



INITIAL STUDY

Residential Congregate Care Facility Expansion
2820 Sycamore Avenue

1. Project Title:	Twelve Oaks Residential Congregate Care Facility Expansion
2. Lead Agency Name and Address:	City of Glendale Community Development Department Planning Division 633 East Broadway, Room 103 Glendale, CA 91206
3. Contact Person and Phone Number:	Dennis Joe, Principal Planner Tel: (818) 937-8157 Fax: (818) 240-0392
4. Project Location:	2820 Sycamore Avenue, Glendale, Los Angeles County
5. Project Sponsor's Name and Address:	Julie McGeever 122 East Arrellaga Street Santa Barbara, CA 93101 Tel: (818) 507-1605
6. General Plan Designation:	Residential – Low Density
7. Zoning:	R1 II (Low Density Residential, Floor Area District II) Zone
8. Description of the Project:	Use and Standards Variance to allow the expansion/modification of an existing nonconforming land use (Residential Care Facility - Twelve Oaks). The scope of work is to demolish twelve existing buildings and to construct a new three-story, 92,420 square-foot, 104 bed, Residential Congregate Care Facility with a 26,471 square-foot subterranean garage on an irregularly-shaped, 4.3-acre lot, zoned R1 II (Low Density Residential Zone, Floor Area District II). The project includes approximately 20,837 cubic yards (CY) of grading (20,010 CY cut, 827 CY fill, and 19,183 CY export). The property is currently developed with an existing residential congregate care facility (Twelve Oaks) that consist of twelve buildings with a maximum capacity of 60 residents and consists of a total of 49 tree species by the City of Glendale's Indigenous Tree Ordinance that are either on or within 20 feet of the subject property's boundaries.
9. Surrounding Land Uses and Setting:	<u>North:</u> R1 II (Low Density Residential Zone, Floor Area District II)/ Single-Family Residential <u>South:</u> R1 II (Low Density Residential Zone, Floor Area District II)/ Single-Family Residential <u>East:</u> R1 II (Low Density Residential Zone, Floor Area District II)/ Single-Family Residential <u>West:</u> R1 II (Low Density Residential Zone, Floor Area District II)/ Single-Family Residential
10. Other public agencies whose approval is required (e.g., permits, financing approval or participation agreement).	None.

MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

The following mitigation measure shall apply to the proposed Residential Congregate Case Facility Expansion located at 2820 Sycamore Avenue to reduce identified impacts to less than significant levels.

BIO -1 The applicant shall replace the three indigenous tree species identified within the Indigenous Tree Report prepared by Episcopal Communities Services (dated November 22, 2023) at a 2:1 ratio within the property limits of the Project with tree species, size, and locations subject to the satisfactory of the City's Urban Forester. Species replacement shall be a minimum 24-inch box size selected from a combination of City of Glendale Protected Trees as defined in the Glendale Municipal Code (GMC) Chapter 12.44 to provide diversity not limited to quercus agrifolia (coast live oak).

Monitoring Action: Plan review; site inspection
Timing: Prior to issuance of grading permit (plan review)
 During any site grading or excavation activities (site inspection)
Responsibility: Director of Public Works

BIO -2 The applicant shall comply with all applicable Specific and General tree protection measures included within the Indigenous Tree Report prepared by Episcopal Communities Services (dated November 22, 2023)

Monitoring Action: Plan review; Site Inspection
Timing: Prior to issuance of development permits (plan review).
 Prior to final building inspection(site inspection)
Responsibility: Director of Public Works

NOI -1 Excavators and vibratory rollers shall operate at least 30 feet away from any building structure. If vibratory rollers are used, they must be operated with the vibration function turned off. For construction activities occurring within 30 feet of a building structure, the contractor shall implement alternative construction techniques or utilize equipment specifically designed to minimize vibration impacts. Acceptable alternatives may include, but are not limited to: hand excavation in lieu of mechanical excavation in sensitive areas; the use of smaller soil compactors, mini-excavators, or compact track loaders where feasible; and strategic sequencing of work to avoid the simultaneous operation of vibration-intensive equipment. Adhering to this setback distance significantly reduces the risk of structural damage to adjacent buildings and lighter less impactful tools and techniques should be used to ensure the protection of nearby structures and to maintain compliance with acceptable vibration standards.

Monitoring Action: Plan review
Timing: Prior to issuance of development permits (plan review).
Responsibility: Project Applicant and their construction contractor

Agreement to Proposed Mitigation Measures and Mitigation Monitoring Program

I/WE THE UNDERSIGNED PROJECT APPLICANT (S), HEREBY AGREE TO MODIFICATION OF THE PROJECT TO CONFORM WITH THE IMPACT MITIGATION MEASURES AND THE MITIGATION MONITORING PROGRAM SPECIFIED HEREIN REGARDLESS OF CHANGE OF OWNERSHIP. IF I/WE DISAGREE WITH ANY RECOMMENDED MITIGATION MEASURES OR ALL OR PART OF THE MITIGATION MONITORING PROGRAM, IN LIEU OF MY/OUR SIGNATURE HEREON, I/WE MAY REQUEST RECONSIDERATION OF THE MATTER UPON SUBMITTAL OF THE APPLICABLE FEE AND DOCUMENTATION IN SUPPORT OF MY/OUR POSITION ON SAID MITIGATION MEASURES AND/OR MITIGATION MONITORING PROGRAM. (THE ENVIRONMENTAL AND PLANNING BOARD WILL RECONSIDER THE ISSUES AND TAKE ACTION AS DEEMED APPROPRIATE.)

Dated: _____
Signature(s) of the Project Applicant(s)

Dated: _____

11. Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forest Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards / Hazardous Materials |
| <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

The Project is located entirely within the City and has the authority for design review, issuance of a Use and Standards variance. For this reason, the City is the public agency in the position to act as lead agency for the Project (CEQA Guidelines §15051(b)). Pursuant with the City's adopted CEQA Guidelines, CEQA processing is the responsibility of the City Planning Division for all projects where the lead agency is the City of Glendale or Glendale Housing Authority.

LEAD AGENCY DETERMINATION:

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Prepared by:

Reviewed by:

Date:

Signature of Director of Community Development or his or her designee authorizing the release of environmental document for public review and comment.

Director of Community Development: _____

Date: _____

A. AESTHETICS

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Have a substantial adverse effect on a scenic vista?				X
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other zoning regulations governing scenic quality?			X	
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

1) Have a substantial adverse effect on a scenic vista?

No Impact. No scenic vistas, as identified in the Open Space and Conservation Element (January, 1993), exist within, or within view of the Project site. Therefore, no impacts to scenic vistas would result from project implementation.

Mitigation Measures: No mitigation measures are required.

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

No Impact. No state scenic highway is located adjacent to or within view of the Project site. No impacts to scenic resources within a State scenic highway would occur.

Mitigation Measures: No mitigation measures are required.

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

Less Than Significant Impact. The Project site is located within the North Glendale Community Plan area in the City of Glendale. The Project site is surrounded by R1 (Low Density Residential) zoned properties to the north, south, east, and west. The setting for the project’s location is within an urbanized area which the adjacent properties are developed with one- and two-story single-family residences to the north, south and

east, and the west, and the Crescenta Valley Water District Glenwood Plant to the west. The subject lot is developed with 12 buildings in a campus setting, with construction and renovation dating before 1935 through 2009. There are a total of 49 protected indigenous trees on and near the site, two of which are western sycamores (*Platanus racemosa*) and the remainder of which are coast live oaks (*Quercus agrifolia*). Four of the coast live oaks are located on property lines, while nine other coast live oaks are located nearby on adjacent properties. Further discussion regarding protected indigenous trees and tree preservation is provided below within Section D-5 (below).

The proposed project involves the demolition of twelve existing buildings and the construction of a new three-story, 92,420 square-foot Residential Congregate Care Facility, including a 26,471 square-foot subterranean garage, on a 4.3-acre site. The applicant requests approval of two standards variances to allow deviations from R1 II zone development standards, including building height and floor area ratio (FAR). The proposed structure would reach a height of 37 feet 5 inches and three stories, exceeding the maximum permitted two stories and 25-foot height limit (plus up to 3 additional feet for a sloped roof). The project also proposes a FAR of 0.49, exceeding the maximum allowable 0.40, and lot coverage of 51 percent, where 40 percent maximum is permitted. Notwithstanding these deviations, the project would not conflict with zoning regulations related to scenic quality. The subject property is a larger parcel compared to the immediately abutting parcels, which range in size from 7,500 to 76,540 square feet. The site is approximately 4.3 acres in size, with partial frontage along Sycamore Avenue and portions located behind five single-family residential parcels developed with one- and two-story homes facing Sycamore Avenue. The proposed building would be set back approximately 60 feet from Sycamore Avenue and about 44 feet from the adjacent single-family residences, thereby reducing potential visual impacts and maintaining scenic quality.

Last, the proposed building will be constructed with quality materials typically associated residential buildings, such as cementitious lap siding (Hardie Plank), stucco, asphalt shingle roofing material, decorative wooden balcony railings and trellis' and stone veneer as the base of the building. Review and approval of the Design Review Board along with compliance with the zoning standards and City's Comprehensive Design Guidelines would ensure that the proposed projects would not substantially degrade the existing visual character or quality of the site and its surroundings. As a result, impacts to visual character and quality of the site are anticipated to be less than significant.

Mitigation Measures: No mitigation measures are required.

4) *Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?*

Less Than Significant Impact. Per the applicant's submitted project narrative, "the building is designed in a Craftsman style that is suited to the rural and wooded nature of the site, but also intentionally reflective of the traditional design of the existing single-story lodge building. The design incorporates a mix of shingle, lap and batten-board siding, stoneclad bases and retaining walls, asphalt shingle roofs with substantial 18-inch roof overhangs, casement and single-hung windows, and Craftsman details including wood rails, brackets and trims. The building coloration is proposed to be in keeping with the existing lodge, and makes use of green, sandstone and earth-tone hues that are sympathetic to the natural setting and surroundings and reminiscent of buildings. The Project's lighting will be limited to be located adjacent to walkways, building entryways, balconies and parking areas. The proposed building would be set back approximately 60 feet from Sycamore Avenue and about 44 feet from the adjacent single-family residences with lush landscaping within and at the perimeter of the property to buffer operation noise and appearance. Any external lighting of the property is required to be directed towards the subject property and shielded to

prevent light from spilling over onto neighboring properties. As a result, less than significant impacts associated with lighting are anticipated.

Mitigation Measures: No mitigation measures are required.

B. AGRICULTURE AND FOREST RESOURCES

<i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
3. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code section 4526)?				X
4. Result in the loss of forest land or conversion of forest land to non-forest use?				X
5. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. There is no prime farmland, unique farmland, or farmland of statewide importance within or adjacent to the proposed Project site, and no agricultural activities take place on the Project site. No impact would occur.

Mitigation Measures: No mitigation measures are required.

2) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. No portion of the Project site is proposed to include agricultural zoning designations or uses, nor do any such uses exist within the City under the current General Plan and zoning. There are no Williamson Act contracts in effect for the Project site or surrounding vicinity. No conflicts with existing zoning for agricultural use or Williamson Act contracts would result. No impact would occur.

Mitigation Measures: No mitigation measures are required.

3) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code section 4526)?**

No Impact. There is no existing zoning of forest land or timberland in the City. No impact would occur.

Mitigation Measures: No mitigation measures are required.

4) **Result in the loss of forest land or conversion of forest land to non-forest use?**

No Impact. There is no forestland within the City of Glendale. No forest land would be converted to non-forest use under the proposed project. No impact would occur.

Mitigation Measures: No mitigation measures are required.

5) **Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use?**

No Impact. There is no farmland or forest land in the vicinity of or on the Project site. No farmland would be converted to non-agricultural use and no forest land would be converted to non-forest use under the proposed project. No impact would occur.

Mitigation Measures: No mitigation measures are required.

C. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Conflict with or obstruct implementation of the applicable air quality plan?			X	
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
3. Expose sensitive receptors to substantial pollutant concentrations?			X	
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

1) **Conflict with or obstruct implementation of the applicable air quality plan?**

Less than Significant Impact. The Project site is located in the Los Angeles County portion of the South Coast Air Basin (SoCAB), and for air quality regulation and permitting, the site is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency responsible for preparing the Air Quality Management Plan (AQMP) for the Basin. Since 1979, a number of AQMPs have been prepared. The most recent comprehensive plan fully approved by the U.S. Environmental Protection Agency (U.S. EPA) is the 2022 Air Quality Management Plan (AQMP), which was adopted on December 2, 2022, by the SCAQMD Governing Board and includes a variety of strategies and control measures.

The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when

necessary. It is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources and has prepared an Air Quality Management Plan (AQMP) that establishes a program of rules and regulations directed at attaining the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS).

The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State air quality standards. For a project to be consistent with the AQMP, the pollutants emitted from the project should not (1) exceed the SCAQMD CEQA air quality significance thresholds or (2) conflict with or exceed the assumptions in the AQMP. The AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Therefore, projects, uses, and activities that are consistent with the applicable assumption used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

The Project proposes to expand an existing nonconforming land use, the Twelve Oaks Residential Care Facility. The scope of work includes the demolition of twelve existing buildings and the construction of a new three-story, approximately 92,420-square-foot residential care facility. The new building would provide 104 residential congregate living care units, representing an increase of 66 units over existing conditions. The project does not result in population and housing growth that would cause growth in Glendale to exceed the SCAG forecast. Consequently, implementation of the Project would be consistent with AQMP attainment forecasts and with applicable air quality plans. No impact would occur.

Mitigation Measures: No mitigation measures are required.

2) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

Less Than Significant Impact. The project is to demolish five buildings with an approximate cumulative area of 34,823 square-feet, and to construct a new three-level, 92,322 square-foot, 104-unit (24 units of memory care and 80 assisted living) residential congregate care facility (104 units) project that includes a 94-space, two-level, semi-subterranean garage. A total of 20,837 cubic yards of soil will be graded which includes 20,010 cubic yards of cut and 827 cubic yards of fill (total 19,183 CY exported offsite).

The SCAQMD has adopted significance thresholds to assess the regional impact of air pollutant emissions in the SoCAB. A project with emissions rates above these thresholds is considered to have a significant impact on air quality. The Project would generate criteria pollutants in the short-term during construction and the long-term during operation, which may have a significant impact. An analysis of the Project's construction and operation emissions in relation to the SCAQMD thresholds which the California Emissions Estimator Model (CalEEMod version 2022.1.1.4) was used to estimate air quality impacts during the construction and operation. Results from the model indicate that the proposed project would not exceed thresholds for construction, area, or operational impacts. A summary of the results is attached. As a result, less than significant impacts will occur.

