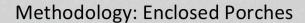


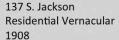
Methodology

- Staff have asked specifically for your comments on Survey methodology
- TGHS requests that Commissioners reject the automatic exclusion of properties as historic resources based on:
 - Enclosed porches
 - Addition of composition siding
- Registration Requirements in the South Glendale Historic Context Statement specifically note the "increasing rarity" of early buildings (1918 or earlier) in South Glendale and that a greater degree of alteration may be permissible
- TGHS requests that Commissioners urge HRG and staff to upgrade 7 properties built before 1918 to 5S3





405 Concord Transitional Craftsman, 1902

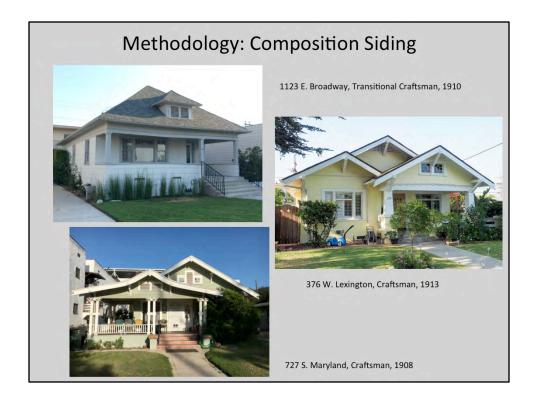




HRG: both added as 6L. TGHS believes the HPC would find these properties eligible for the Glendale Register (5S3) despite early porch enclosures and asks that the Commission reject this portion of the Methodology. The HPC recently approved the Craftsman-style Beggs House for the Glendale Register despite an early enclosed porch. Consistent with HRG's Methodology Statement, "For the earliest [buildings], (late 19th century into the first years of the 20th century) a greater degree of alteration was determined acceptable due to the rarity of these resources" (p. 5, emphasis added), which applies to 405 Concord. There is no evidence to suggest the roofline has been altered at this property as claimed by HRG. It is a very early, clearly recognizable Transitional Craftsman. For 137 S Jackson, the Registration Requirements for historic resources listed in HRG's Historic Context Statement (September 2014) specifically advise that "Resources from this period [1918 and before] are increasingly rare" (p. 57), and "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, emphasis added).



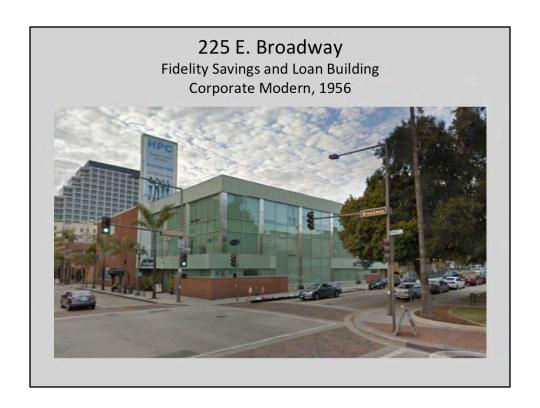
HRG: both added as 6L. TGHS believes the HPC would find these properties eligible for the Glendale Register (5S3) despite early porch enclosures and asks that the Commission reject this portion of the Methodology. All were built well before HRG's "early Glendale" cut-off date of 1918, when a "greater degree of alteration" is specifically permissible according to HRG's Registration Requirements.



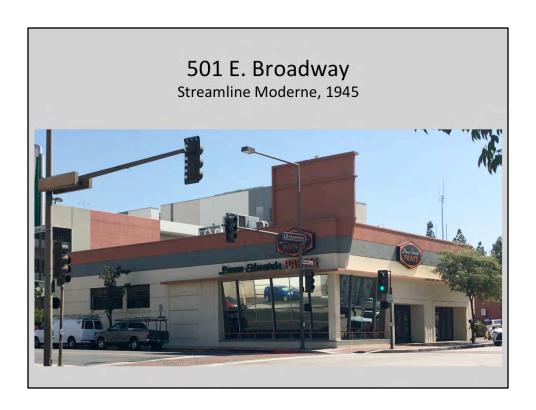
HRG: 6L. TGHS believes that the HPC would find these properties eligible for the Glendale Register (5S3) despite composition siding and asks that the Commission reject this portion of the Methodology. In 2014 the HPC approved Hovaguimian House, a Buff & Hensman, for the Glendale Register with non-original cement board siding at the front façade. Unlike stucco, the addition of composition siding typically does not affect features such as window openings. 1123 E. Broadway is a very rare and elegant version of a simple Hipped-Roof Cottage/Transitional Craftsman; the others are distinctive Craftsmans built well before the "early Glendale" cut-off date of 1918, when a "greater degree of alteration" is specifically permissible according to HRG's Registration Requirements.

