new addition could incorporate current corporate branding elements consistent with the Secretary of the Interior's Standards for differentiated new construction, mandatory retention of the historic showroom's glazing and brick façades along the primary Brand Boulevard frontage would preclude uniform application of Mazda's standard frontage treatment across that portion of the building, partially conflicting with corporate branding consistency requirements.
2.	Optimize site utilization and operational efficiency by consolidating the showroom, service reception, and sales offices into a cohesive, state-of-the-art facility.	**Not met.** The character-defining features required to be retained under this alternative (i.e., the post-and-beam showroom structure, its fixed structural bay spacing, and the modular brick façades on the east façade of the parts building/service entrance and north façade of the showroom offices) occupy the northern and eastern portions of the site along both the Brand Boulevard and Los Feliz Road frontages. Since the new 11,840-square-foot addition must be integrated behind and around this retained, irregularly-shaped historic footprint rather than sited as a single contiguous volume (as under the proposed Project's placement on the southern lot), the resulting floor plan splits the showroom, service reception, and sales offices across the retained historic bays and the new construction, requiring interior circulation to route around the preserved structural grid. This constrains the ability to create a cohesive internal layout.
3.	Enhance the customer retail and service experience by providing modern amenities, including a dedicated vehicle delivery studio, prominent display areas, and expanded customer lounge spaces.	**Partially met.** While some modern amenities and expanded lounge spaces could be built into the new additions, the retained post-and-beam structure utilizes a fixed column spacing that would not match the open, column-free floor plate that modern vehicle displays typically need. The historic showroom glazing is also a protected character-defining feature under the Secretary of the Interior's Standards, so it cannot be substantially reconfigured for the large-format unveiling presentation a dedicated vehicle delivery studio usually calls for.
4.	Implement comprehensive sustainable building practices including rooftop solar installation and all electric building systems to conform to the latest California Green Building Standards Code and applicable City of Glendale codes.	**Met.** The new additions and adaptively reused structures could be retrofitted with all-electric systems and rooftop solar, achieving the sustainability objective.

Project Objective	Relationship to the Objective
5. Reconfigure on-site circulation and surface parking to efficiently accommodate vehicle display, customer parking, and tandem service parking, while utilizing the parking relief provisions of Assembly Bill (AB) 2097 for developments in transit-rich areas.	**Partially met.** While AB 2097 parking relief could still be utilized, the proposed Project's 66-space parking configuration relies on converting the northern portion of the site, which is currently occupied by the approximately 8,600-square-foot showroom and service reception building, to surface parking and vehicle display area following demolition. Under Alternative 2, this same northern area remains occupied by the retained historic façades and structural bays, removing that area from the developable surface parking and vehicle display inventory. This would reduce the available surface area needed to optimize on-site circulation and vehicle display relative to the proposed Project's configuration.
6. Recognize and memorialize the mid-century commercial automotive heritage of the "Brand Boulevard of Cars" and the site's architectural history to the extent feasible given the Project's operational needs, including through documentation and public interpretive materials where physical retention is not feasible.	**Met.** Alternative 2 physically retains the primary character-defining features that convey the property's Mid-Century Modern significance (i.e., the showroom's glazed frontage, post-and-beam construction, and modular brick façades), which satisfies the objective's intent. For the portions of the historic complex not retained under this alternative, they would still be addressed through documentation and interpretive mitigation consistent with **MM CUL-1** and **MM CUL-2.**
7. Strengthen the City of Glendale's economic base by retaining, modernizing, and expanding a major automotive retailer within the established "Brand Boulevard of Cars" commercial corridor, thereby generating increased local sales tax and property tax revenues to support municipal services, infrastructure, and public amenities.	**Met.** Alternative 2 retains the dealership within the "Brand Boulevard of Cars" corridor and includes construction of a new facility addition, continuing to generate local sales tax and property tax revenue. The operational inefficiencies noted in Objectives 2, 3, and 5, above, may modestly reduce the facility's revenue-generating potential compared to the proposed Project's more streamlined layout, but the core fiscal goal of retaining and expanding the retailer's presence is still substantially met.

The environmental effects of Alternative 2 are included in **Table 4.0-4, Comparison of Alternatives to the Project**, below.