Mitigation Measures: No mitigation measures are required.

3) *Expose sensitive receptors to substantial pollutant concentrations?*

Less Than Significant Impact. Please refer to Response C-1 and C-2 above.

Mitigation Measures: No mitigation measures are required.

4) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact: According to the SCAQMD's CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The Project does not propose any of these land uses and would not otherwise produce objectionable long-term operational odors. The Project is to expand an existing residential congregate care use and therefore would not result in a significant increase in other emissions such as those leading to odors over existing conditions as a residential land use.

Sensitive receptors located near the Project site include single-family dwellings located immediately to the south. The applicant would be required to adhere to South Coast Air Quality Management District (SCAQMD) Rule 403 - Fugitive Dust, which would further reduce the impact related to construction-related impacts. Short-term construction equipment and activities would generate odors, such as diesel exhaust emissions from construction activities. There may be situations where construction activity odors would have an olfactory presence, but these odors would not be unfamiliar or necessarily objectionable. The odors would be temporary and would dissipate rapidly from the source with an increase in distance. The Project use is also regulated from nuisance odors or other objectionable emissions by SCAQMD Rule 402. Rule 402 prohibits discharge from any source of air contaminants or other material, which would cause injury, detriment, nuisance, or annoyance to people or the public. Therefore, the impacts would be short-term; would not be objectionable to a substantial number of people; and would be less than significant. All Project related odors would be construction related and short term in nature; no long-term operational odors would result. As such, the proposed Project would have less than significant impact in regard to other emissions.

Mitigation Measures: No mitigation measures are required.

D. BIOLOGICAL RESOURCES

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
3. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		X		
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

- 1) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

No Impact. The Project site is not identified as a Significant Ecological area in the Open Space and Conservation Element. The proposal to expand an existing residential congregate care facility would not result in any adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

- 2) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

No Impact. The Project site is located within the North Glendale Community Plan in the City of Glendale. The proposed project is located in an area that has been heavily urbanized for many years and surrounded by one- and two-story single-family residences to the north, south and east, and the west, and the Crescenta Valley Water District Glenwood Plant to the west. No riparian habitat and/or other sensitive natural communities are present within the vicinity, and no such areas are present on or adjacent to the Project site. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

- 3) **Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact. The Project site is neither in proximity to, nor does it contain, wetland habitat or a blue-line stream. No federally protected wetlands are present within the vicinity, and no such areas are present on or adjacent to the Project site. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. The proposed project is located in an area that has been urbanized for many years. The area has been substantially modified by human activity, as evidenced by other developments of similar type and uses, and human activity associated with these types of development. Implementation of the proposed project will not interfere with the movement of native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact with Mitigation Incorporated. The Glendale Municipal Code, Section 12.44 protects several Southern California native tree species, including any hybrid trees with parentage of one or more species: coast live oak, scrub oak, San Gabriel oak, valley oak, mesa oak, California bay, and the western sycamore. A total of 49 protected indigenous trees were identified to be on and near the site, two of which are western sycamores and the remainder of which are coast live oaks. Four of the coast live oaks are located on property lines, while nine other coast live oaks are located nearby on adjacent properties.

An Indigenous Tree Report (ITR) was prepared (Episcopal Communities Services, dated November 22, 2023) to inventory, report and include all information necessary to satisfy the City of Glendale Indigenous Tree Program as it relates to the Project’s scope of work. As part of the Project, the ITR identified a total of three coast live oak trees (identified as trees 5, 14, and 34) that will be removed to accommodate new interior roads and building foot print. Project implementation is expected to have major impacts on 10 coast live oak trees (Trees PL7, 8, 11, 17, 22, 36, 37, 38, 39, and 40) and also minor to moderate impacts on another 29 indigenous trees.

SUMMARY OF PROTECTED INDIGENOUS TREE DISPOSITIONS	
Total number of indigenous trees listed on Plan.....	49
On-site trees.....	36
Property line trees.....	4
Off-property trees.....	9
Total number of indigenous trees proposed for removal.....	3
Total number of indigenous trees expected to be impacted by the project.....	39
Total number of indigenous trees not expected to be removed or impacted.....	7

As mitigation for removal of three protected indigenous tree species, a tree replacement ratio of 2:1 is provided for the removal of these trees with specific and general tree protection measures. As recommended by the ITR, six replacement coast live oaks, at least 24”-box size, shall be provided to the satisfaction of the City’s of Glendale’s Urban Forestry Department for the species, size, and locations. The Replacement trees shall be provided with a drip irrigation system to each tree, a basin for water around each tree, and mulch to 4” deep around each tree. Furthermore, specific mitigation measures have been provided to address major impacts to the identified 10 coast live oak trees during demolition and construction impacts and general tree protection mitigation measures for the remaining 29 protected indigenous trees inventoried to have varying minor to moderate impacts.

Mitigation Measures: Compliance with mitigation measures BIO-1 and BIO-2 will reduce potentially significant impacts to less than significant impacts.

BIO- 1: The applicant shall replace the three indigenous tree species identified within the Indigenous Tree Report prepared by Episcopal Communities Services (dated November 22, 2023) at a 2:1 ratio within the property limits of the Project with tree species, size, and locations subject to the satisfactory of the City’s Urban Forester. Species replacement shall be a minimum 24-inch box size selected from a combination of City of Glendale Protected Trees as defined in the Glendale Municipal Code (GMC) Chapter 12.44 to provide diversity not limited to quercus agrifolia (coast live oak).

BIO-2: The applicant shall comply with all applicable Specific and General tree protection measures included within the Indigenous Tree Report prepared by Episcopal Communities Services (dated November 22, 2023)

6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. No adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan has been adopted to include the Project site. Therefore, the project would not conflict with any such plans. No impact would occur.

Mitigation Measures: No mitigation measures are required.

E. CULTURAL RESOURCES

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?			X	
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			X	
3. Disturb any human remains, including those interred outside of formal cemeteries?			X	

1) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?

Less than Significant Impact. The property is developed with a residential congregate care facility (Twelve Oaks) that consists of a campus of twelve buildings set within well-landscaped grounds featuring many native trees. It is located in the North Glendale Community Plan area, which is densely populated with single-and multi-family residential and commercial buildings.



A Historical Resources Assessment Report (HRA) was prepared by Sapphos Environmental, Inc (dated June 16, 2023) for the Project to determine if the subject property constitutes a historic resource pursuant to Section 15064.5(a) of the California Environmental Quality Act (CEQA) Guidelines. The HRA determined that Twelve Oaks Lodge is not eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the City of Glendale Register of Historic Resources, or as a local historic district and is, therefore, not a historic resource. Glendale's historic preservation planner has visited the site and reviewed the HRA, agreeing that the property is not a historic resource, as described in the analysis below, which augments the HRA and assesses the site under the designation criteria for each register, along with providing a review of the property's historic integrity.

The HRA assessed the property using the themes, registration requirements, and integrity thresholds established in the North Glendale Historic Context, a document that was prepared in 2011 as part of the North Glendale Community Plan. Twelve Oaks Lodge was evaluated under the Residential Development and Suburbanization, 1910-1945 theme, Residential Development and Suburbanization post 1945 theme, and the Health Care theme and some of that information is included in the following discussion.

Eligibility Determinations for Listing in the National Register of Historic Places, California Register of Historical Resources, and Glendale Register of Historic Resources

Criteria A/1/1: Associated with Events Significantly Contributing to Broad Patterns of History

National Register Criterion A

The resource is associated with events that have made a significant contribution to the broad patterns of our history.

California Register Criterion 1

The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Glendale Register Criterion 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, or historic heritage of the nation, state, or city, and retains historic integrity.

The Glendale area has been a regional center for medical care since late 19th century, starting with the construction of Briggs' Sanitarium for tuberculosis patients in the Crescenta Valley, an area north of the young city, in the 1890s. This was followed by the conversion of a failed hotel in the city proper into the Glendale Sanitarium in 1905, marking the beginning of today's Glendale Adventist Hospital, now the city's largest. Many other small sanitariums and health facilities opened in the area, with a strong focus in the Crescent Valley, where higher altitudes, clean air, and benign weather were touted as beneficial for those with physical and mental health conditions.

Twelve Oaks Lodge, which opened in 1935, was one of many sanitariums in the area to open in the first decades of the 20th century. Very little is known about the facility's early years. James and Effie Fifield wintered in the house on a large lot at 2820 Sycamore Avenue. Mr. Fifield died in 1933, and Mrs. Fifield donated the house to the Verdugo Hills branch of the International Sunshine Society in 1935. The group's goal was to "bring sunshine into the hearts and lives of those less fortunate" (Lawler and Newcombe, 2006). The building was converted to housing for the elderly and Mrs. Fifield continued working with the group until her death in 1937. It appears that Twelve Oaks did not focus on any specific medical issues, as was the case at other area businesses including the nearby Rockhaven, but rather provided housing and assistance to older residents in the manner of today's retirement homes and assisted living facilities. Eleven additional buildings occupy the site today, but it is not known if any predate the Fifield House, which still stands in much altered form, or if all site development occurred after the business was established.

The HRA found no information to suggest that Twelve Oaks Lodge was associated with broader patterns of residential, institutional, and healthcare facility development pertaining to national, state, and local narratives. The subject property was not heavily advertised beyond space available advertisements, charity events, and the 1964 dedication of Stern Hall. While it grew over time with new buildings to accommodate more residents, it does not appear to have made a lasting impact on the surrounding community or to have influenced the course of geriatric health care or housing. It is not mentioned by local historians Mike Lawler and Robert Newcombe in their 2006 book *La Crescenta* and is not discussed in the North Glendale Historic Context and Lawler and Newcombe's *La Crescenta* history.

Based on this information, Twelve Oaks is not identified or associated with any important events that have contributed to the city, region, state, or nation and is not significant under National Register Criterion A, California Register Criterion 1, or Glendale Register Criterion 1.

Criteria B/2/2: Association with Significant Persons**National Register Criterion B**

The resource is associated with the lives of persons significant in our past that have made a significant contribution to the broad patterns of our history.

California Register Criterion 2

The resource is associated with the lives of persons important in our past.

Glendale Register Criterion 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.

Effie Fifield's role in establishing Twelve Oaks was undoubtedly important in the facility's early history, but little is known about her and any role she played before her death a few years after the business was established. The Fifields were from the Midwest and wintered in the Crescenta Valley at the property on Sycamore Avenue. Mr. Fifield was a successful lawyer and businessman, including work as a publisher in Chicago, who was also involved with civic organizations. The HRA indicates that the Verdugo Hills chapter of the Sunshine Society operated the facility until 1963, when ownership was transferred to the National Charity League's Glendale chapter. Around 2003, the site was bought by Southern California Presbyterian Homes. About ten years later, that group made plans to redevelop the site and evicted many elderly residents, which generated enormous controversy in the community, which led the company to change its plan and ownership reverted back to the National Charity League/Twelve Oaks Foundation, which has submitted the current plan to redevelop the site.

Little information has been found to indicate that either the Fifields, the Sunshine Society in the Crescenta Valley, or any other people, groups, or businesses associated with the property over the years made any significant contributions to the history of the city, state, or nation. Therefore, the property is not significant under National Register Criterion B, California Register Criterion 2, or Glendale Register Criterion 2.

Criteria C/3/3: Architectural Significance

National Register Criterion C

Embodies the distinctive characteristics of a type, period or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.

California Register Criterion 3

Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

Glendale Register Criterion 3

The proposed historic 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.

The construction history of Twelve Oaks Lodge, especially in the early years after its establishment in 1935, is unclear. The property was under the jurisdiction of Los Angeles County until 1952, when the area was annexed into the City of Glendale. The Fifield Building was originally the winter home of the family that founded the facility and became its primary building once the business opened. Today, multiple alterations have dramatically changed the building, but some of its original form, along with possible early roof tiles, remain evident and suggest that it was designed in either the Spanish Colonial Revival or Mediterranean Revival styles that were popular during the 1920s and early 1930s. Seven of the other, smaller buildings were very likely built after the establishment of Twelve Oaks, probably at various times over the next couple of decades (Acacia, Elm, Ivy, Locust, Pine, and Palm buildings and a garage). The HRA identifies these as Minimal Traditional in style, but this is not an accurate assessment. They currently have no definable architectural style and feature plain stucco walls, gabled roofs, and more contemporary door and window replacements. They can now only be described as vernacular in design, though it is likely that some, if not all, once had cladding materials and other design embellishments that would have allowed them to display aspects of architectural styles prevalent at the time(s) of their construction. It appears likely, therefore, that eight of the twelve buildings on the property have been significantly altered.

The Portwood building (1957) resembles a small motel and has a roof extending over the walkway connecting the units that is suggestive of the Ranch style but lacking in any cladding, trim, or other features that define the style. It is similar in this way to the other, earlier stripped-down stucco buildings. Two other later buildings – Oaks (date unknown) and Stern (1964) - retain elements of some design trends of the mid-

20th century, such as low-pitched gable roofs and, at Stern, a low roof monitor, but remain modest examples of the Modern style. The most recent building, the Lodge and Office (1985), is the most interesting building remaining on the site, providing a quality of rustic modernism with its combination of hipped and gabled roof forms, tall roof monitor, decorative brick chimney, and vertical wood siding above a stucco wainscoting. The Lodge has a somewhat awkward massing at its roof forms and is not a distinctive or exemplary specimen of design, though it does compare favorably with the other buildings on the property.

The site plan of Twelve Oaks is rather straightforward, with most buildings aligned with varying orientations along the main driveway in a way that suggests they were added on an ad hoc basis over the years rather than being driven by a conceptual plan. Unlike a site like Rockhaven, to which comparison is appropriate due to their shared conception of multiple small buildings arrayed in a landscape, Twelve Oaks does not display any careful integration of buildings, users, and landscape. Most buildings have walkways leading to parking along the central driveway and that, in some cases, link the buildings. There is little to indicate that the outdoor spaces were intending as gathering places for residents or for individual use. It appears many areas may have featured lawns, but these are not currently maintained. An area at the south of the site does look to be designed for residents' use, but its curvilinear forms and planting patterns appear to be of recent vintage and not indicative of any early design concepts.

Three architects are associated with the property who have done notable work at other locations. Graham Latta and Carl Denney were involved with alterations to the Fifield Building in the early 1950s. Some of this work may be partly responsible for the fact that it is barely recognizable as the former Fifield residence and no exterior alterations, composed primarily of stucco clad volumes, are architecturally significant. Latta did produce more interesting work in his career, including the Tropic Branch of the Glendale Public Library, which is likely eligible for listing in the Glendale Register. In Glendale, Denney designed the original Adult Recreation Center at Central Park (now demolished), which won a local AIA award. Charles Walton, who designed the Lodge and Office building, also designed the Brand Library Art Center and Studios, which is included in the Glendale Register listing for the Brand Library. The more modest building at Twelve Oaks, as noted above, is not a distinctive or exemplary architectural expression and therefore would not be individually eligible for the local register. Though capable of fine work, none of the three architects' work at the subject property indicates a level mastery, creativity, or genius that might warrant consideration for the quality of design.

