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May 10, 2020

The Honorable Vrej Agajanian and Members of the City Council
City of Glendale
613 East Broadway, Suite 200
Glendale, CA 91206

RE: Agenda Item 1 Combined Stage 1 and 2 Design Review for 340 N. Central

Dear Mayor Agajanian and Members of the Glendale City Council:

The Glendale Historical Society is grateful for the opportunity to comment on the proposed project at 340 N. Central.

TGHS is commenting because of the project's very close proximity to the Armenian Consulate, which has been found eligible for the National Register of Historic Resources. It is an outstanding and very rare remaining example of Spanish Revival commercial architecture in Glendale. As the location of the Consulate General of the Republic of Armenia, the building possesses cultural and social significance within our community that is clearly ongoing.

TGHS has concerns about the project as proposed, which we enumerate here. We ask that you not approve Phase 1 and Phase 2 design review and instead return the project for a redesign and request completion of an appropriate environmental review document, most likely a Mitigated Negative Declaration.

Project Is Not Categorically Exempt from CEQA

We do not believe the project as proposed is categorically exempt from CEQA review given that there is potential for significant impacts to the historic resource. Indeed, the staff report notes that the Consulate is built "at the property line," and the new three-story building will entirely obscure the side façade and "change its immediate visual setting" (Staff Report, May 12, 2020, p. 3). Given the importance and rarity of this building, it is worth considering how the visual impacts to the building could be diminished so that it is not so overwhelmed by the new construction. We have a few suggestions for how this might be accomplished below.

It is difficult to discern from the plans exactly how much space separates the new building from the Consulate; however, the building width is given as 48'11" (see Figure 1). According to

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.

the Los Angeles County Assessor, the lot is 50' wide; this would leave perhaps just six inches between it and the buildings on either side.

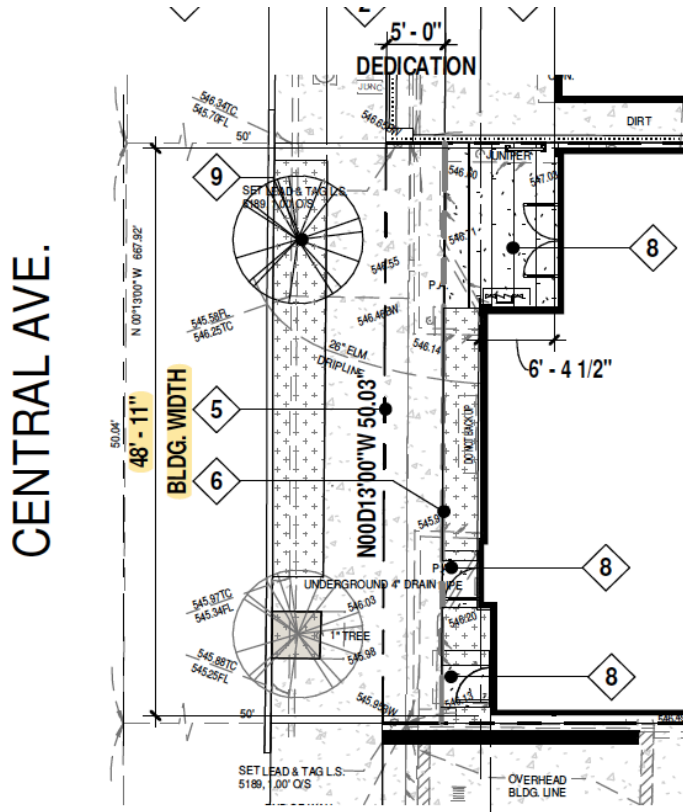


Figure 1. Detail, p. 23.



Figure 2. Project Site

At least four window openings on the Consulate building would lose all light and air; in addition, there is character-defining decorative-ironwork that projects from two windows. Also, how would the exterior of the Consulate be accessed for maintenance on this side? What would happen to the mature elm that is part of the building's historic setting? The image below attempts to approximate how close the buildings would be.