4.6 ALTERNATIVE 3: FULL PRESERVATION / FREESTANDING EXPANSION ALTERNATIVE

4.6.1 Description of the Alternative

Under Alternative 3, the entire 1958 Mason & Muntz showroom, sales offices, and parts building would be retained in their current condition, avoiding destructive physical alterations or partial demolition. Consistent with the proposed Project, the new two-story, approximately 11,840-square-foot facility would be constructed as a freestanding structure located entirely on the southern portion of the Project site. However, rather than demolishing the historic northern structures to create reconfigured surface parking and vehicle display areas, the 1958 complex would remain intact.

The existing historic showroom could be repurposed for secondary dealership uses, such as indoor vehicle display, administrative space, or customer lounge so that it remains in active use and is not left functionally obsolete.

4.6.2 Comparative Impact Analysis

Cultural Resources

Alternative 3 is designed to completely avoid the physical demolition or material impairment of the historical resource. By preserving the 1958 structures in their entirety and locating all new construction on the adjacent southern parking lot, the historical resource would maintain integrity of location, design, materials, workmanship, feeling, and association.

Since the character-defining features and fabric of the 1958 complex would remain intact, Alternative 3 would avoid the significant and unavoidable cultural resources impact associated with the proposed Project, reducing the Project's impact on historical resources to less than significant.

Hazards and Hazardous Materials

Alternative 3 requires no demolition or major renovation of the 1958 structures, thereby eliminating the need for specialized abatement of ACMs or LBP within those historic buildings. Construction of the new facility on the southern parking lot would still involve grading and site preparation; however, previous Phase II and soil vapor investigations indicate that subsurface conditions in this area are below applicable screening levels and that vapor mitigation is not required.

Operational hazardous materials use would be similar to the proposed Project, since the site would continue to function as an automobile dealership regulated by CUPA and other agencies. Overall, hazards and hazardous materials impacts under Alternative 3 would remain less than significant and would be incrementally less than those of the proposed Project due to reduced disturbance of older building materials.

4.6.3 Relationship to Project Objectives

Alternative 3 would conflict with several fundamental Project Objectives. **Table 4.0-3, Alternative 3 Relationship to Project Objectives**, provides a detailed comparison of Alternative 3 against the established Project Objectives.

Table 4.0-3
Alternative 3 Relationship to the Project Objectives

	Project Objective	Relationship to the Objective
1.	Modernize and upgrade the existing Star Mazda dealership to comply with current Mazda corporate architectural, design, and branding standards.	**Partially met.** Unlike Alternative 2, the new freestanding facility under Alternative 3 would not incorporate any retained historic fabric and could, therefore, fully implement Mazda's contemporary architectural design and branding standards without constraint, consistent with the Secretary of the Interior's Standards' preference for differentiated new construction rather than façade alteration. However, because the retained 1958 building would remain prominently visible along the Brand Boulevard and Los Feliz Road frontages, the site as a whole would present two visually distinct architectural structures (a fully modern, branded showroom and a separate, retained Mid-Century Modern structure) rather than the single, unified corporate design that the objective contemplates.
2.	Optimize site utilization and operational efficiency by consolidating the showroom, service reception, and sales offices into a cohesive, state-of-the-art facility.	**Not met.** Operations would be fragmented across two completely separate, freestanding structures (the historic building and the new southern building), failing the objective to consolidate into a single cohesive facility.
3.	Enhance the customer retail and service experience by providing modern amenities, including a dedicated vehicle delivery studio, prominent display areas, and expanded customer lounge spaces.	**Partially met.** While the new freestanding building would contain modern amenities and delivery studios, customers would need to physically travel between two separate, non-contiguous structures to experience the full dealership offerings: the new southern building would house the primary sales functions, including the vehicle delivery studio and service reception, while the retained historic showroom to the north would be repurposed for secondary uses such as supplemental vehicle display, administrative space, or a customer lounge. This separation breaks what is otherwise designed as a single continuous customer experience (from initial vehicle viewing through delivery) into two physically disconnected experiences.
4.	Implement comprehensive sustainable building practices including rooftop solar installation and all electric building systems to conform to the latest California Green Building Standards Code and applicable City of Glendale codes.	**Partially met.** The new freestanding building could be constructed to CALGreen standards with rooftop solar but retrofitting the historic 1958 building for rooftop solar and full electrification presents specific conflicts with its character-defining features. Rooftop solar mounting systems typically require roof penetrations and visible array installations that could alter the profile of the building's flat roof and wide overhanging eaves (both identified character-defining features) potentially conflicting with the Secretary of the Interior's Standards for minimal, reversible intervention. Similarly, converting the building's gas-fired HVAC and water heating systems to all-electric infrastructure would require routing new electrical conduit and panels through a structure built around exposed post-and-beam construction and largely unobstructed glazing and brick walls; concealed routing would likely require cutting into historic brick masonry or the structural roof deck, while exposed routing would visually intrude on the retained character-defining features.