Previously Surveyed Historic Resources

- Changing findings of eligibility from city-adopted surveys requires well-reasoned justifications based on facts
- Many properties previously found eligible for the Glendale, California, and/or National Registers have been downgraded without adequate justification
- TGHS requests that Commissioners defend these 6 properties as historic resources as found in previous surveys and in the absence of disqualifying evidence



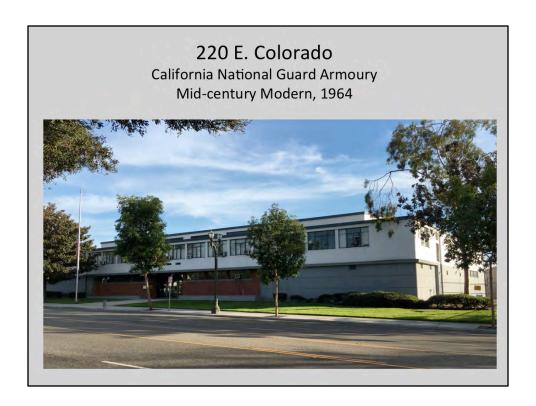
HRG: 3CS (eligible for the California Register). In comments HRG states that it "does not appear eligible for National or California Registers." Is it California Register eligible or not? This building was designed by internationally renowned architect W. A. Sarmiento and was found eligible for the National and California Registers in cityadopted Jones & Stokes Survey of 2006. Contrary to HRG's rationale for downgrading the property, the spandrel panels remain intact; louvers were removed, but these were later additions. Some new windows in existing openings may comply with the Standards for Rehabilitation, particularly when the change is necessary to accommodate a new use.



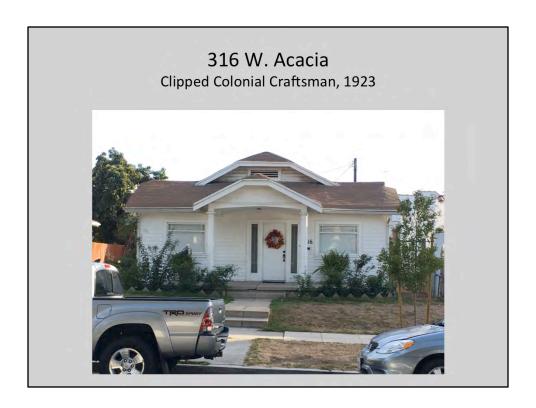
HRG: downgraded to 6Z. Found eligible for the Glendale Register (5S3) in the city-adopted Jones & Stokes Downtown Survey in 2006. At that time it was rightly called "one of the best remaining commercial properties *in Glendale* from the 1940s" (emphasis added). It has not been altered since, and it retains obvious character-defining features of the Streamline Moderne style, including its highly distinctive "chimney" with fillets, cantilevered canopy, and large canted windows. There is no justification for changing its status. HRG identifies only two 1940s commercial retail buildings as locally eligible: the Great White Hut (121 E. California, vernacular, 1941, downgraded from National Register-eligible) and the Salvation Army Building (801 S. Central, Spanish, 1940). No Streamline Moderne building was found to be a historic resource in the Survey (220 N. Glendale, a late Moderne office building was added at TGHS's behest). Streamline Moderne is a rare resource type; we believe that the HPC would find it eligible for the Glendale Register.



HRG: downgraded to 5S3, locally eligible. Found eligible for the National and California Registers in the Jones & Stokes Downtown Survey in 2006. Its rarity as a type, locally, regionally, and nationally, has only increased in the past decade.



HRG: downgraded to 6Z. Found eligible for the California Register in the city-adopted Jones & Stokes Downtown Survey of 2006 "because it embodies distinctive characteristics of a type and period of construction" and for its association with the National Guard pending an intensive evaluation. Character-defining features include planar walls, steel sash ribbon windows, stack bond and sand-finished scored stucco in a rectangular grid pattern, and a cantilevered second story. No alterations since previous finding of eligibility are noted. We believe that the HPC would find this property eligible for the Glendale Register for its architecture.



HRG: added to Survey as 6L. This was previously found eligible for the Glendale Register (5S3) in the city-adopted Craftsman Survey of 2007. It appears to be unaltered since that time. Consistent with HRG's Methodology, which identifies as locally eligible intact Craftsmans from 1919-1925 "with some degree of architectural detail" (p. 21), this high-integrity Craftsman with its distinctive asymmetrical front facade and matching clipped-roof garage should qualify as a historic resource. We believe the HPC would find it eligible for the Glendale Register.



HRG: downgraded to 6Z, substantially altered. 407 Naranja is already a locally eligible historic resource (5S3) based on findings in the city-adopted Craftsman Survey of 2007. Disqualifying alterations must be described. Early alterations are not intrinsically disqualifying.