Based on this information, Twelve Oaks does not rise to a level of architectural quality for either its buildings or landscape design to be significant under National Register Criterion C, California Register Criterion 3, or Glendale Register Criterion 3.

Criteria D/4/4: Archaeological Significance

National Register Criterion D

The resource has yielded, or may be likely to yield, information important in prehistory or history.

California Register Criterion 4

The resource has yielded, or may be likely to yield, information important in prehistory or history.

Glendale Register Criterion 4

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

As discussed further in the sections below, Sapphos Environmental Inc. produced a study of potential impacts to archaeological cultural resources in the Cultural Resources Technical Report dated March 31, 2023. After reviewing the literature and visiting the site, it concluded that, based on a desktop review, records search results, and reconnaissance survey, no archaeological, human remains, or Tribal cultural resources requiring evaluation for federal, state, or local registers are located within the proposed project

study area. Based on this conclusion, Twelve Oaks does not possess any archaeological significance that would make it eligible for listing under National Register Criterion C, California Register Criterion 3, or Glendale Register Criterion 3.

Historic District Analysis

The HRA assessed Twelve Oaks under Glendale's criteria for designating historic districts and found that it does not meet any of the nine criteria. The analysis in that document is augmented by Glendale Planning Division staff as follows:

- A. The Twelve Oaks Lodge does not exemplify or reflect special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history (as noted in the section above);
- B. It is not identified with persons or events significant in local, state, or national history (as noted in the section above);
- C. It does not embody distinctive characteristics of a style, type, period, method of construction, and is not a valuable example of the use of indigenous materials or craftsmanship (as noted in the section above);
- D. It does not represent the work of notable builders, designers, or architects (as noted in the section above);
- E. It does not have a unique location, nor is it a view or vista representing an established and familiar visual feature of a neighborhood community or of the city (Twelve Oaks is set in a residential neighborhood that is not unique and it blends into the overall streetscape in a manner that doesn't create any views or vistas from the surrounding area.);
- F. It does not embody a collection of elements of architectural design, detail, materials, or craftsmanship that represents a significant structural or architectural achievement or innovation (the lack of distinction of the individual buildings, as noted above, does not allow their grouping on the site to represent any architectural achievement or innovation);
- G. It does not reflect significant geographical patterns, including those associated with different eras of settlement and growth, transportation modes, or distinctive examples of park or community planning (no significant geographical pattern were established through the planning or design of the site);
- H. It does not convey a sense of historic and architectural cohesiveness through its design, setting, materials, workmanship, or association (the somewhat random, ad hoc configuration of the building, along with the major alterations made to the majority of them, does not produce any sense of cohesiveness or original design intent); and/or
- I. It has not been designated a historic district in the National Register or the California Register.

Twelve Oaks does not meet any of the criteria to become a local Historic District Overlay Zone, where meeting only one is required. In addition, eight of the twelve buildings on site are dramatically altered from their original appearance. Glendale requires that 60% of a district's buildings be contributors, meaning they were built in the Period of Significance and have not been significantly altered. This period extends from c. 1930, when the Fifield House was likely built, to 1985, when the Lodge became the final building added to the site. All twelve buildings were built during this range, but only 33% of the building appear to be largely unaltered, placing the site well under the 60% threshold and making it ineligible for designation as a Glendale historic district. Because of this lack of local eligibility, it would also not be eligible for consideration as a National Register or California Register historic district.

Historic Integrity Analysis

The Glendale Register designation criteria specifically indicate that a property needs to retain historic integrity to be eligible for listing. This is also expected for National and California Register listings. Historic integrity is defined as the ability of a property to convey its significance and seven specific aspects of integrity have been defined by the National Park Service: location, design, setting, materials, workmanship, feeling, and association. Planning Division staff provides the following analysis for Twelve Oaks:

Location

The buildings on the property do not appear to have been moved and the site retains its integrity of location.

Design

As discussed above, eight of the twelve buildings on the site appear to have been dramatically altered. While the original appearance of these earlier buildings is unknown, it is clear that the Fifield House is altered almost beyond recognition. The vernacular stucco buildings have been altered through door and window changes, but it is also highly likely that they once had some decorative siding and/or other architectural elements that are now lost. Buildings of such plain design were not common during the 1930s and 1940s, and generally beyond. The later buildings have not been altered as dramatically, and a couple may reflect their original design. Overall, the design of the site, including its buildings and landscape, does not reflect its likely earlier appearance and its integrity of design is severely compromised.

Setting

The immediate setting of Twelve Oaks, a group of relatively small buildings set in an open landscape with mature trees, is similar to its original condition. The site was clearly transformed from its early residential condition, but this occurred gradually over time and without any clear long-range planning. Since the setting was never static, its integrity is difficult to assess. Certain obvious changes, however - such as the large parking area at the center of the site and the contemporary design of the garden area at its south side - do clearly reflect changes at odds with its likely appearance in earlier decades.

Materials

As noted with regard to the site's design, it appears that many original materials have been removed from multiple buildings and that the site has a very compromised sense of integrity of materials.

Workmanship

As with materials, any examples of early workmanship appear to have largely been erased. For the more recent buildings, as well as earlier ones that appear to have been altered, machine-applied stucco and a limited amount of wood trim do not convey any sense of hand craftsmanship, and the site does not appear to maintain any integrity of workmanship.

Feeling

The site does not express any sense of its time of construction due to the extended period over which it was developed and the apparently ad hoc arrangement of buildings. The various alterations and lack of character-defining features also deny the ability to place the site in time, which is critical to maintaining integrity of feeling.

Association

Though the building has no associations with significant people or events, it is clear that the site would be largely unrecognizable to the Fifields or any early residents. Therefore, the site does not have any integrity of association.

Based on the discussion above, Twelve Oaks Lodge is not a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines because it is not eligible for designation at the federal, state, or local level, is not eligible for designation as a historic district, and because it has lost (or may never have had) its sense of historic integrity. Therefore the demolition of the campus will not result in a substantial adverse

change to a historical resource per Section 15064.5(b) of the CEQA Guidelines, and a less-than-significant impact on cultural resources will occur.

Mitigation Measures: No mitigation measures are required.

2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less than Significant Impact. A Cultural Recourses Technical Report was prepared by Sapphos Environmental, Inc (dated March 31, 2023) for the Project to determine potential impacts to historical, archaeological, and Tribal cultural resources of the proposed project site. A reconnaissance survey was conducted which examined exposed ground surface for artifacts (e.g., flaked stone tools, tool-making debris, milling tools, ceramics), faunal remains (e.g., marine shell and bone), soil discoloration that might indicate the presence of a cultural midden, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations), or historic debris (e.g., metal, glass, ceramics). Exposed subsurface soils resulting from rodent and other animal burrows were consistently identified and were visually inspected for cultural resources. No historic or prehistoric archaeological resources were revealed as a result of the reconnaissance survey.

Prehistoric and historic archaeological sites are not known to exist within the project area. The City’s Open Space and Conservation Element indicate that no significant archaeological sites have been identified in this area of Glendale. Nonetheless, construction activities associated with project implementation would have the potential to unearth undocumented resources. In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 100-meter radius must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. With implementation of this standard requirement, no significant impact would occur.

Mitigation Measures: No mitigation measures are required.

3) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. The Project site and surrounding area are characterized by features typical of industrial and residential land uses. No known burial sites exist within the vicinity of the Project site or surrounding area. However, impacts would be potentially significant if human remains were to be encountered during excavation and grading activities. State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition, pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendant of the deceased Native American, who will then serve as a consultant on how to proceed with the remains (i.e., avoid removal or reburial).

Mitigation Measures: No mitigation measures are required.

F. ENERGY

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary			X	

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
consumption of energy resources, during project construction or operation?				
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

1) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact.

Construction of the Project would require consumption of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil, natural gas, and gasoline) for automobiles and construction equipment, and other resources including, but not limited to, lumber, sand, gravel, asphalt, metals, and water. Construction would include energy used by construction equipment and other activities at the Project site (e.g., building demolition, excavation, paving), in addition to the energy used to manufacture the equipment, materials, and supplies and transport them to the Project site. Energy for maintenance activities would include that for day-to-day upkeep of equipment and systems, as well as energy embedded in any replacement equipment, materials, and supplies. It is expected that nonrenewable energy resources would be used efficiently during construction and maintenance activities given the financial implications of inefficient use of such resources. Therefore, the amount and rate of consumption of such resources during construction and maintenance activities would not result in the unnecessary, inefficient, or wasteful use of energy resources.

Operation of the Project would involve consumption of electricity and natural gas; however, these resources are already consumed on the Project site, and an incremental increase in the consumption of these resources associated with Project operation would not represent unnecessary, inefficient, or wasteful use of resources. The Project would be designed to comply with Title 24 Building, Energy and Green Buildings Standards (California Building Code, Title 24, Parts 4, 6, and 11). Sustainable design strategies for the new building would include the use of high-performance glazing and a light-colored, single-ply, thermoplastic roof membrane over a well-insulated roof assembly to reduce heat gain during the summer. Other sustainable features would include energy-efficient light fixtures, lighting controls, and water-conserving plumbing fixtures. The building roof would be solar ready and able to support future installation of a photovoltaic system. Given the foregoing, the Project's consumption of energy resources would be less than significant, as it would not represent unnecessary, inefficient, or wasteful use of energy resources.

Mitigation Measures: No mitigation measures are required.

2) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. As described above, the expanded residential congregate care facility building's energy efficiency would, at a minimum, comply with the California Energy Code and the California Building Code. While not specifically applicable to the Project, Senate Bill 350 sets ambitious 2030 targets for energy efficiency and renewable electricity, increasing California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. As described in Section 2.2.2, the expanded residential congregate care facility would include a solar-ready roof which could support future installation of a photovoltaic system. As such, the Project would not conflict with or obstruct state or local plan for renewable energy or energy efficiency.

Mitigation Measures: No mitigation measures are required.

G. GEOLOGY AND SOILS

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
2. Result in substantial soil erosion or the loss of topsoil?			X	
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
4. Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life or property?			X	
5. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
6. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?			X	

1) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Less Than Significant Impact. According to the City’s Safety Element (April 2025), the subject site is not located within an Alquist-Priolo Earthquake Fault Zone. Based on the available geologic data, active or potentially active faults with the potential for surface fault rupture are not known to be located directly beneath or projecting toward the Project site. Therefore, impacts from the rupture of a seismic fault are considered to be less than significant.

Mitigation Measures: No mitigation measures are required.

- ii) Strong seismic ground shaking?**

Less than Significant Impact. The Project site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. According to the City’s Safety Element (April 2025),

closest surface trace of an active fault to the site is the Sierra Madre Fault Zone, located approximately 1.7 miles to the northeast (USGS, 2006). Other nearby active faults include the Verdugo Fault, the Raymond Fault, and the Hollywood Fault, located approximately 2.9 miles southwest, 6.3 miles south, and 6.7 miles south of the site, respectively. Faults exist throughout Southern California and could pose a risk to public safety and property by exposing people, property, or infrastructure to potentially adverse effects, including strong seismic ground shaking. Compliance with applicable building codes would minimize structural damage to the building and ensure safety in the event of a moderate or major earthquake. Therefore, impacts related to strong seismic ground shaking would be less than significant.

Mitigation Measures: No mitigation measures are required.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

The proposed Project site is located within an area prone to liquefaction as indicated in the City of Glendale's Safety Element (April 2025). A Preliminary Geotechnical Investigation (geotechnical report) was prepared by GEOCON West, Inc. (dated August 4, 2022; updated June 3, 2024) to evaluate subsurface soil and geologic conditions underlying the site and to provide conclusions and recommendations pertaining to the geotechnical aspects of design and construction. A liquefaction analysis of the soils underlying the site was performed for the Maximum Considered Earthquake level by using a historic high groundwater table of 30 feet below the ground surface, a magnitude 7.04 earthquake, and a peak horizontal acceleration of 0.931g (PGAM). For borings B1, B4, and B7, indicate that the alluvial soils below the historic high groundwater level could be susceptible up to approximately 0.0, 0.4, and 0.0 inches, respectively, of total settlement during Maximum Considered ground motion.

The foundation design recommendations presented herein are intended to mitigate the effects of settlement on proposed improvements. Based on seismic considerations, the proposed structure supported on a spread foundation system should be designed for a combined static and seismically induced differential settlement of $\frac{3}{4}$ inch over a distance of 20 feet. The proposed Project would adhere to all engineering and building codes, ensuring there would be no increased risk of liquefaction due to implementation of the proposed Project. The proposed Project would not significantly increase risks to human health or safety related to liquefaction compared to existing conditions. Thus, less than significant impacts associated with seismic-related ground failure or liquefaction are anticipated to occur.

Mitigation Measures: No mitigation measures are required.

iv) Landslides?

Less than Significant Impact. The Project site is not located within a landslide hazard zone area, as indicated by the City of Glendale General Plan Safety Element (April 2025). Therefore, no impacts associated with landslides would occur.

Mitigation Measures: No mitigation measures are required.

2) *Result in substantial soil erosion or the loss of topsoil?*

Less than Significant Impact. The Proposed Project would be designed, constructed, and operated with adequate stormwater run-off control measures to minimize erosion. Construction activity associated with the proposed project development may result in wind and water driven erosion of soils due to grading activities if soil is stockpiled or exposed during construction. Further, as part of the proposed project, the applicant would be required to adhere to conditions under the Glendale Municipal Code Section 13.42.060 to prepare and administer a plan that effectively provides for a minimum stormwater quality protection throughout project construction. The plan would incorporate Best Management Practices (BMPs) to ensure that potential water quality impacts from water-driven erosion during construction would be reduced to less than significant. In addition, the applicant would be required to adhere to South Coast Air Quality Management District (SCAQMD) Rule 403—Fugitive Dust, which would further reduce the impact related to soil erosion to less than significant.

Mitigation Measures: No mitigation measures are required.

3) *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

Less Than Significant Impact. Subsidence is the process of lowering the elevation of an area of the earth's surface that can be caused by tectonic forces deep within the earth or by consolidation and densification of sediments sometimes due to withdrawal of fluids such as groundwater. According to the City's Safety Element (April 2025), the Project site is not located in an area of significant subsidence activity and would not include fluid withdrawal or removal. Therefore, impacts related to unstable soils are anticipated to be less than significant.

