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[www.GlendaleHistorical.org](http://www.GlendaleHistorical.org)

February 5, 2017

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

Dear Mayor Devine and Members of the City Council:

On behalf of the Board of Directors of The Glendale Historical Society (TGHS) and its more than 700 members, I thank you for the opportunity to comment on the proposed Urgency Ordinance.

Further to our comments at the January 31, 2017 City Council meeting, we urge you to adopt the Interim Urgency Ordinance as written by staff at the earliest opportunity. The Interim Urgency Ordinance is a thoughtful, careful document that puts reasonable standards in place to govern the approval process of ADUs in our City. As you know that approval must be ministerial; there is no design review and no opportunity for public comment. And until Glendale adopts its own Ordinance, the State law is our law, and that law is both extremely permissive and vague.

For these reasons we were surprised that some Council members raised objections that threaten to derail its speedy approval. We would suggest that there are endless tweaks and changes that could be made to it, but that is not the point of an Interim Urgency Ordinance. The point is to get something on the books as soon as possible so that Glendale residents enjoy protections *right now* for their homes and neighborhoods from a one-size-fits-all law that was written with no consideration of differences between cities and individual properties, with inadequate consideration of the special character and quality of historic resources, and with completely unrealistic assumptions about how state mandates regarding local land use decisions will play out in actual communities.

Staff did exactly the right thing in drafting this Ordinance. They created a document designed to ease Glendale's transition to ADUs and came up with considered guidelines to mitigate the worst impacts on our historic neighborhoods while a final Ordinance is crafted, which will go through a process including public hearings before the Planning Commission and City Council. It is wisely cautious in its approach, to allow time for staff, commissioners, Council members, and the public to understand the ramifications of the law and its radically new approach to development in Glendale's single-family neighborhoods.

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.

It was suggested at Council that a 500 square feet maximum is too small and that at least 800 square feet should be allowed. 500 square feet makes perfect sense for the Interim Ordinance; it is the longstanding maximum for guest houses, the closest thing Glendale has had to ADUs. The significant number of residents currently inhabiting unpermitted second units in converted small garages, pool houses, and other accessory structures indicates not only that there is a market for small units of 500 square feet or less in our city but that market is thriving. 800 square feet is the size of a small two-bedroom house: allowing ADUs of this size will increase the demolition of smaller original and often historic accessory structures, the buildings we should most want to see adaptively reused for additional housing, and create correspondingly more unresolvable problems of architectural incompatibility and out-of-scale construction. *And the essential fact is that there is no design review or public comments or hearings for ADUs*; the larger the structure, the larger the second story on a one-story house or garage, the larger its impact on neighbors and on neighborhood aesthetics and character.

The absence of design review is one reason that owner-occupancy for the ADU applicant should be required. Council members should be looking out particularly for the well-being of Glendale residents, the people who stake their family, social, and work lives in their community and not merely their dollars. It is extremely imprudent to allow investors or flippers with few or no ties to the neighborhood and community to throw up ADUs and then disappear. Whether the property is rented as a single unit or two units does not change this fact, and it presents new problems of enforceability.

Finally, changes to floor-area ratio should not be part of any Interim Urgency Ordinance. FARs are a careful calculation, and it would be irresponsible to hold up its passage on the basis of a change that requires extensive further study, such as one might reasonably expect from the drafting of the final ADU ordinance, and that would have an impact not only on lots with ADUs but potentially on single-family properties of all kinds.

We ask that on Tuesday you adopt the Interim Urgency Ordinance as written by the City's professional Planning staff and presented to Council on January 31<sup>st</sup>.

Thank you for your consideration and service.

Sincerely,

*Catherine Jurca*

Vice-President and Chair, Preservation Advocacy Committee  
The Glendale Historical Society

cc: Ardy Kassakhian, City Clerk  
cc: Scott Ochoa, City Manager