

APPENDIX 1.0(b)

Responses to Notice of Preparation



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

Notice of Preparation

June 7, 2006

To: Reviewing Agencies
Re: Center City II Mixed Use Project, 141 North Brand Boulevard
SCH# 2006051146

Attached for your review and comment is the Notice of Preparation (NOP) for the Center City II Mixed Use Project, 141 North Brand Boulevard draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Dave Ahern
Glendale Redevelopment Agency
633 E. Broadway, Room 201
Glendale, CA 91206-4387

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Project Analyst, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2006051146
Project Title Center City II Mixed Use Project, 141 North Brand Boulevard
Lead Agency Glendale Redevelopment Agency

Type NOP Notice of Preparation
Description The project is a mixed-use residential and hotel concrete hi-rise development with associated support spaces, such as parking, amenity rooms, storage rooms, lobby, circulation, and service spaces. In addition, the project would provide a retail/ cafe component at ground level in the areas of the Center City I Plaza.

Lead Agency Contact

Name Dave Ahern
Agency Glendale Redevelopment Agency
Phone 818.548.2005 **Fax**
email
Address 633 E. Broadway, Room 201
City Glendale **State** CA **Zip** 91206-4387

Project Location

County Los Angeles
City Glendale
Region
Cross Streets North Brand Boulevard, Wilson Avenue, Orange Street
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use GP: Regional Commercial
 Zoning: Central Business District (CBD)

Project Issues Aesthetic/Visual; Other Issues; Public Services; Water Quality; Noise; Recreation/Parks; Air Quality; Landuse; Population/Housing Balance; Traffic/Circulation

Reviewing Agencies Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 5; Department of Health Services; Native American Heritage Commission; California Highway Patrol; Caltrans, District 11; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

Date Received 06/07/2006 **Start of Review** 05/24/2006 **End of Review** 06/22/2006

