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June 22, 2016

Mr. Art Simonian, Chairman, and Members of the Board
Design Review Board
City of Glendale
633 East Broadway
Glendale, CA 91206

RE: PDR 1329554, 510-512 West Doran Street

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

The Glendale Historical Society is grateful for the opportunity to comment 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 are extremely pleased that City staff found the property at 510-512 West Doran Street to be locally eligible, thus a "historical resource" under the California Environmental Quality Act (CEQA). We sincerely applaud staff's reversal of the consultant's findings. Unfortunately, no intensive evaluation or technical report regarding the subject property established the criteria under which it was found eligible. The results of such an evaluation will be necessary to perform a thorough analysis of the proposed project and its potential impacts on the historical resource. As you know, the proposed project has been under discussion for quite some time, and we support the basic premise. Now that we have received details, TGHS has comments on the adequacy of the CEQA categorical exemption as well as the proposed project's conformance with The Secretary of the Interior's Standards for Rehabilitation.

As the staff report notes, because the property was found to be locally eligible by City staff, it should be considered a discretionary historical resource for the purposes of CEQA. The impacts of the proposed project on historical resources must be analyzed, and appropriate mitigation measures may be identified that would be implemented to avoid or reduce those effects on the historical resource.

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.

Proposed Project Is Not Categorically Exempt

The proposed project is not exempt from CEQA because it may cause substantial adverse change in the significance of a historical resource (California Public Resources Code (PRC), Section 21084). Because the property was found eligible for local listing, and therefore for listing in the California Register of Historical Resources, there is an exception to the exemption.

The existence of that exception requires that the project be fully analyzed for impact on historical resources regardless of the fact that the project otherwise meets the criteria for a categorical exemption. According to our information, the project environmental review may be focused on cultural resources impacts.

PRC Section 5020.1 and CEQA Guidelines Section 15064.5(b)(1) define a “significant effect” as one that would materially impair the significance of a historical resource. According to CEQA Guidelines Section 15064.5(b)(2), material impairment of a resource’s historic significance could result if the project would:

- Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historic Resources;
- Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to local ordinance or resolution (PRC Section 5020.1[k]), or its identification in an historical resources survey meeting the requirements of PRC Section 5024.1(g) unless a preponderance of evidence establishes that the resource is not historically or culturally significant; or
- Demolish or materially alter in an adverse manner those physical characteristics of a resource that convey its historical significance and that justify its eligibility for its inclusion on the California Register..., as determined by the lead agency.

As proposed, the project under review would cause material impairment and may result in substantial adverse change to the historical resource. We remind the Board that it must consider potential impacts to all parts of the historical resource, including those beyond public view. As proposed, the historical resource is not only being relocated, but it is being radically reconfigured to make way for the proposed project. Successful conformance with CEQA would be in reverse: the project should be reconsidered to accommodate the building in its setting (which is part of the historical resource).

The Secretary of the Interior’s Standards for Rehabilitation

We note that the staff report states that the proposed project “meets most aspects of the Secretary of the Interior’s Standards for Rehabilitation.” This sentence suggests a misunderstanding of what the Standards are and how they are appropriately applied. The ten Standards for Rehabilitation operate in unity; a project involving a historical resource under CEQA that meets

most of the Standards but not all of them fails to meet the Standards and therefore would trigger further environmental review.

The staff report provides the Board (and the public) with no technical report to suggest how the proposed work meets or fails to meet the Standards. A brief review of the proposed project, prepared by Francesca Smith, a qualified architectural historian who meets and exceeds the Secretary of the Interior's Professional Qualifications Standards in architectural history, fills this gap and reveals general lack of conformance with the Standards for Rehabilitation:

<i>Standards for Rehabilitation</i>	TGHS Comments
1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.	The proposed project necessitates removal of a large amount its distinctive materials (demolition of the rear third of the building, its foundation and front steps, rear porch and reconfiguration of its roof), its features (rear 18 linear feet, back porch, foundation and roof form), its exterior and certain interior spaces. The existing roof is pyramidal in front with bellcast eaves. As proposed, the upper ridge would be lowered and the overall shape changed, resulting in a modification of its large scale and careful original proportions. The proposed project would entirely alter the spatial relationships with neighboring buildings on all sides, as well as its setback from the street, position on the parcel and the size of its parcel. The front yard would be reduced by about half. The enormous front and rear new building designs would entirely overpower the original, main residence because of their large masses, sizes and heights. The original height of the original building's roof ridge is not provided (existing or proposed), nor is the dimension of the main building's original setback. The project does not meet this standard.