	Project Objective	Relationship to the Objective
5.	Reconfigure on-site circulation and surface parking to efficiently accommodate vehicle display, customer parking, and tandem service parking, while utilizing the parking relief provisions of Assembly Bill (AB) 2097 for developments in transit-rich areas.	**Partially met.** Occupying both the northern portion of the site (with the preserved historic structures) and the southern portion of the site (with the new freestanding building) would substantially reduce the on-site surface area available for vehicle display and customer/service parking compared to the proposed Project's configuration. However, the Project already relies on AB 2097 parking relief and existing off-site parking arrangements (44 spaces at 114 E. Laurel Street and 43 spaces at 122 W. Los Feliz Road, together comprising the majority of the Project's total 104-space parking supply), which would remain available to supplement the reduced on-site capacity under this alternative. The remaining constrained on-site area would still limit the efficiency of vehicle display and tandem service parking relative to the proposed Project.
6.	Recognize and memorialize the mid-century commercial automotive heritage of the "Brand Boulevard of Cars" and the site's architectural history to the extent feasible given the Project's operational needs, including through documentation and public interpretive materials where physical retention is not feasible.	**Met.** Alternative 3 retains the entire 1958 Mason & Muntz building complex in its original physical form, avoiding demolition or material impairment of any character-defining features. Since full physical retention is feasible under this alternative, the site's mid-century commercial automotive heritage and architectural history are preserved directly, achieving the objective's purpose for recognizing the heritage more completely than via documentation for situations where retention is infeasible.
7.	Strengthen the City of Glendale's economic base by retaining, modernizing, and expanding a major automotive retailer within the established "Brand Boulevard of Cars" commercial corridor, thereby generating increased local sales tax and property tax revenues to support municipal services, infrastructure, and public amenities.	**Partially met.** Alternative 3 retains the dealership within the "Brand Boulevard of Cars" corridor and includes construction of a new freestanding facility, continuing to generate local sales tax and property tax revenue from an actively operating auto dealership. However, the operational fragmentation identified in Objectives 2 and 5 above, which discuss the divided facilities and constrained on-site circulation, could reduce the dealership's sales efficiency and revenue-generating potential relative to the proposed Project's more consolidated configuration.

The environmental effects of Alternative 3 are included in **Table 4.0-4, Comparison of Alternatives to the Project**, below.

4.7 COMPARISON OF ALTERNATIVES

Table 4.0-4 summarizes the effects of the alternatives compared to the Project.

Table 4.0-4
Comparison of Alternatives to the Project

Environmental Issue Area	Project Impact	Alternative 1: No Project/No Build	Alternative 2: Partial Preservation	Alternative 3: Full Preservation / Freestanding Expansion
Cultural Resources (Historical)	Significant and Unavoidable	**Less** (No Impact)	**Less** (Substantially lessened / potentially less than significant)	**Less** (Less than significant)
Hazards and Hazardous Materials	Less than Significant	**Incrementally Less** (Less than significant)	**Similar** (Less than significant)	**Incrementally Less** (Less than significant)

4.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

State CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify an environmentally superior alternative among those evaluated. If the No Project alternative is identified as environmentally superior, the EIR must also identify an environmentally superior alternative from among the remaining alternatives.

Alternative 1 (No Project/No Build) would avoid the significant and unavoidable cultural resources impact entirely by leaving the Project Site in its existing condition. As a result, Alternative 1 is the environmentally superior alternative overall. However, because Alternative 1 is the No Project scenario and does not meet any of the Project's objectives (as detailed in Section 4.4.3), CEQA requires identification of an environmentally superior alternative among the build alternatives.

