



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

March 5, 2018

The Honorable Mayor Gharpetian and Members of City Council
City of Glendale
613 E. Broadway
Glendale, CA 91206

RE: City Council Agenda Item 9a, Appeal of Decision on 361 Myrtle St.

Dear Mayor Gharpetian and Members of City Council:

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 appeal of the Director of Community Development's decision that an Environmental Impact Report (EIR) is required before a demolition permit can be issued for the buildings at 361 Myrtle.

We ask that you support the finding of the City's consultant, the City's Historic Preservation Planner, the Director of Community Development, and the City Attorney that the 1920 Clipped Colonial Craftsman at the above-listed address is a historic resource under CEQA and that its proposed demolition would cause a substantial adverse change in the significance of a historic resource, requiring the preparation of a focused EIR.

The City's own consultant, Historic Resources Group (HRG), assigned the property a Status Code of 5S3; the category "5" identifies "Properties Recognized as Historically Significant by Local Governments." In 2014 HRG prepared the South Glendale Historic Context Statement, a comprehensive analysis of the development and architectural history of South Glendale that is part of the Community Plan. The City selected HRG to prepare the South Glendale Historic Resources Survey in recognition that there is no other consultant so well positioned to evaluate the comparative historic significance of properties across this part of the city.

TGHS has pointed out many times that the 2007 Craftsman Survey is out of date and thus is no longer a qualified Survey for purposes of CEQA. Its findings cannot be used as substantial evidence that the property at 361 Myrtle is not a historic resource under CEQA. A Survey more than five years old is not qualified unless it has been "updated to identify historical resources

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.

which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource” (California Public Resources Code, Section 5024.1(g)(4).

The South Glendale Historic Resources Survey provides a necessary update to the findings in previous surveys in light of “changed circumstances,” which include the steady and substantial reduction of the number of Craftsman houses, especially in South Glendale, since the Craftsman Survey was prepared eleven years ago. For example, the 2007 Craftsman Survey identified 51 Clipped Colonial Craftsmans among the properties surveyed in South Glendale; only 22 of those retained high integrity. In the last decade more than 25 percent of these have lost or will soon lose their integrity through alteration (four), demolition (one, 344 Myrtle), or pending demolition (one, 358 W. Milford, approved by the DRB in October 2017). The status of buildings that were once found not to be historic resources can change as those building types become increasingly rare. This is one reason it is essential to maintain current surveys. And the changes in status cut both ways: while some properties were assigned higher status codes in the South Glendale Historic Resources Survey than in previous surveys, many more were downgraded or dropped based on the Methodology, even properties that were unaltered since the previous review.

The building at 361 Myrtle is a fine example of the Clipped Colonial Craftsman sub-type and embodies the distinctive and exemplary characteristics of the style. CEQA affords the lead agency the responsibility of determining whether or not a property is significant. The Survey, prepared by a consultant hired by the City, has been thoroughly vetted by the Historic Preservation Commission as well as historic preservation staff. There is substantial evidence that the property is a historic resource under CEQA. We ask that the City Council stand by the opinions of its professionals and experts and require a focused EIR before a demolition permit can be issued.

Thank you for your consideration.

Sincerely,

Greg Grammer

President
The Glendale Historical Society

CC: Jay Platt, Senior Urban Designer
Phil Lanzafame, Director of Community Development
Michael Garcia, City Attorney
Yasmin Beers, City Manager