

## 3.0 COMMENTS AND RESPONSE TO COMMENTS

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### INTRODUCTION

*This section of the Final EIR presents copies of written comments received on the Draft EIR during the public review period, and the City of Glendale Redevelopment Agency's (Agency's) responses to those comments. Each comment letter is numbered and the individual comments within each comment letter are numbered for reference. Comment letters are followed by responses, which are numbered to correspond with the letters.*

*The Agency's responses to comments on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. As discussed in Section 15088(a) of the California Environmental Quality Act (CEQA) Guidelines, the Agency is not required to respond to all comments on the Draft EIR, but only to those comments that raise environmental issues.*

### LIST OF AGENCIES THAT COMMENTED ON THE DRAFT EIR

The following agencies and organizations provided written comments:

#### **State Agencies**

1. California Department of Transportation, Elmer Alvarez, dated December 15, 2008

#### **Regional Agencies**

2. Los Angeles County Metropolitan Transportation Authority, Susan Chapman, dated December 17, 2008

DEPARTMENT OF TRANSPORTATION  
DISTRICT 7, REGIONAL PLANNING  
IGR/CEQA BRANCH  
100 MAIN STREET, MS # 16  
LOS ANGELES, CA 90012-3606  
PHONE: (213) 897-6696  
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Be energy efficient!*

IGR/CEQA No. 081219AL, EIR & TS  
Referenced to IGR/CEQA No. 080602AL, NOP  
Glendale Triangle Project  
Vic. LA-05 / PM 24.33  
SCH # 2008051111

December 15, 2008

Mr. Allen Castillo  
Glendale Redevelopment Agency  
633 East Broadway, room 201  
Glendale, CA 91206

Dear Mr. Castillo:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is to construct 218 residential units, 54,000 square feet of commercial space, recreation and open space amenities, and a 3.5 level subterranean parking garage with 707 parking spaces.

1

We note on page 32 of Traffic and Parking Impact Study, dated August 7, 2008, the proposed project will generate 232 Average Daily Traffic (ADT). This represents a reduction of vehicle trips during the AM peak hour and an addition of 10 trips during the PM peak hour. Given these assumptions, we concur that no significant traffic impacts are anticipated on State facilities due to project traffic.

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However, decision makers should be aware that given current level of congestion on I-5 and SR-134, any additional traffic including **related project trips** (66,816 ADT, 3,651/5,865 AM/PM trips) directed to I-5 and SR-134 during peak hours will have significant cumulative traffic impact to the State facilities. Cumulative traffic mitigation measures need to be proposed for those relative projects to improve traffic congestion on State facilities. Thank you for the opportunity to have reviewed this project.

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If you have any questions, please feel free to contact me at (213) 897-6696 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 081219AL.

Sincerely,

ELMER ALVAREZ  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

*"Caltrans improves mobility across California"*

**1. Letter from California Department of Transportation, Elmer Alvarez, dated December 15, 2008**

**Response 1**

The comment contains introductory remarks and summarizes the proposed project. The comment is noted and no further response is required.

**Response 2**

This comment summarizes and concurs with the conclusions of Section 4.11, Traffic, Circulation and Parking of the Draft EIR that no significant traffic impacts would occur on State facilities as a result of the project traffic. No further response is required.

**Response 3**

*State CEQA Guidelines* Section 15130(a) requires that EIRs discuss the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable."<sup>1</sup> If the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, Section 15130(a)(2) requires a brief discussion in the EIR of why a cumulative impact is not significant and why it is not discussed in further detail. Section 15130(a)(3) requires supporting analysis in the EIR if a determination is made that a project's contribution to a significant cumulative impact is less than cumulatively considerable; and, therefore, is not significant. *State CEQA Guidelines* Section 15130(b) discusses the standards for analysis of cumulative impacts, and states that it need not be as detailed as the analysis of project impacts, but instead should "be guided by the standards of practicality and reasonableness." The discussion of cumulative impacts in the Draft EIR focused on whether the impacts of the Glendale Triangle project are cumulatively considerable.

Cumulative traffic impacts analyzed in the Draft EIR were determined by applying an ambient growth factor to existing conditions to account for areawide regional growth and then adding the forecast of traffic generated by related projects. The proposed project's weekday trip generation was then added to this future without project traffic condition in order to determine the project' contribution to cumulative traffic impacts.

The comment indicates that any additional trips, including all trips generated by the related projects, directed to the Interstate 5 (I-5) and State Route 134 (SR-134) freeways during peak hours would have a significant cumulative traffic impact to the State facilities. The forecast total trip generation of the related projects is indicated on page 4.11-39 of the Draft EIR and in Table 8-2, page 46 of Appendix 4.11 of the Draft EIR. However, it is reasonable to assume that only a portion of the peak hour trips associated with

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

the related projects would utilize the freeway network. Figures 4.11-13 and 4.11-14 of the Draft EIR illustrate the assignment of trips associated with the future without project condition to the local street system during the AM and PM peak hours.

