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August 23, 2017

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

RE: 352 – 358 W Milford
Case No PDR: 1705454

Dear Board Members Benlian, Charchian, Malekian, and Simonian:

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 multi-family project at 352–358 W. Milford Street.

The City is relying on a categorical exemption from review under the California Environmental Quality Act (CEQA), but we believe that the historic resources evaluation prepared by the developer's consultant is inadequate and disagree with the conclusion that 358 W. Milford is not a historic resource. The City's own draft Historic Resources Survey for South Glendale found the property to be locally significant. Thus we believe that a categorical exemption under CEQA is not appropriate for this property. We ask that you decline to approve the project as proposed and instead require the City to prepare an Environmental Impact Report.

As staff noted a year ago, in a similar case involving the proposed demolition of two Clipped Colonial Craftsman style residences at 401–409 Hawthorne, the City must offer "substantial evidence" that a property is not a historic resource under CEQA when there is disagreement among experts (Memorandum Re: 401-409 Hawthorne Street [PDR 1603633], August 11, 2016).

We note that the City contracted with Historic Resources Group (HRG) to prepare a Historic Resources Survey of South Glendale (Survey) as part of the South Glendale Community Plan, which found the subject property at 358 W. Milford individually eligible for listing in the Glendale Register. In other words, although a consultant selected by the developer did not find the property to be significant, the City's own consultant believes it is a historic resource under CEQA. Francesca Smith, a qualified architectural historian who meets and exceeds the Secretary

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.

of the Interior's Professional Qualification Standards in history and architectural history and has more than thirty years experience in the field, concurs with HRG's professional opinion.

The City selected HRG to prepare the Survey in a non-competitive process, because in 2014 the firm prepared the South Glendale Historic Context Statement, a definitive analysis of the development and architectural history of South Glendale. In other words, the City recognized that there was no other firm so well positioned to evaluate the architectural significance of properties in this part of the city. In that Context Statement, HRG established the "registration criteria" against which they evaluated properties for significance. HRG presented the City with a draft of the Survey results in May 2017; staff reviewed the draft, discussed the results with HRG, and a revised version of the Survey was completed in July.

TGHS agrees that 358 W. Milford does not meet Glendale Register Criteria 1, 2, or 4. But the consultant for the developer did not adequately apply Criterion 3 for design significance (and mistakenly applies Criterion 3 of the California Register instead). A property need only meet one criterion to be eligible for listing in the Glendale Register. Criterion 3 deals with the architectural significance of a property: "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" (Glendale Municipal Code, 15.20.050). The sum total of the consultant's analysis of 358 W. Milford is two sentences: "The residence is a common and low-style example of Craftsman architecture, and the garage is utilitarian in design and construction. The buildings are not known to be the work of a master, and do not embody the distinct [sic] characteristics of a type, period, or method of construction pursuant to Criterion C [sic]" (Historic Resources Evaluation, prepared by Sapphos Environmental, Inc., July 18, 2016, pp. 7-8).

The consultant is incorrect. It is actually a fairly rare example of a Clipped Colonial Craftsman subtype, and it indeed represents "distinctive and exemplary characteristics" of the style. Its most distinctive features are the side-gabled jerkinhead roof and the pair of nested, highly prominent clipped gables, one serving as the roof of the full-width concrete porch. Other character-defining features include: the one-story symmetrical façade, horizontal beveled wood siding, vertical slat attic vents beneath the gables, two pairs of casement windows on either side of the wood paneled door, wide wood casings, and Doric columns. Character-defining features of this style, according to the Craftsman Survey's "Style Guide" include: a front jerkinhead roof, horizontal wood siding, wood sash...windows with wide casings, vertical slat attic vents and classical porch columns (p. 6). The subject property retains the characteristics which together distinguish the Clipped Colonial Craftsman style from other more common Craftsman types.

The property also retains its original Hollywood-style driveway. The consultant dismisses the garage as "utilitarian" but does not seem to be aware that the Craftsman-style, one-car garage, with a pair of likely original wood doors, is itself a rarity, and that "utilitarian" is perhaps the adjective that best describes the purpose of a garage for a modest bungalow in 1920. Because the addition at the rear was constructed in 1926, only six years after the house itself, and is in keeping with the feeling of the building, it is part of its period of significance and does not

reduce its integrity, as the Craftsman Survey pointed out (p. 38). Minor alterations include the replacement of two windows at the east façade and the reversible addition of a security door.

The subject property buildings retain integrity of their original *location*; their early 20th-century *design* is intact; nearly all of their initial exterior *materials* remain; their overall early carpentry and masonry *workmanship* remains, and the *feeling* and *association* of the buildings remain unchanged. The City's consultants, HRG and Galvin Preservation Associates, who prepared the Craftsman Survey, and TGHS find this property retains high integrity. The developer's consultant states that "the setting of the property has been compromised because it is now largely surrounded by modern, multi-story apartment buildings, although Craftsman residences from this period do remain." We note that Glendale does not typically consider that alterations to setting constitute threats to the eligibility of historic resources, even when those alterations are substantial and undertaken on the same property: witness, for example, the new construction surrounding the Victorian Goode House (119 N. Cedar, #8 in the Glendale Register of Historic Resources), the American Foursquare at 337 N. Cedar, and, most recently, that proposed for the Transitional Craftsman at 512 W. Doran, which city staff has argued and the Design Review Board has agreed will continue to be eligible for the Glendale Register after it is surrounded by much taller townhouses in very close proximity.

