



P.O. Box 4173 Glendale CA 91202
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March 9, 2022

Villa Zemaitaitis
Community Development Department
Planning Division Office
633 East Broadway, Room 103
Glendale, CA 91206

Re: Comment on Sustainable Communities Environmental Assessment (SCEA) for 620 N Brand and 625 N Maryland Ave, Glendale CA 91203

Dear Ms Zemaitaitis:

Thank you for the opportunity to comment on this important project.

The Glendale Historical Society observes with disappointment that the 620 North Brand Boulevard Parking Garage (Parking Garage), which is an original component of the larger Home Savings & Loan property (Home Savings), and is both functionally related to the main building and was designed specifically by the architects to reflect features of the larger commercial building and to serve the office building, is proposed for demolition as part of the project without any mention or recognition of historic resource impacts.

The main issues are: ignoring that the Home Savings Parking Garage is a character-defining feature of the 620 N. Brand Boulevard historic resource, the proposed project's lack of conformance with the Secretary of the Interior's Standards for Rehabilitation, the fact that it is not consistent with the current requirements in the Downtown Specific Plan, and the use of a Sustainable Communities Environmental Assessment (SCEA).

Parking Garage

The proposed project would destroy the setting of the property and importantly demolish the functionally related, matching Parking Garage at 620 North Brand, which must be considered a contributing feature of the Home Savings property.

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.

TGHS believes that the Parking Garage is “functionally related” to the main Home Savings Building. The National Park Service directs “Buildings may be functionally related historically if they “...were located on the same property historically (thus, lack of individual lot lines historically could indicate a relationship); were designed as an overall composition around a common landscape feature and are reasonably proximate” (Technical Preservation Services, National Park Service, Functionally Related Structures – General Criteria 2007). The Parking Garage meets each of these stated general criteria.

TGHS notes that the City of Glendale, to date, has not considered the Parking Garage a contributor to or a significant part of the historical resource. However, the Home Savings Parking Garage is part of, and contributes to, the significance of the historical resource. This assertion is based on facts (*e.g.* the date of the Parking Garage construction and as the project architect’s design), reasonable assumption predicated on facts (if the main building is significant under the themes Commercial Development, Post-World War II Commercial Development, Architecture & Design: Post-World War II Modernism (1919-2000), Post-World War II Commercial Development (1945-1969), then so is its *matching, functionally-related* Parking Garage) and expert opinion supported by facts. The evaluation was made by Francesca Smith, who meets the Secretary of the Interior’s Professional Qualification Standards in History and Architectural History and has a substantial design review record. Demolition of the Parking Garage at 620 North Brand Boulevard is expected to cause substantial adverse change to the significance of the National Register-eligible historical resource. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired (California Public Resources Code Section 5020.1(q)). The Parking Garage was specifically designed to correspond to the design of the main building, which since its completion has relied on the Parking Garage for the retail and office uses. Its low-scale concrete-finished exterior reflects the filleted exterior design of the larger building. Both have cornices, and the Parking Garage exterior even corresponds to the effect of the vertical exterior window arrangement.



Figure 1: Parking Garage at 620 North Brand Boulevard, view east. Note the simple base, filleted shaft separated by screens and the bracketed, wide upper frieze. The stepped out, framed entry portal on the right-hand side further echoes the Corporate Modern design style of the main building it was constructed to serve. Photograph January 2022.

We note the close correspondence in the Character Defining Features section, Overall Visual Character and Exterior Materials and Craftsmanship between the Home Savings Building and its Parking Garage using the consultant-prepared Historical Resource Technical Report (January 2022, p. 32). In the table below, review of the Overall Visual Character of the Home Savings Building and the Parking Garage reveals that the Parking Garage shares the main building’s most important characteristics and materials. “Yes” in the tables below means that a concept applies to the Parking Garage as well:

Overall Visual Character

Home Savings Building

- Proximity to freeway
- Setback from west property line that continues around the office building
- Six story height
- Rectangular form
- Vertical orientation
- Symmetrical composition of each façade