Mitigation Measures: No mitigation measures are required.

4) *Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life or property?*

Less Than Significant Impact. Fine-grained soils, such as silts and clays, may contain variable amounts of expansive clay minerals. These minerals can undergo significant volumetric changes as a result of changes in moisture content. The upward pressures induced by the swelling of expansive soils can have significant harmful effects upon structures and other surface improvements. Per the City of Glendale's Safety Element (April 2025), most of the Glendale area is underlain by alluvial units that are composed primarily of granular soils (silty sand, sand, and gravel). Such units are typically in the low to moderately low range for expansion potential. However, every sedimentary unit in the area contains lenses or layers of fine-grained soils (clays and silty clays) that are typically in the moderate to highly expansive range. Such sediments are most likely to be found in the more distal parts of the alluvial fans, in the southern part of the City. Expansive clay can also be found within fault and fracture zones in the highly sheared crystalline bedrock of the San Gabriel and Verdugo Mountains and in the San Rafael Hills. The soils encountered during the Preliminary Geotechnical Investigation prepared by GEOCON West, Inc. (dated August 4, 2022; updated June 3, 2024) were considered to have a "very low" expansive potential and are classified as "non-expansive" as defined by 2022 California Building Code. Further, per Plate P-1 of the Safety Element, the Project site is not located on or within of a Fault Hazard Management Zone, the soils underlying the Project site and surrounding area are considered to have a low expansion potential.

Mitigation Measures: No mitigation measures are required.

5) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The project would connect to and use the existing sewage conveyance system located within La Crescenta Avenue or Sycamore Avenue. Septic tanks will not be used in the project. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

6) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

Less than Significant Impact. Plant and animal fossils are typically found within sedimentary rock deposits. Geologic units within the City of Glendale consist of poorly or crudely stratified sand, silt, and gravel in the lowlands, with dense crystalline rock forming most of the hillsides (Glendale Open Space and Conservation Element, January 1993). The Project site is not known to contain paleontological resources and the proposed Project site is not within an area that contains sedimentary rock. Also, no buried discoveries have occurred in the vicinity of the proposed Project site. As a result, the potential to encounter in-situ remains associated with significant paleontological and/or a unique geological feature during proposed Project related excavation is low. Impacts related to paleontological resources or unique geological features would be less than significant.

Mitigation Measures: No mitigation measures are required.

H. GREENHOUSE GAS EMISSIONS

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
2. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			X	

1) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. Greenhouse Gas (GHG) Emissions are said to result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other adverse effects.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the greenhouse gas emissions reduction goal for the State of California into law. GHG as defined under AB 32 includes: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. AB 32 requires the California Air Resources Board (CARB), the State agency charged with regulating statewide air quality, adopt rules and regulations that would achieve greenhouse gas emissions

equivalent to statewide levels in 1990 by 2020 by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires the California Air Resources Board (ARB) to set regional targets for the purpose of reducing greenhouse gas emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. The Southern California Association of Governments (SCAG) has prepared the region's Sustainable Communities Strategy (SCS), which is part of the Regional Transportation Plan (RTP). Glendale has an adopted Greener Glendale Plan which meets regional greenhouse gas reduction targets, as established by SCAG and adopted by the ARB. The Greener Glendale Plan uses land use development patterns, transportation infrastructure investments, transportation measures and other policies that are determined to be feasible to reduce GHG.

At this time no air agency, including the SCAQMD, has adopted applicable project-level significance thresholds for GHGs emissions. AB 32 did not set a significance threshold for GHG emissions, although EPA, CARB or another agency may issue regulations at some point which may set forth significance criteria for CEQA analysis. In the interim, none of the CEQA Guidelines, the CEQA Air Quality Handbook, the Air Quality Management Plan, or the SCAQMD set forth applicable significance thresholds for GHG emissions.

Due to the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the project's very small and essentially temporary (primarily from construction) increase in emissions could cause a measurable increase in global GHG emissions necessary to force global climate change.

CEQA Guidelines Section 15130(f) clarifies that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. CEQA Guidelines Section 15064.4 recommends consideration of qualitative factors that may be used in the determination of significance, including the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. Examples of such programs include "plans or regulations for the reduction of greenhouse gas emissions."

On March 27, 2012, the City of Glendale's City Council adopted the Greener Glendale Plan for Community Activities to address how the City of Glendale can meet its state mandated reduction targets for GHG emissions. Per this plan, it identifies that energy consumed in buildings accounts for 49% of Glendale's GHG inventory emission. To ensure that new construction is sustainable and improve efficiency of the building stock, the City of Glendale adopted a Green Building Standard (June 7, 2011) with requirements exceeding those in the State of California's mandatory CAL Green Code. The City of Glendale's Building Standard requirements include:

- Projects must exceed California Energy Code requirements by 15%.
- Projects must reduce baseline water usage by 20%.
- Radiant roof barriers shall be installed.
- Gas-fired tankless water heaters shall have an energy factor of at least 0.80.
- Gas-fired storage-tank type water heaters shall have an energy factor of at least 0.61.
- Buildings shall be "solar ready".
- 20% permeable paving required.
- High-efficiency gas-fired space heating equipment required.

- High-efficiency air conditioning equipment required
- Increased natural lighting and ventilation required.
- Increased green building standards for homes larger than 5,000 square feet.

Senate Bill 379 (SB 379) and Assembly Bill 2684 (AB2684, passed in 2015 and 2024 respectively, both require cities and counties to update their planning frameworks to address climate change-related hazards. SB 379 mandates that local governments integrate climate adaptation and resilience strategies into their general plans, assessing vulnerabilities to a range of climate impacts such as wildfires and flooding. AB 2684 builds on these requirements by specifically focusing on extreme heat, requiring local governments to update their safety elements to address heat-related risks. AB 2684 also mandates regular reviews to incorporate the latest data on extreme heat hazards, strengthening California's adaptation efforts in the face of rising temperatures

On August 12, 2025, the City of Glendale's City Council adopted the Climate Action Adaption Plan (CAAP) to align the City of Glendale towards achieving the State of California's target of reducing GHG emissions to 40 percent below 1990 levels by 2030, while also making strides towards carbon neutrality by 2045. Per this plan, a 2021 GHG emissions inventory for the community (2021 Community GHG Inventory). The 2021 Community GHG Inventory completed for the City includes GHG emissions from activities within the City's jurisdictional boundaries. In 2021, the Glendale community emitted approximately 1,053,141 metric ton carbon dioxide equivalent (MT CO₂e) across five primary sectors. The transportation sector is the largest source of GHG emissions, generating approximately 572,532 MT CO₂e, or 54 percent of the total 2021 community emissions. The transportation sector includes passenger and commercial vehicles, public transit, and offroad vehicles. The energy sector, including electricity and natural gas used within residential and nonresidential buildings, was the second largest source of GHG emissions, generating approximately 397,105 MT CO₂e, or 38 percent of the total 2021 community GHG emissions. The solid waste sector, including the processing and decomposition of waste at landfills in various locations, resulted in 75,067 MT CO₂e or seven percent of the City's GHG emissions while the conveyance, delivery, and treatment of water (6,588 MT CO₂e) and treatment of wastewater (1,848 MT CO₂e) resulted in the remaining GHG emissions.

The CAAP provides detailed measures and supporting actions that will help put the City on a path towards reaching its climate goals. The plan's measures detail achievable and implementable GHG emissions reduction policies designed to achieve the City's GHG emissions reduction targets for 2030 (40 percent below 1990 levels) and provide substantial progress towards meeting the longer-term target of carbon neutrality by 2045. The City of Glendale's Building System approach focuses on electrifying residential and commercial buildings to leverage increasingly carbon-free and renewable electricity provided by GWP. Electrifying Glendale's building stock consists of transitioning natural gas appliances—the equipment that traditionally heats our water, air conditions the spaces we live and work in, cooks our food, and dries our clothes—to efficient electric alternatives. When combined with carbon-free electricity, all-electric buildings eliminate GHG emissions from the building system, effectively decoupling development and our energy needs from GHG emissions. Further, the CAAP include measures that are long range goals that the City has established to reduce emissions and/or improve resilience in line with the State of California's emission reduction goals, such as BLD-2 "Require healthy, safe, decarbonized, and resilient new buildings by 2026" that include:

BLD-2.1 Based on available legal pathways, implement a new building electrification ordinance which limits the installation of new natural gas infrastructure to improve health, safety, and reduce costs associated with new construction. BLD-2.2 Amend the building code to require CALGreen Tier 2 Voluntary Standards Section A5.106.11.2 for cool roofs and Section A5.106.7.2 for cool walls by 2026.

BLD-2.3 Amend the building code to require indoor cooling in new multi-family buildings by 2026. Monitor the California Department of Public Health guidance regarding indoor cooling which will inform the 2025 California building codes update cycle.

BLD-2.4 Amend the building code to require all newly installed HVAC units for new buildings to have two-way air conditioning capabilities to provide heating and cooling.

Since this project is required to comply with Greener Glendale Plan and CAAP to reduce GHGs, this project would result in a less than cumulatively considerable impact on GHG emissions and no mitigation is required.

Mitigation Measures: No mitigation measures are required.

2) ***Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?***

Less than Significant Impact. For the reasons discussed in Response H.1 above, the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Less than significant impacts are anticipated.

Mitigation Measures: No mitigation measures are required.

I. HAZARDS AND HAZARDOUS MATERIALS

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
4. 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?				X
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the Project site?				X
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
7. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X	

1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The proposed project involves the demolition of twelve existing buildings and to construct a new three-story, 92,420 square-foot, Residential Congregate Care Facility with a 26,471 square-foot subterranean garage on 4.3-acre lot, zoned R1 (Low Density Residential Zone, Floor Area District II.

All businesses within the City of Glendale, as mandated by the California Health and Safety Code Chapter 6.95, are required to file a Hazardous Material Business Plan (HMBP) with the Glendale Fire Department. The HMBP covers the use and storage of all regulated hazardous chemicals and materials to be used and/or stored onsite. As a result, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The residential congregate living facility will function as a residential use for persons in need of on-site assistance with activities of daily living and on-site assistance with medical care. The proposed land use will involve the incidental use of household cleaning products and routine

storage/dispensing of medication that is not expected to create a reasonably foreseeable upset or accidental conditions involving the release hazardous materials into the environment.

The existing buildings at the Project site may be found to contain asbestos-containing materials or lead paint. This would not be expected to result in any significant impacts. The operator would be required to comply with all applicable state and local regulations for the abatement, handling and disposal of asbestos and lead paint, including but not limited to, the South Coast Air Quality Management District's Rule 1403 for abatement and implement OSHA regulations for the handling and disposal of lead paint and materials. Further, the project would be required to comply with all applicable rules established by the SCAQMD, including Rules 403, during construction that would prevent dust from migrating beyond the Project site. Compliance with these rules will result in a less than significant impact.

Mitigation Measures: No mitigation measures are required.

3) ***Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

Less Than Significant Impact. Within one-quarter mile of the Project site there is a single existing school, Robbin's Nest Preschool. As mentioned within responses I-1 and I-2 (above), the residential congregate living facility will function as a residential use for persons in need of on-site assistance with activities of daily living and on-site assistance with medical care. The proposed land use will involve the incidental use of household cleaning products and routine storage/dispensing of medication that is not expected to create a reasonably foreseeable upset or accidental conditions involving the release hazardous materials into the environment. All businesses within the City of Glendale, as mandated by the California Health and Safety Code Chapter 6.95, are required to file a Hazardous Material Business Plan (HMBP) with the Glendale Fire Department. The HMBP covers the use and storage of all regulated hazardous chemicals and materials to be used and/or stored onsite. As a result, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4) ***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?***

No Impact. The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

As a result, no impact would occur.

Mitigation Measures: No mitigation measures are required.

5) ***For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the Project site?***

No Impact. The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. No impact would occur.

Mitigation Measures: No mitigation measures are required.

6) ***Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

Less than Significant Impact. The City's Emergency Plan is a planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. This document is designed to include the City of Glendale as part of the California

Standardized Emergency Management System (SEMS) and National Incident Management System (NIMS), which have been adopted for the purpose of exercising operational management and coordination of emergency operations. The City maintains a dedicated Emergency Operations Center (EOC) to manage and coordinate major emergencies or disasters.

The City's EOC serves to keep citizens informed and prepared for an emergency, coordinates resources during an emergency, and provides relief after an emergency. The goal of EOC personnel is to save lives and protect property by developing programs and emergency operational capabilities in the event of a natural or man-made disaster. Planning for and responding to disasters and emergencies requires many different actions, such as evacuations, shelter set-ups or preparations for power outages. All of these activities are coordinated and directed by the EOC. Training for residents and employees within the City continues through the Community Emergency Response Team program (Glendale 2003).

Construction activities, associated with development, may result in temporary construction barricades or other obstructions that would impede emergency access. However, development projects that involved work within a public ROW would be subject to review and approval from the Public Works Department, which requires coordination to inform police and fire departments of potential obstructions or street closures.

The Office of Emergency Services is tasked with coordinating disaster operations within the City. Glendale General Plan Safety Element Goal 8, Policy 8-1 and Program 8-1.1 is directly related to emergency services, as it requires that emergency response and recovery plans are sufficient to protect public safety and the general welfare in accordance with regional, State, and federal regulations. The City's Emergency Plan is updated annually, and City personnel are trained annually in exercises ranging from tabletop discussions to full-scale exercises involving dozens of personnel in the field supported by the activation of the City's EOC. Continued adherence to Goal 8, and related policies and programs, in the Safety Element of the Glendale General Plan would reduce impacts associated with an emergency response plan or emergency evacuation plan by keeping the community prepared for emergency response and recovery from natural and urban disasters, in light of local conditions.

According to the City of Glendale General Plan Safety Element (April 2025), La Crescenta avenue is a City Disaster Response Route, which is a road that can best move emergency services and supplies to where they are needed the most immediately following a major disaster. Implementation of the project would neither result in a reduction of the number of lanes along this roadway nor result in the placement of an impediment, such as medians, to the flow of traffic. During construction, the contractor shall notify the Glendale Police and Fire Departments of construction activities that would involve the movement of equipment so as to give first emergency response teams the option of rerouting traffic to an alternative route. Further, during construction the applicant would be required to obtain any necessary permits from the Glendale Public Works Department for all work occurring within the public right-of-way. Implementation of these requirements would be incorporated as conditions of approval. By complying with these regulations and conditions the Project would not impair the implementation of or physically interfere with the City's adopted emergency response plan or emergency evacuation plan. Consequently, project impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

- 7) ***For people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands??***

Less than Significant Impact. State Responsibility Areas (SRAs) are areas where the State of California has primary financial responsibility for the prevention and suppression of wildland fires. The California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services. Fire protection in Local Responsibility Areas (LRAs) is typically provided by city fire

departments, fire protection districts, counties, or CAL FIRE (under contract to a local government). For the City, fire protection is provided by the Glendale Fire Department. CAL FIRE uses an extension of the SRA Fire Hazard Severity Zone (FHSZ) model as the basis for evaluating fire hazards in LRAs. FHSZs are identified as Moderate, High, or Very High in an SRA and Very High in an LRA.