Associative Criterion

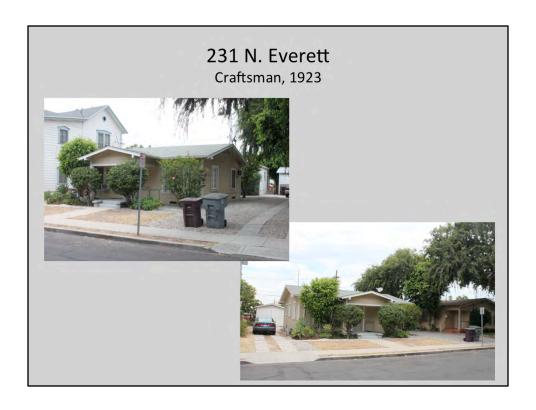
- Properties associated with a person, persons, or groups that contributed significantly to the history of the city are eligible for the Glendale Register (Criterion 2)
- TGHS requests that Commissioners urge HRG and staff to upgrade 6 properties based on their association with significant people from Glendale's past



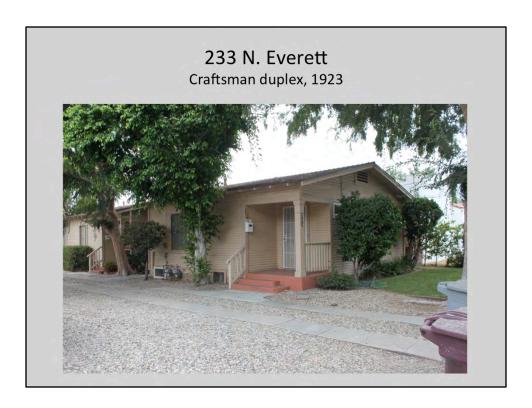
HRG: 6L. TGHS believes these buildings are individually eligible and qualify as a historic district, along with 823 Milford, which HRG found to be individually eligible (5S3). The 1996 San Fernando Road Corridor Survey states that "the 800 block of Milford and the 500 block of Commercial contain the best examples of a group of industrial buildings within the San Fernando Road project area dating from the second quarter of the twentieth century...It is recommended that these buildings be considered eligible for the National Register as a group of related buildings" (emphasis added). HRG has not acknowledged the findings of this Survey in its own evaluation. TGHS continues to believe these three related industrial buildings along with 823 Milford, all of which were built by prominent Glendalebased architect and City Council member Merrill Baird for Fred Peterson, are eligible for the Glendale Register. Three of Baird's projects are listed in the Glendale Register, including the Glendale Municipal Building, which he designed with A. C. Martin. Peterson co-owned Modern Refrigerator Works with his brother Arthur; it operated out of 823 Milford and 514 Commercial (top photo) for almost seventy years. 823 Milford and 514 Commercial are connected but occupy separate assessor parcels. Whether or not the HPC agrees that these are individually eligible we request that Commissioners ask HRG and staff to find the four buildings eligible as a local historic district.



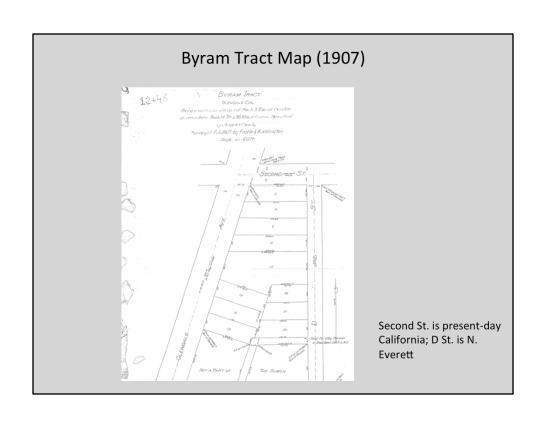
HRG: 6Z "slated for demolition" (this appears to be incorrect). L. H. Wilson was the leading figure in the development of the San Fernando Road Corridor. He built dozens of buildings and actively brought businesses to the area; according to HRG, in 1928 alone he "brokered deals that brought 14 companies to the San Fernando Road area and built nine industrial buildings, five of which he sold before the end of that year" (HRG, "3901 San Fernando Road Historic Resources Assessment, October 9, 2013, 2). In 2013 HRG found 3901 San Fernando Road, also built by Wilson, eligible for the Glendale Register for its association with L. H. Wilson, as "a person who significantly contributed to the history of the City." That building has since been demolished. 4500 San Fernando Road is his earliest known extant building and his only known remaining commercial building; the others are all industrial properties. No Wilson buildings have been identified as historic resources in the Survey. The Registration Requirements for commercial buildings from 1919-1929, prepared by HRG in the South Glendale Historic Context Statement, state: "Due to tremendous development pressures throughout South Glendale's history, properties from this period are relatively rare; therefore a greater degree of alteration may be acceptable" (121). We believe that the HPC would find this eligible for the Glendale Register for its association with L. H. Wilson and for its architecture.

