



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

April 13, 2016

Members of the Design Review Board
City of Glendale
633 E. Broadway
Glendale, CA 91206

RE: 401-409 Hawthorne Street, Glendale
Case No PDR 1603633

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

On behalf of the Board of Directors of The Glendale Historical Society and its more than six hundred members, I would like to thank you for the opportunity to provide comments on the proposed multi-family project at 401-409 Hawthorne Street.

We are writing because we respectfully disagree with the use of a CEQA Exemption for the above-referenced project based on the information that has been made available for public review and comment. We apologize for the late hour of this letter.

The proposed project is described in the Public Notice, Administrative Exception letter and the Design Review Commission Staff Report as being “exempt from environmental review as a Class 32 ‘Infill Development Project.’”

CEQA Exemptions cannot be used if where 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 categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource*” (emphasis added).

The Administrative Exception letter and Staff Report each stated that the existing buildings had been determined ineligible for designation as historic resources at the local, state, or national levels and thus “would not be considered historic resources under the California Environmental Quality Act.” We are concerned that no technical reports are presented to justify this finding; we

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.

requested a copy of a historic resources assessment from City staff last week but did not receive one, although we understand that staff conducted some historic research on the properties. An intensive evaluation of the properties historic significance prepared by qualified professionals should be included in this project's administrative record. Such an evaluation would entail review of appropriate historic contexts, building permits, information regarding the builder and architect (if applicable), identification of who lived there in the past and what their achievements and relation to Glendale may have been, as well as analyzing the architectural styles and types in the community and region. We believe that this should be standard operating procedure in Glendale for any proposed demolitions of properties with improvements completed more than 45 years ago or if there are other reasons to believe a property may be significant.

The improvements at 401, 403-405 and 409 South Hawthorne Street are briefly described below:

- 401 Hawthorne (401) was completed in 1922. It contains two Clip-Roofed Craftsman bungalows and a garage detailed to match the residences. Each of those three buildings retains high integrity; the only evident exterior alteration is the addition of a security door on the main house (date unknown). The houses and garage are Clipped-Colonial in style as described in the "Reconnaissance Survey and Historic Context Statement of Craftsman Style Architecture 2006-2007" (Craftsman Survey, City of Glendale). That survey population did not include the subject property. There is no listing in the California Office of Historic Preservation's "Historic Property Data File for Los Angeles County" evidencing a previous survey for historic significance. According to the Craftsman Survey, the subject property would represent one of fewer than 60 remaining properties of that style remaining in Glendale (page 37). The Craftsman Survey recommended: the identification of additional buildings that were missed in that survey, further research of Clipped-Gable Colonial style buildings and continuing the survey of single-family Craftsman residences (zoned single-family, items 4, 5 and 6, pages 43 and 44).
- 403-405 Hawthorne (403) was completed in 1940. It looks to be a vernacular, multi-family building with elements of Moderne style. It has a Hollywood-style driveway and a two car garage with a hipped roof. Unless someone significant or an event important in our past occurred at the property it is doubtful that it is significant, but that information should be presented.
- 409 Hawthorne (409) was completed in 1910, four years after the city's incorporation. It is a Craftsman-era Hip-Roofed Cottage. Character-defining features of that style are the flared, hipped roof; remaining decorative picture window with lattice panes above; clapboard-finished exterior walls; the simple square plan; inset, raised, partial porch and lattice dormer vent. It retains the essential elements of integrity despite the replacement of a window and addition of a security door. The building would be recognizable to a former resident, which is a standard test of integrity. As a hip-roofed cottage, it is one of few remaining buildings of that style in Glendale.

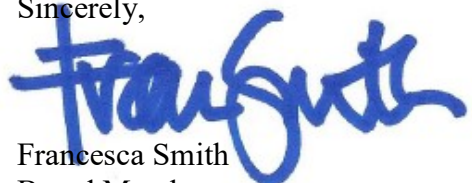
While it is not known whether or not these properties are historically significant, that is precisely the difficulty. The burden of proof is on the lead agency, and for the reviewers to analyze impacts of the proposed project, the city has to prove a case that they are not significant as part of the public record.

We ask that no decision on the proposed project be made until an intensive survey prepared by an architectural historian professional qualified under the Secretary of the Interior's Professional Qualification Standards has been offered for public review and inclusion in the administrative record. If one has not yet been prepared, it should be done before the project moves forward. It is entirely possible that none is significant, but two of these properties very well may meet city or

state criteria for historic significance. We also iterate the recommendation that intensive evaluations by qualified professionals without ties to project proponents be prepared for any demolitions of buildings completed more than 45 years ago. We point out that CEQA has no “age” cut-off and that any properties that may be historically significant should be adequately studied as part of the planning process.

Thank you very much for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Francesca Smith". The signature is stylized and cursive, with the first name being more prominent.

Francesca Smith

Board Member

The Glendale Historical Society