



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

September 27, 2018

Mr. Philip Lanzafame  
Director of Community Development  
City of Glendale  
633 E. Broadway  
Glendale, CA 91206

**RE: Mitigated Negative Declaration for Proposed Project at 401 – 409 Hawthorne**

Dear Mr. Lanzafame:

The Glendale Historical Society is grateful for the opportunity to comment on the draft Mitigated Negative Declaration (MND) prepared for the proposed project at 401 – 409 Hawthorne. Our non-profit organization has more than 700 members and works to preserve and celebrate Glendale's rich history and architectural heritage.

We are pleased that the applicant's historic resources consultant now finds the pair of Clipped Colonial Craftsman houses and matching garage at 401 Hawthorne and 141 S. Columbus to be eligible for listing in the Glendale Register and the California Register as important examples of the style within Glendale. We agree with the conclusion that the three buildings form a single historic resource whose significance is "enhanced" by their grouping and are grateful the applicant proposes to retain them (Applied EarthWorks, DPR for 141 S. Columbus, November 2017, p. 3).

We are a bit bewildered by the conclusions in the draft MND. Specifically, while it analyzes the impacts of "the project" on the surrounding neighborhood, making a case for its compatibility with, for example, the three-story parking garage across the street, it has virtually nothing to say about the impacts of the five-story apartment building on the one-story Craftsman buildings that would be immediately adjacent to it and incorporated into its common areas. We believe that the construction of this building scarcely 15 feet from the historic resource, and some 40 feet taller, along with the direct alterations to the physical property and the historic setting proposed as part of the project, will cause a substantial adverse impact to the significance of the historic resource for which no appropriate mitigation is offered, in part because these impacts have not been studied. We believe that the project must either be redesigned, or subsequent environmental review is required.

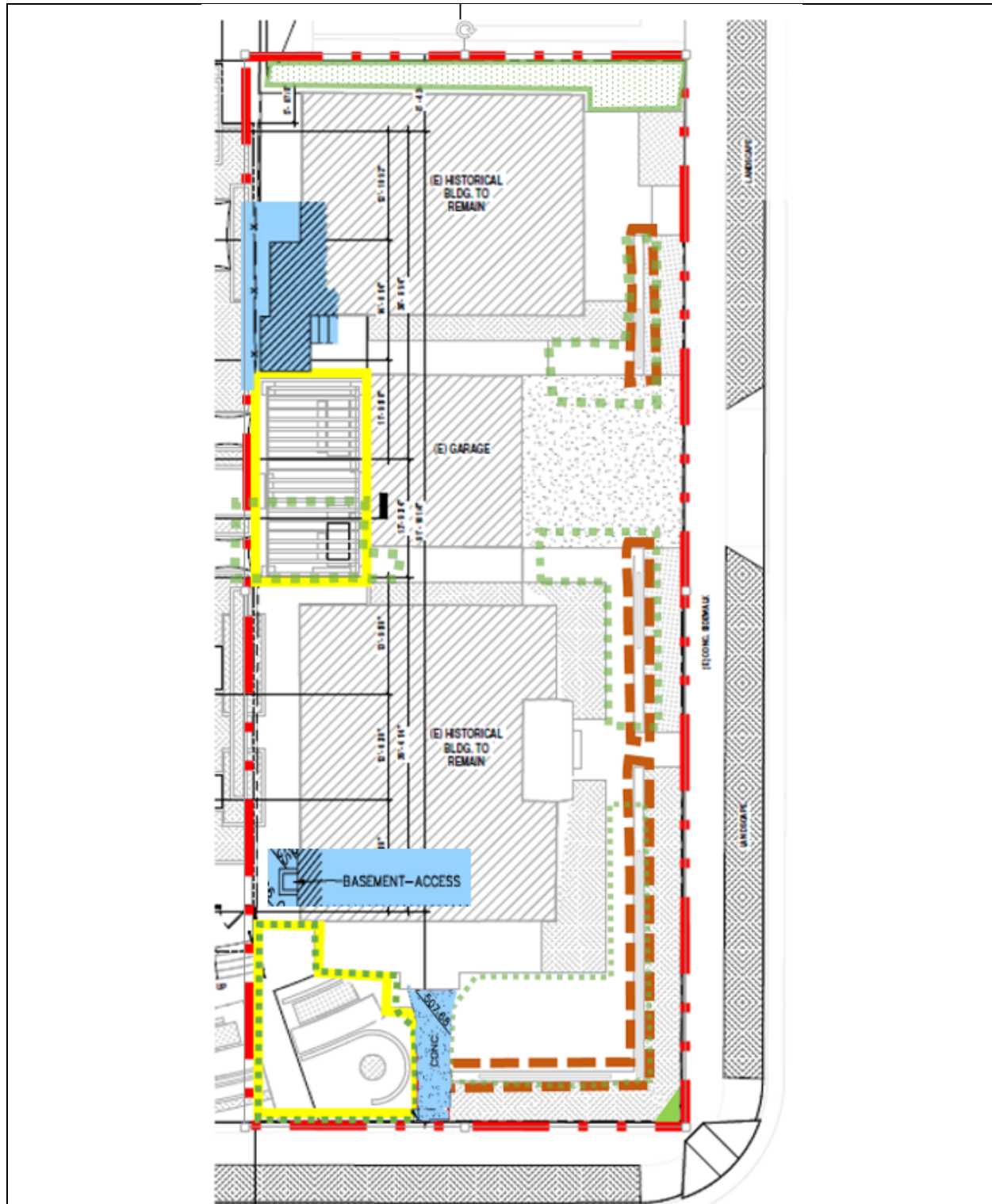
The Glendale Historical Society (TGHS) advocates for the preservation of important Glendale landmarks, supports maintaining the historic character of Glendale's neighborhoods, educates the public about and engages the community in celebrating and preserving Glendale's history and architectural heritage, 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.

