



P.O. Box 4173 Glendale CA 91202  
www.GlendaleHistorical.org

October 2, 2017

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

Re: Agenda Item 4b: Removal and Replacement of City Hall Front Entrance Steps

On behalf of the Board of Directors of The Glendale Historical Society and its 700 members, I thank you for the opportunity to comment on this project.

I am writing because TGHS is concerned about the lack of information City Council and the public have been provided regarding the proposed replacement of the front entrance steps at City Hall. In addition, the City has applied the wrong exemption under CEQA. We ask that Council deny the Resolution adopting Plans and Specifications for the Removal and Replacement of the City Hall Front Entry Steps Project, Specification No. 3653, until this information is provided.

The Staff Report notes that Glendale City Hall has “historical significance,” but to be more precise, it was determined eligible for listing in the National Register of Historic Places on April 2, 1994 (see excerpt from the Directory of Properties In the Historic Property Data File for Los Angeles County, Attachment 1), which means that it was automatically listed in the California Register of Historical Resources, making it a “historical resource” as defined in CEQA (CEQA Guidelines Section 15064.5 and California Public Resources Code Section 21084.1). It is also listed in the Glendale Register of Historic Resources (#31).

A Class 1 exemption never applies to a historic property. The appropriate exemption would be Class 31, which applies to

projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources in a manner consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (CEQA Guidelines Section 15331).

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.

To use a Class 31 exemption to demolish and replace the front steps of Glendale City Hall, the project must be found to be in conformance with the Secretary of the Interior's Standards for Rehabilitation (the Standards for Reconstruction to be exact), which would mean appending a memorandum describing that review with appropriately detailed plans. The Report to City Council asserts that the entry stairs "are showing significant signs of aging that is innate to many concrete structures," but it does not justify the feature's wholesale replacement. Neither the Standards for Rehabilitation nor the Standards for Reconstruction support demolition of an extant character-defining feature such as the entry steps if they can be repaired. The feature must be proven to be irreparable, which normally requires analysis by a structural engineer who specializes in historic buildings.

We appreciate that the Staff Report does state that the stairs would be replaced "like for like," which is essential. However, there is a process that must be followed. In light of the fact that the wrong exemption was used, and a feature that might be repaired is proposed to be replaced without any details, TGHS is concerned that the City's approach to one of its most important historic public buildings is potentially inappropriate and damaging. We respectfully request that analysis of the entry steps' current condition, with detailed proposed plans and an analysis of the proposed project's conformance with the Standards, be made available *or* that Alternative 2 (Repair) be adopted and the work performed by someone with expertise in historic buildings.

We appreciate the opportunity to comment and look forward to working with the City to ensure appropriate review and compliance with CEQA as it relates to historic resources.

Thank you for your consideration.

Sincerely,

*Greg Grammer*

Greg Grammer  
President, The Glendale Historical Society

cc: Roubik Golanian, Director of Public Works  
Jay Platt, Senior Urban Designer  
Mike Garcia, City Attorney