



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

June 28, 2016

Planning Hearing Officer
City of Glendale
633 E. Broadway
Glendale, CA 01206

Re: Case No. PDBP 1601780
429-503 N. Kenwood St., Glendale

To Whom It May Concern:

On behalf of the Board of Directors of The Glendale Historical Society and its more than 650 members, I would like to thank you for the opportunity to provide comments on the proposed rental housing project at 429-503 N. Kenwood.

We are writing because we have concerns about the appropriateness of the CEQA categorical exemption for the above-referenced project. We apologize for the late hour of this letter; the project only recently came to our attention.

We believe that the staff report mischaracterizes the findings of the historic resource report prepared by Environmental Science Associates and PCR Services Corporation. More important, an out-of-date historic resources survey is allowed to stand in for an intensive evaluation of the subject properties to ascertain whether they qualify as historic resources under CEQA. And we believe the subject properties may be eligible for local designation under criteria established in the "South Glendale Context Statement" (2014).

The Historic Resource Report is Limited in Scope

The proposed project is described in the Public Notice and the Planning Hearing Officer staff report as "exempt from environmental review as a Class 32 'Infill Development Projects' exemption pursuant to State CEQA Guidelines Section 15332."

CEQA Exemptions cannot be used if there is a "reasonable possibility that the activity may have a significant effect on the environment..." (*Title 14. California Code of Regulations, Chapter 3. Guidelines for Implementation of the California Environmental Quality Act, Article 19, Section 15300.2. Exceptions (c)*). Those guidelines expressly state under (f) Historical Resources that "A

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.

category exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.”

The staff report justifies the exemption by stating that a “historic resource report... found that none of the existing single-family dwellings are eligible for designation at the local, state or national level and that they are therefore not considered historic resources under the California Environmental Quality Act (CEQA).”

However, the historic resource report makes no such finding. Such a finding would be based on an intensive evaluation of each of the subject properties to determine whether they meet one of five criteria for listing on the Glendale Register of Historic Resources. Rather, the consultant notes that “the City... requested a summary of the occupancy history for each bungalow.” Based on that summary, which revealed no association with a historic personage, the consultant determined that the subject properties “do not appear to satisfy National Register Criterion B, California Register Criterion 2, or the local register for eligibility related to a historic personage [Criterion 2].”

The limited scope of the requested assessment precluded the consultant from making any specific claim about its local eligibility based on other criteria, including criteria that deal with the architectural style of the subject properties in the context of the community and region and with the early heritage of Glendale (Criteria 3 and 5). Indeed, she was quite careful *not* to make such a claim. To be determined eligible for the Glendale Register the subject properties would only need to meet one of the five criteria. The fact that the subject properties do not meet Criterion 2 (association with a historic personage) does not mean that they are ineligible for listing on other grounds.



Figure 1. 429 N Kenwood (1911) and 503 N Kenwood (1913)

The 2006-2007 City of Glendale Reconnaissance Survey Is Out of Date

The consultant correctly notes that both bungalows “were assigned California Historical Resource (“CHR”) Status Codes of 6L in the City of Glendale Reconnaissance Survey [and Historic Context Statement of Craftsman Style Architecture 2006-2007],” which means they “were ‘determined ineligible for local listing or designation through local government review process, but may warrant special consideration in local planning.’” As currently being processed, we find no evidence of any “special consideration” being extended in the local planning process. A reconnaissance survey (also known as a “windshield” survey) is not an intensive evaluation and thus is an ineffective tool in determining whether or not these hundred-year-old bungalows are in fact historic resources under CEQA. That the City requested a summary of the occupancy history is a testament to the provisional, partial nature of such a survey, and it is to be commended for seeking to add this important information to the public record. Other avenues of research should have been pursued to make fully-informed evaluations of historic significance, including county assessor records review.