Among the build alternatives evaluated, Alternative 3 (Full Preservation / Freestanding Expansion) is identified as the environmentally superior build alternative. By preserving the 1958 structures in their entirety at the northern end of the site while constructing the new freestanding facility on the southern surface lot, Alternative 3 fully avoids demolition of the historical resource and reduces hazards and hazardous materials impacts incrementally below those of the proposed Project. Consistent with this outcome, Alternative 3 fully satisfies, and exceeds, Project Objective 6 by physically preserving the entire historic complex rather than relying on documentation-based mitigation measures. While Alternative 2 (Partial Preservation) would substantially lessen impacts by preserving key façades and character-defining features, it would still involve destructive alterations to portions of the historic building.

Because Alternative 3 requires no demolition of the historic structure, it provides the greatest reduction in physical environmental impacts among the build alternatives. However, as detailed in the objectives analysis (Section 4.6.3), Alternative 3 would conflict with the Project's fundamental operational (Objective 2) and branding (Objective 1) objectives and would only partially achieve the Project's site circulation objective (Objective 5) and economic base objective (Objective 7), notwithstanding its full achievement of the Project's heritage-recognition objective (Objective 6).

5.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

INTRODUCTION

State CEQA Guidelines Section 15128 requires an EIR to include a brief discussion of the reasons why various possible significant effects of a project were determined not to be significant and are therefore not discussed in detail in the EIR. In accordance with this requirement, this section summarizes environmental issue areas where impacts were found to be "less than significant" or to have "no impact" based on the Initial Study prepared for the Project, which is included as **Appendix 1.0-1** to this Draft EIR.

5.1 AESTHETICS

The Project site is an existing vehicle dealership located in a highly urbanized area known as the "Brand Boulevard of Cars." There are no scenic vistas, rock outcroppings, or designated State scenic highways in the vicinity. The new 11,840 square foot showroom building and site improvements would be subject to Design Review Board review for site planning, massing, materials, and landscaping to ensure compatibility with the surrounding built environment. Exterior lighting would be shielded and directed downward in compliance with the Glendale Municipal Code to avoid light spillover. Aesthetic impacts were therefore determined to be less than significant.

5.2 AGRICULTURE AND FORESTRY RESOURCES

The Project site is fully developed within an urban commercial corridor and does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor is it zoned for agricultural or timberland use. There is no forest land within the City of Glendale. Accordingly, the Project would have no impact on agriculture or forestry resources.

5.3 AIR QUALITY

The Project is consistent with Southern California Association of Governments (SCAG) growth projections and would not conflict with the South Coast Air Quality Management District (SCAQMD) 2022 Air Quality Management Plan (AQMP). An Air Quality and Greenhouse Gas (GHG) Impact Analysis by Giroux & Associates (2022) used CalEEMod to estimate emissions and found that both construction and operational emissions would be below SCAQMD significance thresholds. As an auto dealership expansion with enclosed showroom and office uses, the Project is not expected to generate objectionable odors. Air quality impacts were therefore determined to be less than significant.

5.4 BIOLOGICAL RESOURCES

The Project site is heavily urbanized, fully paved or developed, and lacks natural vegetation or habitat suitable for sensitive species. There are no riparian habitats, federally protected wetlands, or wildlife movement corridors on or adjacent to the site. No protected native or indigenous trees (e.g., Coast Live Oak or California Sycamore) subject to Glendale Municipal Code Section 12.44 occur on or within 20 feet of the site. Consequently, the Project would have no impact on biological resources.

5.5 CULTURAL RESOURCES (ARCHAEOLOGICAL RESOURCES AND HUMAN REMAINS)

Impacts to historical resources are evaluated in **Section 3.1** of this Draft EIR. With respect to archaeological resources and human remains, the Project site has been extensively disturbed and developed since the late 1940s, and no known archaeological sites or burial grounds are present. In the unlikely event that archaeological resources or human remains are encountered during excavation, work would be halted and handled in accordance with standard City conditions and State Health and Safety Code Section 7050.5, including notification of the County Coroner and, if appropriate, the Native American Heritage Commission. Compliance with these requirements ensures impacts to archaeological resources and human remains would be less than significant.