The major undeveloped regions in the City are the Verdugo Mountains, the San Rafael Hills, and the foothills of the San Gabriel Mountains. These mountainous regions present a substantial safety problem in the form of fire hazards to the many areas developed nearby the City of Glendale. While the Project site is in an LRA that has been classified as Very High Fire Hazard Severity Zone (VHFHSZs) (CAL FIRE 2025), it is located in an area that has been heavily urbanized for many years and surrounded by one- and two-story single-family residences to the north, south and east, and the west, and the Crescenta Valley Water District Glenwood Plant to the west. Currently there are two Fire Stations (City of Glendale Fire Station 28 and Los Angeles County Fire Station 63) within 2 street miles of the Project area, which could respond to a wildland fire. The Verdugo Fire Communications Center, a multi-jurisdictional regional dispatch center including the City of Glendale, was established to provide a central dispatching service, using computer-aided dispatch (CAD) to send fire resources and providing pre-arrival instructions for medical emergencies across 13 cities in the Los Angeles County. Therefore, the Project would not affect use of or access along La Crescenta Avenue as an emergency access route or impair implementation of an adopted emergency response plan or evacuation plan.

The proposed Project has minimal potential to create a wildland fire during construction through the routine use of construction equipment and related activities (e.g., on-site refueling, gasoline spills, etc.). Compliance with applicable building codes would reduce the Project's exposure to wildfire risk once construction of the new residential congregate care facility is complete. Further, the City of Glendale General Plan Safety Element Policy 4-2 and Program 4-2.1 directly address fire hazards. These provisions require the City to mandate fire protection plans for all new developments and, where feasible, discourage new residential development within the most up-to-date Very High Fire Hazard Severity Zones (VHFHSZs). Fire protection plans must include a risk analysis; consideration of increased wildfire hazards due to climate change; evaluation of fire response capabilities; fire safety requirements; fuel management strategies; mitigation measures; design requirements; and wildfire education, maintenance, and operational limitations. Additionally, new development should be limited in areas with single access points in or adjacent to steeply sloped terrain (greater than 40 percent slope) where such conditions could result in significant and unavoidable impacts related to rapid wildfire spread. The City shall also encourage residents to plant and maintain drought-resistant, fire-resistant landscape species to reduce the risk of brush fires and soil erosion in areas adjacent to canyons, and to implement stringent site design standards.

Overall, the Project impacts to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands would be less than significant. Less than significant impacts would occur as a result of the proposed project.

Mitigation Measures: No mitigation measures are required.

J. HYDROLOGY AND WATER QUALITY

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in a substantial erosion or siltation on- or off-site?			X	
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
iv. Impede or redirect flood flows?				
4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

1) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Less than Significant Impact. The project would be required to comply with all NPDES (National Pollutant Discharge Elimination System) requirements including pre-construction, during construction and post-construction Best Management Practices (BMPs). In addition, the project will be required to submit an approved SUSMP (Standard Urban Stormwater Mitigation Plan) to be integrated into the design of the project. As a result of the NPDES and SUSMP requirements, impacts associated with water quality standards or waste discharge requirements are anticipated to be less than significant.

Mitigation Measures: No mitigation measures are required.

2) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Less than Significant Impact. The City currently utilizes water from Glendale Water and Power (GWP), which relies on some local groundwater supplies. Consequently, implementation of the proposed project would result in additional development that could indirectly require a slight increased use of groundwater through the provision of potable water by GWP. This Project was routed to GWP for comment and this department did not comment with concerns that the Project will substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. As a result, implementation of the proposed project would not substantially impede sustainable groundwater management.

The subject property is an approximately 189,050 square-foot (4.3 acres) parcel developed with paved parking lot, driveways and walkways, and 12 buildings (approximately 41 percent lot coverage). With exception of the existing improvements specified above, the surface of the site has large areas of the site that are "naturalized" and park-like with native and non-native trees and shrubs, perennials, grasses, and wildflowers. While the Project proposes an amount of hardscape (approximately 52 percent lot coverage) more than the current on-site conditions, the site will still consist of large landscaped areas with a park-like appearance and will consist with 91,265 square-feet of landscaping (48 percent). The proposed project would not significantly interfere with the recharge of local groundwater or deplete the groundwater supplies. Less than significant impacts would occur as a result of the proposed project.

Mitigation Measures: No mitigation measures are required.

3) ***Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***

i. ***Result in a substantial erosion or siltation on- or off-site?***

Less than Significant Impact. The Project Site is currently improved with paved parking lot, driveways and walkways, and 12 buildings) throughout the 189,050 square-foot lot. Water that falls on the site either is absorbed into the ground on-site or is directed into existing City streets and drains.

As specified within Response J-2 (above), the Project will occupy approximately half of the lot (52 percent lot coverage) with approximately 48 percent landscaping. While the Project improvements will include slightly less landscaping compared to the existing site conditions, all runoff will continually be conveyed via streets and gutters to storm drain locations around the Project site. Development of the proposed project would not require any substantial changes to the existing drainage pattern of the site or the area, nor would it significantly affect the capacity of the existing storm drain system. In addition, the applicant would be required to adhere to conditions under the NPDES (National Pollutant Discharge Elimination System) Permit set forth by the RWQCB (Regional Water Quality Control Board), and would be required to prepare and submit a SWPPP (Storm Water Pollution Prevention Plan) administered throughout proposed project construction. The SWPPP would incorporate BMPs (Best Management Practices) to ensure that potential water quality impacts from water-driven erosion during construction would be reduced to a less than significant level.

In accordance with Chapter 13.42 (Stormwater and Urban Runoff Pollution Prevention Control) of the Glendale Municipal Code, the project would be required to prepare and implement a Standard Urban Stormwater Mitigation Plan (SUSMP). The SUSMP would incorporate appropriate design features and best management practices (BMPs) to reduce pollutants in post-construction stormwater discharges.

Additionally, the project would be required to comply with Chapter 14.43 (Low Impact Development Standards), which is intended to reduce the adverse effects of stormwater runoff on natural drainage systems and receiving waters. Key objectives of Low Impact Development (LID) include minimizing pollutant loads from impervious surfaces through the use of properly designed BMPs, and reducing erosion and hydrologic impacts by incorporating appropriate hydromodification control measures.

Compliance with National Pollutant Discharge Elimination System (NPDES) permit requirements, including preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of a SUSMP, would ensure that potential impacts to drainage patterns and water quality are effectively minimized.

Furthermore, there are no streams or rivers located on the project site, and the project would not substantially increase the rate or volume of surface runoff in a manner that would result in on-site or off-

site flooding. Therefore, impacts related to drainage, runoff, and water quality would be less than significant.

The project will not alter the course of a stream or river, since no river or stream is located on the site, nor would the project result in a substantial increase in runoff.

Mitigation Measures: No mitigation measures are required.

ii. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

Less than Significant Impact. In addition to stormwater management outlined within Response J-3i above, the proposed project would be required to adhere to Chapter 14.43, Low Impact Development Standards of the Glendale Municipal Code. Primary goals of LID (Low Impact Development) are: i) to lessen the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters and other water bodies, ii) minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed, technically appropriate BMPs and other low impact development strategies, and iii) minimize erosion and other hydrologic impacts on natural drainage systems by requiring development projects to incorporate properly designed, technically appropriate hydro-modification control development principles and technologies. Further, there are no streams or rivers on the site and the Project will not substantially increase the rate or amount of surface runoff in a manner which would result in on or off site flooding. As such, impacts will be less than significant.

Mitigation Measures: No mitigation measures are required.

iii. *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

Less than Significant Impact. A Project-specific SWPPP is required to adhere to conditions under the NPDES (National Pollutant Discharge Elimination System) Permit set forth by the RWQCB (Regional Water Quality Control Board), and would be required to prepare and submit a SWPPP (Storm Water Pollution Prevention Plan) administered throughout proposed project construction. BMPs would be incorporated into the site design to fully address all expected pollutant sources and storm water runoff volumes. Therefore, the proposed Project would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Mitigation Measures: No mitigation measures are required.

iv. *Impede or redirect flood flows?*

Less than Significant Impact. Less than Significant Impact. In addition to stormwater management outlined within Response J-3 above, the proposed project would be required to adhere to Chapter 14.43, Low Impact Development Standards of the Glendale Municipal Code. Primary goals of LID (Low Impact Development) are: i) to lessen the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters and other water bodies, ii) minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed, technically appropriate BMPs and other low impact development strategies, and iii) minimize erosion and other hydrologic impacts on natural drainage systems by requiring development projects to incorporate properly designed, technically appropriate hydro-modification control development

principles and technologies. Further, there are no streams or rivers on the site, and the Project will not substantially increase the rate or amount of surface runoff in a manner which would result in on or off site flooding. As such, impacts will be less than significant.

Mitigation Measures: No mitigation measures are required.

4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less than Significant Impact. According to Federal Emergency Management Agency flood hazard maps, the Project site is not located within a 100-year flood zone. Seiches are typically caused when strong winds and rapid changes in atmospheric pressure push water from one end of a body of water to the other, causing the water then continues to oscillate back and forth for hours or even days. The proposed Project site is not located downslope of any large body of water that would produce a seiche. Tsunamis are large ocean waves generated by sudden water displacement caused by a submarine earthquake, landslide, or volcanic eruption. A review of the County of Los Angeles Flood and Inundation Hazards Map indicates that the site is not within the mapped tsunami inundation boundaries. Last, the project location is not located in an area susceptible to mudflow due to proximity to slopes. The proposed project is located in an area that has been heavily urbanized for many years and surrounded by one- and two-story single-family residences to the north, south and east, and the west, and the Crescenta Valley Water District Glenwood Plant to the west. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. Please refer to Response J-1 and J-2 above. The proposed project would slightly increase potable water demand supplied by Glendale Water and Power but is not expected to substantially deplete groundwater supplies or interfere with groundwater recharge, resulting in less-than-significant impacts on sustainable groundwater management. Although the project would increase hardscape coverage, it would retain substantial landscaped areas and comply with NPDES and SUSMP requirements, ensuring less-than-significant impacts related to groundwater recharge and water quality.

Mitigation Measures: No mitigation measures are required.

K. LAND USE AND PLANNING

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Physically divide an established community?			X	
2. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X	

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
3. Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

1) Physically divide an established community?

Less than Significant Impact. The property is a 189,050 square-foot (4.3 acres) parcel, zoned R1 II (Low Density Residential Zone, Floor Area District II), developed with a paved parking lot, driveways and walkways, 12 buildings (approximately 41 percent lot coverage) and is landscaped with native and non-native trees and shrubs, perennials, grasses, and wildflowers. The subject facility has operated since 1935 and proposes to expand its maximum capacity from 66 tenant and increase the capacity to a maximum of 120 tenants. The project will remove the existing 14 buildings dispersed throughout the site and consolidate the residents into single, four-level, building with amenities for the residents including common dining rooms, wellness rooms, lounge and activity space, kitchen, fitness / gym area, lobby, and reception. The Project will not expand the use beyond the property line boundaries of the site. Therefore, the project will not physically divide an established community. Less than significant impacts would occur.

Mitigation Measures: No mitigation measures are required.

2) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. The existing zoning designation on the project site is R1 II (Low Density Residential Zone, Floor Area District II), and the General Plan designation is Residential – Low Density. Low Density Residential allows for density standards of 1 to 8 units per acre. Although the property is zoned for low-intensity residential land uses, the existing residential congregate care facility has been in operation on the project site for over 80 years. During this time, the facility has received several variances from the Zoning Administrator and Planning Commission to expand campus buildings for additional bedroom capacity, dining, and assembly areas.

The project applicant is seeking approval for variances to allow for the expansion or modification of the existing residential congregate care facility, with the goal of increasing the bedroom count and enhancing facility amenities. For uses allowed in the R1 zone via variance on or before April 3, 2009, the Glendale Municipal Code (GMC) permits the Planning Commission to grant a new variance for the expansion or modification of previously granted uses, provided that such expansion or modification does not include extending the boundaries of the subject property compared to its boundaries at the time the original variance was granted.

The proposed project consists of the expansion and modification of this existing use within the boundaries of the subject property and does not introduce a new or incompatible land use. Consistent with the Glendale Municipal Code, the Planning Commission retains discretionary authority to approve variances for the expansion or modification of uses that were originally authorized by variance, provided the expansion does not extend beyond the site’s established boundaries. The project complies with this requirement.

Furthermore, California state housing element law requires jurisdictions to facilitate and encourage a variety of housing types for all economic segments of the community. This includes the production of housing that meets the needs of different households with incomes ranging from low to above moderate, as well as new

housing types and supportive services, such as residential congregate living facilities. Expanding an existing residential congregate care facility will enhance housing opportunities that require supportive services and further the City’s goal of providing a variety of housing types. Residential congregate care facilities serve an important housing function by accommodating populations with specific needs, thereby advancing City and State housing objectives related to inclusivity and housing choice. As a result, less-than-significant impacts would occur.

Because the project expands an existing, legally established use; and will remain within the confines of the project site; and supports broader housing policy goals, it would not conflict with the intent or provisions of the R1 zone or the City’s General Plan. Therefore, no conflict with applicable plans, policies, or regulations would occur. Less than significant impacts would occur.

Mitigation Measures: No mitigation measures are required.

3) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. No adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan has been adopted to include the Project site. Therefore, the project would not conflict with any such plans. No impact would occur.

Mitigation Measures: No mitigation measures are required.

L. MINERAL RESOURCES

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
2. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

1) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The City’s Open Space and Conservation Element (January 1993) does not identify the Project site as within an area containing valuable mineral resources. No impact would occur.

Mitigation Measures: No mitigation measures are required.

2) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As indicated in Response L-1 above, there are no known mineral resources within the Project site. No impact would occur.

Mitigation Measures: No mitigation measures are required.

M. NOISE

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
2. Generation of excessive groundborne vibration or groundborne noise levels?		X		
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

- 1) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less than Significant Impact.

Project Construction Noise

The Project site is located within the North Glendale Community Plan in the City of Glendale surrounded by other R1 (Low Density Residential) zoned properties to the north, south, east, and west. The adjacent properties are developed with one- and two-story single-family residences to the north, south and east, and the west, and the Crescenta Valley Water District Glenwood Plant to the west.