<i>Standards for Rehabilitation</i>	TGHS Comments
<p>2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.</p>	<p>The historic character of the property would not be retained or preserved by the building relocation. Its roof shape, roof and building height, entrance steps, foundation, rear windows and deck would change as a result of the demolition of the rear third of the house. For a building of this style, its roof is undeniably a character-defining feature. Existing wood-sash windows should not be removed: they should be protected, shored and boarded-over in place during any relocation activities. None should be reconfigured or rearranged as proposed. The existing entry stairs are five steps high at most; the proposed elevation depicts six. Thus the proposed foundation looks to be higher than the existing foundation. Neither the existing nor the proposed materials of the foundation and steps are specified. Based on review of photos, the chimney may need to be dismantled and reconstructed as existing with an appropriate new brick chimney stack above the roof line. See above for discussion of the existing spatial relationships for the subject building which would be entirely lost. The project does not meet this standard.</p>
<p>3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.</p>	<p>Proposed new buildings both facing the street and behind the historical resource row should be subordinate in design and size to the existing building: all smaller, lower, set back farther from the street and less imitative in their proposed designs in order to avoid creating a false sense of development. As proposed, the far taller, almost entirely unarticulated, visually unanimated, Hardieplank®-finished, new buildings with clad windows would take visual and aesthetic precedence over the main house, which is the historical resource and should be the focal point. The project does not meet this standard.</p>
<p>4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.</p>	<p>While the rear third of the original building is not a known alteration, it should not be demolished to make way for large, out-of-scale additions to the property. An established period of significance may inform this question. The building is being proposed to be moved entirely within its previous front set back, which neither retains nor preserves its original setting. The project does not meet this standard.</p>

<i>Standards for Rehabilitation</i>	TGHS Comments
<p>5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.</p>	<p>The rear third of the building should not be demolished to make way for large, out-of-scale additions to the property. The windows should not be removed and re-installed, but retained in place and protected during any relocation activities. Particular care should be given to the entry sidelights, which are probably more brittle than the other windows. The front door may be removed, preserved, and the opening braced during a move. Consult a reputable stained-glass expert with experience in successful rehabilitations. The house mover should also have demonstrated success with relocation of historic buildings. The project does not meet this standard.</p>
<p>6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.</p>	<p>See TGHS comments 1-5 above. The chimney may require dismantling and reconstruction and the stack above the roofline should be reconstructed according to documentary and physical evidence. The project does not meet this standard.</p>
<p>7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.</p>	<p>This standard should be followed wherever applicable: including repainting, removal of bricks, etc. The project may meet this standard, but without detailed plans and specs, it cannot be assured.</p>
<p>8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.</p>	<p>This standard must be followed if archeological resources are found. Construction should stop until a qualified archaeologist can judge the significance of the resource. The project could meet this standard if an appropriately worded condition were included in the plans, specs and environmental document.</p>

<i>Standards for Rehabilitation</i>	TGHS Comments
<p>9. 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.</p>	<p>The new buildings should be far more visually subordinate to the existing building. Their designs, scale and massing and their materials should be far less imitative than proposed. The rear third of the building should not be demolished to make way for large, out-of-scale additions to the property. Compatible, differentiated designs need not be derivative and are normally discouraged. The project does not meet this standard.</p>
<p>10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.</p>	<p>As proposed, the new additions and adjacent, related new construction are not proposed in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired. Consider a revised design with fewer, smaller units that do not overpower the existing building and if removed in the future, would retain the essential form and integrity of the historic property and its environment. The project does not meet this standard.</p>

This evaluation does not mean that the proposed project can never be approved, only that it does not meet the Standards as proposed and that redesign and further environmental review under CEQA would be necessary before approval can be given.

Conformance with The Secretary of the Interior’s Standards for Rehabilitation and Moving Historic Buildings

Because the proposed project includes the relocation of an historical resource, it should not only be consistent with the Standards but more importantly, with guidance in *Moving Historic Buildings* by John Obed Curtis (1979), a publication of the Department of the Interior’s Technical Preservation Services Division.

As an overview, Curtis asserts “consider the adjacent structures and the site. Shape, mass, and scale are critical; the relocated structure must adapt harmoniously to its new location if it is not to appear awkward or out of place” (page 32). Further principles include in particular how well the relocated building would “fit in” with buildings on the receiver site and adjacent parcels; taking into consideration setbacks, side yards and whether architectural styles would be complementary or imitative; proposed height, materials and finishes of existing and proposed foundations as well as whether or not proposed alterations conform to the Standards for Rehabilitation (*The Secretary of the Interior’s Standards for The Treatment of Historic*

Properties With Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings. Weeks and Grimmer, 1995).

As proposed, and as rendered on the final page of the staff report, the relocated historical resource appears to look both out of place and awkward, it would be overwhelmed by the proposed surrounding structures and crowded into the northeast corner of the lot. A different project that would meet project goals should be possible while conforming to the principles in both *Moving Historic Buildings* and the Standards.

Conclusion

While retaining an historic building as part of a larger infill project is commendable, and we thank the project applicant for their willingness to work with the City to achieve its stated historic preservation goals, we believe that this project as currently proposed misses the mark and should be redesigned to better accommodate the historical resource.

Beyond our recommendation for redesign, the more fundamental point here is that there is a process that the City must follow when an historical resource under CEQA may be subject to substantial adverse change. Demolishing one-third of a historical resource, extensively reconfiguring what remains and relocating it to an inappropriate position on the augmented lot is a clear example of material impairment as well as adverse change.

We are not arguing that development of this property cannot ultimately take place. TGHS has in the past supported relocation of the residence to accommodate new building and continues to do so in principle. However, for the reasons stated above, a categorical exemption for the proposed project cannot be used, and further environmental review is required before the project can be approved. That is, the preliminary work of the lead agency is not yet complete, and a decision should not be rendered by the Design Review Board until it is.

Thank you for your 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