5.6 ENERGY

The Project would not result in wasteful, inefficient, or unnecessary energy consumption. The Project Site is located in an urbanized area served by existing utility infrastructure, and no new or extended energy transmission infrastructure would be required.

During construction, energy would be consumed by demolition equipment, grading and excavation machinery, construction vehicles, and construction workers. Construction-phase energy use would be temporary and short-term in duration, limited to the Project construction period, and would not adversely affect local or regional energy supplies. Construction energy use would not be wasteful, inefficient, or unnecessary.

During operation, the Project would consume electricity for building lighting, heating, ventilation, and air conditioning (HVAC), and general dealership operations including service bay equipment and vehicle display systems. The City's local reach codes ("reach codes" are locally adopted building standards that exceed the statewide minimum requirements of Title 24) previously required full electrification of new construction; however, following the Ninth Circuit's decision in *California Restaurant Association v. City of Berkeley*, enforcement of that all-electric requirement has been suspended due to federal preemption under

the Energy Policy and Conservation Act. The City's separate reach code requirements for electric vehicle (EV) charging and EV-readiness remain in effect and are unaffected by this ruling. Independent of the current enforceability of the all-electric mandate, the new facility would be an all-electric building with no new natural gas service, consistent with Project Objective 4. The new facility would also comply with Title 24 Building Energy Efficiency Standards and the 2022 CALGreen Code, which are designed to reduce wasteful and unnecessary energy use in new construction. Since the Project would comply with all applicable state and local energy efficiency standards, and would incorporate all-electric building systems, operational energy use would not be wasteful, inefficient, or unnecessary. Energy impacts were therefore determined to be less than significant.

5.7 GEOLOGY AND SOILS

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, a mapped liquefaction area, or a landslide hazard area, as indicated in the Glendale General Plan Safety Element. Although the Project Site is subject to regional seismic ground shaking, compliance with the California Building Code would ensure appropriate seismic design. Construction related erosion would be minimized through SCAQMD Rule 403 (Fugitive Dust) and implementation of a Stormwater Pollution Prevention Plan (SWPPP) with best management practices (BMPs). Local geology consists primarily of igneous and metamorphic rock not known to be highly sensitive for paleontological resources; standard conditions apply if unanticipated fossils are encountered at depth. Geology and soils impacts were determined to be less than significant.

5.8 GREENHOUSE GAS EMISSIONS

The Air Quality and GHG Impact Analysis (Giroux & Associates, 2022) estimated that Project construction would generate approximately 253 metric tons (MT) of CO_2e in total; amortized over 30 years and combined with annual operational emissions of approximately 59 MT CO_2e/year, total annual emissions would be approximately 10.4 MT CO_2e/year. This is far below the SCAQMD screening threshold of 3,000 MT CO_2e/year for commercial/residential projects. The Project would not conflict with any applicable GHG reduction plans. GHG impacts were therefore found to be less than significant.

5.9 HAZARDS AND HAZARDOUS MATERIALS (ROUTINE TRANSPORT, SCHOOLS, AIRPORT, AND EMERGENCY RESPONSE)

Impacts related to reasonably foreseeable upset and accident conditions (e.g., demolition of older structures, residual contamination) are analyzed in **Section 3.2** of this Draft EIR. For other hazards thresholds, the dealership's retail and office functions do not involve the routine transport, use, or disposal of substantial hazardous materials beyond typical automotive and cleaning products managed under existing regulations.

The Project would not emit hazardous emissions within a quarter mile of a school (the nearest, Cerritos Elementary School, is approximately 0.2 mile to the southeast), and the Project Site is not listed on the Cortese List (Government Code Section 65962.5). The Project Site is not within an airport land use plan, flight path, or wildland fire hazard area. Although South Brand Boulevard is a designated Disaster Response Route, the Project would not alter the roadway network, and standard construction traffic control would maintain emergency access. These hazards and hazardous materials issues were determined to be less than significant or to have no impact.