The City of Glendale General Plan Noise Element establishes noise criteria for the various land uses throughout the City. Section 4.4.3 of the City of Glendale Noise Element refers to City of Glendale Noise Ordinance 8.36.080 to address construction noise. The Glendale Municipal Code (GMC) Section 8.36.080 prohibits construction activities from occurring during prohibited hours that have been established in the GMC. Prohibited hours refers to any time after the hour of 7:00 PM of any day; any time before the hour of 7:00 AM of any day; any time on Sunday; and any time on holidays. In accordance with the Noise Ordinance, construction would be prohibited from 7:00 PM to 7:00 AM every night and from 7:00 PM on Saturday to 7:00 AM on Monday. Construction on holidays is also prohibited.

Table 5 – General Assessment Construction Noise Criteria

Land Use	Leq (1hr), dBA	
	Day	Night
Residential	90	80
Commercial	100	100
Industrial	100	100

While Noise Ordinance 8.36.080 does not establish noise level thresholds for construction noise, the Federal Transit Administration (FTA) manual provides a standardized framework for evaluating construction noise impacts. This approach incorporates several key assumptions to estimate noise levels generated by construction activities, assess their potential impact on surrounding areas, and determine compliance with

applicable noise criteria. According to the 2018 FTA guidelines, construction noise criteria should consider several factors: the existing noise environment, the absolute noise levels during construction, the duration of the activities, and the adjacent land uses. The FTA provides guidelines that serve as reasonable criteria for assessing construction noise. Table 5 below outlines the noise thresholds for various land use categories.

A Noise Study was completed for the proposed Project by Veneklasen Associates, Inc. (dated January 28, 2026). The construction noise impact was analyzed considering the type and amount of equipment used at each phase of construction. The analysis evaluated the nearest property line for each receiver position listed in Figure 2.



As shown in Table 11 (below), the hourly construction noise level will range between 67 to 79 (L_{Aeq} 1-hour) at the nearest property line which is below the 90 dBA residential threshold for Day hours specified by the FTA General Assessment Construction Noise Criteria (see Table 5 above for reference).

Table 11 – Construction Noise Levels at the Boundary of Receiver Positions

Receiver Positions	Average Distance (feet)	Range of Construction Noise Level (Leq-1hr) dBA	Exceed 90 (Leq-1hr) dBA Threshold?
Pos 1	116	72-77	No
Pos 2	148	70-75	No
Pos 3	128	72-76	No
Pos 4	129	72-76	No
Pos 5	224	67-71	No
Pos 6	93	74-79	No
Pos 7	114	73-77	No

Compliance with the City of Glendale's Noise Element and Noise Ordinances, as well as the FTA's General Assessment Construction Noise Criteria would ensure that construction noise does not disturb the residential uses during hours when ambient noise levels are likely to be lower (i.e., at night). Although construction noise would be higher than the ambient noise in the proposed Project vicinity, construction noise would cease to occur once the proposed Project construction is completed. The proposed Project would not increase vehicle trips or introduce other generators of high noise levels to the site. Noise impacts due to proposed construction noise would be less than significant with the Best Management Practices (BMP) and recommendations suggested by the Noise Study prepared by Veneklasen Associates, Inc. as conditions of approval, which include:

- Construction haul trucks and materials delivery vehicles shall not travel through residential areas except when no reasonable alternative route is available. When travel through residential areas is unavoidable, the contractor shall minimize trips during sensitive hours, comply with posted speed limits, and implement measures to reduce noise, vibration, and safety impacts to the community.
- The construction contractor shall, to the maximum extent feasible, position noise-generating equipment and locate construction staging areas as far as practicable from noise-sensitive uses.
- All construction equipment and generators shall be equipped with properly functioning factory-installed or equivalent mufflers to reduce noise emissions. Mufflers shall be maintained in good working condition throughout the duration of construction. Additionally, equipment should be operated in a manner that minimizes unnecessary idling or high-speed operation near noise-sensitive areas to further reduce noise impacts.
- A 6-foot-tall solid fence will be installed along the project site perimeter to function as a noise barrier during construction activities. The fence will help reduce the line-of-sight between construction equipment and nearby receptors, thereby minimizing noise propagation into adjacent properties. This measure is intended to provide consistent noise reduction throughout the duration of the construction period.
- To ensure nearby residents are adequately informed, post a clearly visible sign at the project site that can be read from a distance of at least 50 feet. The sign should include the date(s) of the planned construction activities, a brief description of the type of work being performed and a contact phone number for the construction coordinator in case residents have questions or concerns.

Project Operation Noise

Pursuant to the City of Glendale Noise Element, (2007), the maximum interior and exterior noise level standards for residential uses are 45 and 60 dBA CNEL or less, respectively. The Project will include outdoor mechanical equipment, such as split-system outdoor condensing units. The noise study analyzed and modeled the operation of multiple condensing units operating 24-hours a day located at the roof area of the future project building. Project submittal drawing indicates that mechanical pit on roof area will be 7 ft. lower than the top point of the roof. The computer model SoftNoise Predictor LIMA-ISO 9613 modeling software was utilized to model this noise condition which considers the distance sound attenuation as well as the height of the mechanical equipment relative to the receiver height. Existing terrain grading for all the receivers were considered for the analysis too.

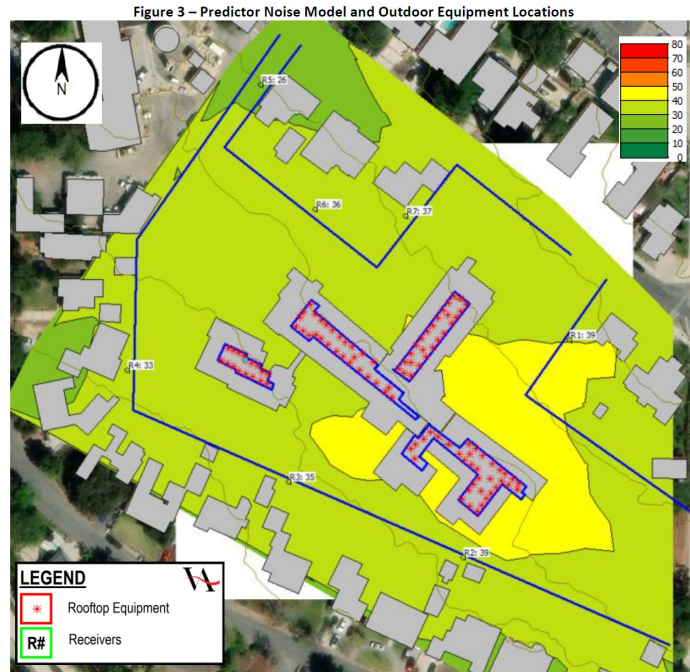


Figure 3 above shows the location of the outdoor condensing units and the noise levels throughout the project site. Table 9 shows the predicted noise levels at receptor positions and equipment sound data is shown in Appendix C.

Table 9 – Predicted HVAC Outdoor Equipment Noise Levels

Receiver Positions	Calculated Noise Levels (dBA)	Allowable Daytime Exterior Noise Level (dBA)	Allowable Nighttime Exterior Noise Level (dBA)
R1	39	60	53
R2	39	54	50
R3	35	53	52
R4	33	53	52
R5	26	55	54
R6	36	50	50
R7	37	53	53

With the highest projected exterior noise level due to future mechanical equipment from the proposed project reaching 39 dBA, the resulting interior noise level will not exceed 33 dBA. This ensures compliance with the City of Glendale’s Noise Ordinance interior noise threshold of 45 dBA for both on-site and off-site areas.

Overall, the noise impacts due to proposed construction noise would be less than significant with the Best Management Practices (BMP) and recommendations suggested by the Noise Study prepared by Veneklasen Associates, Inc. incorporated into the project as conditions of approval.

Mitigation Measures: No mitigation measures are required.

2) Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact with Mitigation Incorporated.

The noise study investigated where groundborne vibrations from the Project will fall within the thresholds of the City of Glendale. It was found that the GMC does not identify specific vibration level limits relating construction related activities. As a result, the U.S. Federal Transit Administration's (FTA's) Transit Noise and Vibration Impact Assessment Manual was used to assess the temporary impacts that vibrations produced from the Project onto surrounding properties in regard to building damage and human response to different levels of construction-related groundborne vibration. The FTA's manual functions as one of the few federal sources that provide guidance on the evaluation and assessment procedures and impact criteria for groundborne vibration induced by construction equipment.

The FTA guidelines manual suggests that vibration levels related to construction activities should not exceed motion velocity of 0.2 in/sec to prevent structural damage for non-engineered timber and masonry buildings. Table 12 presents the reference vibration information for construction equipment to be used during construction.

Table 12 – Velocity Vibration Levels (PPV in/sec) of Typical Construction Equipment at 25 ft

Type of Equipment	Reference Level at 25 ft PPV (in/sec)
Air Compressor (Jackhammer)	0.035
Delivery / Concrete Mixer/Dump Trucks	0.076
Dozer / Grader / Scraper	0.089
Excavator	0.202
Paver (Vibratory Roller)	0.210
Skip Loader	0.003

Source: Transit Noise and Vibration Impact Assessment (FTA 2018).

Ft = feet

FTA = Federal Transit Administration

In/sec = inches per second

PPV = peak particle velocity

Given the reference vibration levels shown in Table 12, the vibration levels were calculated at the nearest neighboring properties to show compliance with damage and annoyance criteria. Table 13 presents the estimated vibration levels at each location and for each type of construction equipment.

Table 13 – Construction Vibration Levels

Equipment Type	Location	Distance (ft)	Reference Vibration Levels at 25 ft. (PPV in/sec)	Maximum Vibration Level (PPV)	Compliance with Damage Criteria of 0.2 PPV in/sec?	Compliance with Annoyance Criteria of 0.01 PPV in/Sec?
Air Compressor (Jackhammer)	Pos 1 (2820 Sycamore Ave)	19	0.035	0.037	Yes	Yes*
	Pos 2 (2820 Sycamore Ave)	2		0.058	Yes	Yes*
	Pos 3 (3648 Glenwood Ave)	13		0.040	Yes	Yes*
	Pos 4 (3700 Glenwood Ave)	7		0.045	Yes	Yes*
	Pos 5 (2842 Sycamore Ave)	35		0.033	Yes	Yes*
	Pos 6 (2838 Sycamore Ave)	50		0.030	Yes	Yes*
	Pos 7 (2828 Sycamore Ave)	14		0.039	Yes	Yes*
Delivery / Concrete Mixer/Dump Trucks	Pos 1 (2820 Sycamore Ave)	19	0.0762	0.080	Yes	Yes*
	Pos 2 (2820 Sycamore Ave)	2		0.126	Yes	Yes*
	Pos 3 (3648 Glenwood Ave)	13		0.087	Yes	Yes*
	Pos 4 (3700 Glenwood Ave)	7		0.098	Yes	Yes*
	Pos 5 (2842 Sycamore Ave)	35		0.071	Yes	Yes*
	Pos 6 (2838 Sycamore Ave)	50		0.066	Yes	Yes*
	Pos 7 (2828 Sycamore Ave)	14		0.085	Yes	Yes*
Dozer / Grader / Scraper	Pos 1 (2820 Sycamore Ave)	19	0.089	0.094	Yes	Yes*
	Pos 2 (2820 Sycamore Ave)	2		0.147	Yes	Yes*
	Pos 3 (3648 Glenwood Ave)	13		0.101	Yes	Yes*
	Pos 4 (3700 Glenwood Ave)	7		0.115	Yes	Yes*
	Pos 5 (2842 Sycamore Ave)	35		0.083	Yes	Yes*
	Pos 6 (2838 Sycamore Ave)	50		0.077	Yes	Yes*
	Pos 7 (2828 Sycamore Ave)	14		0.100	Yes	Yes*
Excavator	Pos 1 (2820 Sycamore Ave)	19	0.202	0.213	Yes*	Yes*
	Pos 2 (2820 Sycamore Ave)	2		0.335	Yes*	Yes*
	Pos 3 (3648 Glenwood Ave)	13		0.230	Yes*	Yes*
	Pos 4 (3700 Glenwood Ave)	7		0.261	Yes*	Yes*
	Pos 5 (2842 Sycamore Ave)	35		0.189	Yes	Yes*
	Pos 6 (2838 Sycamore Ave)	50		0.176	Yes	Yes*
	Pos 7 (2828 Sycamore Ave)	14		0.227	Yes*	Yes*
Paver (Vibratory Roller)	Pos 1 (2820 Sycamore Ave)	19	0.210	0.222	Yes*	Yes*
	Pos 2 (2820 Sycamore Ave)	2		0.348	Yes*	Yes*
	Pos 3 (3648 Glenwood Ave)	13		0.239	Yes*	Yes*
	Pos 4 (3700 Glenwood Ave)	7		0.271	Yes*	Yes*
	Pos 5 (2842 Sycamore Ave)	35		0.196	Yes	Yes*
	Pos 6 (2838 Sycamore Ave)	50		0.183	Yes	Yes*
	Pos 7 (2828 Sycamore Ave)	14		0.236	Yes*	Yes*
Skip Loader	Pos 1 (2820 Sycamore Ave)	19	0.003	0.003	Yes	Yes
	Pos 2 (2820 Sycamore Ave)	2		0.005	Yes	Yes
	Pos 3 (3648 Glenwood Ave)	13		0.003	Yes	Yes
	Pos 4 (3700 Glenwood Ave)	7		0.004	Yes	Yes
	Pos 5 (2842 Sycamore Ave)	35		0.003	Yes	Yes
	Pos 6 (2838 Sycamore Ave)	50		0.003	Yes	Yes
	Pos 7 (2828 Sycamore Ave)	14		0.003	Yes	Yes

Source: Federal Transit Administration (except Hanson 2001 for Vibratory rollers), 1995.

*In compliance with mitigation measures in place. Refer to Section 4.2.

Based upon the findings of Veneklasen Associates, Inc.'s noise study, certain construction equipment, particularly excavators and vibratory rollers, generate relatively high vibration levels when operating at a distance of 30 feet or less from a structure. The following mitigation measures have been added to ensure

that the project will comply with the recommended conditions in the noise study which will prevent the generation of excessive groundborne vibration or groundborne noise levels construction activities.

Mitigation Measure: Compliance with Mitigation measures NOI-1 will reduce potentially significant impacts to less than significant.