The developer's consultant did not prepare a comprehensive architectural evaluation but instead relied on the results of 2006-2007 Craftsman Survey. The consultant neglected to mention that the Craftsman Survey made a specific recommendation for additional research into the Clipped Colonial Craftsman subtype (p. 44), which to our knowledge has not been prepared. As we have pointed out on numerous occasions, the Craftsman Survey is out of date and is no longer a qualified survey for purposes of CEQA. It should not be used as supporting evidence that a property is not historic. The Craftsman Survey was also never submitted to the State Historic Resources Inventory as required under Public Resources Code (PRC) Section 50124.5 (g) (1), and it did not receive State Historic Preservation Officer concurrence, which means that the State has not agreed with the findings. According to the State Office of Historic Preservation guidelines, surveys are supposed to be updated every five years

to consider properties that may have achieved significance since the survey was originally conducted and to incorporate resources that were initially overlooked.

Updating an existing survey offers an opportunity to identify and document physical changes that have occurred to a property and its surroundings since the last survey, and to identify sites where historic properties have since been moved or demolished. (Emphasis added, http://ohp.parks.ca.gov/?page_id=23317)

There have been substantial physical changes to Glendale since the survey research was prepared 11 years ago. The once ubiquitous Craftsman has been significantly reduced in number, particularly in South Glendale; even in 2006 "there were not any areas within the city that had retained large concentrations of Craftsman buildings" and "the areas that once had streets lined with Craftsman buildings have been significantly filled in with very large apartment buildings" (Craftsman Survey, p. 37). This demolition of Craftsman properties has only increased of late and may now constitute a "cumulative effect" as defined in State CEQA Guidelines.

We note that *you are asked to approve the demolition of a Craftsman for all three projects before you this week*: a 1914 Craftsman residence at 722-724 E. Acacia St., a 1923 Colonial Craftsman at 1329 Virginia Ave., as well as the 1920 Clipped Colonial Craftsman on W. Milford. According to city staff, at least twenty-six Craftsman houses were approved or proposed for demolition last year, up from ten by their count the previous year. Many other Craftsman residences in Glendale have been altered beyond recognition. Indeed, the historic Colonial Craftsman just got a little bit rarer: since the research for the South Glendale Survey was completed, the owner of 408 W. Windsor, a property found eligible for the Glendale Register in the HRG Survey, received permits to remove and replace wood siding and windows, rendering the property no longer eligible for local designation.

The status of buildings that were once found, appropriately or erroneously, not to be historic resources may change as those building types become increasingly rare. This is why surveys must be regularly updated. The consultant takes none of the changes since the initial Craftsman Survey into account. We note that as a Certified Local Government it is the City's responsibility to keep track of the prevalence or rarity of historic buildings, which the South Glendale Survey should help to accomplish, and that CEQA does not allow use of a categorical exemption for a project that would cause a cumulatively considerable impact on historic resources.

Both the South Glendale Survey and the Craftsman Survey of 2006-2007 were conservative in their findings.¹ The Craftsman Survey found 23 Clipped Colonial Craftsman properties in South Glendale with high integrity, but of those only two were found eligible for designation. The other 21 were given a status code of 6L, "may warrant special consideration in planning." Another 29 Clipped Colonial Craftsman houses retained only moderate or low integrity. It was assumed by staff and TGHS that some of these high integrity properties from the Craftsman Survey would currently be found historically significant and that others may be demoted to 6Z, meaning they were no longer eligible even for "special consideration in planning." This is precisely what happened: the South Glendale Survey finds 6 of the 23 Clipped Colonial Craftsman eligible for designation, but only 9 are given a status code of 6L. The last 8 no longer warrant any special consideration. Of these, three appear to maintain their integrity from the previous survey. One has had alterations that are in keeping with the Craftsman style (at least as visible from the street). Another has had incompatible window replacements at the front and side façades. 344 Myrtle (1918, the oldest Craftsman of the Clipped Colonial subtype), has been demolished, and 319 N. Adams was remodeled to the extent the City considers it "new construction" (Glendale Property Portal). 460 W. Lexington was also remodeled beyond recognition with new stucco, windows and door. In other words, over 60 percent of these eight Craftsman, and more than 20 percent of the Clipped Colonial Craftsman houses with high integrity surveyed in South

¹ Of the 524 Craftsman residences built between 1900-1925 in multi-family zoned areas that were included in the Craftsman survey area, only 59, or 11 percent, were found eligible for local designation, even though 201, or 38 percent, retained high integrity, and the Craftsman style was understood to command special attention because of its radical decline in Glendale. Of the 9,000 properties surveyed in South Glendale for the 2017 survey, only 365, or 4 percent, were found eligible for designation, even though South Glendale is home to the City's oldest residential neighborhoods and the consultant considered factors other than architecture, including associations with significant people, in making a finding of eligibility.

Glendale in 2006, have lost that integrity. The fate of these properties is characteristic of the recent history of the Craftsman in Glendale.

TGHS does not believe that the City has met the substantial evidence test that 358 W. Milford is not a historic resource under CEQA; on the contrary, even its own consultant—presumably the most neutral party involved—has found it eligible for designation on the Glendale Register, and as we have shown, in relying on the 2006-2007 Craftsman Survey the developer's consultant has ignored the local changes that render it obsolete. If a proposed project may cause substantial adverse change in the significance of a historic resource it is not exempt from CEQA review (California Public Resources Code [PRC], Section 21084). Demolition is by definition a substantial adverse change. Therefore the City must prepare a complete CEQA analysis of cultural resources for the proposed project.

Thank you for your consideration.

Sincerely,

Greg Grammer

President
The Glendale Historical Society

CC: Kathy Duarte, Planner
Jay Platt, Senior Urban Designer