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September 19, 2017

Historic Preservation Commission
City of Glendale
633 E. Broadway
Glendale, CA 91206

Re: Agenda Item 7a – South Glendale Historic Resources Survey

Dear Chairperson Shier and Members of the Historic Preservation Commission:

On behalf of The Glendale Historical Society, I thank you for the opportunity to comment on the draft South Glendale Historic Resources Survey.

Reviewing and providing input on this Survey is probably the most important task the Historic Preservation Commission has had in many years. The results will shape preservation and development in South Glendale for decades to come.

A handful of TGHS volunteers has spent hundreds of hours over the last two months reviewing the Survey to provide comments in advance to Historic Resources Group (HRG), City staff, and now, at last, to you. We are grateful to the City and to HRG for this opportunity. We covered virtually every square foot of South Glendale, mostly on foot, identifying potential historic resources we thought might have been overlooked given the enormity of the endeavor. We followed up on several hundred properties; in the end, based on visual inspection and, in the vast majority of cases, review of permits, we submitted a list of approximately 160 properties that we believe should be added to the Survey, primarily with status codes of 5S3 (“appears... locally eligible through survey evaluation”) but also sometimes as 6L (“may warrant special consideration in local planning”), or that we believe should be upgraded from 6L to 5S3. As you know, a property with a status code of 6L in the Survey is not considered a historic resource and can be demolished through Design Review, although certain limitations may be placed on alterations (i.e. wood siding on a Craftsman might be replaced with fiber-cement board like Hardieplank but not with stucco, original wood windows replaced with aluminum-clad wood but not with vinyl, etc.), but that application is inconsistent.

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.

In other words, we have been thorough, deliberative, and conservative in our analysis. Indeed, most of us would have preferred a far more generous and aggressive approach to identifying historic resources, given the acknowledged widespread loss of historic fabric and historic buildings in South Glendale, as explained in the Historic Context Statement prepared by HRG (September 2014). But we wanted to adhere to that document's criteria for findings that properties are significant, even though the described Registration Requirements are notably more conservative than those in the August 2014 draft Historic Context Statement. The latter is the version reviewed by the Historic Preservation Commission and the public.

We submitted the list of properties to the consultant and to the City in two groups, the first on August 14, 2017 and the second on September 10, 2017. The consultant incorporated some of our additions from the first group; apparently, and understandably, HRG did not review our most recent comments, and we hope that they will do so as the process moves forward.

We proposed almost 90 properties in our first group. 69 properties were suggested for designation as 5S3. 19 of these have now been so designated—one is an upgrade from 6L; the rest are new to the Survey. In addition, some two dozen properties that had been omitted from the Survey are now included with a 6L status code. All this indicates that our concerns about unidentified properties are not unwarranted.

TGHS does not believe that all old buildings are historic—not even all Craftsman houses—but we do think that all the properties we identified after extensive vetting deserve a second look on architectural and historical grounds and in some cases because they reflect Glendale's early heritage. Many properties' significance is not readily apparent, particularly in a reconnaissance survey.

Specifically, we ask the Commission to do four things:

1) **Please review our list of proposed additions.** We know this is scarcely possible for Thursday, and so we include photos with short captions of some of the most deserving properties as a supplement to this letter. The entire list of our proposed additions is also attached to this email as an excel file; there are two spreadsheets, one for each group of our submissions. We identify those properties that the consultant has already added to the current draft Survey. We include a specific rationale for inclusion including character-defining features. We will share photos of all of our proposed additions via Dropbox, and you will receive an email when those are ready.

We know you don't have the authority to add properties to the Survey—this is ultimately the consultant's task—but a forceful recommendation should carry weight.

2) **Please encourage the consultant and City Staff to meet with TGHS.** TGHS would welcome the opportunity to meet to discuss our findings and recommendations and to understand the consultant's methodology. We have not yet been afforded the opportunity for such a meeting. It is commonplace for historic resource survey consultants to coordinate with local historians and preservation groups at various stages of the process to garner information and to engender support for the survey findings. National Register guidance on how to undertake local surveys directs: "Special efforts should be made to involve those in the community with particular

interests in historic properties or community development” (“Guidelines for Local Surveys: A Basis for Preservation Planning.”) TGHS is willing to pay for HRG’s time if community outreach is not included in the scope of work.

3) Please urge the consultant to add or upgrade Craftsman houses identified by TGHS in its review, particularly those constructed before 1918, which the consultant set as the end date for the Early Development & Town Settlement Context in the Historic Context Statement. Their document allows for more flexible treatment of this once plentiful and now depleted resource—and of all buildings—from this period than is practiced in the Survey: “Due to tremendous development pressures throughout South Glendale’s history, properties and features from this period are rare; therefore a greater degree of alteration may be acceptable” (p. 59). As for integrity considerations, the document is clear that the loss of some features is not disqualifying if the majority of such features remain. This applies to properties from all periods.

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. *The property is not eligible*, however, if it retains some basic features conveying massing but *has lost the majority of the features that once characterized its style*” (p. 59, emphasis added).

We believe that too many properties that have been assigned 6L or excluded altogether. The consultant’s Methodology Statement explains: “Replacement of wall cladding, porch enclosures, replacement of windows on primary façade with incompatible materials, alterations to window openings, *or* replacement of all windows are generally not acceptable alterations” (emphasis added). Generally only the alteration of window openings would on its own be sufficient automatically to disqualify a property for architectural significance. The Historic Context Statement specifically allows eligibility if a property retains “the majority of” its character-defining features.

We further note that the Methodology Statement is not a document that is normally created after the fact, to explain what the consultant did; it is rather produced before work commences, and is subject to revision, to explain what the consultant plans to do. The City should have scheduled review of the proposed methodology by the Commission with the public afforded the opportunity to weigh in.

4) Please ask staff to flag properties that have been identified as eligible in the draft Survey. Projects involving properties the City has every reason to believe are historic resources should receive appropriate scrutiny. This doesn’t mean that work can’t be performed, only that staff won’t inadvertently grant over-the-counter permits for work that would cause a substantial adverse impact.

A few properties identified as locally eligible (5S3) in the Survey have already received over-the-counter approval for projects. In June, the owner of 408 W. Windsor received a permit and removed and replaced original windows and siding, changes that render it ineligible for the Glendale Register. At 1417 Columbia, one of the "Five Sisters," an Adams Hill landmark of

English Revival homes, a permit was granted to replace windows at the front and side facades; front facade window openings were substantially altered as well.

We know that the Commission cannot compel City staff to comply with this request, but as the appointed body charged with oversight responsibilities for Glendale's historic resources, your support for this sensible and simple precaution would be appreciated. Most nearby cities, particularly Certified Local Governments like Glendale, have had this basic safeguard in place for decades.

It is our shared goal—and, indeed, our responsibility—to ensure that the Survey include all properties that are consistent with the Historic Context Statement that HRG prepared and to provide a layer of protection for those properties that have been identified as significant.

Thank you for your consideration.

Please review the attached document of sample properties to see some of the marvelous resources TGHS volunteers uncovered. They are from the first set of proposed additions (August 14) only, which the consultant already reviewed. They represent a wide range of styles and periods. The spreadsheets contain additional details about the properties.

Sincerely,

Greg Grammer

Greg Grammer
President, The Glendale Historical Society

cc: Jay Platt, Senior Urban Designer