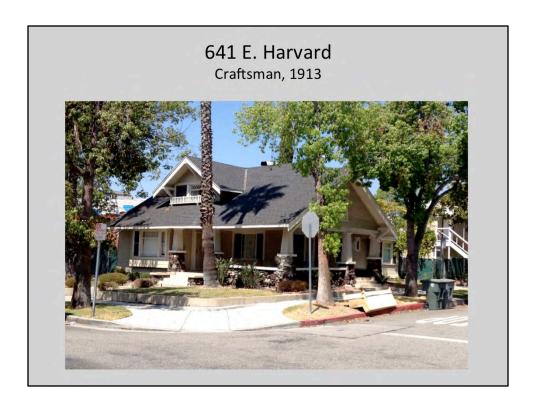


HRG: 7R (not evaluated), previously 6L. We believe that the HPC would find 231 N. Everett eligible for the Glendale Register for its association with one of Glendale's pioneering families. It retains high-integrity. 231 N. Everett was built by Ruth Byram, daughter of early Glendale settlers Ellis T. Byram and Huldah Byram. HRG's claim that 231 and 233 N Everett (built by Ruth's brother Ralph, next page), were not part of the Byram farmhouse property is incorrect. In 1887 E. T. Byram transferred title to the property, which encompassed 14 lots, to his wife Huldah (property deed, Sept. 8, 1887, Block 3, Glendale, LA County Recorder, 282:273). This property included the Byram House (formerly 228 N Glendale, now 227 N. Everett, visible in upper photo) and extended north to present-day California St., including the lots on which 231 and 233 N. Everett were built. Ellis Byram died in 1908; his wife Huldah continued to live at the farmhouse with daughters Ruth and Eva and son-in-law Joseph Banker at least until 1923, when the houses were built next door [1920 Census; 1923 Directory]. Together with neighboring Byram House (upper left) and 233 N. Everett, 231 N. Everett illustrates the evolving presence and legacy of this pioneer family over half a century in Glendale.



HRG: 7R (not evaluated), previously 6L. 233 N. Everett was built by Ralph Byram, son of Glendale settlers Ellis T. Byram and Huldah Byram, on the original farmhouse property. Together with neighboring Byram House and 231 N. Everett (previous page), this property illustrates the evolving presence and legacy of this pioneer family over half a century in Glendale. It retains high integrity. We believe the HPC would find it eligible for the Glendale Register for this association and as a rare Craftsman duplex.

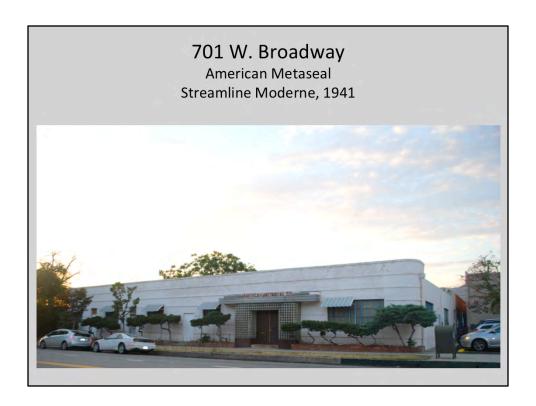




HRG: added as 6L. We believe the HPC would find this property eligible for the Glendale Register for its association with Herman Nelson, a prominent business leader in early Glendale. At the time this house was built, Nelson was a Director as well as Secretary, Treasurer, and Cashier of the Bank of Glendale, the city's first bank, organized in 1905. When the Bank of Glendale was acquired in 1920 by Los Angeles Trust and Savings Bank, Nelson remained as the local manager and later became a vice president of that bank. He was active in civic life and is covered in John Calvin Sherer's History of Glendale and Vicinity (1922). To be found significant for its association with an important local person the property needs to retain sufficient integrity to be recognizable to that person, which it does. And that person needs to have lived there when making his or her local contributions, which he did. Nelson may have been the original builder/resident; in the absence of a building permit, available city directories show that he lived there from at least 1915 (under its old address, 503 W. 5th St.) and still resided there in 1936. He moved to Rossmoyne by 1940.

Industrial and Commercial Buildings

- TGHS believes the Historic Preservation Commission would find these 3 industrial and commercial properties eligible for the Glendale Register for their rarity
- We request that Commissioners urge HRG and staff to assign these examples status codes of 5S3

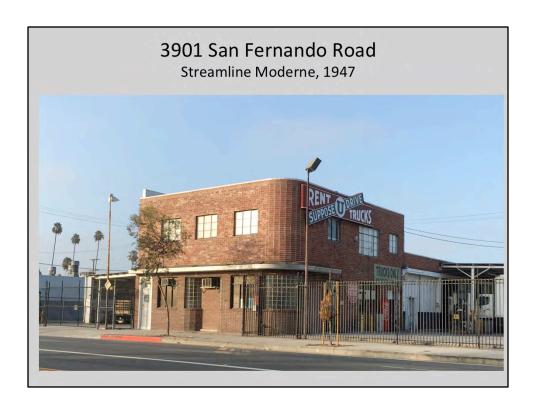


HRG: added as 6L. TGHS strongly disagrees that this rare Streamline Moderne industrial building is not distinctive. It is one of the very few examples of this style in Glendale and retains high integrity. No Streamline Moderne buildings of any kind were identified as historic resources in the Survey (HRG added one Late Moderne office building at 220 N. Glendale at TGHS's behest). It is a one-story, painted brick building with banded brick fillets, a brick parapet, banded metal canopy with 1950s signage, a glass block entry, and brick planting boxes. We believe that the HPC would find this building eligible for the Glendale Register as a rare example of the Streamline Moderne style.