Home Savings Building Parking Garage

- YES**
- Not applicable (NA), but consistent setbacks on east and west sides**
- NA two-story height, executed in proportion**
- YES**
- YES despite its low height**
- YES on Maryland side, one of two primary facades**

- Flat roof with parapet **YES flat top deck with flat parapet**
- Wide frieze **YES**
- Narrow window bays **YES narrow openings with screens**
- Centrally located entrances **NO but symmetrical entrances on Maryland side**

Exterior Materials and Craftsmanship

Home Savings Building

Home Savings Building Parking Garage

- Precast exposed concrete aggregate piers and paving **YES precast exposed concrete piers and vertical fillets
Concrete paving is normally poured-in-place**
- Metal framed doors and windows **NA**
- Two-toned window and spandrel glass **NA**

The consultant states the garage is not part of the resource because it was built outside the period of significance, which is 1969, the year the Home Savings Building was completed. Let us leave aside the unjustifiably narrow period of significance that excludes a functionally related and more-over *matching* structure. The Parking Garage was built in 1970, and was designed Homolka and Associates, who were associated with the construction of the main building, which was designed by Heusel, Homolka and Associates. The senior partner, Francis J. Heusel died in 1968.

The Home Savings Building itself was not completed until 1970. The Inspection Record establishes final inspection completed by a Glendale City Building Inspector bearing the initials “AUR” on March 10, 1970 (Building Permit No. 40497, Inspection Record). It makes even less sense to consider the functionally related Parking Garage that was completed in 1970 not historically significant on the grounds it was completed *after* the main building, which was completed the same year. The consultant further erred in evaluating the Parking Garage separately, as though it were not an integral part of and moreover a contributor to the larger Home Savings property.

Based on these facts and our evaluation prepared by a qualified architectural historian, the Parking Garage is part of, and contributes to, the significance of the historic resource. Because of the proposed Parking Garage demolition and the setting impacts, the proposed project is expected to cause a significant effect on the environment, which should have been the conclusion by the Lead Agency.

Substantial adverse change in the significance of a historical resource *is* considered a significant impact on the environment (CEQA Guidelines Section 15064.5(b)). Substantial adverse changes means demolition, destruction, relocation or alteration of the resource or its immediate surround-

ings resulting in the significance of the resource being materially impaired. Significance of a resource materially impaired when the physical characteristics that convey its historical significance and that justify its designation as a historical resource are demolished or materially altered in an adverse manner.

The Lead Agency must prepare an Environmental Impact Report when substantial evidence in the record demonstrates that a project may have a significant effect on the environment.

Compliance with the Secretary of the Interior's Standards for Rehabilitation

TGHS was dismayed to note that the consultant and the Staff reports prepared for the project applied only one of ten of the Secretary of the Interior's Standards for Rehabilitation (Standards) to the proposed project, which is a serious oversight, a procedural omission and is absolutely necessary for any proposed project that would be built on the property of and abutting other historic resources. The cursory reference in the consultant's report to Standard 9, with the puzzling equivocation that "the project *could be* considered 'related new construction'" (p. 45, emphasis added), as though that were not precisely what a 24-story building would be, is simply not adequate and does not make sense (p. 41).

Nor does the assertion that the Standards "are not directly applicable because they are not the threshold for impacts" (p. 41). The Standards are codified both in the Glendale Municipal Code under definitions (Chapter 15.20 Historic Preservation, Section 15.20.020) as well as in the California Environmental Quality Act (CEQA). Indeed, rehabilitation projects that meet the Standards are generally, but not always considered categorically exempt from CEQA review. The Standards are nationally recognized and used as the best measurement to gauge potential impacts of a project, are always applicable for a project involving a historic resource under CEQA. Whether or not the Standards are the "threshold for impacts" is irrelevant. This project does not meet the Standards *because* it would result in substantial adverse impacts to a historic resource, not the other way around.

We note that nothing in the Staff Report addresses either historical resources' setting or the massive changes proposed to those settings.

Absent a local or state definition for setting, it is a term of art specifically defined in National Register guidance as:

the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the character of the place in which the property played its historical role. It involves how, not just where, the property is situated and its relationship to surrounding features and open space.

Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as...vegetation; simple manmade features (paths or fences); and *relationships between buildings and other features or open space*.

These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its surroundings (National Park Service “How to Apply the National Register Criteria for Evaluation” 1990, revised 1995, emphasis added).

The current proposed project would permanently destroy the character of the property, including but not limited to its relationship to surrounding contributing features and its integral internal open space.

While each of the Standards applies to the proposed project, Standards 1, 2, 4, 5, 9 and 10 are particularly germane and, as demonstrated below, would not be met or followed in the proposed project:

1. A property will be used as it was historically or be given a new use that requires minimal change to the distinctive materials, features, spaces, and spatial relationships.

The Home Savings Building and its property include the landscaped surface parking lot and its functionally related, original, and matching Parking Garage (Parking Garage). Elements of the Home Savings Building’s property (Assessor’s Parcel No. 5643-018-032) and its distinctive matching contributing garage would be subject to demolition, which would clearly alter not only the Parking Garage itself, but the spaces between buildings, landscaping, parking lot and spatial relationships associated with the property. Each of those characteristics would be permanently lost by the construction of the out-of-scale new project.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

Likewise, the currently proposed project would demolish both the extant open space and its original, functionally related, coordinated Parking Garage which clearly cannot be understood as retaining or preserving those contributing and character-defining features.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

Despite the consultant’s suggestions to the contrary, the Parking Garage is an original feature of the Home Savings property. While there is no clear known record of the landscaping in the related parking lot, its current planting plan and arrangements of lawn, foundation planting and trees with low, stepped stacked Roman blocks or bricks should be considered the historic baseline.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property will be preserved.

The Parking Garage’s distinctive features, as well as the concrete exterior features and finishes, including the board-formed concrete mushroom interior columns’ construction techniques, the stack bond concrete masonry unit end walls as well as other examples of that craftsmanship which characterize the Home Savings Parking Garage would be permanently lost.



Figure 2: Parking Garage interior view north. Note the fitted screens in the exterior openings (left) archaic stack bond endwalls (center and right), and square, full height support columns at center and right with yellow bases. Photograph January 2022.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the historic integrity of the property and its environment.

The proposed more than 460,000 square-foot (SF) new “addition” would certainly be related new construction. It would demolish, thereby destroying, the historic materials that characterize the property including the landscaped parking lot and the functionally-related Parking Garage.

10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The latest design for the proposed nearly half-a million SF “new addition,” which is both adjacent and undeniably related new construction, would require that all of Home Savings integral parking be destroyed. If the more than 460,000 SF addition was removed in the future, the essential form and integrity of the Home Saving Building property and its environment would be more than impaired; they would have more than four-story below-grade pits. The Home Savings Building would have no parking whatsoever, and worse, its related setting including the Parking Garage would be forever lost.

Another important historic resource impact we see has not been addressed is the very real potential for vibration-related damage to both historic properties (including differential settlement) during and in the immediate years following construction. Protection from other construction-related activities, such as equipment and vehicles striking buildings, over-spray of various materials, over-excavation of the soil and pile driving depths and methods will present a serious threat to the historic properties. Without a complete study by a qualified structural engineer who has a demonstrated specialty in the protection of historic buildings before and during construction directed by clear, concise mitigation measures that would ensure structural investigations, pre-construction surveys, continuous vibration monitoring with related stop-work orders that would trigger less vibration-intense equipment or methods, we can only assume that damage may well occur to the historic resources, which would be extremely close to the proposed project, its subterranean garage and whatever types of pilings will be proposed. This concern was voiced by Design Review Board Caro Minas, CE, GE, a geotechnical engineer, in the DRB meeting on January 13.

For these reasons, we believe this project as currently proposed does not comply with even the most basic principles in the Standards for Rehabilitation. This analysis was thoroughly reviewed for adequacy and accuracy by former Board of Directors and former Design Review Board member Francesca Smith, who meets and exceeds the Secretary of the Interior’s Professional Qualification Standards.