Resources Agency

Resources Agency
Nadell Gayou

Dept. of Boating & Waterways
David Johnson

California Coastal
Commission
Elizabeth A. Fuchs

Colorado River Board
Gerald R. Zimmerman

Dept. of Conservation
Roseanne Taylor

California Energy
Commission
Paul Richins

Dept. of Forestry & Fire
Protection
Allen Robertson

Office of Historic
Preservation
Wayne Donaldson

Dept of Parks & Recreation
Environmental Stewardship
Section

Reclamation Board
DeeDee Jones

S.F. Bay Conservation &
Dev't. Comm.
Steve McAdam

Dept. of Water Resources
Resources Agency
Nadell Gayou

Conservancy

Land Game

Dept. of Fish & Game
Scott Flint
Environmental Services Division

Fish & Game Region 1
Donald Koch

Fish & Game Region 2
Banky Curtis

Fish & Game Region 3
Robert Floerke

Fish & Game Region 4
Julie Vance

Fish & Game Region 5
Don Chadwick
Habitat Conservation Program

Fish & Game Region 6
Gabriana Gatchel
Habitat Conservation Program

Fish & Game Region 6 I/M
Tammy Allen
Inyo/Mono, Habitat Conservation
Program

Dept. of Fish & Game M
George Isaac
Marine Region

Other Departments

Food & Agriculture
Steve Shaffer
Dept. of Food and Agriculture

Depart. of General Services
Public School Construction

Dept. of General Services
Robert Sleppy
Environmental Services Section

Dept. of Health Services
Veronica Malkoy
Dept. of Health/Drinking Water

Independent

Commissions, Boards

Delta Protection Commission
Debby Eddy

Office of Emergency Services
Dennis Castrillo

Governor's Office of Planning
& Research
State Clearinghouse

Native American Heritage
Comm.
Debbie Treadway

County: Los Angeles

Public Utilities Commission
Ken Lewis

State Lands Commission
Jean Sarino

Tahoe Regional Planning
Agency (TRPA)
Cherry Jacques

Business, Trans & Housing

Caltrans - Division of
Aeronautics
Sandy Hesnard

Caltrans - Planning
Terri Pencovic

California Highway Patrol
Shirley Kelly
Office of Special Projects

Housing & Community
Development
Lisa Nichols
Housing Policy Division

Dept. of Transportation

Caltrans, District 1
Rex Jackman

Caltrans, District 2
Marcelino Gonzalez

Caltrans, District 3
Jeff Pulverman

Caltrans, District 4
Tim Sable

Caltrans, District 5
David Murray

Caltrans, District 6
Marc Bimbaum

Caltrans, District 7
Cheryl J. Powell

Caltrans, District 8
Dan Kopulsky

Caltrans, District 9
Gayle Rosander

Caltrans, District 10
Tom Dumas

Caltrans, District 11
Mario Orso

Caltrans, District 12
Bob Joseph

Cal EPA

Air Resources Board

Airport Projects
Jim Lerner

Transportation Projects
Ravi Ramalingam

Industrial Projects
Mike Tollstrup

California Integrated Waste
Management Board
Sue O'Leary

State Water Resources Control
Board
Jim Hockenberry
Division of Financial Assistance

State Water Resources Control
Board
Student Intern, 401 Water Quality
Certification Unit
Division of Water Quality

State Water Resources Control Board
Steven Herrera
Division of Water Rights

Dept. of Toxic Substances Control
CEQA Tracking Center

Department of Pesticide Regulation

CON# 2008051140

Regional Water Quality Control
Board (RWQCB)

RWQCB 1
Cathleen Hudson
North Coast Region (1)

RWQCB 2
Environmental Document
Coordinator
San Francisco Bay Region (2)

RWQCB 3
Central Coast Region (3)

RWQCB 4
Teresa Rodgers
Los Angeles Region (4)

RWQCB 5S
Central Valley Region (5)

RWQCB 5F
Central Valley Region (5)
Fresno Branch Office

RWQCB 5R
Central Valley Region (5)
Redding Branch Office

RWQCB 6
Lahontan Region (6)

RWQCB 6V
Lahontan Region (6)
Victorville Branch Office

RWQCB 7
Colorado River Basin Region (7)

RWQCB 8
Santa Ana Region (8)

RWQCB 9
San Diego Region (9)

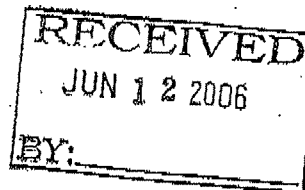
Other _____

Last Updated on 04/28/06



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DEPARTMENT OF TRANSPORTATION
 DISTRICT 7, OFFICE OF REGIONAL PLANNING
 100 MAIN STREET, IGR/CEQA BRANCH
 LOS ANGELES, CA 90012-3606
 PHONE (213) 897-3747
 FAX (213) 897-1337
 TTY (213) 897-4937



June 5, 2006

IGR/CEQA cs/060552 - NOP

City of Glendale

Proposed City Center II Mixed Use Residential Project

141 N. Brand Blvd.

Includes 2 high rise structures, a 20 story 191 residential
 condominium tower and an 18 story hotel/mixed use building
 152 hotel units, and restaurant uses

Vic. LA-134-7.12; SCH #

Mr. Dave Ahern
 City of Glendale
 Glendale Redevelopment Agency
 633 E. Broadway, Rm. 201
 Glendale, California 91206

Dear Mr. Ahern:

Thank you for including the California Department of Transportation in the environmental review process for the above-mentioned project. Based on the information received, we have the following comments:

A traffic study will be needed to evaluate the project's overall impact on the State transportation system including the mainline SR-134 (Ventura Freeway) and all affected freeway on/off ramps. The traffic study should include, but not be limited to:

- 1) Assumptions used to develop trip generation/distribution percentages and assignments.
- 2) An analysis of ADT, AM and PM peak hour volumes for both the existing and future (year 2025) conditions. This should also include level-of-service calculations using the HCM 2000 methodology. The analysis should include the following:
 - existing traffic volumes
 - project and cumulative traffic volumes
 - future traffic volumes projections for year 2025
 - existing level-of-service (LOS) calculations
 - project and cumulative level-of-service (LOS) calculations
- 3) Any mitigation measures proposed to alleviate traffic impact should include, but not be limited to the following:
 - financing
 - scheduling considerations

Mr. Dave Ahern
June 5, 2005
Page Two

- implementation responsibilities
- monitoring plan

- 4) The Equitable Share responsibility for traffic mitigation measures will need to be calculated as determined by the percentage increase in projected peak period trips resulting in operational impacts to State Route 134 mainline freeway facility and affected on/off-ramps. The City should refer to Appendix "B" Methodology for Calculating Equitable Mitigation Measures found in our Caltrans Guide for the Preparation of Traffic Impact Studies. The Guide can be found on the Internet at:

<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

We recommend that the City implement a rideshare program that would include links to the Glendale Metrolink commuter rail and Amtrak intercity rail station as well as links to other rideshare programs.


