



May 9, 2016

The Honorable Paula Devine and Members of the City Council  
City of Glendale  
613 East Broadway, Suite 200  
Glendale, CA 91206

**Re: Agenda Item 9a - Appeal of Denial of Demolition Permit Application  
No. PDPRV 1601877 Located at 1420 Valley View Road**

Dear Mayor Devine and Members of the City Council:

On behalf of the Board of Directors of The Glendale Historical Society (TGHS), I would like to thank you for the opportunity to comment on the denial of a permit to demolish the 1908 Chubbuck Residence at 1420 Valley View Road.

Established in 1979, TGHS is a non-profit organization with more than 600 members dedicated to the preservation of Glendale's history and architectural heritage through advocacy and education.

TGHS agrees with the staff determination that the owners must prepare an Environmental Impact Report (EIR) before the City considers whether to issue a permit to demolish the existing buildings. One of the owners' own historic resources consultants argued that the subject house may be a historic resource and that its demolition may constitute an avoidable significant impact under CEQA.

In addition, the subject property was found eligible for the California Register of Historical Resources and the Glendale Register of Historic Resources by TGHS Board member Francesca Smith, a qualified architectural historian with more than thirty years of experience. She meets and exceeds the Secretary of the Interior's Professional Qualification Standards in architectural history and history. Please refer to the attached DPR 523 form. Our evaluation found the subject property eligible for listing in the California Register under Criteria 2 and 3 and designation in the Glendale Register under Criteria 2, 3, and 5, which triggers review and consideration under CEQA before the buildings can be demolished.

Despite the unpermitted demolition of the interior, and destructive removal of the roof, the building contains exemplary exterior elements of Arts & Crafts design detail, including extensive

decorative wood joinery, ornamental craftsmanship, and original materials from the period. The house is a rare example of a high-style Craftsman residence, which is an uncommon resource type north of the Verdugo Wash in Glendale.

The property is also significant for its associate qualities. It is associated with the Honorable Levi Chubbuck, a person who significantly contributed to the history of the nation, state, and region.

Finally, the subject property dates from the first five years of Glendale's incorporation and is an intact example of the City's early heritage, when Craftsman style homes were widespread.

The owners of the subject property had a second historic resource assessment prepared after the first found that the building may be a historic resource. We agree with staff that the Kaplan Chen Kaplan assessment is inadequately researched. There is no reference to the Chubbucks as owners, and thus it misses the building's eligibility under Criterion 2. It ignores the intricacy and exemplarity of the building's ornamental design elements and thus wrongly finds it ineligible under Criterion 3. It scarcely considers Criterion 5 at all, stating that the house "was constructed to accommodate the Glendale area's burgeoning population growth," a claim so vague that it can be used to discount virtually any residential building from the first quarter of the twentieth century. It further implies that the east side of Valley View has "undergone significant development," but in fact it retains a number of single-family houses like the one found on the subject property. It also inappropriately references an out of date survey (the 2007 Reconnaissance Survey and Historic Context Statement of Craftsman Architecture) to deny the architectural significance of the subject building, although it was not part of the very limited survey population. In the absence of an update we do not know how many Craftsman buildings have been demolished or altered since the survey was prepared and adopted; therefore it cannot be used to make claims about the status of the Craftsman style in Glendale in 2016.

A property needs to meet only one of the five designation criteria to be deemed eligible for listing on the Glendale Register. That threshold has clearly been met. In addition it meets California Register criteria and will be submitted to the California Office of Historic Preservation. Based on these facts, demolition should not take place until an appropriate environmental review has been prepared and adopted. The resulting EIR will likely require the adoption of a statement of overriding considerations, meaning the proposed condo complex is more important to the city than its history.

We note that a CEQA review is triggered when there is disagreement between experts about whether a property qualifies as a historic resource. As demonstrated in the attached DPR 523 form, a qualified expert disagreed with the Kaplan Chen Kaplan assessment that the subject property is ineligible for designation on the Glendale Register. Further CEQA review, likely in the form of a focused EIR, is therefore required,

We have already noted that the original interior was gutted without a permit. We respectfully request the issuance of appropriate administrative citations and fines for municipal and building code violations pursuant to Glendale Municipal Code section 1.24. In addition, the owners received a permit to replace the roof; instead the roof was willfully removed entirely without replacement. That action endangered the building's structural integrity and its future. We therefore

also ask for the immediate repair of the roof to protect the historic property from further deterioration.

The property owners should not be allowed to use the building's disrepair, which they have done much to exacerbate, as an excuse to proceed with demolition. Disrepair is not one of the seven recognized aspects of integrity, practically when it was undertaken on purpose and in bad faith. Individuals who perform unpermitted work in Glendale need to be held accountable for their actions.

And lastly, we once again ask the City Council to ensure that when a developer seeks to demolish or significantly alter a known or potential historic resource, it is the City that chooses an impartial qualified preparer of technical reports and environmental reports from a list of qualified firms (the developer would continue to pay the costs, including administrative fees). This is standard practice in other cities. Currently in Glendale, the developer is allowed to choose the preparer, which fails to ensure objective assessments.

In December 2013, Council directed staff to bring forward a proposal regarding this change. The Council has yet to see it. The purpose of environmental review is to provide decision makers with the tools to make decisions that protect the community's interests. We note that as long as developers choose their preparers that objective goal is routinely thwarted.

We appreciate your consideration of this important matter.

Sincerely,

*Greg Grammer*

Greg Grammer, President  
The Glendale Historical Society

Attachment: DPR523 form for 1420 Valley View Road

cc: Scott Ochoa, City Manager  
Phil Lanzafame, Director of Community Development  
Alan Loomis, Deputy Director of Urban Design & Mobility  
Jay Platt, Senior Urban Planner/Historic Preservation Planner