

EXHIBIT 6

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MEMORANDUM

TO: Glendale City Attorney

CC: Luis Rodriguez and Michael de la Torre, Linc Housing

FROM: Elisa Paster and Eric Geier

DATE: July 13, 2021

SUBJECT: 515 Pioneer Drive Proximity to Major Transit Stop

Introduction

Our client, Linc Housing, is exploring the construction of a 340 unit, 100% affordable (excluding managers units) housing project in partnership with the City of Glendale (“Project”) at 515 Pioneer Drive, Glendale, California 91203 (“Project Site”). As the Project will be seeking a Density Bonus and associated concessions, the purpose of this memorandum is to identify for the City the major transit stop within one-half mile of the Project Site that would qualify the Project for an exemption under the California Environmental Quality Act and for a density increase pursuant to the Government Code (GOV).

Major Transit Stop as Defined by the Government Code and Public Resources Code

State Density Bonus law allows 100% affordable projects to have unlimited density, four concessions and a height increase of up to 33 feet if they are located within one-half mile of a major transit stop. (GOV §§ 65915(d)(2)(D), 65915(f)(3)(D)(ii).) Government Code Section 65915 defines major transit stop as it is defined in Public Resources Code (PRC) section 21155, which in turn cites PRC section 21064.3, with some modifications. (GOV § 65915(o)(3), PRC § 21155(b).) Collectively, the PRC sections define major transit stops as existing rail or bus rapid transit stations, ferry terminals served by either a bus or rail transit service, and the intersection of two or more bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods, as well as “major transit stops that are included in the applicable regional transportation plan.” (PRC §§ 21064.3, 21155(b)¹.) Bus rapid transit (BRT) is an enhanced public mass transit service with features that are distinguishable from typical bus operations. (PRC § 21060.2.)

¹ PRC § 21155(b) identifies the following characteristics of transit priority projects: 1) containing at least 50% residential uses or at least .75 FAR when containing between 26-50% residential uses, 2) a minimum density of at least twenty dwelling units per acre, and 3) be within one half mile of an existing major transit stop or a major transit stop included in the applicable regional transportation plan. The Project is consistent with each of these characteristics as it is a 100% affordable residential project, includes 121 dwelling units per acre, and is within one half mile of a major transit stop as defined by PRC § 21155(b).

The NoHo to Pasadena BRT

The Project Site is located within one half mile of Pacific Avenue and Glenoaks Boulevard, which has been identified as a future BRT station for a project included in the Southern California Association of Governments (SCAG) most recent Regional Transportation Plan. The designation of the BRT station in the Regional Transportation Plan qualifies the Project Site as being located within one-half mile of a major transit stop for the purposes of Government Code § 65915.

Further, Metro is currently completing its environmental analysis on the North Hollywood to Pasadena Transit Corridor (NoHo to Pasadena BRT), which would extend the G Line (Orange Line) east to connect with the L Line (Gold Line). The Metro Board of Directors recently selected a project alignment which includes a proposed BRT station at Pacific Avenue and Glenoaks Boulevard.² The Draft Environmental Impact Report was circulated for comment in late 2020, and the staff report from the project alignment approval on May 27, 2021 anticipates certification of a Final EIR in the summer of 2021.³ On September 3, 2020, SCAG unanimously voted to approve and fully adopt Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.⁴ Connect SoCal *includes* the NoHo to Pasadena BRT: “TABLE 3.1 displays selected major transit capital projects ***included in Connect SoCal.***” (Connect SoCal, page 63, emphasis added.) Listed in table 3.1 is “BRT Connector - Orange/Red Line to Gold Line.” (Connect SoCal, page 64.)

Accordingly, the BRT station at Pacific Avenue and Glenoaks Boulevard is a planned major transit stop included in the Regional Transportation Plan, consistent with PRC section 21155(b). Consequently, the Project Site is within one-half mile of a major transit stop as defined by State Density Bonus provisions. (GOV § 65915(o).)

² <https://i0.wp.com/thesource.metro.net/wp-content/uploads/2021/05/NoHoPasMap-scaled.jpg?ssl=1>

³ <https://boardagendas.metro.net/board-report/2021-0103/>

⁴ <https://scag.ca.gov/connect-socal>