We recommend that construction related truck trips on State highways be limited to off-peak commute periods. Transport of over-size or over-weight vehicles on State highways will need a Caltrans Transportation Permit. The contractor should agree to avoid excessive or poorly timed truck platooning (caravans of trucks) to minimize transportation related operational conflicts, minimize air quality impacts, and maximize safety concerns.

We would appreciate advance copies of the Draft EIR and Traffic Study to facilitate our internal Caltrans review. Advance copies should be sent to the undersigned:

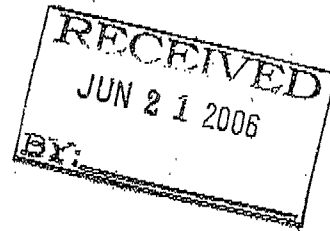
Cheryl J. Powell
Caltrans District 7 Office of Regional Planning
IGR/CEQA Branch
100 South Main Street
Los Angeles, CA 90012

If you have any questions regarding our comments, please refer to our IGR/CEQA Record number cs/060552 and you may contact me at (213) 897-3747.

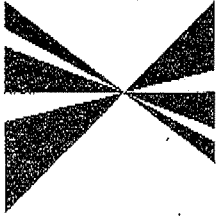
Sincerely,


Cheryl J. Powell
IGR/CEQA Program Manager

cc: Scott Morgan, State Clearinghouse



SOUTHERN CALIFORNIA



ASSOCIATION of GOVERNMENTS

Main Office

818 West Seventh Street
12th Floor
Los Angeles, California
90017-3435
t (213) 236-1800
f (213) 236-1835

www.scag.ca.gov

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Imperial County: Victor Carrillo, Imperial County • Jon Edney, El Centro

Los Angeles County: Yvonne B. Burke, Los Angeles County • Zev Yaroslavsky, Los Angeles County • Jim Aldinger, Manhattan Beach • Harry Baldwin, San Gabriel • Paul Bowen, Cerritos • Todd Campbell, Burbank • Tony Cardenas, Los Angeles • Stan Carroll, La Habra Heights • Margaret Clark, Rosemead • Gene Daniels, Paramount • Mike Dispensa, Palmdale • Judy Dunlap, Inglewood • Rae Gabellch, Long Beach • David Galin, Downey • Eric Garretti, Los Angeles • Wendy Grael, Los Angeles • Frank Gurulé, Cudahy • Janice Hahn, Los Angeles • Isadore Hall, Compton • Keith W. Hanks, Azusa • José Hulzar, Los Angeles • Tom LaDange, Los Angeles • Paula Lanz, Pomona • Paul Nawalka, Torrance • Pam O'Connor, Santa Monica • Alex Podilla, Los Angeles • Bernard Parks, Los Angeles • Jan Perry, Los Angeles • Ed Reyes, Los Angeles • Bill Rosenblatt, Los Angeles • Greig Smith, Los Angeles • Tom Sykes, Walnut • Paul Talbot, Alhambra • Mike Ten, South Pasadena • Tonia Reyes Uranga, Long Beach • Antonio Villaralosa, Los Angeles • Dennis Washburn, Calabasas • Jack Weiss, Los Angeles • Herb J. Wesson, Jr., Los Angeles • Dennis Zine, Los Angeles

Orange County: Chris Norby, Orange County • Christine Barnes, La Palma • John Beaudin, Brea • Lou Bone, Tustin • Art Brown, Buena Park • Richard Chavez, Anaheim • Debbie Cook, Huntington Beach • Leslie Daigle, Newport Beach • Richard Dixon, Lake Forest • Paul Glaab, Laguna Niguel • Marilyn Poe, Los Alamitos

Riverside County: Jeff Stone, Riverside County • Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Loveridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Gary Ovitt, San Bernardino County • Lawrence Dale, Barstow • Paul Eaton, Montclair • Lee Ann Garcia, Grand Terrace • Tim Jasper, Town of Apple Valley • Larry McCallon, Highland • Deborah Robertson, Rialto • Alan Wegner, Ontario

