



P.O. Box 4173 Glendale CA 91202
www.GlendaleHistorical.org

April 12, 2017

Design Review Board
City of Glendale
633 E. Broadway
Glendale, CA 91206

Re: Agenda Item 8c – 1732 Ard Eevin Avenue

Dear Members of the Design Review Board:

On behalf of the Board of Directors of The Glendale Historical Society and its more than seven hundred members, I would like to thank you for the opportunity to provide comments on the proposed project at 1732 Ard Eevin.

As the current Staff Report notes, an MND was prepared and adopted by the Planning Commission seven years ago when the owner of the property sought to subdivide it into two lots; that is, it assessed the impacts of a tentative parcel map. When an MND has previously been prepared for a project, an addendum is appropriate only if there are no new potential impacts. However, the proposed project, which includes the construction of a 7,500 square-foot residence, plus 770 square feet of garage space, has changed significantly since the 2010 MND; indeed, the original proposal to subdivide the lot, for which the MND was adopted, has been entirely abandoned. We believe that a new environmental clearance document must be prepared to adequately address the potential for substantial adverse impacts associated with the new project.

We note that the California Supreme Court recently provided clarification on the applicable standard of review when an agency relies on an addendum under CEQA. The Court found that a determination of whether there are unstudied impacts and thus the need for a major revision is reviewed differently depending on whether the previous environmental review document was an EIR or an MND.

When there is a proposal to modify a project originally approved through EIR, no “major revision” to the initial EIR is required if the initial EIR already adequately addresses any additional environmental effects that may be caused by the

The Glendale Historical Society (TGHS) advocates for the preservation of important Glendale landmarks, supports maintaining the historic character of Glendale’s neighborhoods, educates the public about and engages the community in celebrating and preserving Glendale’s history and architectural heritage, and operates the Doctors House Museum. TGHS is a tax-exempt, not-for-profit 501(c)(3) organization, and donations to TGHS are tax-deductible to the extent permitted by law.

proposed modification. **In contrast, when a project is initially approved by negative declaration, a “major revision” to the initial negative declaration will necessarily be required if the proposed modification may produce a significant environmental effect that had not previously been studied.** Indeed, if the project modification introduces previously unstudied and potentially significant environmental effects that cannot be avoided or mitigated through further revisions to the project plans, then the appropriate environmental document would no longer be a negative declaration at all, but an EIR.

(Friends of the College of San Mateo Gardens v. San Mateo County Community College District (2016) 1 Cal.5th 937, 957–58, emphasis added.)

We respectfully suggest that the new construction project involves potential substantial cultural resources and aesthetics impacts that were not considered in the MND adopted by the Planning Commission when it approved a tentative parcel map. A new environmental review document should therefore be prepared that addresses the new project as proposed.

The 2010 MND considers the association of the subject property with 851 West Mountain, also known as “Ard Eevin,” which is listed in the Glendale Register of Historic Resources, the California Register of Historical Resources, and the National Register of Historic Places. The new MND or EIR must be prepared to address the potential substantial adverse impacts to that property and to the Ard Eevin-Highlands Historic District, both of which are immediately adjacent to the proposed project. The 2010 MND does not address impacts to either historic resource in its discussion of the project’s impact on “the existing visual character or quality of the site and its surroundings” (pp. 3-4).

Our principal concern is with the size, massing, and scale of the proposed project. The Staff Report states that the proposed project is “compatible” with the massing and scale of the project site and surrounding area, but the facts do not support that claim. The project far exceeds the bulk of existing development in the vicinity. At 7,562 square feet, the proposed residence would be more than 265 percent larger than the average residence in the neighborhood, which is 2,852 square feet. The existence of one house of similar size, built in the 1980s, does not constitute the creation of a new neighborhood-wide threshold of compatibility, especially in a neighborhood characterized by smaller-scale homes built in the 1920s – 1950s, whose significance and integrity the City has formally acknowledged through the creation of the historic district.

Due to its size, massing, scale, and hillside location, the proposed residence would visually dominate the surrounding area, and it will “substantially degrade the existing visual character or quality of the site and its surroundings.” We note that “A project may meet all of its height, bulk, scale and zoning requirements and still have a significant visual impact on the environment if it is not in character with the surrounding development and natural landforms” (“California Environmental Quality Significance Determination Thresholds,” City of San Diego, Development Services Department, January 2011, accessed April 11, 2017 at www.sandiego.gov/sites/default/files/legacy/development-services/pdf/news/sdtceqa.pdf). In

other words, building regulations help to define the possible rather than determining the appropriate or desirable.

Historic integrity, as defined by *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, includes integrity of setting and feeling. The National Register Registration form for Ard Eevin noted the integrity of its distinctive rural setting for over one hundred years and its contribution to the property's significance: "Because of its elevation over the neighborhood and the shrubbery that obscured it, the Ard Eevin residence reads as set apart from the surrounding dwellings, which read as continuous and relational to one another" (Ard Eevin National Register Registration Form, May 13, 2006, p. 15). We do not argue that the subject property cannot be developed but rather that the eventual residence should be significantly reduced in size so as to be more appropriate to the historic setting and more compatible with the historic resources that are immediately adjacent to it. Because the currently proposed residence has potentially significant aesthetic and cultural resources impacts, reliance on an Addendum is inappropriate environmental clearance.

Finally, we note that the Design Review Board (DRB) is the environmental review authority for the current project. As we have pointed out previously, the DRB needs to be provided the appropriate documents in order to make its determination. We understand that a cultural resources technical report was prepared by Compass Rose in 2002 to evaluate the property and that the MND recommended a Mitigation Monitoring and Reporting Plan specific to the historic resource. This technical report must be made available to the DRB so that its members can make informed decisions about cultural resources-related mitigation measures and any other mitigation measures required by the outdated MND. We observe that no alternatives were evaluated that would avoid impacting identified cultural resources on the site—the city's conclusion skipped ahead to mitigation that does not reduce the impacts to less than significant.

In sum, while we support development at the subject property, we insist that a new MND or EIR be prepared that adequately addresses impacts on aesthetics and cultural resources in advance of approval.

Thank you for your consideration.

Sincerely,

Greg Grammer

Greg Grammer
President, The Glendale Historical Society

cc: Mr. Chris Baghdikian, Planner, City of Glendale
Mr. Jay Platt, Senior Urban Designer, City of Glendale
Mr. Phil Lanzafame, Director of Community Development, City of Glendale