5.10 HYDROLOGY AND WATER QUALITY

The Project would not violate water quality standards, substantially alter drainage patterns, or increase runoff in a manner that would cause flooding. The site is already developed and predominantly paved; post-project conditions would maintain similar impervious coverage. During construction, the Project would comply with the National Pollutant Discharge Elimination System (NPDES) requirements through preparation and implementation of a SWPPP. Postconstruction, a Standard Urban Stormwater Mitigation Plan (SUSMP) with Low Impact Development (LID) features would be implemented pursuant to Glendale Municipal Code Chapter 13.42. The site is not in a FEMA mapped flood zone and is not subject to tsunami or seiche risk. Hydrology and water quality impacts were determined to be less than significant.

5.11 LAND USE AND PLANNING

The Project is consistent with the Project Site's General Plan designation of Community Services Commercial and its Commercial Auto (CA) zoning. It represents an expansion and modernization of an existing auto dealership and would not physically divide an established community. Pursuant to AB 2097, the Project is exempt from minimum parking requirements because it is within 0.5 mile of the Glendale Transportation Center and located on High-Quality Transit Corridors. No conflicts with applicable land use plans or policies for environmental protection were identified, and land use impacts were found to have no impact.

5.12 MINERAL RESOURCES

The fully urbanized Project Site is not identified as a locally important mineral resource recovery site in the Glendale Open Space and Conservation Element. No mineral extraction activities occur on or near the Project Site. The Project would have no impact on mineral resources.

5.13 NOISE

A Noise Impact Analysis (Giroux & Associates, 2022) determined that maximum construction noise at the nearest sensitive receptor, Dignity Health Glendale Memorial Hospital (approximately 34 feet away), would be about 75.9 dBA Leq, below the Federal Transit Administration's 90 dBA Leq construction criterion. Construction would occur during allowable daytime hours per Glendale Municipal Code Chapter 8.36. Construction vibration at the hospital is estimated at 0.056 inches/second peak particle velocity (PPV), well below the 0.2 inches/second PPV building damage threshold. Operationally, the new enclosed building is expected to reduce existing outdoor dealership noise, and the modest net increase of 65 daily vehicle trips would not perceptibly increase ambient traffic noise. Noise and vibration impacts were therefore determined to be less than significant.

5.14 POPULATION AND HOUSING

The Project involves expansion of a commercial facility and does not include residential development. No existing housing or residents would be displaced, and the temporary construction employment generated would not induce substantial unplanned population growth. The Project's modest net increase of approximately 2,340 square feet of building area represents an expansion of an existing, already-operating automobile dealership rather than the introduction of a new employment-generating use. Since the Project would continue the same dealership operations at a similar operational scale, any increase in permanent staffing associated with the expanded facility would be incremental and would not constitute the type of substantial new employment generation that typically induces unplanned population growth through increased housing demand or in-migration. Population and housing impacts were found to be less than significant.

5.15 PUBLIC SERVICES

The Project site is in an urbanized area served by existing public services. Fire protection is provided by Glendale Fire Station No. 22 (approximately 0.4 mile away), and police services are provided by the Glendale Police Department headquarters (approximately 1.7 miles away). The Project would not require construction or expansion of fire, police, school, park, or library facilities. The applicant would pay mandatory school impact fees pursuant to Government Code Section 65995. As a vehicle dealership, the Project is exempt from park and library Development Impact Fees under Ordinance No. 5820. Public services impacts were, therefore, determined to be less than significant.

5.16 RECREATION

Because the Project does not include residential uses, it would not generate a new resident population that would increase demand on neighborhood or regional parks or other recreational facilities. As a result, recreation impacts were found to be less than significant.

5.17 TRANSPORTATION

The Project is consistent with the City's Circulation Element and would continue to take access from South Brand Boulevard and West Laurel Street without introducing hazardous geometric design features. A Vehicle Miles Traveled (VMT) and Trip Generation Evaluation by Stantec (2023) concluded that the Project would generate a net increase of approximately 65 daily trips; and since the new building is less than 50,000 square feet and daily trips are well below 145, the Project screens out of detailed VMT analysis under the City's Transportation Impact Analysis Guidelines. Furthermore, consistent with state and regional transportation policies (including Caltrans directives), the Project utilizes Assembly Bill 2097 to reduce its on-site parking footprint. By restricting parking supply within a transit-rich environment (0.3 miles from the Glendale Transit Center), the Project inherently improves transit access and reduces single-occupancy vehicle trips, ensuring consistency with applicable multimodal transportation plans. Transportation impacts were, therefore, determined to be less than significant.