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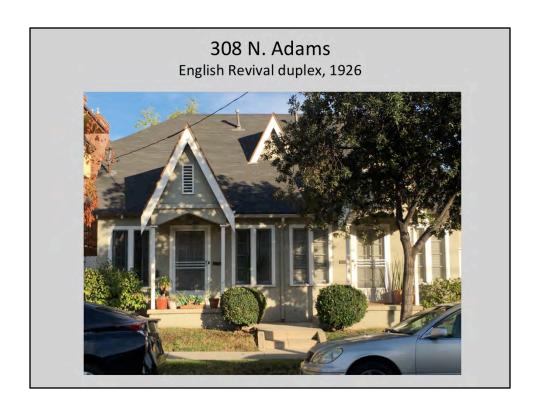
HRG: added as 6L. This Quonset hut is a rare, possibly unique resource type in Glendale. According to SurveyLA's Historic Context Statement on the Quonset Hut, 1941-1965: "an important symbol of mid-century utilitarian design and construction, the Quonset hut is a rapidly disappearing building type." We believe the HPC would find it eligible for the Glendale Register.



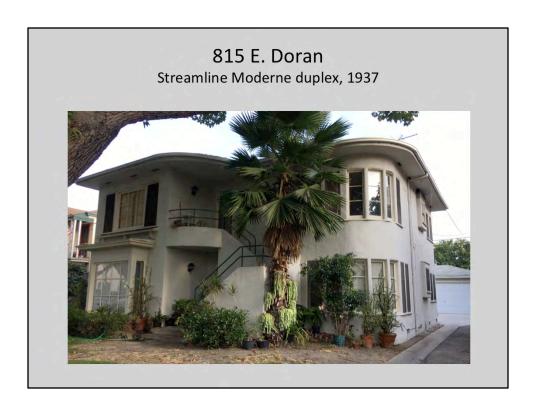
HRG: added as 6L. TGHS strongly disagrees that this rare two-story Streamline Moderne commercial building is not distinctive. HRG called it out as an example of this rare style in the South Glendale Historic Context Statement. There is no evidence that the second story was added later. On the contrary, the brick is differentiated between first and second stories at the cantilevered canopy at the front, which is not surprising; indeed, the different types of brickwork, including a third treatment at the rounded "corner," is part of its distinctive design. No Streamline Moderne buildings of any kind have been identified as historic resources in the Survey (HRG did add one Late Moderne office building at 220 N. Glendale at TGHS's behest). We believe the HPC would find this eligible for the Glendale Register.

Multi-Family Buildings

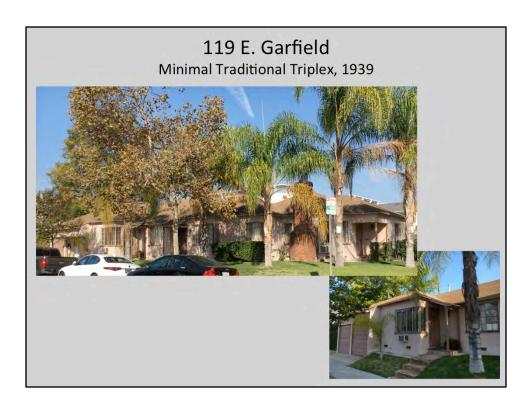
- TGHS believes the Historic Preservation Commission would find the following multi-family properties eligible for the Glendale Register
- We request that Commissioners urge HRG and staff to assign these 6 properties status codes of 5S3



HRG: added as 6L. TGHS originally requested a 6L status code but believes this property should be added as 5S3 given extreme rarity of the type. No other English or Tudor Revival duplexes are identified in the Survey. No known alterations.