NOI-1. Excavators and vibratory rollers shall operate at least 30 feet away from any building structure. If vibratory rollers are used, they must be operated with the vibration function turned off. For construction activities occurring within 30 feet of a building structure, the contractor shall implement alternative construction techniques or utilize equipment specifically designed to minimize vibration impacts. Acceptable alternatives may include, but are not limited to: hand excavation in lieu of mechanical excavation in sensitive areas; the use of smaller soil compactors, mini excavators, or compact track loaders where feasible; and strategic sequencing of work to avoid the simultaneous operation of vibration intensive equipment. Adhering to this setback distance significantly reduces the risk of structural damage to adjacent buildings and lighter less impactful tools and techniques should be used to ensure the protection of nearby structures and to maintain compliance with acceptable vibration standards.

3) 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 expose people residing or working in the Project site to excessive noise levels??

No Impact.

The proposed Project site is neither located within an airport land use plan nor is it located within two miles of a public airport or public use airport. No impact would occur.

Mitigation Measures: No mitigation measures are required.

N. POPULATION AND HOUSING

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
2. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X

1) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than Significant Impact.

As discussed in Response K-1 and K-2 (above), the residential congregate facility has operated at the Project since 1935 and proposes to expand its maximum capacity from 66 tenant and increase the capacity to a maximum of 120 tenants, resulting in a net increase of 55 tenants and is within the Southern California Association of Governments (SCAG) growth projections for Glendale. The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) adopted by SCAG projected the household population for Glendale will be 214,000 persons by the year 2040. The latest Department of

Finance estimate for the City of Glendale was 203,054 in 2017. As a result, the proposed project would not exceed the growth projections outlined in the 2016 RTP/SCS.

The Project site is located within an urban area and is currently served by existing circulation and utility infrastructure, no extension of infrastructure is required as part of the proposed project. Additionally, no expansion to the existing service area of a public service provider is required. Therefore, development of the Project site would not induce direct or indirect substantial population growth, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

2) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. As discussed within Response N-1, Project is to expand an existing residential congregate care facility with a maximum capacity from 66 tenant and increase the capacity to a maximum of 120 tenants. When completed, the project will provide a net increase of 54 bedrooms for residence requiring supportive services. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

O. PUBLIC SERVICES

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?			X	
d) Parks?			X	
e) Other public facilities?			X	

1) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?

Less than Significant Impact. The City of Glendale Fire Department (GFD) provides fire and paramedic services to the Project site. The project will require compliance with the Uniform Fire Code, including installation of fire sprinklers, and to submit plans to the Glendale Fire Department at the time building permits are submitted for approval. Comments received from GFD did not express major concern. Specifically, the project is not expected to significantly increase calls for service or necessitate expansion or construction of a new facility. Less than significant impacts would occur.

Mitigation Measures: No mitigation measures are required.

b) Police protection?

Less than Significant Impact. The Glendale Police Department (GPD) provides police protection services to the Project site. The site is located in an urban, developed area of the City and similar uses exist along South Central Avenue. Comments received from GPD indicate the Project is not expected to significantly increase calls for service or necessitate expansion or construction of a new facility.

Mitigation Measures: No mitigation measures are required.

c) Schools?

Less than Significant Impact. Section 65995 of the Government Code provides that school districts can collect a fee on a per-square-foot basis to assist in the construction of or additions to schools. Pursuant to Section 65995, the project applicant is required to pay school impact fees to the Glendale Unified School District based on the current fee schedule prior to the issuance of building permits. Payment of the school impact fees would mitigate any indirect impacts to a less than significant level.

Mitigation Measures: No mitigation measures are required.

d) Parks?

Less than Significant Impact. The proposed Project would not involve the development or displacement of a park. The property is zoned for mixed uses and was not planned for use as a park. In accordance with the requirements of the Glendale Municipal Code (Ordinance No. 5820), the project applicant will be required to pay the Development Impact Fee to the City based on the current fee schedule prior to the issuance of building permits. Payment of the impact fees is considered full mitigation of any impacts on parks and libraries and therefore the Project would result in less than significant impact to park facilities.

Mitigation Measures: No mitigation measures are required.

e) Other public facilities?

Less Than Significant Impact. The additional residential dwelling units could increase the demand for library services an incremental amount; however, in accordance with the requirements of the Glendale Municipal Code (Ordinance No. 5820), the project applicant will be required to pay the Development Impact Fee to the City based on the current fee schedule for mixed use developments prior to the issuance of building permits. Payment of the impact fees is full mitigation of any impacts on parks and libraries. The Project would therefore result in less than significant impacts.

Mitigation Measures: No mitigation measures are required.

P. RECREATION

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

1) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

Less than Significant Impact. The proposed Project is not expected to generate a substantial increase in demand for existing park or recreational facilities because the population increase is small (54 residents) and is within the SCAG population projection for Glendale (See Section N-1 above). As discussed in Response O-1d, the project applicant will be required to pay the City’s Park and Library Development Impact Fee to provide for park and recreation facilities based on the current fee schedule for commercial and residential development prior to the issuance of a certificate of occupancy. Senate Bill 937, (effective Jan. 1, 2025) solidified the deferral of payment from prior to issuance of building permits in order to reduce upfront costs for developers. Development impact fees are generally due at the final inspection or issuance of a certificate of occupancy (CO), whichever occurs first, rather than at the building permit stage. Payment of the City’s Development Impact Fees for parks and libraries is full mitigation of any impacts on parks and recreational facilities.

Mitigation Measures: No mitigation measures are required.

2) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

Less than Significant Impact. As discussed above in Response P-1, the project is not anticipated to create a significant demand on parks facilities that would require the construction or expansion at existing public recreational facilities. In addition, the Project does not include or require the construction or expansion of recreational facilities. Therefore, less than significant impacts would occur.

Mitigation Measures: No mitigation measures are required.

Q. TRANSPORTATION/TRAFFIC

<i>Would the project:</i>	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			X	
3. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
4. Result in inadequate emergency access?			X	

1) ***Conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

Less than Significant Impact. The project site is an irregularly shaped, 4.3-acre lot, generally located at the southwest of intersection of Sycamore Avenue and La Crescenta Avenue, which Sycamore Avenue is a local street, and La Crescenta Avenue is identified as a “major arterial”. Major arterials are characteristically the widest (4-6 lanes) urban streets and carry the heaviest traffic volumes (up to 45,000 vehicles per day). They generally provide motorists with the most continuous, efficient routes throughout the City since traffic signals, parking limitations and prohibitions, and access are utilized to maximize traffic flow. Major arterials distribute traffic to freeways, other arterials, collectors (urban, community and neighborhood), activity and business centers, and other major traffic generators within and outside the City. They also serve regional traffic between adjacent cities, are generally truck routes, corridors of high transit service and patronage, and potential bicycle lane or route locations. Local streets perform a variety of functions and accommodate both vehicular, bicyclist, and pedestrian traffic. In most instances, they serve the residential needs of the immediate community, carrying low volumes of traffic to and from collectors and arterials.

The Project includes the demolition of twelve existing buildings and to construct a new three-story, 92,420 square-foot, Residential Congregate Care Facility with a 26,471 square-foot subterranean garage. Construction activities for the proposed project would generate additional traffic as a result of the Project and construction truck transport of equipment and building material during construction period. The increase in daytime traffic is not considered substantial since the construction phase is short-term, approximately 12-18 months and will not exceed the capacity of the existing circulation system.

To ensure all construction traffic impacts (including construction worker trips and truck traffic for material delivery and material import/export) are less than significant, as a project design feature, a Construction Traffic Management Plan will be submitted to the City's Public Works Department for approval prior to any construction related activities. The Construction Traffic Management Plan will include a Construction Traffic Control Plan, a Construction Parking Plan, a Haul Routes Plan, and construction hours. As a result, construction traffic impacts would be less than significant.

The proposed project does not conflict with any program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities as the slight increase in the number of vehicles using the area streets resulting from the project is anticipated to create a less than significant impact. A Vehicle Miles Travel (VMT) Analysis Screening Memorandum was prepared by Jano Baghdanian & Associates (dated May 30, 2023), which evaluated the project's potential significant impacts. The City prepared Transportation Analysis (TIA) Guidelines to provide guidance on whether a project can be screened out of a detailed VMT analysis, or whether the applicant needs to perform a detailed VMT analysis. The Project site is not located within a High Quality Transit Area (HQTAs) as identified by the Southern California Association of Governments, Metro, and the City TIA Guidelines HQTAs Map, and is located in an area that is not screened out of a VMT analysis. Nevertheless, the Project site is served by Glendale Beeline bus Route 3 (at the intersection of La Crescenta Avenue and Honolulu Avenue) and Route 31 (at the intersection of La Crescenta Avenue and Honolulu Avenue). The Project will result in a net increase of 77 daily trips, with a net increase of 8 trips in the AM peak hour and 9 trips in the PM peak hour. The net increase in average daily trips is below the City's threshold of 145 daily vehicle trips; therefore, the Project can be presumed to cause a less-than significant transportation impact and would not require a detailed VMT analysis. As a result, less than significant impacts to the existing circulation system will occur.

Mitigation Measures: No mitigation measures are required.

2) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Section 15064.3 of the State CEQA Guidelines were adopted in December 2018, which require all lead agencies to adopt Vehicle Miles Traveled (VMT) as a replacement for automobile delay-based level of service (LOS) as the measure for identifying transportation impacts for land use projects. This statewide mandate went into effect July 1, 2020, consistent with Senate Bill 743 (SB 743). To comply with SB 743, the City adopted the Transportation Analysis Guidelines (October 2020). Jano Baghdanian & Associates prepared a VMT Analysis Screening Memorandum using the City's Transportation Analysis Guidelines to analyze potential impacts. The Screening Memorandum determined that the project site is not located within a High Quality Transit Area (HQTA) as defined by SCAG, Metro, or the City's TA Guidelines. The site is also not eligible for VMT screening. However, the project site is served by two Glendale Beeline bus Route 3 and Route 31 (both of which stop at intersection of La Crescenta Honolulu Avenue).

The VMT Analysis Screening Memorandum estimated the Project would add 140 daily trips, including 10 during the AM peak hour and 13 during the PM peak hour because the facility operates on three shifts, employee arrivals and departures are spread throughout the day. Since the net increase is below the City's 145-trip threshold the Project can be presumed to cause a less-than significant transportation impact and would not require a detailed VMT analysis. As a result, the project is expected to have a less-than-significant transportation impact and does not require a detailed VMT analysis.

Mitigation Measures: No mitigation measures are required.

3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Vehicular access onto the Project Site will be via three, two-way driveways from Sycamore Avenue and La Crescenta Avenue. As discussed above in Response Q-1, the City's Public Works – Traffic Division reviewed the Project and did not express major concern in regard to the traffic design.

Last, a Construction Traffic Control plan approved by the Glendale Public Works Department will be required prior to construction. The plan is required to identify all traffic control measures, signs, and delineators to be implemented by the construction contractor. The plan will also identify contractor information, hours of construction, construction worker parking information, as well as the proposed haul route. In addition, the proposed project would not result in any changes to the existing roadway network. Less than significant impacts would occur.

Mitigation Measures: No mitigation measures are required.

4) Result in inadequate emergency access?

Less than Significant impact. The ingress and egress for the site have been evaluated by the City's Traffic Division and found to be adequate for emergency access or access to nearby uses. Further, the Project does not involve the elimination of a through-route or the narrowing of a roadway. While temporary and occasional lane closures may be required during construction, two-way traffic would still be maintained along La Crescenta Avenue, allowing for emergency access, as necessary. As indicated in Section Q-3 above, a traffic control plan will be required for the construction phase of the Project. The plan will be reviewed and approved by the City's Engineering Division to ensure that emergency access is not impacted during construction.

As such, implementation of the proposed Project would not create new obstructions to emergency access in the Project area. All proposed accesses and drive lanes would be subject to the Fire Department’s access standards. The Project must also comply with all Building, Fire, and Safety Codes. Project plans would be subject to review and approval by the Public Works Engineering and Traffic Divisions, Community Development Department Building & Safety Division and Fire Department. Upon compliance with City standards for emergency access, impacts would be less than significant. As a result, less than significant impacts to emergency access will occur.

Mitigation Measures: No mitigation measures are required.

R. TRIBAL CULTURAL RESOURCES

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and this is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or			X	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

1) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and this is:**

i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or Less Than Significant Impact.** Written notice was given to the Fernandeano Tataviam of Mission Indians, Gabrielino-Tongva Tribe, and Soboba Band of Luiseno Indians, as required by AB 52 and codified in Public Resources Code Section 21080.3.1 et seq. Consultation was not requested by any of the tribes within the 30-days of notice. In addition, no known tribal resource is located on the Project site. In the event that resources are unearthed during project subsurface activities, all earth-disturbing

work must be temporarily suspended or redirected until NAHC has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. With implementation of this standard requirement, no significant impact is anticipated.

Mitigation Measures: No mitigation measures are required.

- ii) ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Less Than Significant Impact. As mentioned previously, no known burial sites exist within the vicinity of the Project site and surrounding area. Therefore, the potential for impact on known human remains or a resource determined to be significant by a California Native American tribe is low. No resources have been identified on the Project site pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. Written notice was given to the Fernandefio Tataviam of Mission Indians, Gabrielino-Tongva Tribe, and Soboba Band of Luiseno Indians, as required by AB 52 and codified in Public Resources Code Section 21080.3.1 et seq. Consultation was not requested by any of the tribes within the 30-days of notice. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

S. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
4. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X

1) ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

Less than Significant Impact. Under Section 401 of the Clean Water Act (CWA), the RWQCB issues NPDES permits to regulate waste discharged to waters of the U.S., which includes reservoirs, lakes, and their tributary waters. Waste discharges include discharges of stormwater and construction related discharges. A construction project resulting in the disturbance of more than one acre, as does the proposed Project, requires a NPDES Permit; construction projects are also required to prepare a SWPPP. The proposed Project would comply with the RWQCB-established waste discharge prohibitions and water quality objectives, which would be incorporated into the proposed Project as a project design feature.

For all utility needs, the proposed Project would tie into the existing utility lines, but it would only require minimal resources. The expanded residential congregate care facility would utilize the City of Glendale's utilities. The City of Glendale maintains and improves traditional storm drain systems which intercept storm runoff from local streets and convey the flows to the Verdugo Wash in order to minimize flooding. Runoff from the expanded residential congregate care facility would be conveyed to existing storm drain locations. The slight increase in runoff from the proposed Project would not result any substantial changes to the existing drainage pattern of the site or the area, nor would it affect the capacity of the existing storm drain system.

The proposed Project would not require new utility service facilities and would tie into the existing utility infrastructure. All proposed utilities, including water, wastewater, stormwater drainage, telecommunications, and electrical, would connect with the existing utility infrastructure from the City of Glendale's utilities along either Sycamore Avenue or La Crescenta Avenue. The proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Therefore, impacts associated with the proposed Project would be less than significant.