5.18 TRIBAL CULTURAL RESOURCES

The City initiated Native American consultation pursuant to Assembly Bill 52, sending written notifications to the Fernandeño Tataviam Band of Mission Indians, the Gabrielino-Tongva Tribe, and the Soboba Band of Luiseño Indians. No tribe requested consultation within the 30-day period. In the event that tribal cultural resources are discovered during ground-disturbing activities, standard conditions require temporary suspension of work and evaluation in coordination with appropriate tribal representatives and the Native American Heritage Commission. Tribal cultural resource impacts were determined to be less than significant.

5.19 UTILITIES AND SERVICE SYSTEMS

The Project would connect to existing utility infrastructure serving the site. The Hyperion Treatment Plant has adequate remaining capacity to treat the Project's wastewater, and the Project's incremental water demand would be minimized through water-efficient fixtures required by CALGreen. Solid waste generation would be handled within the capacity of existing landfills and diversion programs and would comply with the City's Zero Waste Action Plan and SB 1383 organics diversion requirements. Utilities and service systems impacts were, therefore, determined to be less than significant.

5.20 WILDFIRE

The Project Site is completely urbanized and is not located within a State Responsibility Area or a Very High Fire Hazard Severity Zone. The Project would not expose people or structures to wildfire risks or post-fire slope instability and would not require wildland fire infrastructure. As such, there would be no impact related to wildfire.

5.21 REFERENCES

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Stantec. *Glendale Star Mazda Expansion - VMT and Trip Generation Evaluation*. February 24, 2023. **Appendix 1.0-1**.

State of California. *Assembly Bill 2097 (Government Code Section 65863.2)*.

State of California. *California Building Standards Code (Title 24), Part 11 (CALGreen)*.

6.0 OTHER CEQA CONSIDERATIONS

Section 15126.2 of the *State CEQA Guidelines* requires that an EIR evaluate specific categories of environmental impacts, including growth-inducing impacts, significant irreversible environmental changes, and significant and unavoidable environmental impacts.

6.1 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the *State CEQA Guidelines* requires an EIR to discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Induced growth is considered a significant impact only if it would adversely affect the ability of agencies to provide public services or would result in other significant physical environmental effects.

6.1.1 Direct Growth Inducement

A project can directly induce growth if it provides new housing that generates a new residential population. The proposed Project entails demolition of approximately 9,500 square feet of existing commercial structures and construction of a new 11,840 square-foot showroom and office building to serve an existing vehicle dealership. The Project does not include any residential uses and would not directly induce population growth or construction of additional housing within the City of Glendale.

6.1.2 Indirect Growth Inducement

A project can indirectly induce growth by creating substantial new employment opportunities that attract new residents or by removing an obstacle to growth, such as extending major infrastructure into previously unserved areas. The Project is a modest expansion and modernization of an existing dealership and would result in a minor net increase of approximately 2,340 square feet of floor area. Any additional employment generated would be nominal and readily absorbed by the existing labor pool within Glendale and the broader Los Angeles metropolitan region; no substantial influx of new residents or associated housing demand is anticipated.

The Project Site is located within a fully urbanized, densely developed commercial corridor along the "Brand Boulevard of Cars" and is already served by existing roadways, transit, water, sewer, and electrical infrastructure. The Project would connect to existing utility mains in adjacent public rights-of-way and would not extend infrastructure into undeveloped areas or otherwise remove obstacles to growth.

Accordingly, the proposed Project would not foster substantial economic or population growth and would not indirectly induce housing development. Growth-inducing impacts would be less than significant.

6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the *State CEQA Guidelines* requires an EIR to discuss any significant irreversible environmental changes that would be involved in a project. An impact is considered an irreversible environmental change if it would: (1) commit future generations to particular uses; (2) involve a large commitment of nonrenewable resources; or (3) result in irreversible damage from environmental accidents.

6.2.1 Commitment of Future Generations

The Project Site has been continuously used as an automobile dealership since the 1940s. The proposed Project represents continuation and modernization of this established use and is consistent with the site's General Plan designation of Community Services Commercial and its Commercial Auto (CA) zoning. The Project does not constitute a new land use type that would commit future generations to a different development pattern; rather, it optimizes an existing, permitted use within an established commercial corridor.

