

MEMORANDUM

July 14, 2016

To: City of Glendale Design Review Board

From: Jay Platt, Senior Urban Designer

Re: 510-12 W. Doran Street – Project Analysis and Response to TGHS Comments

Planning staff has reviewed the letter submitted to the Glendale Design Review Board by the Glendale Historical Society (TGHS), dated June 22, 2016, regarding the project at 510-12 W. Doran Street. This memorandum is provided to the Board to indicate staff's analysis of the project and provide a response to the various concerns raised by the historical society.

Project Analysis

By way of background, when the applicants first presented a project for this site in 2013, demolition of the existing house was proposed. Staff indicated that the subject property contained a potential historic resource and that a historic evaluation would be necessary. The c. 1910 house appears to be a highly intact representative of the Transitional Craftsman sub-type identified in the City's 2007 Craftsman survey. Although, the house itself was not included in the survey because the survey did not include properties in the R-3050 zone. Houses like this reflect the shift from the Folk Victorian style that lingered into the first decade of the 20th century, typified by simple wood-clad structures with modest Victorian flourishes, toward the less ornamental, structurally-expressive Craftsman style that began to coalesce in the years just before the subject property was built. Homes of this type and period appear to be rare in Glendale and staff expressed concern that the loss of 510-12 W. Doran could result in a significant adverse impact under CEQA.

A historic structure evaluation, prepared for the applicants by Kaplan Chen Kaplan and dated September 15, 2014, was submitted for staff review. The document found the property to be ineligible for historic designation at the local, state, or national level, concluding that it is therefore not a historic resource under CEQA and its demolition would not be an adverse impact. Staff found the report to be inadequate, particularly with regard to the property's eligibility for the Glendale Register under Criterion 3. This criterion features several clauses under which a property's architecture may qualify it for designation. Specifically, staff believes the Doran house appears to meet the first clause in that it "embodies the distinctive...characteristics of an architectural style, architectural type, [or] period..." Rather than hire another consultant or ask Kaplan Chen Kaplan to revise their report and provide more detailed bases for its conclusions, the applicants decided to work with staff to retain the house and relocate it on site to free up space for new development. In analyzing the site and zoning constraints, the applicants further proposed to reduce the size of the house by removing approximately the rear third of the structure.

Staff acknowledges that the current proposal represents a compromise that allows for adding density to the site while retaining the overall historic character of the house, as well as its ongoing eligibility for listing on the Glendale Register. Though the rear eighteen feet of the structure will be removed and the setting of the property will be considerably changed, the house will retain all of its character defining features (as discussed below) and continue to convey the significance of its architectural design, typology, and period of construction, therefore continuing to meet Glendale Register Criterion 3. For guidance in this assessment, staff referred to *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Section 8 of this document focuses on evaluating a property's integrity, meaning its ability to convey its historic significance:

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. **A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation.** The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style. [emphasis added]

Staff also believes the property meets Criterion 5, the City's "incentive criterion," as its early condition and retention of many character-defining features helps it "exemplif[y] the early heritage of the city."

The subject property will retain the character-defining features of its style. It will remain a rectangular-plan house, though shorter in depth than its original configuration, with a hipped roof featuring flared eaves. The roof itself is one of the key signifiers of the period of construction because of its height and pitch. Both of these aspects will be retained and the structure's placement on the continuum between the Victorian and Craftsman styles will continue to be clear to the observer. Some spatial arrangements of the actual house (notably its overall length and the relationship between the east attic vent dormer and the roof) will change due to the removal at the rear, but all others will remain the same. The spatial relationship between the house and its immediate setting will be completely changed, an inevitable result of the proposed preservation/development compromise. The proportions of the house will be somewhat altered by its shortening, but the overall relationships between the components of each facade will remain the same. Historic window sash and opening patterns will be retained, including the east and west bay windows, with the exception of the loss of one window at the west façade and the reconfiguration of a three-part window at the east façade into a single sash. The rear windows, along with their pattern will also be retained at the new south wall. The front door and sidelight will remain. The rear doors and transom will be reconfigured and placed in a new, shorter opening, allowing some of the existing appearance to remain. The rear deck and French doors opening on to it are probably not original and the metal railing is clearly a contemporary addition. There is visual evidence that the rear façade has undergone alterations over time, but maintaining its overall appearance as proposed is appropriate. Finally the front porch materials, columns and capitals, window surrounds and sills, and clapboard siding will all be retained. At the new rear wall, the existing siding will be reused, if possible, and any new siding will be milled to match the existing.

Staff is confident that, as proposed, the house will retain enough of its historic character, physical materials, and overall integrity to remain eligible for the Glendale Register. If the property in its current condition were also determined eligible for the California

Register, it is likely that that eligibility would be retained upon the conclusion of the project given the rarity of this building type in Glendale. Per National Register Bulletin 15:

Comparative information is particularly important to consider when evaluating the integrity of a property that is a rare surviving example of its type. The property must have the essential physical features that enable it to convey its historic character or information. The rarity and poor condition, however, of other extant examples of the type may justify accepting a greater degree of alteration or fewer features, provided that enough of the property survives for it to be a significant resource.