Downtown Specific Plan Compliance

The Glendale Downtown Specific Plan (DSP) contains Standards that direct:

B. The bulk of buildings shall be reduced through the articulation of building massing and building facades.

Articulation emphasizes the different visible aspects of the various parts of a building. Sometimes the effect completely obscures the sense of the whole, breaking it down into too many pieces, but in most cases, articulation creates a balance between the two. Articulation can also be expressed in recessed bays, which require giving up small amounts of valuable real estate. The modest articulation in the following figures emphasize the proposed building's nearly indefinable parts (Figure 1). There are three basic components, the base, equal and repetitive “grid” bay types on the left and right sides and the off-center, top and far left bays proposed as “dark gray spandrel glass.” The

only visible proposed enunciation of components, other than the obvious differences in materials, is in the difference in heights at the top floors of the proposed project, see Figures 3, 4, 5 and 6.

We also note that the proposed differences in color on the exterior of a high-rise, which is generally a difficult long-term maintenance choice, does not provide the necessary articulation. The proposed busy color scheme would provide some animation at an unnecessary long-term cost, but not the necessary articulation of massing required. Note that the differences in color are nearly lost at the scale depicted in the figures below.

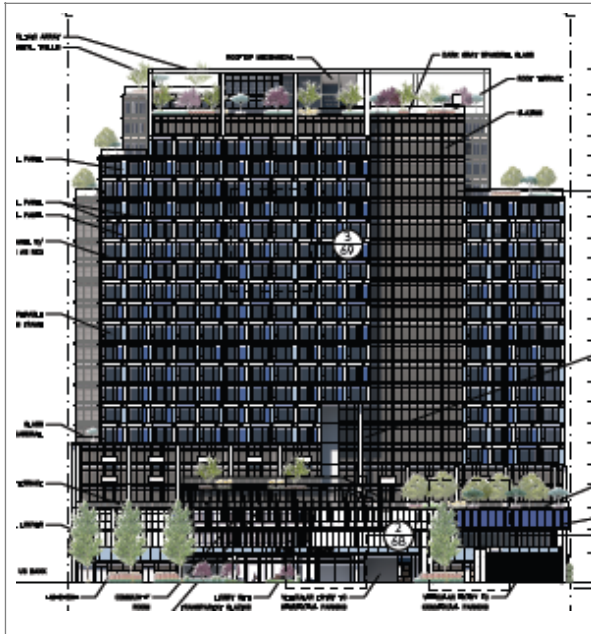


Figure 3: Excerpt from East Elevation, page 57. Note the parsimonious difference in heights on the left and right three bays. Source: Lucia Park 625 Maryland Ave, Glendale CA Stage II Design Review by John Freidman Alice Kimm Architects, 2019, not for publication (Lucia Park).



Figure 4: Excerpt from South Elevation, page 58. Note the limited heights on the left and right bases (one or two bays). There is no recognition of the Home Savings Building’s frieze or of its termination in lower middle section of the addition. The Fidelity Savings Building at 600 North Brand Boulevard, a historic resource which is six stories high is not depicted. Source: Lucia Park.

D. High-rise facades (as defined in Chapter 30.33 of the Zoning Code) shall provide a substantial modulation or change of materials every 150 feet in length.

The material presented does not clearly show 150 foot intervals nor does it provide adequate scale to determine those measurements. Based on our 150 foot estimates used in review of elevations, the proposed design does not comply with the standard for the required substantial modulation in continuous walls or the requisite differences in materials.

G. To improve the consistency of scale on the streets, new buildings shall respond to the scale and placement of design features of earlier buildings adjacent to them. Such design features include but are not limited to cornice lines, colonnades, fenestration, and materials.

Review of the full design packet as well as Exhibit 1 and Figures 3, 4 and 5 reveals that that the project, as currently proposed, does not respond to the modest scale of the existing historic resources. The Home Savings Building has, among other character-defining features:

- a prominent cornice line,
- a raised, continuous exterior podium with low open, wide stairs,
- deep, full height exterior fins,
- a Parking Garage designed as a miniature interpretation of the main building, and
- an existing open parking lot.