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Marehouse, San Buenaventura • Toni Young, Port Huensme

Orange County Transportation Authority: Lou Correa, County of Orange

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark

20 June 2006

Mr. Dave Ahern
Economic Development Manager
City of Glendale Redevelopment Agency
633 East Broadway, Room 201
Glendale, CA 91206-4386

RE: **SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the City Center II Project**
SCAG No. I 20060354

Dear Mr. Ahern:

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the above-mentioned project to the Southern California Association of Governments (SCAG) for review and comment. SCAG's responsibility as the region's clearinghouse per Executive Order 12372 includes the implementation of California Environmental Quality Act (CEQA) §15125 [d]. This legislation requires the review of local plans, projects and programs for consistency with regional plans. SCAG bases review of such projects on its adopted regional plans:

Destination 2030: 2004 Regional Transportation Plan (RTP)
Regional Comprehensive Plan and Guide (RCPG) – 1996 Version
Compass Growth Vision

CEQA requires that EIRs discuss any inconsistencies between the proposed plan and the applicable general plans and regional plans (Section 15125 [d]). Please state separately how the proposed plan will or will not support each regional plan. Please cite specific policies in the regional plans that the proposed project supports. If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided. Visit www.scag.ca.gov for downloadable versions of these documents.

SCAG also offers the following specific comments:

The City Center II Project is located in a Compass 2% Strategy Area, where development is intended to balance employment, housing, and services to reduce vehicle trips and emissions, enhance livability, expand prosperity, and increase sustainability. It appears that the City Center II Project will support principles of the Compass Growth Vision; please demonstrate how the Project does or does not support these principles.

Please provide a minimum of 45 days for SCAG to review the EIR when this document is available. SCAG looks forward to following the success of this potentially significant infill development in one of the region's significant activity centers. If you have any questions regarding these comments or the available services, please contact me at (213) 236-1851. Thank you.

Sincerely,

Brian Wallace
Associate Regional Planner
Intergovernmental Review

DOCS # 123580



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

RECEIVED JUN 02 2006

May 30, 2006

Mr. Dave Ahern
Glendale Redevelopment Agency
633 East Broadway, Room 201
Glendale, CA 91206-4387

Dear Mr. Ahern:

**Notice of Preparation of a Draft Environmental Impact Report for
City Center II Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. In addition, please send with the Draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files.

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2002 Model. This model is available on the SCAQMD Website at: www.aqmd.gov/ceqa/models.html.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

Consistent with the SCAQMD's environmental justice enhancement I-4, in October 2003, the SCAQMD Governing Board adopted a methodology for calculating localized air quality impacts and localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality

Mr. Dave Ahern

-2-

May 30, 2006

analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA webpages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additionally, SCAQMD's Rule 403 - Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/agguide/agguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,



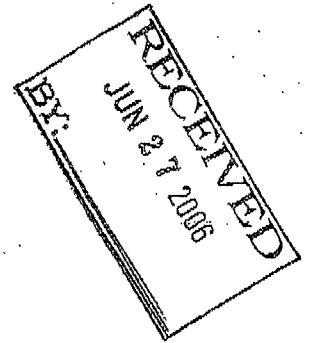
for Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development and Area Sources

SS:CB:li

LAC060530-07LI
Control Number



DONALD L. WOLFE, Director

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS*"To Enrich Lives Through Effective and Caring Service"*900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
www.ladpw.orgADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

June 22, 2006

IN REPLY PLEASE

REFER TO FILE: LD-0

Mr. Dave Ahern
Redevelopment Agency
City of Glendale
633 East Broadway, Room 201
Glendale, CA 91206-4386

Dear Mr. Ahern:

CITY CENTER II PROJECT-141 NORTH BRAND BOULEVARD
NOTICE OF PREPARATION FOR DRAFT ENVIRONMENTAL IMPACT REPORT
CITY OF GLENDALE

Thank you for the opportunity to review the Notice of Preparation for the Draft Environmental Impact Report (DEIR) for the proposed City Center II project located at 141 North Brand Boulevard. We reviewed the Initial Study and offer the following comments for your consideration.

Utilities and Service Systems – Storm Drain

The proposed project would result in increased stormwater runoff as stated in page 48 of the Initial Study. The impacts to the existing drainage system from this project and other projects in the area would need to be analyzed and addressed in the DEIR including identification of any applicable mitigation measures.