The TGHS letter indicates that the group has reached a series of different conclusions for a variety of reasons. The remainder of this memorandum considers and comments upon the issues raised by the group for consideration by the Design Review Board dated June 22, 2016.

Response to TGHS Comments

- **Categorical Exemption under CEQA**

The City has determined the project to be Categorically Exempt from further review under CEQA as a Class 31 "Historic Resource Restoration/Rehabilitation" exemption pursuant to Section 15331 of the State CEQA Guidelines. TGHS asserts that this exemption is not applicable because the project may cause a substantial adverse change in the significance of a historical resource, specifically by materially impairing its significance. While staff clearly acknowledges that there will be a material change to the property, its analysis suggests that the changes will not impair its significance or its ongoing eligibility for designation. Given this, staff believes the Categorical Exemption is appropriate and the City has correctly followed all CEQA requirements.

- **Secretary of the Interior's Standards for Rehabilitation**

The National Park Service defines rehabilitation as, the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values. Staff views the proposal for 510-12 W. Doran as a rehabilitation, through which the property will be allowed to change in a way that retains its significance. The Secretary of the Interior's Standards are a set of federal guidelines for the treatment of historic properties that the Park Service indicates should be applied to projects in "a reasonable manner, taking into consideration economic and technical feasibility." There are ten standards, each of which is addressed in the TGHS letter. Each standard is listed below, followed by the TGHS comments and staff's response.

Standard 1

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

TGHS: The proposed project necessitates removal of a large amount its distinctive materials (demolition of the rear third of the building, its foundation and front steps, rear porch and reconfiguration of its roof), its features (rear 18 linear feet, back

porch, foundation and roof form), its exterior and certain interior spaces. The existing roof is pyramidal in front with bellcast eaves. As proposed, the upper ridge would be lowered and the overall shape changed, resulting in a modification of its large scale and careful original proportions. The proposed project would entirely alter the spatial relationships with neighboring buildings on all sides, as well as its setback from the street, position on the parcel and the size of its parcel. The front yard would be reduced by about half. The enormous front and rear new building designs would entirely overpower the original, main residence because of their large masses, sizes and heights. The original height of the original building's roof ridge is not provided (existing or proposed), nor is the dimension of the main building's original setback. The project does not meet this standard.

Staff: This standard really focuses on the use of a historic property. In this case, the house will remain residential in use and therefore meets Standard 1. The TGHS discussion is more relevant to Standards 3, 5, and 9. Nonetheless, several clarifications of the TGHS statements are in order. The ridgeline of the existing house will remain at its current height, though shortened in length, and the change in pitch at the eaves will be retained. Some inaccuracies in the drawings, the correction of which is a condition of approval in the staff report, may have led to this conclusion. The existing foundation will be demolished and a new one poured at the new location. This is typical for the relocation of all historic properties and does not violate the Standards as the existing foundation is not a character defining feature. No distinctive materials will be lost as a result of the demolition of the rear portion of the house. Staff agrees that the spatial relationships of the existing site will be completely altered by the project.

Standard 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.

TGHS: The historic character of the property would not be retained or preserved by the building relocation. Its roof shape, roof and building height, entrance steps, foundation, rear windows and deck would change as a result of the demolition of the rear third of the house. For a building of this style, its roof is undeniably a character-defining feature. Existing wood-sash windows should not be removed: they should be protected, shored and boarded-over in place during any relocation activities. None should be reconfigured or rearranged as proposed. The existing entry stairs are five steps high at most; the proposed elevation depicts six. Thus the proposed foundation looks to be higher than the existing foundation. Neither the existing nor the proposed materials of the foundation and steps are specified. Based on review of photos, the chimney may need to be dismantled and reconstructed as existing with an appropriate new brick chimney stack above the roof line. See above for discussion of the existing spatial relationships for the subject building which would be entirely lost. The project does not meet this standard.

Staff: As discussed in greater detail above, staff believes that, despite the proposed alterations, the historic character of the property, including its distinctive materials and features, will be retained and preserved. Staff believes that, with the exception of the change in the site's spatial relationships, the project meets Standard 2. While the hipped roof will be shortened, it will remain a hipped roof with a height and pitch

that clearly distinguishes its character as a Transitional Craftsman structure. The flared eaves will be retained and a condition of approval calls for corrections to the drawings that will include the accurate depiction of the existing and new portions of roof. Almost all windows will be retained as discussed above. Staff believes the applicants' intention is to keep the new foundation at its current height and maintain the historic steps at the front. A condition of approval calls for the staff-required moving plan to include detailed specifications for the treatment of the porch and its steps and railings with the goal of retaining the historic porch material. The proposal calls for rebuilding the chimney in its current altered configuration. The Board may see fit to recommend another treatment, perhaps including the construction of a simple brick upper portion to bring this element closer to its original appearance.

Standard 3

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 or elements from other historic properties, will not be undertaken.