Although the proposed design does incorporate some features of the Home Savings Building, there are opportunities to strengthen the connection with additional modifications.

K. Projects built adjacent to historic structures that are smaller in scale shall step down at the street wall to align with the existing cornice.

We see inadequate evidence in the proposed 24-story building design of any such response to the existing, established low-rise scale on the subject property block. To that end, little human scale is expressed in the proposed design.

Because the proposed cornice lines would not align with the historic buildings on either side, the proposed window bay rhythm and fenestration bear no relation to the existing, elegantly modulated Home Savings Building.

The proposed building at 24 stories would not “step down” as described to align with the existing cornices (see Figure 6). A string course or “a horizontal band... in a building forming a part of the design” is not a step, except on three bays at the slim north side which notably faces the freeway (*Merriam-Webster.com Dictionary*, Merriam-Webster, <https://www.merriam-webster.com/dictionary/stringcourse>. Accessed 9 Jan. 2022). In the section entitled “Building Design: Massing and Scale,” the Downtown Specific Plan directs in a diagram that “High rise massing should be divided to reduce overall bulk and step graciously down towards lower adjacent structures” (page 4-11). We see little stepping and no demonstrated evidence of design courtesy or deference toward the existing, low-rise historic resources.

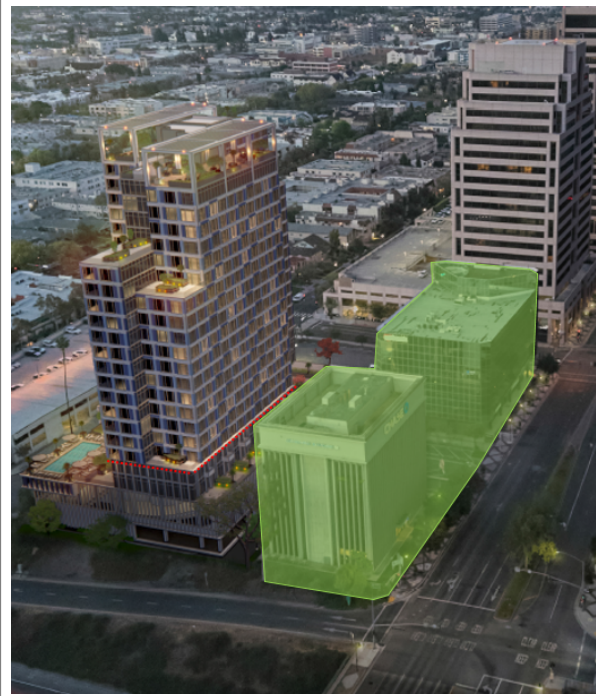


Figure 6: Annotated excerpt from page 8 of Exhibit 1, Stage II Final Design Review Packet. Proposed project string course is highlighted in a dashed red, the historic buildings at 600 and 620 North Brand in green. Note that the building immediately south of the proposed project (top right) has stepped volumes at beginning at the base which diminish in size sequentially from the wide base to the top floors, thus allowing the much taller, larger building to fit into the existing low-rise context. Source: “high aerial from northwest- looking south on Brand Blvd” Lucia Park 625 Maryland Ave, Clendale CA Stage II Design Review by John Freidman Alice Kimm Architects, 2019, not for publication.

The project Staff Report asserts “The project effectively utilizes off-set building forms, step-backs, façade modulations and floor plate reductions to lessen the appearance of its mass. The end volumes also step down at their outside corners in order to break down their overall massing, similar to several taller commercial buildings just to the south on the same side of Brand Boulevard (400-550 N. Brand, [Figure 7]).” The project provides the absolute minimum step-backs and doesn’t compare to those in the block to the immediate south.

Figure 7: Rendering of 550 N Brand Boulevard, a 21-story building designed by HOK, Inc. and completed in 1989. It is located on the block immediately south of the proposed project. Note the five generous major steps in the design, as well as the different window rhythms, shapes and sizes of openings, the inverted entrance and corners that reduce the perceived mass of the Post-Modernist style building. Not for publication.