Utilities and Service Systems – Landfill/Solid Waste

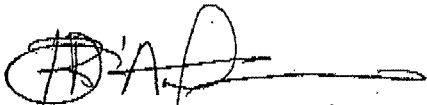
Page 49 of this Initial Study estimates that the proposed project would result in additional 355 tons of solid waste per year. Page 50 of the Initial Study for the Orange/Milford Condominium project located at 420 North Orange Street, approximately quarter mile north of the subject project, estimates the Orange/Milford Condominium project would result in additional 223 tons of solid waste per year. The remaining discussions in the respective Initial Studies do not account for the additional amounts of solid waste from the proposed project in the vicinity. Please analyze and address the cumulative impacts of additional solid waste generated from all proposed projects in the City that would be disposed at the Scholl Landfill.

Mr. Dave Ahern
June 22, 2006
Page 2

If you have any questions, please contact Mr. Suk Chong at (626) 458-7150.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

A handwritten signature in black ink, appearing to read 'R. D'Antonio', with a long horizontal stroke extending to the right.

ROSSANA D'ANTONIO
Assistant Division Engineer
Land Development Division

SPC:jmw
P:\dpub\CEQA\Suk\City Center II Project_Glendale_EIR-nop.doc

GLENDALE UNIFIED SCHOOL DISTRICT

223 NORTH JACKSON STREET
GLENDALE, CALIFORNIA 91206

(818) 241-3111

June 7, 2006

David Ahern
City of Glendale Redevelopment Agency
633 East Broadway, Room 201
Glendale, CA 91206

Dear David:

Please accept the following comments regarding the preparation of an Environmental Impact Report ("EIR") for the 141 North Brand Boulevard Project ("Project"):

- 1) The Glendale Unified School District is the sole public school district serving the proposed Project and other residential projects in the City of Glendale. As such, we have some concern regarding our ability to provide necessary facilities to accommodate students generated by the Project.
- 2) Future developers within our jurisdiction will likely examine this EIR and borrow from it where convenient or advantageous in the preparation of their EIRs. As a result, we have a long-term interest in assuring that this EIR fairly addresses impacts on the District, and fairly proposes mitigation measures.
- 3) We believe the EIR does not adequately address the Project's actual impacts on schools as it did not set forth a reasonable, detailed and accurate description of existing environmental settings, including both natural and man-made conditions per established CEQA guidelines.
- 4) Without knowing the extent and nature of the impact on schools, readers of the EIR and agencies, including the District, are unable to adequately assess the actual impact. Similarly, without knowing more about the specific impacts, it is impossible to formulate meaningful mitigation measures.
- 5) The EIR offers no discussion of the cumulative impacts of the proposed Project and other nearby projects on the District.
- 6) Under the Mitigation Section (M), the payment of school developer fees authorized under S.B. 50 is the only measure the Project intends to take to mitigate the impacts on schools.

David Ahern
June 7, 2006
Page 2

We would note that Senate Bill 50 does not relieve a city from analyzing schools and concluding that there are significant impacts that may remain unmitigated. We believe the Project cannot be approved unless the City either imposes mitigation measures adequate to mitigate the impact to a level of less-than-significant or it adopts an applicable statement of overriding consideration.

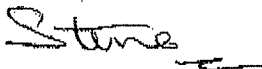
Additionally, S.B. 50 developer fees are not necessarily adequate to mitigate fully the impact of development upon school facilities. Therefore, if the City's position that it does not have the authority to impose additional mitigation above that authorized by S.B. 50 is correct, then the result is that there is an unmitigatable (and hence an unmitigated) impact.

Note: The Level 1 Developer Fees are now \$2.63 for residential development and \$.42 for commercial development. Also, the "student generation rates" for multi-family units are 0.148 (grades K-6), 0.052 (grades 7-8), and 0.110 (grades 9-12),

- 7) Finally, because we believe the EIR does not provide the necessary information and analysis, the mitigation measure proposed by the payment of a developer fee cannot be deemed to have sufficiently reduced the impact on schools to the necessary level of insignificance.

Thank you for your consideration of this information.