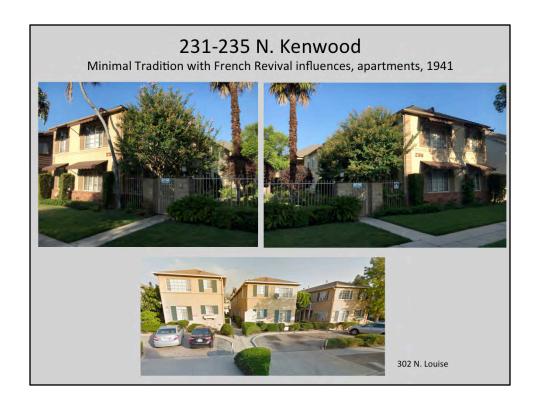
Good and rare example of Streamline Moderne duplex. Identified by HRG as a contributor to the proposed E. Doran Street historic district but appears to be individually eligible (status code 5B). There are no Streamline Moderne residential properties identified as historic resources in the Survey; no Streamline Moderne buildings were identified at all. Character-defining features include curved roof and building plan, radius curved front corner with two stories of windows, radius curved balcony and handrails, distinctive front entry doors with intersecting line motif. We believe the HPC would find it eligible for the Glendale Register.



HRG: added as 6L. There are no Minimal Traditional duplexes and only one or two triplexes of any style in the Survey. HRG asserts the existence of "many examples of these properties in other areas of Glendale"; however, it must provide addresses of actual and better examples of high-integrity Minimal Traditional triplexes (or even duplexes) elsewhere. We don't know of a finer example in the City; others have alterations, large apartment buildings attached in the rear, or lack the detail and design quality of this one. We believe the HPC would find this eligible for the Glendale Register.



HRG: 6Z. There are numerous dingbats in Glendale, but none were found to be historic resources. We believe this partial dingbat with its "worm-eaten"-style wood siding and stack-bond Roman brick is the best example in Glendale. HRG should identify superior examples of the style in Glendale if this one does not qualify as a "good example."



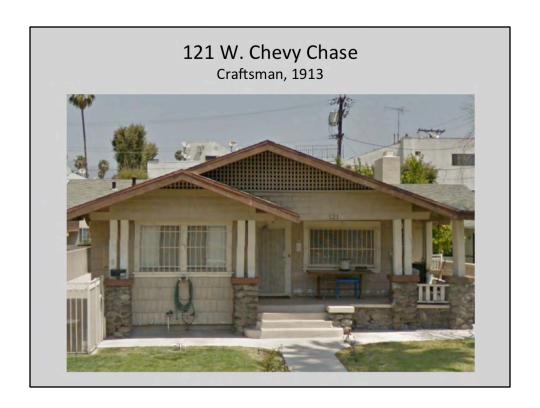
HRG: 6L. We strongly disagree with HRG's conclusion that 231-235 N. Kenwood is unremarkable in its own right or inferior in comparison with other examples identified from this period in the Survey, such as 302 N. Louise, which is a fine example but lacks the rarer French Revival influence described by HRG. It was found eligible for the Glendale Register. 231 – 235 N. Kenwood compares favorably with 1434 and 1458 E. Wilson, which were also found eligible. We believe the HPC would find this property eligible for the Glendale Register. The reversible addition of the security fence and awnings are not remotely disqualifying.



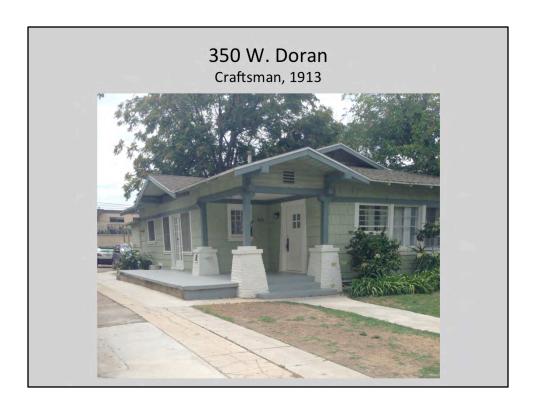
HRG: 6Z. TGHS strongly disagrees that this is not a distinctive example of a postwar garden apartment. Its simple streamlined features include original steel-sash windows that turn at the rounded "corners"--this in itself is a distinctive feature. It has the original brick walkway leading to a lush garden at right and a brick water table. We believe the HPC would find it eligible for the Glendale Register.

Craftsmans

- Several worthy Craftsman houses from as early as 1902 have been rejected as historic resources
- TGHS believes the following Craftsman properties qualify as historic resources, consistent with HRG's Methodology, which notes:
 - Before 1918, "the primary facade must be largely intact"
 - From 1919-1925, the property must be intact and possess "some degree of architectural detail"
- We request that Commissioners urge HRG and staff to upgrade these 14 properties to 5S3



HRG: added as 6L due to alterations. But HRG notes only one replacement window at the front façade and trivial, reversible additions of security bars and door. Consistent with HRG's Methodology that "the primary facade must be largely intact" (p. 20) for Craftsmans built before 1918, this 1913 property should qualify as a historic resource. We believe the HPC would find it eligible for the Glendale Register.



HRG: added as 6L. Consistent with HRG's Methodology that "the primary facade must be largely intact" (p. 20) for Craftsmans built before 1918, we note that some but not all windows at front façade have been replaced and that all original openings remain. We believe the HPC would find it eligible for the Glendale Register.



