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July 13, 2016

Design Review Board
City of Glendale
633 East Broadway
Glendale, CA 91206

RE: PDR 1329554, 510-512 West Doran Street

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

The Glendale Historical Society is grateful for the opportunity to comment again on the proposed project at 510-512 West Doran Street. Our non-profit organization has more than 650 members and works to preserve and celebrate Glendale's rich history and remaining architectural heritage.

We appreciate the City's detailed response to our comments of June 21, 2016. We commend in the strongest possible terms staff's conclusion that the Kaplan Chen Kaplan historic resource assessment was inadequate and that the subject property should be considered a "historical resource" as defined in CEQA. We also applaud their ambition to treat it as such. The added conditions regarding the moving plan, high-resolution photos of existing conditions before issuance of a moving permit, and the height of the foundation are also welcome.

We continue to believe, however, that the project as proposed is not in conformance with the Secretary of the Interior's Standards for Rehabilitation and that a Class 31 "Historic Resource Restoration/Rehabilitation" exemption is inappropriate because the proposed project would cause substantial adverse change in the significance of a historic resource (512 W. Doran St.). Further environmental review, most likely in the form of a focused EIR that would analyze the impacts to the historic resource, should be required. The City "clearly acknowledges that the project will cause material change to the property, [however] its analysis suggests that the changes will not impair its significance or its ongoing eligibility for designation" (City of Glendale, Memorandum regarding 510-12 W. Doran Street, Project Analysis and Response to TGHS Comments, July 14, 2016). Demolition by its nature is material impairment of a historic resource under CEQA; no feasible mitigation measures exist to mitigate the demolition of a substantial part of a historic resource to a less than significant level.

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 are concerned by the use of *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* to justify significant alterations to a historic resource. The purpose of *Bulletin 15* is to guide evaluations for significance when a property that may be historically significant is found in an *already altered condition*. That is, it should not be used to rationalize future alterations to an identified historic resource. *Bulletin 15* should also therefore not be used as evidence that the subject property may retain eligibility for the California Register because of “the rarity of this building type in Glendale.” The rarity of the Transitional Craftsman Bungalow in Glendale is not a reason to allow substantial alterations to an extant, high-integrity version of a singular style; it must be recognized, rather, as a powerful argument against doing so.

Although relocation of a historic resource within its original parcel need not be a significant impact, alterations that are not in compliance with the Standards for Rehabilitation, such as removing the rear third of a building, and the related reconfiguration of the roof, are not made permissible by retaining or relocating a building to accommodate a large development. As proposed here, the historic resource will inarguably lose integrity of its original massing and specific proportions; almost one-third of its original materials and workmanship; the L-shaped, rectangular plan and design; its original distinctive location on the lot; and the spatial relationships within its setting and with surrounding properties, all of which would irretrievably reduce its integrity of design, materials, workmanship, location, overall feeling, and original associations.

The only significant, irrevocable, adverse impact that the staff Memorandum acknowledges is to the spatial relationships that characterize the property, which it concedes will be “completely altered by the project.” Avoiding or minimizing changes to spatial relationships are integral to successful compliance with Standards 1, 2, and 9, and so it is not possible for the project as proposed to meet these Standards. Indeed, when the Memorandum states that the project meets Standards 2 and 9 “with the exception of the change in the site’s spatial relationships” (Standard 2) and again “with the exception of the loss of the site’s existing spatial relationships” (Standard 9), it effectively indicates that the project does not meet them. And as noted in our previous letter, the Standards operate as a unity; a project must meet all ten Standards to be considered in compliance, and a project that does not meet the Standards is not eligible for a Class 31 exemption.

The Memorandum “agrees with TGHS that the intent of [Standard 10] cannot be fully met” because the removal of the rear of the house and its relocation are non-reversible. This means that the project also does not meet Standard 10. It comments further, however, that “economic feasibility can be considered when assessing a project against the Standards, which appears to be appropriate given the project goals and the various zoning code restraints on the site.” However, economic considerations, whatever those may be in this case, should be explored in the technical section of a more robust environmental clearance document. They cannot be used as a justification for bypassing environmental review. Economic feasibility can come into play later, when determining whether a project with an adverse impact on a historic resource should be approved regardless.

The Staff Report tends to minimize the number and significance of the changes and their overall impact. For example, the original pattern of windows and doors on the south, east, and west sides would be changed. Window numbers 6, 7, 7c and 8 would be removed in the rear third of the house (Doran Villas, sheet A-1C, no date). The existing window 8 is a character-defining feature that dates from 1910 and is a three-part, double hung set of one-over-one windows. That historic fabric is not proposed for reuse. Its opening would be infilled and the new southwest corner would interrupt its original, cased opening. Nine of the twelve existing window groupings are proposed to be retained—only three-quarters of the original fenestration—and only one of three original doors will remain as a door.

None of the proposed alterations to the rear of the building meets the intent of the Standards. The removal of distinctive materials and alteration of features, spaces, and spatial relationships that characterize a property should absolutely be avoided. The rear third of the building, including the three-part window, are undeniably features of the historic building. The rooms on the rear are spaces that characterize the property. Truncating the building would create a false sense of historical development: the building did not historically look that way and was not historically configured in a square. Removing windows and reusing them, as well as reconfiguring a set of two doors with a continuous transom and reusing as a window, likewise creates a false sense of development as described in Standard 3.

