



P.O. Box 4173 Glendale CA 91202  
[www.GlendaleHistorical.org](http://www.GlendaleHistorical.org)

September 13, 2022

Kristen Asp  
Planning Hearing Officer  
City of Glendale  
Sent via email

**RE: 2960 St. Gregory Road, PVAR 2002984**

Dear Ms. Asp:

The Glendale Historical Society is grateful for the opportunity to comment on the request for two variances for the project at 2960 Saint Gregory Road as well as the proposed Class 3 Categorical Exemption from CEQA under Section 15303.

We originally commented on a project at this property in October 2020, when TGHS pointed out that the Mid-century Modern residence was designed by Charles Walton AIA, an important and prolific local architect who lived in and designed numerous buildings in Glendale.

We noted in 2020 that a historic resources assessment was apparently prepared for this property but was not part of the documentation available to the public for review. A 2020 historic resource evaluation, from Sapphos Environmental, has now been made available for review. That evaluation presents numerous problems that we bring urgently to your attention.

### **Issues with the Consultant**

There are three firms, well known among both the developer and preservation communities, whose findings unmistakably slant toward developer preferences and that have worked within the last decade in Glendale. These include Kaplan Chen Kaplan

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.

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(former firm of Pam O'Connor), ESA (Margarita Jerabek), and Sapphos (Carrie Chasteen, whose name is also attached to the evaluation of 2960 St Gregory but did not visit the property). This is not to say that Sapphos *never* finds a property to be historically significant. Some applicants hope for a finding of significance, and in many cases, the City has already decided that a property is historic (as in the case of 534 N. Kenwood). Nor is it to say that some of the properties they are asked to evaluate truly do not qualify as historic resources. But if the goal is to "Tear It Down!" or to find a consultant to sign off on substantial and potentially impactful alterations to a historic resource, then Sapphos is a well-known, go-to consultant for property owners and developers in Glendale and elsewhere.

Properties previously known, or that came up in an online search, that Sapphos has evaluated recently and found ineligible for designation after being hired by the owner and/or developer include: Crenshaw Women's Center, LA (2021, hired after property nominated as a Cultural-Historic Monument); Chili Bowl, LA (2022, hired after property

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nominated as a Cultural-Historic Monument)<sup>1</sup>; John K. Van de Kamp House, Pasadena (2021, hired after property nominated as a local historic resource); 1039 W. Mountain, Glendale (2020, recommended changing property from historic district contributor to non-contributor); 352-358 Milford, Glendale (2017, supporting demolition of Craftsman that had been identified as historic in the draft South Glendale Historic Resource Survey); 361 Myrtle, Glendale (2017, ditto); 1515 Opechee Way, Glendale (2019, demolition proposed), 1849 Los Encinos, Glendale (2017, ditto), 8000 – 8012 Fountain Ave, West Hollywood (2017, property “improve[ment] proposed); 8760 Shoreham Dr., West Hollywood (2018, “improve[ment]” proposed to surveyed property); 2275 Oak Knoll, San Marino (2018, proposed demolition); 2404 Mission, San Marino (2019, proposed demolition); Jertberg House, Ontario (2020, recommended delisting property from local historic register); 2652 Manhattan, Glendale (2018, proposed demolition and subdivision), 2107-2121 Westwood, LA (2021, appears to have been hired by another consultant working for the developer, properties proposed for demolition); many properties in Monrovia (which has mandatory historic resource review for proposed demolition of main residential buildings that are more than fifty years old); Pig ‘n Whistle, Hollywood

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<sup>1</sup> A remarkable recent case was one of the last, and most intact, examples of a programmatic Chili Bowl in West Los Angeles. It had been identified as a potential historic resource in Survey LA and had continued to serve as a restaurant. The owner wanted to demolish it and objected to efforts to have it declared a Historic-Cultural Monument. They hired Sapphos to...find the property was not historic. Dozens of community members including historic preservation experts (and leaving out over a thousand people who signed petitions) argued for designation; we believe the only person who spoke in opposition to designation at the Planning and Land Use Commission meeting was Ms. Chasteen. The application was rejected, and the building has been removed (or demolished—it’s not exactly clear, but there are no plans for relocation).



Figure 1. Chili Bowl (1935) in West Los Angeles

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(2022, hired by owner to evaluate impacts of numerous un-permitted changes to historic restaurant after public outcry).<sup>2</sup>

That Sapphos sides with a developer in one or even several controversial cases is not the problem. Disagreement among experts is common in this and other fields. But when the same firm, hired by the developer, appears over and over on the same side of cases when the developer's desires could not be clearer, this evidence should be taken into consideration.

### **The Evaluation Is Flawed**

Sapphos claimed the property at 2960 St. Gregory is not a historic resource based on flawed and incomplete research and analysis.

The consultant states that the scope of work was "to determine" the property's eligibility for the California Register and the Glendale Register; however, consultants in fact make *findings* rather than determinations, which are based on research and evaluation and by applying professional judgment, which is normally accrued over time.

