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August 10, 2016

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

RE: 401- 409 Hawthorne Street, Glendale
Case No PDR 1603633

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

On behalf of the Board of Directors of The Glendale Historical Society and its more than six hundred members, I would like to thank you for the opportunity to provide comments on the proposed multi-family project at 401 - 409 Hawthorne Street.

We are pleased the City has acknowledged that it must offer “substantial evidence” that the buildings proposed for demolition are not “historical resources” as defined under CEQA. As we observed in our letter regarding these properties dated June 8, not including such material in the administrative record deprived the Design Review Board, which has environmental review authority in this case, of information necessary to make an informed decision about the historic significance of the properties and their status under CEQA.

We do not, however, agree that the City has met the “substantial evidence” test that the subject property is not a historic resource, as it is obligated to do. Until it does we ask that you not allow the project to move forward using a categorical exemption under CEQA as its environmental clearance.

The Craftsman Survey Is No Longer a Qualified Survey

There are several flaws in the City’s evidence. First, as we have pointed out to the City on multiple occasions, the 2006-2007 Craftsman Survey is out of date. As such, it is no longer a “qualified” survey, which means that it cannot be used as “substantial evidence” that a building is not a historic resource under CEQA. Even though the Craftsman Survey was funded in part by a grant from the California Office of Historic Preservation (OHP), through a program designed

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.

to “promote the integration of local preservation interests and concerns into local planning and decision-making processes” (http://ohp.parks.ca.gov/?page_id=21239), Glendale has failed to update the survey in line with OHP guidelines, which stipulate:

While an existing survey over *five years old* can provide valuable information, it is appropriate to update the survey to ensure that local planning and preservation decisions are based on the most current information available.

Surveys should be updated regularly 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

Furthermore, under Public Resources Code (PRC) Section 50124.5 (g) (1), a qualified survey “will be included in the State Historic Resources Inventory.” After nearly a decade, the results of the Craftsman Survey are not included in that inventory, which would show up on the OHP-prepared “Directory of Properties in the Historic Property File for Los Angeles County.” Thus the City is deficient not only in keeping the survey up to date but also in its most basic reporting duties. We note, in addition, that the out-of-date Craftsman Survey did not receive known State Historic Preservation Officer concurrence, which means that although the local government adopted it, the State has yet to agree with the findings. It is also worth pointing out that the Craftsman Survey does not include 409 Hawthorne in the list of Surveyed Buildings (Appendix B).

We assert that Glendale’s supply of the once ubiquitous Craftsman style (as well as other older homes) has been reduced in the past decade, particularly in South Glendale. Some recently approved and completed demolitions (within the last two years) include Craftsman-style buildings at 827 S. Glendale Blvd., 117 W. Chestnut St., 430 Pioneer Dr., 330 – 334 Salem St., and 518 E. Windsor, but without an up-to-date survey the City has no way of taking changes into account. Other projects involving the demolition of Craftsman bungalows and currently supported by the City include two Craftsman bungalows at 126 - 132 S. Kenwood St. and two at 429 - 503 N. Kenwood St. These projects were likewise declared categorically exempt from CEQA review. Other demolitions are proposed, including a Craftsman-style house at 373 W. Doran, to be heard next week by the Planning Commission, for which the Staff Report is not yet available, and at 1420 Valley View Rd., which the City has identified as a historic resource under CEQA but allows to languish without a roof, thereby facilitating demolition by neglect. The City’s inaction will likely result in the loss of one more historically significant Craftsman building.

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. It is the City’s responsibility to keep track of the prevalence or rarity of historic resources, because CEQA does not allow a categorical exemption for a project that would cause a cumulatively considerable impact on historic resources.

Substantial Evidence Test Is Not Met for 401 Hawthorne, 141 S. Columbus, and 409 Hawthorne

The City uses the out-of-date Craftsman Survey to show that buildings at 401 Hawthorne and 141 S. Columbus, in addition to 409 Hawthorne, are not historic resources under CEQA. It notes that the first two properties were not part of the original survey “for an unknown reason”; it is in part to fill in such gaps, to correct errors, and to register subsequent alterations to previously surveyed properties that surveys must be updated regularly.

The City’s recourse to the Craftsman Survey is notable because the expert hired by the developer, whose evaluation the City finds “adequate,” does not think these are Craftsman buildings. Rather, the consultant misidentifies 401 Hawthorne and 141 S. Columbus as pure examples of the Colonial Revival Style. They are not. As both the DPR we attach and the Staff Report indicate, they are “Clipped Colonial” Craftsman houses, a variation of the “Colonial Craftsman” sub-type.