TGHS: Proposed new buildings both facing the street and behind the historical resource row should be subordinate in design and size to the existing building: all smaller, lower, set back farther from the street and less imitative in their proposed designs in order to avoid creating a false sense of development. As proposed, the far taller, almost entirely unarticulated, visually unanimated, Hardieplank®-finished, new buildings with clad windows would take visual and aesthetic precedence over the main house, which is the historical resource and should be the focal point. The project does not meet this standard.

Staff: Staff agrees that the new construction on the site should not be imitative of the historic structure's style; several recommended conditions regarding roof brackets and color palette will help achieve this. Staff accepts that the two-story configuration of the new units is an unavoidable result of the applicants desire to add marketable units to the site. Efforts to articulate the new units are relatively successful given the tight site, but Board recommendations to enhance this would be welcome. Staff believes that the new and old structures are clearly differentiated and that there is not a false sense of historical development. As conditioned, the project will meet Standard 3.

Standard 4

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

TGHS: While the rear third of the original building is not a known alteration, it should not be demolished to make way for large, out-of-scale additions to the property. An established period of significance may inform this question. The building is being proposed to be moved entirely within its previous front set back, which neither retains nor preserves its original setting. The project does not meet this standard.

Staff: The TGHS comments are not germane to this Standard. There are no apparent changes to the property that have gained significance over time. This Standard is not applicable to the project.

Standard 5

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

TGHS: The rear third of the building should not be demolished to make way for large, out-of-scale additions to the property. The windows should not be removed and re-installed, but retained in place and protected during any relocation activities. Particular care should be given to the entry sidelights, which are probably more brittle than the other windows. The front door may be removed, preserved, and the opening braced during a move. Consult a reputable stained-glass expert with experience in successful rehabilitations. The house mover should also have demonstrated success with relocation of historic buildings. The project does not meet this standard.

Staff: As discussed previously staff believes that no distinctive, character-defining aspects of the house will be lost through the removal of its rear portion. Staff agrees that the relocation of the house must be performed extremely carefully. A recommended condition of approval calls for the work to be performed by a state-licensed mover experienced with historic structures. In addition, staff-recommended conditions call for the preparation of a detailed restoration plan and high-quality photo documentation to be submitted for review and approval prior to issuance of any moving or building permit. Staff believes that, as conditioned, the project will meet Standard 5.

Standard 6

Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

TGHS: See TGHS comments 1-5 above. The chimney may require dismantling and reconstruction and the stack above the roofline should be reconstructed according to documentary and physical evidence. The project does not meet this standard.

Staff: The applicants' intention is to restore and repair all exterior materials whenever possible and use in-kind replacement for material too damaged to retain. The conditioned restoration plan will also help ensure this standard is met. Staff also recommends that the Board consider the reconstruction of the missing upper portion of the chimney as called for by TGHS. As conditioned, staff believes the project meets Standard 6.

Standard 7

Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

TGHS: This standard should be followed wherever applicable: including repainting, removal of bricks, etc. The project may meet this standard, but without detailed plans and specs, it cannot be assured.

Staff: Staff agrees with the TGHS comment and believes that the recommended condition calling for a restoration plan, to be approved by staff, will allow the project to meet Standard 7.

Standard 8

Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

TGHS: This standard must be followed if archeological resources are found. Construction should stop until a qualified archaeologist can judge the significance of the resource. The project could meet this standard if an appropriately worded condition were included in the plans, specs and environmental document.

Staff: Standard City protocols regarding the discovery of potential below-grade historic resources address this issue, allowing the project to meet Standard 8.

Standard 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 integrity of the property and its environment.

TGHS: The new buildings should be far more visually subordinate to the existing building. Their designs, scale and massing and their materials should be far less imitative than proposed. The rear third of the building should not be demolished to make way for large, out-of-scale additions to the property. Compatible, differentiated designs need not be derivative and are normally discouraged. The project does not meet this standard.

Staff: For the reasons discussed in the sections above, and with the exception of the loss of the site's existing spatial relationships, staff believes that the project meets Standard 9. Staff-recommended conditions to remove roof brackets and change the proposed paint palette will help differentiate the old and new designs. Staff recognizes that TGHS's call for a less imitative design is an option, but can support the applicants' proposal to utilize horizontal siding and hung windows with trim boards because it helps harmonize the new structure's design with that of the historic house.

Standard 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.

TGHS: As proposed, the new additions and adjacent, related new construction are not proposed 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. Consider a revised design with fewer, smaller units that do not overpower the existing building and if removed in the future, would retain the essential form and integrity of the historic property and its environment. The project does not meet this standard.

Staff: The removal of the rear portion of the house and its relocation toward the northeast corner of the lot make it difficult to meet this standard as they are for all practical purposes non-reversible, and agrees with TGHS that the intent of this Standard cannot be fully met. Staff does believe that despite this, the essential form and integrity of the house, if not the site, will remain intact. As noted in Park Service documents, economic feasibility can be considered when assessing a project against the Standards, which appears to be appropriate given the project goals and the various zoning code restraints on the site.

- **Conformance with the Standards and *Moving Historic Buildings***

Staff recommends a condition of approval calling for the applicants to hire a moving company that is licensed by the state and has proven experience in the relocation of

historic structures, and expects this to address the concern raised by TGHS.