



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

Mayor Kassakhian and Members of the Glendale City Council  
via email

**Re: Agenda Item 1, 620 N. Brand Boulevard – Stage 2 Design Review**

Dear Mayor Kassakhian and Council Members:

Thank you for the opportunity to comment on this project. TGHS previously submitted comments at Stage 1. This letter updates our prior letter to the Historic Preservation Commission (HPC).

The Glendale Historical Society agrees with the HPC's conclusion that the project as proposed would cause a substantial adverse change in the significance of a historical resource, which means that a SCEA cannot be used and an EIR must be prepared. The developer's own consultant found 620 N. Brand eligible for the California and National as well as the Glendale historic registers. We ask that the City, as required by law, disclose the impacts and study feasible alternatives to the project, including a much smaller residential building.

### **What Is the Historic Resource?**

TGHS and the City agree that 620 N. Brand is a historic resource. There are two disputes: first, whether the resource includes the garage as well as the office building. Jay Correia, Supervisor of the Registration Unit for Cultural Resources Management at the California Office of Historic Preservation answers that question for us. He states that "*without question*" the garage is a contributing resource "[f]or National Register and California Register purposes." "[T]he parking garage cannot be ignored or dismissed. We would *require that it be included in any nomination or evaluation for environmental review*" (email dated February 8, 2022, emphasis added, see attachment 1).

The developer's consultant and the City dismiss the garage, based on unpersuasive and inaccurate claims, which the HPC rejected. They claimed the parking garage is not part of the historic resource because it was built in 1970 while the building dates from 1969. This distinction is nit-picking but also wrong: the office building was in fact completed in 1970 (per City Building Inspector "AUR," Building Permit No. 40497, Inspection Record, March 10, 1970). The office building was designed by Heusel, Homolka and Associates, and the parking garage was likewise architect-designed, by the successor firm Homolka and Associates, following the death of senior partner Francis J. Heusel. Furthermore, the parking garage specifically matches the Neo-Formalist office

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.

building: its low-scale concrete-finished exterior reflects the latter’s filleted exterior design. Both have cornices, and the parking garage exterior openings even respond to the vertical exterior window arrangement of the office building. The correspondence is unmistakable and striking (figure 1). The letter solicited from HRG (Appendix I) does not even bother to describe the garage fully (and is silent on the impact of the project as a whole on the property’s historical significance).



Figure 1. Matching garage with office building in background.

Moreover, the consultant finds the property historically significant as “the first high-rise building in Glendale to be oriented toward the freeway”; “it was at the forefront of the trend in commercial highrise development along the freeway that followed in the 1970s” (“Historic Resources Technical Report,” p. 26). The freeway did not bring pedestrians; it brought *cars*, and the matching parking garage built to accommodate them is obviously part of the story it tells about postwar commercial development on Brand Blvd., along the freeway, in Glendale.

The second dispute is whether the proposed new 24-story building obliterates the six-story historic office building without actually knocking it down. Nothing illustrates better its overwhelming height, scale and proximity than the cover of the Historic Resource Technical Report (figure 2). Concluding that the proposed new construction would not impact the historic resource, the



Historical Resource Technical Report

Figure 2. Technical Report Cove. Small grey building to the right is the historic Home Savings Building. Another adjacent historic resource, the Fidelity Savings Building at 600 N. Brand, is not visible and would be similarly overwhelmed.

consultant concedes that “The project would introduce a new visual element to the setting of the historical resource” (p. 43). A “visual element” is a fountain or a statue not a 24-story building. The setting would be obviously destroyed.

Attached comments from two qualified architectural historians, including from Glendale resident Daniel Paul, support TGHS’s contention that the garage is part of the historic resource and the project would adversely impact the significance of the historic resource.