Additional details of the proposed “step” in the proposed project In Figures 8 and 9, and on pages 53, 56 and 57 of Exhibit 1, Stage II Final Design Review Packet reveal that the step it is no more than a difference in materials, applied at the same depths, embellished by a horizontal band. The proposed step is more window dressing than a demonstrable difference in dimension.

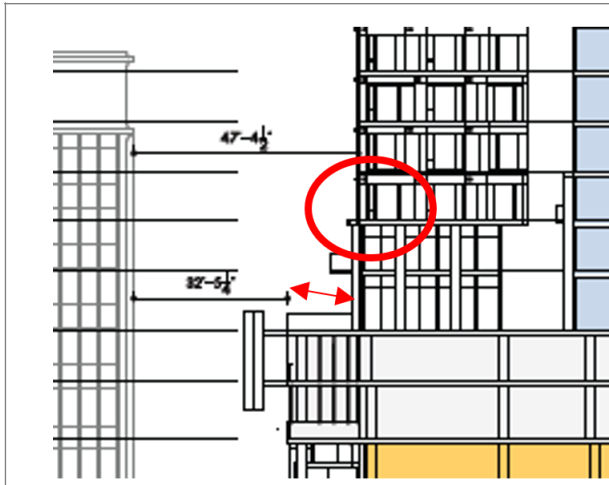


Figure 8: Excerpted annotated section from page 53, “step” between the proposed 5th and 6th levels is circled in red (East-West Section 1). Home Savings Building is depicted at left. The wider volume below is the 1st-3rd floor base that is approximately 15 feet larger, shown as a red arrow.

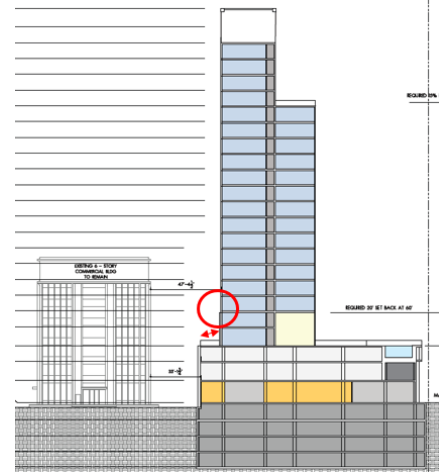


Figure 9: Excerpted, annotated section from page 54, “step” between the proposed 5th and 6th levels is circled in red (East-West Section 2). Note it bears no relation to the Home Savings Building, which is depicted at left. The wider volume below is the 1st-3rd floor base that is approximately 15 feet wider, shown as a red arrow.

What review of the design packet reveals is that the proposed project steps “away” from the Home Savings Building by fewer than 15 feet, which is less than the length of standard parking spaces (red arrows, Figures 8 and 9). What the proposed project would actually “step back” from are the low-rise buildings on the east side of Maryland Avenue, by 20 feet (just 2 feet longer than a standard parking space).

Is the Proposed Project Eligible for a SCEA?

TGHS cannot determine whether the proposed project is being considered a Transit Priority Project under Senate Bill 375 (SB 375) and that would be the reason the Lead Agency is preparing a SCEA instead of an Environmental Impact Report (EIR). SB 375 provides several CEQA reform provisions, including streamlined review and analysis of residential or mixed-use projects consistent with the Sustainable Communities Strategy (SCS); modified review and analysis, through an expedited SCEA for Transit Priority Projects (TPPs) that are consistent with the SCS; and a complete CEQA exemption for TPPs that are consistent with the SCS and meet a specific list of other requirements. A project does not qualify for the CEQA streamlining exemption if it can be expected to cause impacts to historic resources, as is the case here.

Conclusion

We are grateful for the opportunity to comment. We at TGHS are not opposed to new development as the city desperately needs new housing options for its residents. We do believe that the current proposal is detrimental to current historical resources, including but not limited to demolishing the Home Savings garage that was developed and designed as part of the bank building.

Sincerely,

A handwritten signature in black ink, appearing to read "John Schwab-Sims", is written over a light gray rectangular background.

John Schwab-Sims
Vice President, Advocacy
The Glendale Historical Society