The MND states that there will not be significant impacts to “visual character or quality” because the Design Review Board will review “the site planning, mass and scale, architecture, materials, and landscaping to ensure the project’s design is compatible with the surrounding built environment” (12.A.3., p. 5). Like the large parking garage across the street, which the MND indicates will not be impacted by the new construction (see in particular J.1., p. 22), the historic resource is also part of the “surrounding built environment.” Indeed, it is the most immediate and sensitive component of it, and impacts to the historic resource must be considered.

The design of the proposed five-story apartment building is not remotely compatible with the Craftsman buildings. There is no demonstrable design relationship between them; the new construction does not defer to the scale, massing, materials, visual rhythms, or relationships of solids-to-voids of the historic resource in any way but, rather, bespeaks “intentional opposition.” Most importantly, the five-story building would tower above the one-story buildings as a solid monolith, where it appropriately would step down in height and back away from the resource. New construction is certainly possible on the adjoining lots, but it needs to proceed with far greater sensitivity to the historic resource to warrant adoption of an MND.

The only reference to the historic resource under the Visual Character and Quality impact category is to site planning: “The site planning utilizes common open space to provide adequate separation and landscaping between the new development and the existing structures to be maintained at 401 Hawthorne Street.” Site planning is also referenced as a mitigating “buffer” in the study of Cultural Resources impacts : “The project’s site plan takes into account the preservation of these existing structures on the lot that are specifically buffered from the new building by a landscaped common open space area” (E.1., p. 11). The site planning, however, is part of the problem. The new construction is *not* adequately separated; a small common area with planters to serve tenants in all buildings is added, but behind and notably attached (via a pergola) to the shared garage, as well as along the west-facing side yards, where the distance between the Craftsman houses and the new construction appears to be a maximum of only 15’7”. While there is no exact acceptable minimum distance, leaving nothing but narrow side yards brings the five-story building far too close to the historic houses. This degree of separation will hardly diminish the impacts on the visual character and quality of the site and its surroundings, except perhaps for the few people standing next to the planters.