In addition, the foundation, which is an essential component of a relocation project, was not mentioned in the original Staff Report, recommended conditions, or application materials. In staff's response to TGHS, there is a remark about the existing foundation being demolished "and a new one poured at the new location." There is no specification of materials, but it is assumed to be concrete. The existing foundation materials are unknown, but it has painted shiplap skirting facing the street, and the steps are brick. The Memorandum asserts that "[A new foundation] is typical for the relocation of all historic properties and does not violate the Standards as the existing foundation is not a character-defining feature," although we are glad to see that the current Staff Report adds a condition: "Revise drawings to show that the existing foundation height and the proposed foundation height of the relocated house will match."

Foundation walls, including their heights, shapes, configurations, profiles, materials and appearance are absolutely considered character-defining features as described in National Park Service-prepared "Preservation Brief No. 17: Architectural Character—Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving their Character." And in *Moving Historic Buildings* (1979), the book long-used nationwide as the reference guide for such projects, John Obed Curtis states:

As a part of the field survey work at the original site, the dimensions of the structure's foundation will have been taken. Notes will have recorded the condition of the foundation as well as the physical state of the building as it relates to its foundation. This will bear strongly upon the choice of the kind of foundation to be provided at the new site (32).

Curtis makes it clear that defining "the architectural character" (17) of the existing and new foundations is essential in a successful relocation of a historic building. Although

in the Staff Report (June 23, 2016) and attached application materials, there was no discussion of the material, treatment, finish, or height of the existing or proposed foundation and steps, the Memorandum states: "Staff believes the applicants' intention is to keep the new foundation at its current height and maintain the historic steps at the front." The retention of the materials and configuration of the historic steps appears to be a new condition; new shiplap skirting should also be required as a condition of any relocation.

The Memorandum is sanguine when it comes to the overall massiveness of the proposed new construction. It is not simply that the bungalow would be relocated and reduced in size; it would be crammed into a corner of the lot to make way for out-of-scale and much-too proximate townhouses. We quote from National Park Service-prepared guidance regarding "Interpreting the Standards Number 41: Incompatible Alterations to the Setting and Environment of a Historic Property" (see attached), which analyzed an incompatible building relocation in Pasadena that shared some features in common with the proposed project on W. Doran. It strongly asserts that "Setting is essential to a historic property's significance. Drastic changes to the surrounding... landscape features, or incompatible new construction on the site, diminish a historic property's ability to convey its historic significance" (emphasis added). Therefore, such alterations do not conform to the Secretary of the Interior's Standards for Rehabilitation, and thus they would require further review for adequate CEQA compliance.

That analysis concluded:

Furthermore, the formerly expansive, almost pastoral, landscape that surrounded the... [subject property] consisting largely of grass covered areas dotted with small shrubs [and] ...trees has been drastically reduced by the new construction. In addition, the height, massing, scale, and proximity of the new construction dwarf the historic... building. The cumulative effect of all these changes negatively impacts the historic character of the... [historic building]. Accordingly, the project does not meet the Standards.

That analysis was of the reconfiguration and relocation of a historic building, on a formerly large and open lot, and the addition of much larger new buildings. It concluded that the setting should not be substantially changed, that the heights of the new foundation are critical, and that new buildings should not be placed too close nor be too tall, overpowering the historic building. While the facts of that case are not identical, and the new construction was so wildly inappropriate as to turn it into a national model for incompatible alterations to the setting and environment of historic resources, the effects and conclusion are comparable to the case at hand: the new setting must share certain characteristics of the existing historic context; the relocated building must remain in its original configuration; and new buildings should not be placed too close to the historic building or dwarf its overall size. For all of these reasons the proposed project does not meet the applicable Standards and is subject to further environmental review.

Finally, we note that reliance on a categorical exemption to CEQA is prohibited when project approval relies on conditions of approval to eliminate potential impacts, because reliance on such measures "involves an evaluative process...and that process must be

conducted under established CEQA standards and procedures for EIRs or negative declarations" (*Salmon Pro. & Watershed Network v. Cnty. of Marin* (2004) 125 Cal. App. 4th 1098, 1108). We believe that staff recommendation of approval of the project at 510-512 W. Doran is (and should be) subject to conditions that are intended to reduce the impacts of the project on the historic significance of the building.

While we are very pleased that staff recognize that the subject property is indeed a historic resource, we must continue to insist that the project as proposed does not meet the Standards and does not qualify for a categorical exemption from review under CEQA. TGHS has expressed its willingness to see the bungalow appropriately relocated on the lot. Losing the rear third would likely not be a problem for a historic district contributor, but it is for a Glendale Register-eligible property. The proposed new construction is far too close and too large. If possible, the buildings should be stepped back at the second story and the design simplified so that the historic resource is kept prominent and the new building visually recedes. As presented here, the new construction would overwhelm the historic resource and the project as proposed would have a substantial adverse impact on the significance of a historic resource.

Thank you for your time and consideration.

Sincerely,

Greg Grammer

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