HRG: added as 6L, not distinctive and porch enclosed per Sanborn maps. Both units have small recessed entry porches, which are intact; HRG appears to be referring to the long ago enclosure of a small porch to the rear of the property on the north side, which is barely visible from the street. This is a rare, early Craftsman-style multifamily development that should be added as 5S3 consistent with other Craftsman multi-families identified by HRG in the Survey. We believe the HPC would find it eligible for the Glendale Register



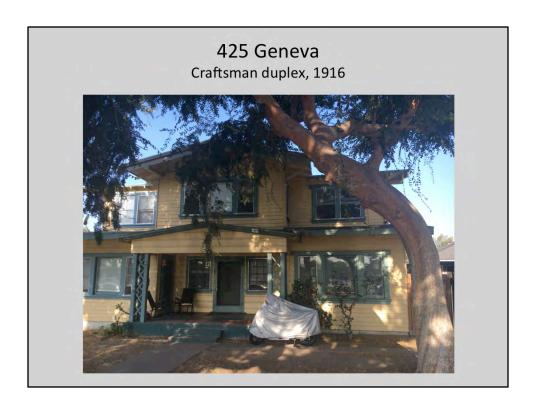
HRG: 6L in original Survey. Consistent with HRG's Methodology, which identifies as locally eligible intact Craftsmans from 1919-1925 "with some degree of architectural detail" (p. 21), this distinctive and high-integrity Craftsman with nested gables, a decorative truss in the front gable, and natural stone piers with tapered porch supports qualifies as a historic resource. The door does not appear to have been altered as Survey originally claimed, and windows and siding are original. It is one of only three high-integrity Craftsmans that remain in the Diamond District, which was once replete with them. We believe the HPC would find it eligible for the Glendale Register. Please note landscaping renders photography difficult.



HRG: planning district. This is an excellent example of the Craftsman style from 1913 with very unusual decorative features, in particular the prominent battered oatmeal stucco piers with battered porch railing and pointed niches and shingles with keynote variations. It has not been assigned a status code, just a comment that it is part of a "planning district" for the Diamond. Given that "planning district" does not have any legal meaning in Glendale, TGHS does not believe this is a satisfactory alternative to a status code. Indeed, the Diamond is full of early Craftsmans with similar alterations that deserve a status code of at least 6L. We believe that the HPC would find this 1913 property eligible for the Glendale Register despite altered windows.



HRG: planning district. This is a remarkable Craftsman from 1911 with a central gable flanked by unusual symmetrical side gables that lower to meet the main roof plane, lattice work in all three gables, a wood sill course, and exaggerated battered sides. There is not another one like it in Glendale. We believe the HPC would find it eligible for the Glendale Register despite altered windows. Given that "Planning District" does not have any legal meaning in Glendale, TGHS does not believe this is a satisfactory alternative to a status code.



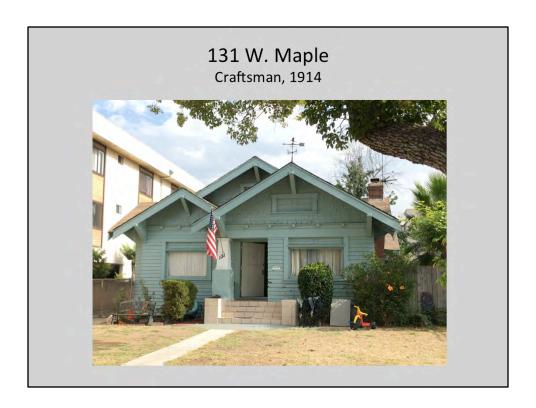
HRG: added as 6L. Consistent with HRG's Methodology that "the primary facade must be largely intact" (p. 20) for Craftsmans built before 1918, we note that some but not all windows in the primary facade have been replaced, in the original openings. The relocation of the duplex in 1938 is not disqualifying. Both two-story and Craftsman duplexes are rare. We believe the HPC would find it eligible for the Glendale Register.



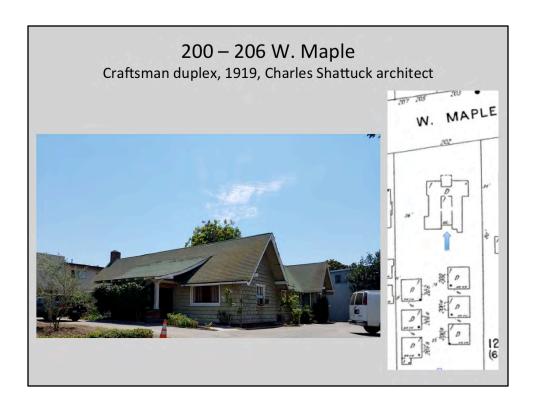
HRG: 6Z due to alterations. HRG's research has confirmed that this Craftsman was built in 1903. Only five properties identified in the Survey as historic resources predate this; one at 819 E. Wilson (1901) was labeled 5S3 despite replacement of windows due to early construction date. Consistent with HRG's Methodology Statement, "For the earliest examples, (late 19th century into the first years of the 20th century) a greater degree of alteration was determined acceptable due to the rarity of these resources" (p. 5). We suggest these alterations to a 1903 Craftsman are non-disqualifying due to early construction date; the porch enclosure was early, and the alteration to the bay window at the side is not visible from the public right of way, as this photo indicates. We believe the HPC would find it eligible for the Glendale Register.