6.2.2 Commitment of Nonrenewable Resources

Construction of the Project would require consumption of nonrenewable resources, including lumber, metals (such as steel and copper), aggregate materials, water, and fossil fuels (diesel and gasoline) to power construction equipment and worker vehicles. These resources are not recoverable once consumed; however, the scale of construction (i.e., a new 11,840 square-foot building on a 1.26-acre infill site) is typical of small commercial redevelopment in Southern California and would not constitute an extraordinary or wasteful commitment of nonrenewable resources.

During operations, the Project would consume electricity and water. The City's local reach codes previously required full electrification of new construction; however, following the Ninth Circuit's decision in *California Restaurant Association v. City of Berkeley*, enforcement of that all-electric requirement has been suspended due to federal preemption under the Energy Policy and Conservation Act. The City's separate reach code requirements for electric vehicle (EV) charging and EV-readiness remain in effect and are unaffected by this ruling. Independent of the current enforceability of the all-electric mandate, the new building would be fully electrified, consistent with Project Objective 4, and designed in compliance with the latest Title 24 standards, and CALGreen Code, including installation of rooftop solar panels. These sustainability requirements would improve energy efficiency and offset a portion of grid-supplied electricity generated from nonrenewable sources.

As a result, the Project's long-term consumption of nonrenewable resources would be efficient and would not represent a significant irreversible environmental change.

6.2.3 Irreversible Damage from Environmental Accidents

As discussed in **Section 3.2, Hazards and Hazardous Materials**, the Project Site historically contained underground storage tanks (USTs), in-ground hoists, and clarifiers associated with auto service operations. Remedial activities have been completed, including removal of the hoists and leaking clarifier, excavation of impacted soil, and regulatory closure of these features by the Glendale Fire Department CUPA. Subsequent Phase II soil vapor and indoor air testing (2024–2025) confirmed that residual volatile organic compound (VOC) concentrations are below commercial screening levels and that vapor intrusion is not occurring.

Demolition of the 1958 building and related construction activities would be conducted in compliance with Cal/OSHA and SCAQMD regulations governing disturbance of asbestos-containing materials and lead-based paint, thereby minimizing the risk of accidental releases. During operation, the modernized dealership will continue to handle automotive fluids, lubricants, and cleaning solvents, which are subject to established storage, containment, and spill prevention requirements under the California Fire Code and CUPA programs.

Given the completed remediation, current subsurface conditions, and regulatory controls on construction and operations, the Project would not expose the public or the environment to a significant risk of irreversible damage from environmental accidents.

6.3 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

Section 15126.2(b) of the *State CEQA Guidelines* requires that an EIR describe any significant environmental impacts that cannot be avoided, including those that can be mitigated but not reduced to a less than significant level.

Based on the analysis in this Draft EIR and the Initial Study (**Appendix 1.0-1**), the proposed Project would result in the following significant and unavoidable impact:

6.3.1 Cultural Resources (Historical)

As detailed in **Section 3.1, Cultural Resources**, the Project would demolish the 1958 showroom, sales offices, parts office, and warehouse buildings located on the northern portion of the Project Site. These structures, designed by Mason and Muntz, embody the distinctive characteristics of Mid-Century Modern commercial architecture and represent a rare surviving post-World War II auto dealership along the "Brand Boulevard of Cars." The property has been determined to be a historical resource for purposes of CEQA.

Demolition of the 1958 building complex would cause a substantial adverse change in the significance of this historical resource. **Mitigation Measures MM CUL-1** and **MM CUL-2** require historic-level documentation, digital scanning, and interpretive materials, which would provide a robust record of the resource and public education but cannot avoid or substantially lessen the physical loss of the historical resource.

Additionally, the loss of this resource would make a cumulatively considerable contribution to the ongoing regional loss of Mid-Century Modern commercial structures in South Glendale. Therefore, the Project's direct and cumulative impacts on historical resources would remain significant and unavoidable.

All other environmental impacts associated with the proposed Project were determined, through the Initial Study and this Draft EIR, to be less than significant or to have no impact on the environment.

7.0 REFERENCES

The following documents, technical reports, and regulatory frameworks were utilized in the preparation of this Draft EIR:

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