The draft MND is largely silent on setting impacts, but according to the documents provided, the proposed “landscaping” changes involve redesigning the historic property to add hardscaping features including walls (Figure 1, dashed terra cotta lines); add utilitarian metal fencing; alter the yard and its mature plantings (Figure 1., in green); alter front walks; and entirely change the entrance and hence the character-defining “sequence of entry” of the corner building (Figure 1, in blue at bottom). These changes do not “buffer” the proposed new construction but constitute substantial adverse impacts to the immediate setting. The Preservation Plan specifically points out that “the spatial relationship between the three buildings remains” (Applied EarthWorks, November 2017, p. 4), and the consultant repeatedly states that the significance of the historic resource is enhanced by the rare grouping of buildings; therefore the importance of their spatial relations and the setting is correspondingly increased.



**Figure 1:** Annotated and appended from Appended Site Plan (A1.0) and Topographic Survey Map (A0.0). Historic property is outlined in dashed red line, areas of landscaping to be lost are shown in green, fabric to be demolished shown in blue, new walls in terra cotta dashes, proposed common areas in the boundaries are shown in yellow. Paved walkways in parkway not shown because of scale limits. TGHS 2018.

None of the proposed “landscaping” alterations, designed to convert most of what is left of the open space on the historic property into “common area” for the project, in any way reduces the substantial adverse impacts to the visual character of the site and to the historic resource of a five-story building looming over single-story Craftsman buildings. Indeed, these changes themselves constitute substantial adverse impacts that cannot be considered mitigated to a less than significant level by implementation of the proposed Preservation Plan.

Compliance with the Preservation Plan, prepared by EarthWorks, is the only mitigation measure proposed. A Preservation Plan is essential, and we are pleased to see that one has been prepared. There are a few omissions. It lists the front door as a character-defining feature of 401 Hawthorne but not 141 S. Columbus, even though it is not noted as a replacement in the DPR form for the latter. The Plan does not mention the small concrete walkway at 141 S. Columbus, which connects the concrete steps and the concrete sidewalk along the front edge of the lawn, although both of these are called out as character-defining features. For 401 Hawthorne the Plan does mention as character-defining the concrete walkways and driveway, but these are omitted from the list of character-defining features for the property. The concrete walkways and driveway should be clearly called out and retained.

The Preservation Plan does not fully address one key objective that the MND claims for it: “The Architectural Historian shall work with the Project Architect to implement the conditions of the Preservation Plan to avoid damage to character-defining features” (E.1., p. 12). The Preservation Plan does not consider how potential damage to the historic buildings from adjacent construction will be avoided. There must be specifications for how the historic resource will be protected during construction. In addition to the potential above-ground impacts, we note that the subterranean garage, which would be built to a depth of twenty-five feet, begins five feet from the Craftsman houses. The MND must consider vibration and the very real possibility of differential settlement.

Under the Land Use and Planning impact category, the MND has this to say:

Though the proposed building will be the tallest residential building in the immediate high density residential neighborhood, the massing is not significantly incompatible, given the project’s corner location across from the one of the city’s largest parking structures associated with a regional shopping center. The neighboring 3-story residential building directly west of the project site would provide an appropriate transition to the other existing, 2- and 3- story residential developments in the surrounding area (J.1., p. 22).

This section is notable for a couple of reasons. First, it indicates that staff do not find the proposed five-story building to be anything but “not significantly incompatible” in its massing even with one of the city’s largest parking structures. This is not an enthusiastic endorsement. It mentions the three-story building directly to the west, but makes no mention of the single-family houses and low-scale two-story multi-family buildings right across the street that will not be accommodated to the new construction by a building farther away. This area may be zoned high density multi-family, but these older, more modest buildings are still there.

The section also makes no mention of the Craftsman buildings, even as it illustrates the cumulative impacts to their setting, impacts the project will inevitably exacerbate. The point of retaining the Craftsmans, and one reason the South Glendale Historic Resources Survey was adopted, is to ensure that single-family houses that are historically significant can continue to tell the story of Glendale and its development from the early years of the twentieth century. Unfortunately, the project as proposed drowns that story out.

The MND needs to take seriously the project impacts on the historic resource. For the reasons outlined above we believe that doing so will mean either redesigning the project so that the property on which the resource sits is let alone and the apartment building is reduced in size, scale, and massing, or preparing an Environmental Impact Report.

Thank you for your consideration.

Sincerely,

*Steve Hunt*

Steve Hunt  
President, The Glendale Historical Society

cc: Vista Ezzati, Planning Associate