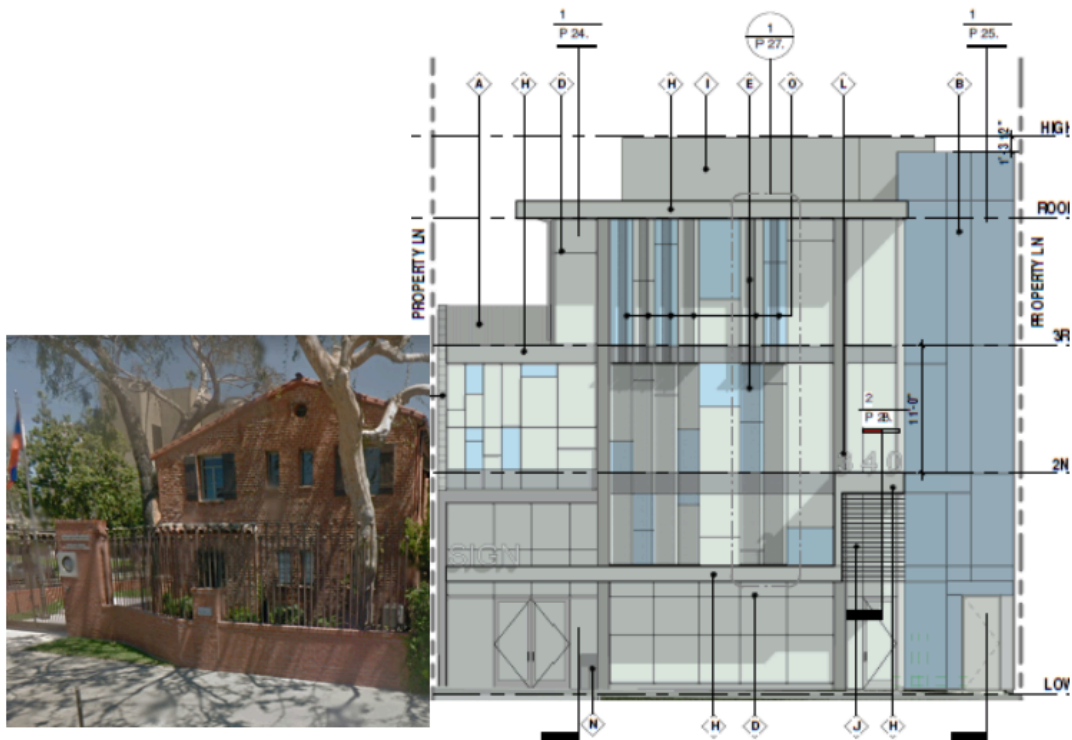


Figure 3. The photo is from 2012 when the mature elm tree in the front was trimmed.

The proximity of the new building to the Consulate is also deeply troubling because of the proposed excavations for the underground parking. TGHS has more than once raised the issue of the impacts of underground parking excavation on adjacent historic resources, and we are sorry to see that such concerns are still not reflected in project review, even when the excavation would take place less a foot from a National Register-eligible building with brick masonry walls. The subterranean garage, which would be built to a depth of at least fifteen feet and perhaps deeper, begins immediately adjacent to the Consulate building. The proposed considerable grading activity is of grave concern to cause differential settlement that would impact the almost ninety-year-old building, which has not addressed in an environmental review document and may result in a substantial adverse impact to the significance of the historic resource. A structural engineer who specializes in historic preservation should be selected by the City to review the proposed work and determine what mitigation measures would be required to protect the adjacent building. At the very least the grading work would need to be monitored by a qualified vibration specialist (a licensed professional engineer with a graduate-level degree from an accredited university in Physics or Acoustics with at least five years of experience in installation and use of vibration-monitoring instruments and data interpretation) and that work be halted immediately and the City notified if results are at or above .12 Peak Particle Velocity (PPV), the level widely considered to risk

damage to historic buildings (Arne P. Johnson and W. Robert Hanne, “Vibration Limits for Historic Buildings and Art Collections” *Apt Bulletin Journal of Preservation Technology*, 46:2-3 2015), or at the first sign of damage occurring to the historic resource. Construction must not recommence until the source of vibration is determined and a Vibration Mitigation Plan to reduce vibration to less than .12 PPV can be implemented. Pre- and post-construction condition of the historic resource should be documented in dated photographs, noting the locations and describing specific conditions.

Improvements to Design

The north wall of the project should be set back further from the historic building to allow for maintenance activities and light and air; in addition, the bulky massing at the northwest corner should be stepped back so that the building better relates to the smaller historic building (this appears to be in line with staff’s suggestion). We also suggest an adjustment to building materials as well. Concrete Masonry Units (CMU) are a cheap and ubiquitous building material; the color would be improved if more compatible with the brick at 346 N. Central. Please consider “Ladera Red” or “Auburn.” The front elevation would likewise benefit from the addition of a brick or terra cotta colored material. Finally, three different colors are proposed for the storefronts and windows. The use of various glass colors is usually reserved for much larger buildings to help break up the overall massing by making the bays of a building seem separate. It is recommended that only two colors of glass be used and their placement not be random (see figure 4).



Figure 4. Proposed Design Modifications

Conclusion

TGHS is not suggesting that this lot cannot be developed; rather, the building needs to pay more deference to the historic resource, and an environmental review document must be prepared to

disclose the potential impacts to the historic resource as a result of the adjacent excavation and to suggest how those impacts will be mitigated to a less than significant level.

The term “by right” can be misleading. It means here that the developer is not requesting a variance as part of the project; that is, it meets current building codes. It does not mean that the developer has the “right” to build this project as proposed, and that you must grant permission to do so. The point of design review is to determine whether it fits the site and the adjacent properties and serves the interests of the community as well as the developer.

TGHS would be grateful if you would direct staff to consider our suggestions and work with the developer to ensure a design that is more suitable for the National Register-eligible building next door.

Thank you for your consideration.

Sincerely,

Steve Hunt

Steve Hunt, President
The Glendale Historical Society

cc: Vista Ezzati, Planner, City of Glendale
Jay Platt, Senior Urban Designer, City of Glendale