### **Support for Preservation Is Not “Perpetuating” Glendale’s Racist Past or Anti-Development**

TGHS believes that development *on* historic properties needs to respect and minimize impacts to them; this is not “weaponizing” historic preservation to perpetuate Glendale’s racist past, as Bradley Calvert asserted at the Historic Preservation Commission hearing. TGHS requested an African American Context Statement years before the city agreed to prepare one, and yet we are told that our position on this project is somehow out of compliance with a document we have not seen. TGHS deplores Glendale’s history of racism and redlining, a discriminatory practice used to withhold investment from “hazardous” neighborhoods, meaning those with large numbers of racial/ethnic minorities and low-income residents. Indeed, our concerns about this past motivated our failed effort to convince the City to prevent demolition of “Clicko” House, where a famous Black circus performer lived, briefly and secretly, in 1938-1939. We reject Mr. Calvert’s contention that the project at 620 N. Brand offers any way to “mitigate” and “correct” the history of redlining, and that any opposition “is only perpetuating those same exclusionary practices.” Imagine our surprise, after his speech, to learn that there will be **zero affordable units** at 620 N. Brand. The developers are instead paying an in-lieu fee. In 2022! Glendale embarrasses itself by championing a luxury project that is closed to low-income residents as a remedy for past redlining. The failure to provide onsite affordable units is especially troubling for a Transit Priority Project, given that its proximity to decent public transportation would most benefit low-income residents. We hope that any decision you make now or in future to add residential units to the site would mandate affordable housing on the property to achieve Mr. Calvert’s vision of “a diverse and vibrant community,” a goal we surely all share.

TGHS is not opposed to new development in Glendale—or even on this site—and understands that both the urgent need for more housing and state law require it. Despite many disagreements over the way the City has handled individual projects, including needless demolition of historic buildings that were *perfect candidates* for adaptive reuse as housing, such as the brick medical office buildings on Central Ave. and 3901 San Fernando Road, TGHS appreciates that Glendale has long planned for growth, well before our neighbors. However, this growth need not come at the expense of our diminishing historic resources. Only about 4% of properties surveyed in the South Glendale Historic Resources Survey, which only included properties built before 1979, were identified as historic resources. The whole point of the Survey was to identify what is historic and *worth preserving*. This property is *special*, and *any development* that occurs on it should respect its character and importance. This project unequivocally does not. A revised project could do so.

### **A SCEA Cannot Be Used If There Is a “Fair Argument” of Historic Resource Impacts**

No one disagrees that the property at 620 N. Brand is a historic resource. Under Public Resources Code section 21155.1(a)(5), a SCEA is applicable *only if* the proposed project “*does not have a significant effect* on historical resources pursuant to Section 21084.1” (emphasis added). Under this section, 620 N. Brand qualifies as a historic resource that is “presumed to be historically or

culturally significant...unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.” No expert has suggested the property is not “historically or culturally significant”; the disagreement is over project impacts. CEQA’s low-threshold “fair argument” standard applies to this question. The exception to CEQA categorical exemptions, like the “applicability requirements” of a SCEA, depend on whether “a project may cause a substantial adverse change in the significance of a historical resource.” The California Supreme Court’s decision in *Berkeley Hillside Preservation v City of Berkeley* (2015) 60 Cal.4th 1086, 1117, endorsed the fair argument standard on that issue, citing with approval the holding of *Valley Advocates v. City of Fresno* (2008) 160 Cal.App.4th 1039, 1072 that “the fair argument standard applies to the question of whether the proposed project ‘may cause a substantial adverse change in the significance of an historical resource’ and thereby have a significant effect on the environment.” There is no contrary authority. Because there is a fact-based fair argument that the proposed project at 620 N. Brand will significantly impact a historic resource, the SCEA procedures do not apply. Only if a project is subject to a SCEA process, which this is not, does the deferential substantial evidence standard apply—to review of the legal adequacy of the public agency’s “review and approval” as stated in Section 21155.2(b)(7).

## Conclusion

TGHS fervently hopes that Council will discourage such contortions by staff to deny that the whole of a property is historic and avoid proper environmental review under CEQA. It would save time and trouble to just prepare an EIR and adopt a Statement of Overriding Considerations if Council believes the public benefits outweigh the expected impact on the environment. The impact of the project as proposed on the eligibility of the historic resource—on its *significance*—is obvious and is supported by fact-based expert opinion as well as the findings of the Historic Preservation Commission. It must be studied in an EIR. We hope Council will either order one prepared or direct the applicant to revise the project to be compatible with the historic resource.

Thank you for your consideration.

Sincerely,

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

cc: Aram Adjemian, City Clerk  
Roubik Golanian, City Manager  
Jay Platt, Senior Urban Designer  
Steve Hunt, President - The Glendale Historical Society

## Attachments

1. Email from Jay Correia
2. Correspondence from architectural historians Francisco Sonnier and Daniel Paul
3. Previous comment letter from TGHS to Council, January 2020