Mitigation Measures: No mitigation measures are required.

2) ***Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

Less than Significant Impact. The projected total water demand in 2030 during a normal year in the City of Glendale is expected to be 25,771 acre-feet per year (afy) with a total available supply of 45,008 afy, resulting in a surplus of 19,237 afy according to the City of Glendale's Urban Water Management Plan (2020). The City of Glendale has identified an adequate supply of water to meet future City demands under normal conditions. Future water demand in the City is based on projected development contained in the General Plan. For purposes of this assessment, the demand of the proposed project was assumed not to have been included in this demand projection. However, even with the additional demand of 8.33 afy generated by the proposed project, ample supply exists to meet remaining City demand under normal conditions.

The Project must comply with the provisions of Glendale's Mandatory Water Conservation Ordinance, as well as the 2022 California Green Building Standards (CALGreen) of the Glendale Green Building Code and the water conserving fixture and fittings requirements per the current California Plumbing Code. All new buildings must utilize higher efficiency plumbing fixtures (low-flush toilets, low-flow showerheads and faucets) and automatic irrigation system controllers based on water or soil moisture, and demonstrate an indoor net reduction in the consumption of potable water.

Normal Weather Conditions

The City of Glendale has identified an adequate supply of water to meet future City demands under normal conditions. As indicated above, a surplus exists that provides a surplus of approximately 19,237 afy of water. Future water demand in the City is based on projected development contained in the General Plan. For purposes of this assessment, the demand of the proposed project was assumed not to have been included in this demand projection. However, even with the addition of 8.33 afy of demand generated by the proposed project, there is ample supply to meet remaining City demand under normal conditions.

Dry Weather Conditions

Water supplies from the San Fernando and Verdugo Basins and recycled water would potentially be affected by drought conditions. If there is a shortage in water supply from the Metropolitan Water District of Southern California (MWD), the City of Glendale's distribution system could be affected. However, MWD's completion of the Diamond Valley Reservoir near Hemet added to the reliability of MWD's supplies. This reservoir plus other MWD storage/banking operations increases the reliability of MWD to meet demands. MWD is also proposing contracts with its member agencies to supply water, including supply during drought conditions. These contracts would define the MWD's obligation to provide "firm" water supply to the City.

It is anticipated that during any 5-year drought, the City would have sufficient water supply to meet demand. According to the 2020 Urban Water Management Plan, the City would use less MWD water supplies in the future compared to its current use because of implemented water conservation efforts (such as, City Best Management Practices, Water-Efficient Landscape Programs and Water-Efficient Indoor Programs). With the City's reduction of dependency on imported water from MWD, GWP has a higher level of reliability in meeting water demands during drought conditions.

Even with the implementation of the proposed project, the GWP would continue to have adequate supply to meet citywide demand under drought conditions. Even with the addition of 8.33 afy of demand generated by the proposed project, there is sufficient supply to meet City demand under drought conditions.

As indicated above, the City would continue to have adequate supply to meet citywide demand under normal and drought conditions with the proposed project. As a result, long-term impacts to water supply during operation of the proposed project under both normal and drought conditions would be less than significant.

Mitigation Measures: No mitigation measures are required.

- 3) ***Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?***

No Impact.

Sewage from the Project site goes to the Hyperion Treatment Plant (HTP), which the City of Glendale has access to through the Amalgamated Agreement. The HTP has a dry-weather design capacity of 450 million gpd and is currently operating below that capacity, at 362 million gpd. As a result, adequate capacity exists to treat the proposed project-generated effluent. Therefore, the proposed project would not require the expansion or construction of sewage treatment facilities.

Water serving the proposed project would be treated by existing extraction and treatment facilities, and no new facilities, or expansion of existing facilities, would be required. No impact would result with regard to impacts to the available sewage treatment capacity.

Mitigation Measures: No mitigation measures are required.

4) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Implementation of the proposed project would result in an increase in development on site. According to CalRecycle (Estimated Solid Waste Generation Rates for Institutional Sector Generation Rates), the proposed project would generate approximately 84.86 tons (nursing/retirement home at 5 lb./person/day) of solid waste per year.

Solid waste generated on the Project site could be deposited at the Scholl Canyon Landfill (owned by the City of Glendale) or at one of the landfills located within the County of Los Angeles. The annual disposal rate at the Scholl Canyon facility is approximately 200,000 tons per year. Combined with the increase of approximately 84.86 tons per year in solid waste generated by the proposed project, the annual disposal amount would increase to approximately 200,085 tons per year. With a total annual disposal amount of 200,085 tons and a remaining capacity of 0.9 million tons, the Scholl Canyon facility would meet the needs of the City and the proposed project for approximately 5-7 years. Because the proposed project would be required to implement a waste-diversion program aimed at reducing the amount of solid waste disposed in the landfill, the amount of solid waste generated would likely be less than the amount estimated. As a result, less than significant impacts are anticipated.

Mitigation Measures: No mitigation measures are required.

5) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The project will comply with all federal, state, and local statutes and regulations related to solid waste. All construction debris will be disposed of according to applicable federal, state, and local statutes, including Glendale Municipal Code Chapter 8.58. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

T. WILDFIRE

If located in or near state responsibility area or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?			X	
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel, breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

1) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. State Responsibility Areas (SRA) are areas where the State of California has primary financial responsibility for the prevention and suppression of wildland fires. CAL FIRE provides a basic level of wildland fire prevention and protection services. Fire protection in Local Responsibility Areas

(LRA) is typically provided by City fire departments, fire protection districts, counties, or CAL FIRE (under contract to a local government). For the City, fire protection is provided by the Glendale Fire Department. CAL FIRE uses an extension of the SRA FHSZ model as the basis for evaluating fire hazards in LRAs. FHSZs are identified as Moderate, High, or Very High in an SRA and Very High in an LRA.

The major undeveloped regions in the City are the Verdugo Mountains, the San Rafael Hills, and the foothills of the San Gabriel Mountains. These mountainous regions present a substantial safety problem in the form of fire hazards to the many areas developed nearby (City of Glendale n.d.). The Project site is not in an SRA and is located in a LRA land that has been classified as Very High FHSZs (CAL FIRE 2025).

The nearest designated City Disaster Response Route is La Crescenta Avenue, which is directly abutting east of the property providing vehicular access to the Project site. Disaster routes serve as thoroughfares primarily for the movement of emergency response vehicles and access to critical facilities. According to the City of Glendale Emergency Plan (Safety Element 2025, Plate-5), the Sparr Heights Senior Center, Crescenta Valley County Park and Crescenta Valley High School are the nearest locations for evaluation within an approximate mile radius. The Project involves the expansion of an existing residential congregate care facility and will not exacerbate conditions or create a new fire hazard especially within in VHFHSZs. Construction activities, associated with development, may result in temporary construction barricades or other obstructions that would impede emergency access. However, development projects that involved work within a public ROW would be subject to review and approval from the Public Works Department, which requires coordination to inform police and fire departments of potential obstructions or street closures. During construction, the contractor shall notify the Glendale Police and Fire Departments of construction activities that would involve the movement of equipment so as to give first emergency response teams the option of rerouting traffic to an alternative route. Further, during construction the applicant would be required to obtain any necessary permits from the Glendale Public Works Department for all work occurring within the public right-of-way. Implementation of these requirements would be incorporated as conditions of approval. By complying with these regulations and conditions the Project would not impair the implementation of or physically interfere with the City's adopted emergency response plan or emergency evacuation plan. Consequently, project impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

2) ***Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?***

Less than Significant Impact. The Project site is in an area of the City that is urbanized and largely built out with single- and multifamily residences. As stated previously, the Project site is in a LRA with lands that have been classified as Very High FHSZs. The construction related activities associated with the Project will not change or exacerbate current risks associated with wildfire or expose occupants to pollutant concentrations. Existing occupants will be relocated offsite during the Project's construction and will not expose occupants with pollutant concentrations from wildfire or the uncontrolled spread of a wildfire. The Project would also not impede implementation of GWP's Wildfire Mitigation Plan and Vegetation Management Program. The goal of the Vegetation Management Program is to reduce the risk of buildings being ignited by a nearby wildfire. The City of Glendale Fire Department (GFD) provides fire and paramedic services to the Project site. The project will require compliance with the Uniform Fire Code, including installation of fire sprinklers, and to submit plans to the Glendale Fire Department at the time building permits are submitted for approval. Comments received from GFD did not express major concern.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. As indicated in Response T-2 above, the Project site is in a LRA with lands that have been classified as Very High FHSZs. The project will require compliance with the Uniform Fire Code, including installation of fire sprinklers, and to submit plans to the Glendale Fire Department at the time building permits are submitted for approval. The proposed Project would not require new utility service facilities or roads and would tie into the existing utility infrastructure. All proposed utilities, including water, wastewater, stormwater drainage, telecommunications, and electrical, would connect with the existing utility infrastructure from the City of Glendale’s utilities along either Sycamore Avenue or La Crescenta Avenue. The proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. As a result, less than significant impacts would occur related to the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. As indicated in Response T-2 above, the Project site is located in an area of the City that is urbanized and largely built out with single- and multi-family residences. The site is situated on relatively flat land in an urban setting, with a low likelihood of flooding or landslides. The Project will not substantially increase the rate or amount of surface runoff in a manner that would result in on- or off-site flooding.

Mitigation Measures: No mitigation measures are required.

U. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				X
2. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
3. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

- 1) ***Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?***

No Impact. The Project site is a currently developed and located within an urbanized area along La Crescenta Avenue. No biological species or habitat for biological species exists on site or within the project vicinity. In addition, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project site. As such, the proposed project would not have the potential to substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Furthermore, the proposed project would not have the potential to eliminate important examples of major periods of California history or prehistory, including historical, archaeological, or paleontological resources. Therefore, the proposed project would not result in significant environmental impacts that have the potential to degrade the quality of the environment. No impacts would occur.

- 2) ***Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?***

Cumulative impacts may occur when the proposed project in conjunction with one or more related projects would yield an impact that is greater than what would occur with the development of only the proposed project. Approximately one-third of a mile north of the project, are separate proposals to construct a new three-story multi-family residential project (12 residential units with two reserved for very low income families) located 2760 Hermosa Drive and approximately half mile north is an additional separate proposal to construct a new three-story multi-family residential project (42 residential units with five reserved for very low income families) located at 2817 Montrose Avenue. As a result, the incremental effect of the new residential congregate living facility is not cumulatively considerable because the Project is not connected with any past, current or foreseeable future project within immediate area or on the subject property. All environmental issues considered in this Initial Study were found to have either no impact, a less than significant impact or less than significant impact with mitigation incorporated. As discussed in Section H (Greenhouse Gas Emissions), the project would not exceed State or regional thresholds for the emission of criteria air pollutants or greenhouse gases. With implementation of mitigation measures for impacts associated with biological resources and noise impacts would be reduced to a less than significant level. With regard to cumulative effects for the issues of agricultural, public services, mineral resources and wildfire, the Project site is located in an urbanized area and therefore, other developments occurring in the area of the project would largely occur on previously disturbed land and are not anticipated to have an impact. Thus, no cumulative impact to these resources would occur. Impacts related to hazards and hazardous materials are generally confined to a specific site and do not affect off-site areas.

Therefore, the proposed project would have no cumulatively considerable effects, and as such, cumulative impacts would not occur.

- 3) ***Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

Less than Significant Impact. As detailed throughout this Initial Study, the proposed project does not exceed any significance thresholds or result in significant impacts in the environmental categories typically associated with indirect or direct effects to human beings, such as aesthetics, agriculture, energy, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use, mineral resources, population/housing, public services, recreation, transportation utilities/service systems, or wildfire.

As mentioned in Response D-5 regarding biological resources, a total of 49 protected indigenous trees were identified to be on and near the site, two of which are western sycamores and the remainder of which are coast live oaks. Four of the coast live oaks are located on property lines, while nine other coast live oaks are located nearby on adjacent properties. As part of the Project, the indigenous tree report (ITR) identified a total of three coast live oak trees will removed to accommodate new interior roads and building foot print and is expected to have major impacts on 10 coast live oak trees and varying minor to moderate impacts on another 29 indigenous trees. Mitigation measures BIO-1 and BIO-2 are recommended to further reduce the impacts via tree replacement and tree protection measures during construction.

As discussed in Response M-2, based upon the findings of Veneklasen Associates, Inc.'s noise study, certain construction equipment, particularly excavators and vibratory rollers, generate relatively high vibration levels when operating at a distance of 30 feet or less from a structure exceeding damage and annoyance criteria set forth by the U.S. Federal Transit Administration's (FTA's) Transit Noise and Vibration Impact Assessment Manual. Mitigation measures NOI-1 is recommended to minimize vibration impacts to ensure the protection of nearby structures and to maintain compliance with acceptable vibration standards

Development of the proposed Project would not create direct and indirect adverse effects on humans. Less than significant impact would occur.

13. Earlier Analyses

None.

14. Project References Used to Prepare Initial Study Checklist

One or more of the following references were incorporated into the Initial Study by reference and are available for review in the Planning Division Office, 633 E. Broadway, Rm. 103, Glendale, CA 91206-4386. Items used are referred to by number on the Initial Study Checklist.

1. The City of Glendale's *General Plan*, "Open Space and Conservation Element," as amended.
2. The City of Glendale's *General Plan*, "Noise Element," as amended
3. California Department of Conservation, *Farmland Mapping and Monitoring Program*, Los Angeles County Important Farmland 2010 (September 2011).
4. South Coast Air Quality Management District, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (May 2005).
5. City of Glendale, *General Plan*, "Safety Element" (2025).
6. California Governor's Office of Land Use and Climate Innovation, *State of California General Plan Guidelines* (2023).
7. City of Glendale Municipal Code, as amended.
8. VMT Analysis Screening Memorandum (prepared by Jano Baghdanian & Associates, dated May 30, 2023)
9. California Emissions Estimator Module (CalEEMod version 2022.1.1.39) Report.
10. City of Glendale, *Climate Action & Adaptation Plan(CAAP)* (August 2025)
11. Noise and Vibration Study (prepared by Veneklasen Associates, Inc., dated January 28, 2026)
12. Los Angeles County Metropolitan Transportation Authority, *Congestion Management Program* (2010)

13. City of Glendale, Bicycle Transportation Plan (September 2012)
14. Indigenous Tree Report (prepared by Alison Lancaster Consulting Arborists, LLC., dated November 22, 2023)
15. Cultural Resources Technical Report (Sapphos Environmental, Inc., dated March 31, 2023)
16. Historic Resources Assessment Report (Sapphos Environmental, Inc., dated June 16, 2023)