The City’s request for such a limited assessment, based on the fact that “the Project Site has been evaluated previously,” is inappropriate. TGHS has repeatedly pointed out to the City of Glendale that the local “Craftsman” Survey is almost ten years old and is thus out of date. According to California’s Office of Historic Preservation website:

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

Glendale’s supply of the once ubiquitous Craftsman style (as well as other older homes) has steadily dwindled, especially downtown, but without a current survey the City has no way of taking this factor into account. CEQA does not allow a categorical exemption for a project that would have a cumulatively considerable impact. Put another way, it is a problem that historic resource consultants continue to be allowed to use the out-of-date reconnaissance-level Craftsman Survey to draw conclusions that this and other properties are ineligible for designation and that the City allows it to substitute for intensive evaluations of such properties. Currently city staff have recommended approving the demolition of four other Craftsman Bungalows downtown, including two at 126 - 132 S Kenwood St., within four blocks of the subject properties, and two at 401 – 409 Hawthorne, based on a categorical exemption from CEQA review. These projects have been continued after TGHS submitted intensive evaluations (one is still being finalized), prepared by Francesca Smith, an architectural historian who meets and exceeds the Secretary of the Interior’s Professional Qualification Standards in history and

architectural history, which demonstrate they are eligible for the Glendale Register and thus qualify as historic resources under CEQA.

The Subject Properties May Qualify for Local Designation

We again note that the consultant did not evaluate the subject properties for Glendale Register eligibility (and was apparently not asked to do so). There is good reason to believe that the subject properties may qualify for local designation under the “Late 19th Century & Town Settlement (1873–1918)” Registration Requirements that were established in the “South Glendale Context Statement.” The Registration Requirements assert:

To be eligible under the Town Settlement and Late 19th Century Development context, a property must:

- date from the period of significance
- display most of the character-defining features of the property type or style; and
- retain the essential aspects of integrity.

As also noted in the “South Glendale Context Statement,” for a property “to retain historic integrity,”

it must retain...the essential physical features that enable it to convey its historic identity.

A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation [emphasis added].

We believe the subject properties may meet the requirements because despite limited alterations, they retain the below-listed character-defining features:

429 N Kenwood St.

Overall horizontal orientation and asymmetry; low-pitched, intersecting gabled roof with wide, unenclosed eaves; exposed, extended purlins at gables; lattice vent at main gable and picturesque lozenge type window at subordinate gable; wide fascia trim; painted shiplap siding, decorative, wide casings at all doors and windows; wide, cased segmental arches at partial-length front porch; exaggerated scale, square masonry porch posts that continue to finished grade and feature decorative caps; matching cheek walls and pierced railings; wide main entry door opening (multi-light door and screen may not be original); mail slot in wall; scored concrete porch deck steps, wide front walk, narrow side walkway and Hollywood type driveway; set back from street by wide lawn.

503 N Kenwood St.

Overall horizontal orientation and asymmetry; low-pitched, front and side gabled roof with wide, unenclosed eaves; exposed rafter tails and extended, carved, undercut purlins at gables, with motif repeated at porch header; massive, continuous header that extends to side pergola; wide fascia trim; painted split shingle gable finish and shiplap siding, decorative, wide casings at all door and window openings (some windows grouped with continuous sills); wide, tapered, painted wood porch posts with caps set on overpainted brick, square porch posts that continue to finished grade and feature decorative caps; matching cheek walls and low porch endwalls; large scaled, decorative pergola off porch; wide main entry door opening; scored concrete porch deck steps, wide front walk, narrow side walkway; set back from street by wide lawn.

Conclusion

We do not believe that the City has proved its case that the subject properties are not historic resources under CEQA and thus a categorical exemption from CEQA review cannot at this stage be used. This does not mean the project cannot ultimately move forward, only that the preliminary work of the lead agency is not yet complete, further environmental review is required, and we would urge the Planning Hearing Officer not to make any decisions about this project until this is done.

We reiterate to the City our recommendation that intensive evaluations by qualified professionals selected by the City be prepared for any demolitions of buildings completed more than 45 years ago and that the City take steps at once to update its Craftsman Survey.

Thank you for your consideration.

Sincerely,

Greg Grammer

President
The Glendale Historical Society

Cc: Mr. Dennis Joe, Planning Assistant, City of Glendale
Mr. Jay Platt, Senior Urban Designer, City of Glendale