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February 20, 2017

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

RE: PDR 1620712, 1929 Vassar Street

Dear Mr. Lanzafame:

The Glendale Historical Society is grateful for the opportunity to comment on the proposed project at 1929 Vassar Street. Our non-profit organization of 700 members works to preserve and celebrate Glendale's rich history and remaining architectural heritage.

We write to respectfully request that the project not be approved as proposed. We strongly believe that the current project does not comply with the Secretary of the Interior's Standards for Rehabilitation and that the goal of increasing the size of the existing 1922 Craftsman can be achieved through a more sensitive treatment of the existing building.

The Staff Report indicates that the Craftsman Bungalow at 1929 Vassar Street is a historic resource and exempt from CEQA review pursuant to Section 15331, Class 31 – Historical Resource Restoration/Rehabilitation. We agree that the subject property is a historic resource. However, the proposed project is neither a restoration nor technically a rehabilitation; nor is it "maintenance, repair, stabilization," "preservation, conservation, or reconstruction." In other words, it meets none of the appropriate goals associated with a Class 31 exemption. The proposed project is also not adaptive reuse, given that the property will remain a single-family house. According to the National Park Service, rehabilitation as a treatment "is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values" (<https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm>). Instead the proposed project involves the demolition of part of the subject property, more than 1,000 square feet of new building area, including a new, second story with a large balcony and an attached garage, and significant modifications to the front of the building.

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.

We disagree with the Staff Report's finding that the resulting changes would not cause the loss of character-defining features and are consistent with the Secretary of the Interior's Standards for Rehabilitation. The Standards call for "minimal change" to a property's "distinctive materials, features, spaces, and spatial relationships" (Standard 1). Further, Standard 2 asserts that "*the removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided*" (emphasis added). The standards further specify that "changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken" (Standard 3).

The proposed project does not conform with the Standards as proposed. It would demolish the rear of the existing building, portions of the side and roof, and entail the construction of a large, new, attached, second floor with a visible balcony and an attached garage, resulting in the loss of character-defining features. As proposed, the project is not a "minimal change" in that it requires removal of historic fabric from both the side and rear in the form of finish materials, doors, windows, and casings; it would irrevocably alter the original, low-profile, single-story, front-gabled configuration of the house through the addition of an incompatible, prominent second story; and it would eliminate the character-defining nested-gable roof configuration at the rear.

Standard 9 states that "New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment." Apart from the destruction of historic materials and features described above, the new work as proposed does not respect the existing building's material palate, scale, and proportions. It is differentiated from the old, but preservation projects normally do not call attention to new additions as this project undeniably would. Additions that conform to the Standards are typically smaller than existing building widths and are sited to avoid visibility from public rights-of-way. Instead, as proposed the additions are wider and taller than the existing building and include an attached garage. The new porch area would be built "outboard" of the exterior perimeter walls, necessitating new, needlessly decorative supports (that would inexplicably mimic the new porch design treatment) on the driveway side. The second story and balcony obviously extend well beyond the existing roofline and will necessarily change it, irrevocably altering the essential single-story form of the building. The National Park Service-prepared "Preservation Brief 14, New Exterior Additions to Historic Buildings: Preservation Concerns" clearly recommends: "One way to reduce overall material loss when constructing a new addition *is simply to keep the addition smaller in proportion to the size of the historic building*. Limiting the size and number of openings between old and new by utilizing existing doors or enlarging windows also helps to minimize loss" (<https://www.nps.gov/tps/how-to-preserve/briefs/14-exterior-additions.htm>, emphasis added). For the proposed project, both the side porch and second story addition would be demonstrably visible from the street, which is specifically "not recommended" in the various widely used federal guidance documents prepared on the subject. Preservation Brief 14 clearly states that additions along the lines of the proposed project are not appropriate: "*Constructing another floor on top of a small, one, two or three-story building is seldom appropriate for buildings of this size as it would measurably alter the building's proportions and profile, and negatively impact its historic character*" (emphasis added).

An addition at the rear of the building that was a single story, with a lower roof ridge, and that would be stepped in from the outer walls of the building may accomplish the same project goals without significantly affecting the historic materials, features, or spatial relationships that characterize the property. It could be accomplished without significantly altering views from the public right-of-way. Thus such a redesigned addition may conform with the Standards for Rehabilitation without causing significant adverse change to the existing property. A single-story, smaller-width addition would also better allow the property to maintain “its essential form and integrity” if the additions were “removed in future” (Standard 10), which would be impossible with the proposed large, new second story, prominent balcony, and full-size, attached garage.

Finally, project renderings of the front façade show that the distinctive front porch Doric columns would be replaced by entirely new, four-part supports with decorative joinery, and the plain post-to-porch connection would be replaced by inappropriately low, decorative stone piers, the removal of two character-defining attic vents and the replacement of the picture window with a single light of glass, none of which existed historically (Figure 1, A and B). Those described alterations appear to have been proposed in order to make the existing 1922, high integrity Craftsman style house



Figure 1. Existing front façade of 1929 Vassar Street and rendering of new façade.

“match” the new side porch. We note that some of the renderings depict a standing seam roof, which would also be inappropriate for this building as it never existed historically. The alterations depicted in the renderings on Sheet A90 are entirely inappropriate; replacing historic features and materials with a contemporary “interpretation” of the Craftsman style disregards the most basic principles and practices of historic preservation

and would be in direct opposition to Standard 5, which states: “Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.”

Because of the described, expected impacts and for the reasons outlined above, we do not believe the proposed project can be considered exempt from CEQA review under Section 15331, Class 31 – Historical Resource Restoration/Rehabilitation and should not be approved as proposed.

Thank you for your consideration of our comments and suggestions.

Sincerely,

Greg Grammer

Greg Grammer
President, The Glendale Historical Society

cc: Dennis Joe, Planner, City of Glendale
Jay Platt, Senior Urban Designer/Preservation Planner, City of Glendale