The City claims that the historic resources assessment prepared for the project applicant “determined that the existing structures are not eligible for designation at the local, state, or national level.” We note that the consultant did not evaluate the buildings for listing on the Glendale Register of Historic Resources but only for the California and National Registers. It is essential that the buildings be evaluated at the local level; thus, the evaluation does not provide the substantial evidence the City needs to show that they are not historic resources under CEQA. On the contrary, when the consultant states that each of the buildings, including 409 Hawthorne, “*does* embody the distinctive characteristics of a type, period, or method of construction” (emphasis added), he indicates that they meet both Criterion 3 of the California Register (“Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values”), although he seems not to realize it, and also, implicitly, Criterion 3 of the Glendale Register: “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; or possesses high artistic values” (Glendale Municipal Code Section 15.20.050). The same conclusion is reached by Francesca Smith, a qualified architectural historian who meets and exceeds the Secretary of the Interior’s Professional Qualification Standards in history and architectural history, who in the attached DPR finds 401 Hawthorne and 141 S. Columbus also eligible for the Glendale Register of Historic Resources and thus discretionarily eligible for the California Register.

The consultant goes on to state that each of the buildings is “not considered to be an important example of this style within the City of Glendale, the region, state, or the nation” but does not provide a single corroborating example. The buildings need not be a high style or important example according to the Criterion, and had he properly applied the Glendale Register criteria, by his own assessment we believe that he should have found the buildings at 401 and 409 Hawthorne and 141 S. Columbus to be locally significant. Had he decided to document the buildings’ relative significance, they would not have been measured against others of the type in “the region, state or nation,” but only in Glendale where fewer examples remain. The City does

not deny that these buildings are eligible for the Glendale Register under Criterion 5 (“the proposed historic resource exemplifies the early heritage of the city”), only that the City has a policy (apparently unwritten) of applying Criterion 5 only in conjunction with one of the other four criteria. In this case Criterion 3 is met by the inadvertent reckoning of the developer’s own expert and by a qualified architectural historian; thus we continue to assert the buildings are eligible for the Glendale Register of Historic Resources under two criteria. A property has to meet only one of the criteria to be deemed eligible for the California or Glendale Registers.

The City does not evaluate 401 Hawthorne and 141 S. Columbus for eligibility for the Glendale Register either. Instead, because the Colonial Craftsman houses were not included in the 2007 Craftsman Survey, planning staff “performed a comparative analysis between the two houses, both examples of the Colonial Craftsman sub-type, and all similar properties considered by the Craftsman Survey.” They rejected the 6Z status code assigned by the consultant and assigned instead a status code of 6L “ineligible for local listing or designation through local government review process; may warrant special consideration in local planning.” A status code is not an evaluation, and details of the comparative analysis, including which properties were considered, are not provided. It is a little surprising, given how heavily the staff report relies on the out-of-date Craftsman Survey, that it does not mention a specific recommendation within it: “Research the Clipped-Gable Colonial buildings further” (44). That is, the sub-type was identified as worthy of particular attention, but it has not received any additional scrutiny that we are aware of.

DPR Form for 409 Hawthorne

City staff are profoundly critical of the DPR form prepared for TGHS. It is not surprising that certain alterations were missed, and we do regret errors; the DPR submitted for TGHS had to be prepared based on what is visible from the public right of way, which was not the case for the consultant or city staff. And alterations that lack permits leave no public record to compensate for limited access to the building.

We do note that the 2007 Glendale Craftsman Survey states: “*Buildings with high integrity may exhibit a few minor reversible alterations; however, overall the windows, window openings, porches, siding, and architectural characteristics should be fairly intact*” (38, emphasis added). We note that the main building at 409 Hawthorne Street retains its original windows on the front elevation except one window, where the replacement fits within the original opening. It retains its original front porch, its painted shiplap siding on the three visible sides, and other identifiable architectural characteristics. The alteration of the original door was not visible from the street because of a security door. Staff acknowledges the rear alteration is from a “likely early” date. The Craftsman Survey notes: “Properties that have had alterations that have been made within the first twenty years of its existence may still have high integrity if the modifications that were made were in keeping with the original architectural design and contribute to the overall feeling of the building” (44).