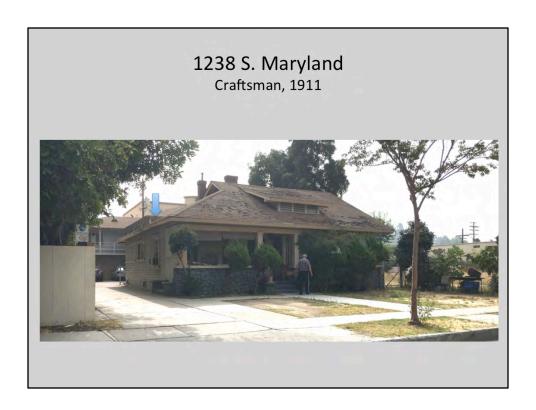
HRG: 6L, "not distinctive." Consistent with HRG's Methodology, which identifies as locally eligible intact Craftsmans from 1919-1925 "with some degree of architectural detail" (p. 21), this high-integrity Clipped Colonial Craftsman should qualify as a historic resource. Its character-defining features include fixed front façade windows with multi-light uppers on either side of door and in front gable transom, partial sidelights and original single-panel door, fascia with decorative return and shaped header. TGHS believes the HPC would find it eligible for the Glendale Register.



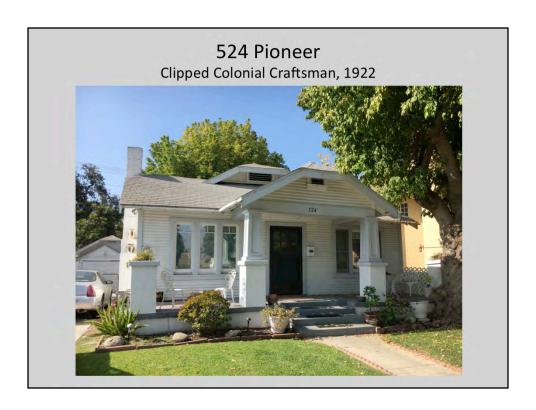
HRG: 6L. Consistent with HRG's Methodology that "the primary facade must be largely intact" (p. 20) for Craftsmans built before 1918, we note that alteration to steps and porch post should not disqualify this distinctive 1914 Craftsman. Features include nested gables, thumbrails at windows, original and distinctive picture windows, Hollywood-style driveway. We believe the HPC would find this eligible for the Glendale Register.



HRG: added as 6L. Charles Shattuck is recognized by the City of Glendale as an important local architect. This alone should qualify this building for the Glendale Register apart from the rarity of Craftsman duplexes in Glendale. The Sanborn map reveals that the building was not a U-shape, as HRG claims, but a rectangle with some central configuration and a solid wall at the rear (denoted by the solid line). We believe the HPC would find it eligible for the Glendale Register. A high-integrity Craftsman bungalow court (also on the 1925 Sanborn map) still exists at the rear of the property, but that is not visible from the public right of way.



HRG: "6L due to alterations," but no disqualifying alterations are described. There is a reversible screen door and a rear apartment building (in the photograph, it looks almost like a second-story addition at the left rear, where the arrow is, but it's a separate building). We note that historic resources in Glendale have been and are proposed to be surrounded by large and, indeed, overwhelming new construction (512 W. Doran; the Goode House), so the presence of proximate buildings is not disqualifying. We believe the HPC would find this 1911 Craftsman eligible for the Glendale Register.



HRG: added as 6L "not distinctive." Consistent with HRG's Methodology, which identifies as locally eligible intact Craftsmans from 1919-1925 "with some degree of architectural detail" (p. 21), this high-integrity Clipped Colonial Craftsman with clipped dormer, decorative recessed porch supports, overpainted brick chimney, and matching clipped gable at the garage should qualify as a historic resource. TGHS believes the HPC would find it eligible for the Glendale Register.



HRG: 6L. There is no evidence that the roofline or massing have been altered, as HRG claims. There is a small shed-roof extension in the rear (comparison of aerial image with 1919 Sanborn map). The City has been notified about the unpermitted alterations; we believe the HPC would find this eligible for the Glendale Register if the owner is required to restore to previous condition. It already has been identified as warranting special consideration in planning, which would necessitate removal of its incompatible siding regardless. Original wood siding was not covered over or replaced at sides; the brickwork is almost certainly intact.

TGHS thanks you for your consideration.