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www.GlendaleHistorical.org

June 8, 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.

Please note that this is precisely the same language with which we began our letter of April 13, 2016, about this case. At that time we wrote: “the Administrative Exception letter and the Design Review Commission 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.”

Our concern remains. We find in the staff report a reference to a “Historic Building [sic] Assessment” that purports to find “that the existing structures are not eligible for designation at the local, state or national level,” but no assessment is included in the project’s administrative record. We question the wisdom of excluding documents that are routinely made available for public review and comment and, indeed, were in this instance actually requested by the public.

Beyond the matters of good governance, transparency, and best practices, we note that by failing to provide DRB members as well as the public with a copy of the historic resources assessment,

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.

city staff has not provided you with the documentation necessary to make an informed decision about the historic significance of this site and its status under CEQA. Therefore, the hearing must once again be postponed.

We have not been afforded the opportunity to address the findings of the assessment prepared by Applied Earthworks. However, we attach a DPR 523 evaluation for 409 Hawthorne, as a sample, which documents that the high-integrity, 1910 hip-roofed bungalow at 409 Hawthorne qualifies for local designation under the “Late 19th Century & Town Settlement (1873-1918)” Registration Requirements that were established in the “South Glendale Context Statement” (2014). It is further eligible for the Glendale Register under Criteria 3 (“The proposed historic resource embodies the distinctive and exemplary characteristics of an architectural style, architectural type, period, or method of construction; or represents a notable work of a master designer, builder or architect; or possesses high artistic values”) and Criteria 5 (“The proposed historic resource exemplifies the early heritage of the city”). It is therefore locally eligible for designation and is presumptively eligible for the California Register and is a “historical resource” as defined under CEQA. The form was prepared by Caprice (Kip) Harper, a qualified architectural historian who meets the Secretary of the Interior’s Professional Qualification Standards in architectural history.

A categorical exemption under CEQA is not allowed for a historic resource, and demolition should not take place until an appropriate environmental review is prepared. We note that a CEQA review is triggered when there is disagreement between experts about whether a property qualifies as a historic resource. As demonstrated in the attached DPR 523 form, a qualified expert has disagreed with the asserted findings of Applied Earthworks that the subject property is ineligible for designation on the Glendale Register. Further CEQA review is therefore required.

We reiterate our 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. And that such evaluations be made public. 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 for your consideration.

Sincerely,

Greg Grammer

President
The Glendale Historical Society