The DPR submitted by TGHS identifies three other Hip-Roofed Cottages in the same tract. The properties against which 409 Hawthorne was compared are: 819 E. Wilson, 353 W. Broadway (mis-labeled on the DPR form), and 429 Ivy. 819 E. Wilson (1901) is a more vernacular example

of the style than the subject property, and it contains no picturesque, lozenge-shaped windows. 353 W. Broadway (1905) “is one of the last intact residential structures remaining from downtown Glendale’s early development, 1900-1914, and contains exemplary elements of design, detail, materials and craftsmanship from this period,” as described in the City’s Glendale Downtown Specific Plan EIR Historic Resources Technical Report, 2006. It was found locally eligible in that survey. That building is half again as large as 409 Hawthorne and likewise contains no decorative windows. Its setting was substantially altered by the construction of a multi-unit apartment building in 1956. 429 Ivy was constructed in 1910 as was the subject property, is configured in an irregular square and has the same distinctive roof shape as the subject property. The fact that it has been substantially altered by the replacement of all windows and the addition of stucco further attests to the subject property’s significance. These three examples were as close as could be found to the subject property, which we take to be evidence of the rarity of the type. The City is not persuaded, yet neither it nor the consultant provide evidence, substantial or otherwise, of any other “Folk Style” or single-story Hip-Roofed Cottages nearby or elsewhere in Glendale, to which 409 Hawthorne might be compared to its disadvantage.

It is difficult to prove that Hip-Roofed Cottages were once prevalent in Glendale in the absence of a citywide historic resources survey that might have provided such information when areas now largely given over to multi-family residence were more intact. That assertion is based on the time period when Glendale emerged from an agricultural area into a small town, when one would expect a significant number of Hip-Roofed Cottages or Transitional Craftsman-style houses to have been constructed. The South Glendale Historic Context Statement asserts that “From bungalows to larger residences, the Craftsman style was ever-present. Few residences in other common styles of the period (the first two decades of the twentieth century), such as Foursquare or Prairie, were seen” (49). That there are few instances of the Hip-Roofed style in Glendale now is one of the cornerstones of the eligibility claim.

The Staff Report offered one new example it found apposite: 512 W. Doran St., which is a high-style Transitional Craftsman house. TGHS fully concurs with staff’s assessment elsewhere that it is a historic resource under CEQA. 512 W. Doran is an interesting example to raise, given that the City has recommended that the DRB approve significant alterations to the house that include demolishing the rear third, reconfiguring the rear, and moving it into a corner of the lot to make way for three townhouses. The City has argued that none of these changes would affect its eligibility for the Glendale Register and further they would also likely not affect its potential eligibility for the California Register “given the *rarity of this building type in Glendale*” (“Memorandum,” Staff Report, July 14, 2016, unpaginated, emphasis added). We think it appropriate to point to this document as evidence that the Transitional Craftsman style, to which the City assigns both 409 Hawthorne and 512 W. Doran, is rare in Glendale and is so considered by staff.

We have strongly disagreed with the Staff Report’s conclusion that the damage to the integrity of 512 W. Doran will not have a substantial adverse impact on the significance of a historic resource. Lest this seem like a contradiction to our claim for the historic significance of 409 Hawthorne, we observe that staff’s case for 512 W. Doran was based on the use of *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* to justify the

future significant alteration of a historic resource. The intended purpose of *Bulletin 15*, however, is to recognize the potential historic significance of a building like 409 Hawthorne, when it is found in an *already altered condition*.

Registration Requirements in the South Glendale Historic Context Statement

The “Response to TGHS Comments” in the most recent Staff Report suggests that TGHS ignored a fourth criterion in the Registration Requirements for the draft South Glendale Historic Context Statement. This is not the case. We were working from the August 2014 draft, which was the only draft available online until last month, when a draft dated September 2014 was posted. Our previous letters and our DPR forms predate its posting. We are troubled by the fact that a new and far more restrictive criterion has been added to the draft Context Statement. But as staff also point out, the document, including this criterion, is a draft and has not yet been fully vetted by the public or approved by Council.

Conclusion

We appreciate that the DRB is confronted with a rather unusual task. TGHS has demonstrated local historic significance for the properties at 401 Hawthorne, 409 Hawthorne, and 141 S. Columbus. More importantly, neither the consultant nor the City has provided the substantial evidence required by CEQA that the buildings proposed for demolition are not historic resources. Indeed, as we have shown, only one of the properties, 409 Hawthorne, has been evaluated for the Glendale Register, and that one-sentence DPR form from 2007 is both out of date and non-intensive. We therefore ask that the Board not use a categorical exemption for CEQA compliance for this project.

Thank you for your consideration.

Sincerely,

Greg Grammer

President
The Glendale Historical Society

Cc: Mr. Jay Platt, Senior Urban Designer, City of Glendale
Ms. Vista Ezzati, Planning Assistant, City of Glendale