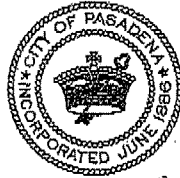
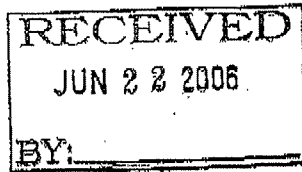
Sincerely,



Stephen R. Hodgson, Ed.D.
Chief Business and Financial Officer

SRH:ks

c: Dr. Michael F. Escalante, Superintendent



PLANNING & DEVELOPMENT DEPARTMENT
PLANNING DIVISION

June 20, 2006

David Ahern
Economic Development Manager
City of Glendale
633 East Broadway Room 201
Glendale, CA 91206

Re: Comments Related to NOP for the City Center II Project, Glendale CA

Dear Mr. Ahern,

Thank you for forwarding a copy of the Notice of Preparation and Initial Study for the "City Center II Project". Based on our review of the documents, we believe that the project's potential regional impacts are related to air quality, a visual change in the Glendale skyline, population forecasts, and a potential increase in freeway traffic along Route 134/210.

The majority of the project's potential impacts are localized to Glendale. However, due to the scale of the project and the few potential regional considerations, Pasadena requests to receive future CEQA notices for the project.

The City of Pasadena appreciates the opportunity to comment on the referenced documents. Should you have any questions regarding this letter, please do not hesitate to contact me at (626) 744-7231.

Respectfully submitted,
City of Pasadena

A handwritten signature in cursive script that reads "Jennifer Paige-Saeki".

Jennifer Paige-Saeki, AICP
Senior Planner

cc: 2006 Read File, Environmental Letters File

City Center II

PROOF OF PUBLICATION (2015.5 C.C.P.)

STATE OF CALIFORNIA,
County of Los Angeles,

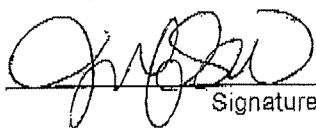
I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer of the News-Press, a newspaper of general circulation, printed and published daily in the City of Glendale, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of March 1, 1934, Case Number 369086; that the notice, of which the annexed is a printed copy (set in type no smaller than nonpareil), will be published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

June 1, 2006

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Glendale, California,

This 1st day of June 2006


Signature

GNP-6-1

**NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT AND
NOTICE OF PUBLIC MEETING**

A Public Meeting (Scoping Meeting) to receive oral comments on the proposed City Center II Mixed Use Residential project will be held on **Wednesday, June 14th, 2006, at 6:00 p.m.** in the Municipal Services Building, 633 E. Broadway, Room 105, Glendale, California 91206-4386.

Contact: Dave Ahern, Economic Development Manager

Lead Agency: City of Glendale, Redevelopment Agency
633 East Broadway, Room 201
Glendale, California 91206-4386

Project Title: City Center II Project - 141 N. Brand Boulevard

Project Location: 141 N. Brand Boulevard - City Center II. The project site is generally bounded to the north by Wilson Avenue, to the west by Orange Street, to the east by Brand Boulevard, and to the south by the 101 N. Brand High-rise office building.

Project Description: The project is located on the south west corner of Brand Boulevard and Wilson Avenue, and also has frontage on Orange Street. The project site abuts an existing 23 story office building (City Center I). The proposed project includes two high rise structures: A 20 story residential condo tower; an 18 story hotel/mixed use building which includes residential units, hotel units, restaurant uses, and on-site parking. In total the proposed project has 191 residential condo units and 152 residential hotel units. The total site area is 60,040 square feet, 1.4 acres.

Any information pertinent to the potential environmental effects of this project should be directed to the Glendale Redevelopment Agency (attention: Dave Ahern) in order to be included in the Draft Environmental Impact Report (EIR). Copies of the Project EIR, Notice of Preparation (NOP), and Initial Environmental Study are available for review at the office of the Glendale Redevelopment Agency and the Glendale City Planning Department office located at 633 E. Broadway, (suites 201 & 101 respectively), Glendale, CA 91206.

The Glendale Redevelopment Agency will be the Lead Agency and will prepare an Environmental Impact Report for the proposed project. Please send your comments/responses to Dave Ahern at the above address and provide the name of a contact person in your agency where applicable.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after publication of this notice.

Date: June 1, 2006

Ardashes Kassakhian,
The City Clerk of the City of Glendale

Publish: 06/01/06