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July 26, 2022

Planning Hearing Officer
City of Glendale
Community Development Department
via email

RE: Case No. PVAR2200992, 1916 Niodrara Dr., Niodrara Drive Historic District

To Whom It May Concern:

The Glendale Historical Society is a grassroots organization of over 1,000 members dedicated to identifying and preserving all aspects of Glendale's history and the city's historic, architectural, and cultural resources. One of our most important preservation activities is to support the creation of historic districts, through outreach, education, research, publicity and financial assistance to offset the application fee.

We supported the creation of the Niodrara Drive Historic District from before submission of the application through to the final vote of City Council. We write this letter in continued support for preserving its remarkable history and unique landscaping features and to ensure that a bad precedent is not set within this and other historic districts in Glendale. We urge you to reject the fence variance to allow a six-foot-tall fence within the front setback along Niodrara Drive.

The rationale for the boundaries of the Niodrara Drive Historic District was the special significance of the stream that historically ran along both sides of the street and provided Glendale with its domestic water, enabling the city's growth in the early years of the last century. Indeed, Niodrara's gentle curves were designed to follow the course of the stream, and developer Frederick P. Newport later took special measures to enhance this natural feature. Unlike other historic districts in Glendale, Niodrara Drive is specifically called out for historically significant landscaping elements, including stone curbs, steps, walls, the ornamental stream bed and ponds, as well as stone, wood, and faux bois bridges. The Historic Resources Survey prepared by Architectural Resources Group (ARG) in June 2015 observed that the district was "notable" not only for its architecture, but "for its landscape and hardscape features," which distinguishes it from other historic districts in Glendale. In finding the historic district eligible under Criterion E, ARG wrote that "Its physical elements, including its trees, native stone features, and stream bed make

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.

it a unique location in Glendale.” The landscape and hardscape features “provided the area with its distinctive sense of place” (ARG, Historic Resources Survey, June 2015, p. 2, 58, 23). The Staff Report to City Council also remarked the significance of the built landscape features, which “exist on public and private property and are included in the nomination as important aspects of the overall visual character of the area” (Staff Report, April 12, 2016, p. 3).

Most of the historic stone features had been removed from the west side of Niodrara, because the stream dried up much earlier on that side. The stream bed was still intact on the east side, in part because it flowed longer, but also because of an easement signed by property owners and an agreement with the City to allow water to flow through the properties down to Verdugo Park to water the trees there (see Figure 1).



Figure 1. West side of Niodrara Dr. at Fernbrook Place, circa 1920s, looking east. The river rock bridge, streambed, and wooden fencing in the foreground have been demolished, date unknown.

We must consider both the variance for the fence and the proposal to demolish features of the historic landscape. First, TGHS is concerned about granting a fence variance within a historic district, let alone one whose landscaping is key to its significance. It is a feature of many older homes and neighborhoods in Glendale that they did not—and do not—have front fences, especially tall security fences. The openness of Glendale’s properties to the street is an important element of historic districts and helps to visually define them. There are many properties that are significantly smaller than 1916 Niodrara; we believe it is safe to assume that many owners would like to enclose their front yards as close to the street as possible, and as small backyards are increasingly consumed with ADUs, the pressure to ask for variances to allow this will grow. We cannot take seriously the premise that a yard that is “only” 95 feet deep from fence to house, rather than 120 feet, is a “hardship.” And while we agree that a property within a historic district is an “exceptional” (and exceptionally wonderful) circumstance, we cannot agree that this is a circumstance that justifies weaker rather than stronger protections for the district. The solution to the

“problem” of the stone retaining wall is simply to make sure that the fence avoids it, by angling closer to the house toward the northern side of the property.

In addition, while we appreciate the concern expressed with protecting the stone retaining wall, which is offered as a reason for requesting the variance, we believe equal importance needs to be placed on preserving the other features that make the historic district “a unique location in Glendale” and are at least as significant. These include the ornamental stream bed and ponds, the wood bridges, walkways and stairs. If a bridge is so deteriorated that it must be replaced (which has not been established), it should be replaced in kind not with a “slab stone” bridge, which would likely not comply with the Secretary of the Interior’s Standards for Rehabilitation, Standard 2: “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...will not be undertaken.” The plans aren’t clear what happens to the second wood bridge; is that to be demolished as well? It should not. It appears that there may be a plan to reuse rock from the portion of the stream bed wall that is proposed to be demolished, perhaps for a new decorative feature. That too would be inappropriate. Because of the stone steps, entry to the property from Niodrara should be maintained at the southwest corner of the property.

The Staff Report states that the project is exempt from CEQA based on a Class 3 “New Construction or Conversion of Small Structures” exemption. Under GMC § 30.10.015 a contributor to a designated historic district is defined as “a historic resource.” A Class 31 exemption must be used, which applies to projects that involve “maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of historical resources in a manner consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties...” (California Code of Regulations 14 § 15331). Regardless, it is premature to declare this project exempt from CEQA, because the Planning Hearing Officer is not considering *the whole of the project*. The fence variance is merely one aspect of a project that involves demolition of historic features of the property, irreversible loss of the stream connecting properties along Niodrara, and the addition of a swimming pool and pergola in the front yard of a historic district contributor. Under CEQA (CCR 14 Guidelines § 15378) a project is defined as “the whole of an action,” and all aspects of the project must be taken into consideration when declaring a project exempt, not just the request for a variance.

Review of this project should *begin* with the Historic Preservation Commission, not conclude with it. The project should conform to site constraints, not demolish them to make way for it. It may be that preservation of character-defining landscape features and the aesthetic and visual character of the property, which are also potential environmental impacts under CEQA, would be better served with a fence that meets local and state code requirements and is designed to enclose the pool. Or it may be that the Commission finds the pool inappropriate for the front yard of a historic district contributor whose historical significance is linked to its landscape as well as to its architecture. TGHS believes that ultimately the Commission should decide the placement of the fence, not the Planning Hearing Officer.

The visual and aesthetic impact of any fence in a historic district must be carefully considered. TGHS understands that the design of the fence is conceptual at this point, but

it should as much as possible disappear into the landscape, which is not the hallmark of the concept offered (figure 2), which is proposed to be painted black. The fence's height



Figure 2. Conceptual design of the gate and fence at 1916 Niodrara.

should also be lowered to facilitate this. The Staff Report and Findings are a little confusing: they state alternatively that the fence has been approved by preservation staff and that it will be approved by preservation staff (Staff Report, July 27, 2022, p. 7). But then a condition of approval (#8) is that the HPC must approve the design of the fence before a building permit is issued. We absolutely support HPC design of the fence. We were also glad to see that staff propose retaining the south-facing walkway from the street to the house. This should be in lieu of, rather than in addition to, a new walkway at the north end.

We close with the language of Section 30.25.010 of the Glendale Municipal Code, which states the following purpose of the Historic District Overlay Zone: "The city recognizes that the historic and architectural resources of Glendale are among its most important assets." Among other reasons, we create historic districts "To protect the beauty of the city and improve the quality of its environment through identification, recognition, conservation, maintenance and enhancement of its historic and architectural resources within neighborhoods"; and "To protect designated areas having historic and architectural significance against intrusion of alterations, additions, new structures and other designs that fail to protect such significance."

We want to ensure that Niodrara Drive and other historic districts in the city are protected as written into the Code. Please deny the fence variance and let this project proceed to the Historic Preservation Commission.

Thank you very much for your consideration.

Sincerely,

John Schwab-Sims, Vice President for Preservation
The Glendale Historical Society

cc: Jay Platt, Senior Urban Designer, City of Glendale