The traffic generation forecast for the proposed project is summarized in Table 4.11-5, Trip Generation of the Draft EIR. The net new project trips were determined by subtracting the traffic volumes generated by the existing uses located on the project site from the proposed project generated trips. In regards to the I-5 Freeway, the proposed project is expected to generate a net reduction of 15 AM peak hour trips and a net increase of 2 PM peak hour trips to the I-5 Freeway north of Los Feliz Boulevard. For the SR-134 Freeway east of San Fernando Road, the project is expected to generate a net reduction of 5 AM peak hour trips and a net increase of one 1 PM peak hour trip to this freeway segment.

While the Department of Transportation identifies a cumulative impact in this comment, this does not necessarily mean that the project-related contribution to this impact is significant as well. Instead, under CEQA, the project's contribution to a significant cumulative impact is only significant if the contribution is "cumulatively considerable." Given the net decrease in project trips during the AM peak hour and the nominal net increase of project trips during the PM peak hour that are expected to use the two freeways, the project's traffic contribution to the local freeways is nominal and the project's contribution to the significant cumulative impact identified in this comment is not cumulatively considerable. No mitigation is warranted or required.



# Metro

Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

December 17, 2008

Allen Castillo  
Project Manager  
Glendale Redevelopment Agency  
633 East Broadway, Suite 201  
Glendale, CA 91206

DEVELOPMENT SERVICES  
2008 DEC 18 P 1:21  
RECEIVED

Dear Mr. Castillo:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Glendale Triangle project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

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The Traffic Impact Analysis prepared for the Draft EIR satisfies the traffic requirements of the proposed project. However, the transit impact analysis should include the following element for the Final EIR:

1. There have been a few significant route changes to Metro bus service since this EIR was drafted. In June 2008, Metro Line 394 (Los Angeles - Sylmar via San Fernando Road. Limited) was cancelled and replaced by new Metro Rapid Line 794 (Los Angeles - Burbank via Brand Boulevard.). Table 5-1 in the Traffic and Parking Analysis should reflect this change.
2. Although the new Rapid Line 794 is routed along Brand Boulevard and therefore will not directly serve the proposed bus plaza to be located at San Fernando Road and Los Feliz Boulevard, a route change is being considered for June of 2009 that will reroute Line 794 service from Brand Boulevard to San Fernando Road. A decision on the proposed route change will not be made until March of 2009. Metro Rapid lines such as Line 794 are typically served by exclusive bus stops. In the event that Line 794 gets rerouted, it is unlikely that Line 794 buses will utilize the proposed bus plaza.
3. Line 94 (Los Angeles - Sylmar via San Fernando Road) service frequencies were recently modified. Weekday bus trips during the AM and PM peak hour amount to the following:
  - Northbound (AM): 6 trips; Northbound (PM): 5 trips
  - Southbound (AM): 5 trips; Southbound (PM): 5 trips
4. Section 5.4.3 of the Traffic and Parking Analysis references two commuter rail transit lines operated by Metro that stop and service the Glendale Station. These lines are operated by Metrolink, not Metro.

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Metro looks forward to reviewing the Final EIR. If you have any questions regarding this response, please call me at 213-922-6908 or by email at chapmans@metro.net. Please send the Final EIR to the following address:

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Metro CEQA Review Coordination  
One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Susan Chapman

Sincerely,



Susan Chapman  
Program Manager, Long Range Planning

2. Los Angeles County Metropolitan Transportation Authority, Susan Chapman, dated December 17, 2008

**Response 1**

The comment contains introductory remarks. The comment is noted and will be incorporated into the Final EIR to be provided for the review and consideration of the decision makers prior to any approval action on the project.

**Response 2**

The comment recommends revisions to Appendix 4.11, Traffic and Parking Impact Study of the Draft EIR regarding Metropolitan Transit Authority (Metro) bus routes that operate in the project area. **Appendix 4.11** has been revised in the Final EIR to reflect this change, which does not change the conclusions or adequacy of the EIR.

**Response 3**

This comment notes that Metro Rapid Line 794 would not use the bus plaza proposed as part of the project at the corner of Los Feliz Boulevard and San Fernando Road. This information does not affect the conclusions or adequacy of the EIR, and no further response is required.

**Response 4**

The comment indicates that the frequency of a Metro bus route has been recently modified. The text of Section 4.11 and Appendix 4.11 of the Draft EIR has been revised in the Final EIR to reflect this modification, which does not change the conclusions or adequacy of the EIR.

**Response 5**

The comment indicates that the discussion in Appendix 4.11 of the Draft EIR regarding commuter rail transit lines that service the Glendale Station should be revised to indicate the lines are operated by Metrolink and not Metro. The text of **Appendix 4.11** has been revised in the Final EIR to reflect this change, which does not change the conclusions or adequacy of the EIR.