The analysis of the property's integrity is flawed. The elevations provided, and on which the evaluation is apparently based, are not as-built records, which would provide evidence of the alterations alleged. Actual evidence that the subject property residence was constructed with the described redwood and cedar natural wood siding has not been presented. Materials are often substituted during construction based on cost, availability and lead times to order and receive the materials. Other than the addition of a retaining wall in 2015 (which may have replaced a previous wall) and the pool in 2008, there are no actual records for the catalog of alleged alterations that are part of the consultant's justifications for finding the property not to be locally eligible. In addition, no clear photographs of the façade or other full sides of the building are presented to demonstrate the effects of alleged alterations.

The evaluation's descriptions of varied colors and textures of stucco, which are not corroborated in photographs or detailed descriptions, do not prove anything (page 4). Stucco is repaired often on buildings constructed more than 60 years ago. It is assumed

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<sup>2</sup> We are not cherry-picking examples. The online search also revealed that in 2019 the Los Angeles County Department of Parks & Recreation hired Sapphos to prepare a nomination of Jackie Robinson Park as an LA County Landmark, and the consultant found it eligible for designation. Sapphos was also retained by the Descanso Gardens Guild to nominate Descanso Gardens to the National Register, for which Sapphos found it eligible. The Gardens were designated in 2021.

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the color difference is based on different paint colors. The vague description of louvre screens that were removed or, more likely, not constructed is likewise not proven. Figures 2a and 2b do show Modern overhanging “eyebrows” on what is described as the “primary façade.” In addition, the described replacement of sliding doors with “modern flush mounted glass doors,” which appear to have black metal extrusions rather than clear aluminum extrusions, with no permit, is a further exaggeration that likely would not affect the building’s integrity (page 4). No building permits or other real evidence for any of the described alterations were provided.



**Figure 2a.** Aerial view of property outlined in blue dated 2022. Source: Office of the Los Angeles County Assessor. Property Portal.



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**Figure 2b.** Aerial view of property dated 2003. Source: Office of the Los Angeles County Assessor. Property Portal.

As described above and depicted in Figures 2a and 2b, there is nothing in the subject property building permit records or the photos provided to suggest significant alterations that would diminish the property's eligibility. However, a 2,300 square-foot, one- and two-story addition to an 1,876 square foot, single-story residence that may cause an impact on a historic resource should be fully analyzed.

The evaluation purports to compare this property unfavorably to “three Midcentury Modern-style residences already listed in the Glendale Register of Historic Resources from the same decade as the subject property” (page 13) This claim might have force if an identification of those resources, and a discussion of their significance, were included. We also wonder why the property was not analyzed in relation to other related styles, such as International, which often feature a single cladding material, particularly white stucco, and to which photographs suggests this residence design is strikingly indebted. See also Henry-Russell Hitchcock and Philip Johnson, *The International Style* (1932, 1960, 1966 and 1997) page 87 and Richard Weston, *Twentieth-Century Residential Architecture* (2002) page 52.

The evaluation is additionally concerning in its largely fact-free dismissal of architect Charles Walton's already established significance:

Charles Walton designed the building and his firm CWA AIA, Inc. is still active today. Walton founded the firm in 1946 and it is best known for its civic and governmental work. The building is not a high-quality example in the cannon [*sic*] of Charles Walton or the firm's work. Additionally, Charles Walton does not appear to rise to the level of a master architect. His work is not listed in the Pacific Coast Architecture Database and no information was found to suggest Walton was a significant architect at the local, state, or national level.

The consultant did not review the South Glendale Historic Resources Survey or its Context Statement (2018). A review revealed information indicating the significance of architect Charles Walton, whose firm was established in 1946 and lives on in Glendale as CWA AIA, which is still located in the award-winning building he designed at 320 Arden (<https://www.cwaaia.com/profile>). Among his projects in collaboration with partner Raymond Jones, are the Central Bank of Glendale Building, the Glendale Unified School District Headquarters, Brand Library & Arts Center addition, and the renovation of City Hall and Glendale Police Department. Walton also designed additions to local schools Cerritos Avenue, John Marshall, and John Muir. He was one of the original members of



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Glendale's Design Review Board, formed in 1986 to raise architectural standards within the city. The above-referenced South Glendale Context Statement and Survey provided much of this information and described several Walton designs. Three of those properties were found eligible for the Glendale Register; others are already listed.

There is no justification for finding Walton not to be a locally significant architect, nor is the fact that he was not known for residential work persuasive. The fact that Walton's firm focused on institutional design only makes the subject property a more uncommon resource in the community than his commercial or institutional projects.

### **Conclusion**

We will not address the specific variances sought except to say that the rationale for denying the variance for the garage, and thereby reducing the overall size of the residence, is sound. We do express our concern about the proposal to grant the interior setback variance through a Section 15303 Categorical Exemption. The historic status of the property is not yet known. In addition, the whole project is not under review, only the variances. Under CEQA the "whole of a project" must be reviewed before making any determination, including impacts to historic resources.

TGHS requests that no decision be made until the question of the historic status of this property has been resolved. We assert that the consultant's evaluation contains fatal flaws in that it does not acknowledge Charles Walton as an important local architect, that alterations are overstated or unproved, and that it relies too heavily on conclusory statements such as "common in style," or "the property does not rise to the same level of architectural significance" as properties that are not even identified rather than on analysis (page 13).

The public and the Planning Hearing Officer and other city representatives should be given the chance to review an adequate evaluation of the property.

Thank you for your consideration.

Sincerely,



John Schwab-Sims  
President  
The Glendale Historical Society