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November 19, 2017

Mr. Erik Krause
Interim Deputy Director of Community Development
City of Glendale Community Development Department
633 E Broadway, Room 103
Glendale CA 91206

RE: Comments on Proposed Grayson Repowering Project Draft Environmental Impact Statement

Dear Mr. Krause:

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 draft Environmental Impact Report (DEIR) for the Proposed Grayson Repowering Project. Established in 1979, TGHS is a non-profit organization with more than 700 members dedicated to the preservation of Glendale's history and architectural heritage through advocacy and education.

We disagree with the findings that the Grayson Steam Electric Power Plant is not a historical resource as defined in CEQA. We believe that the consultant's assessment of historic significance is fundamentally flawed. TGHS believes that the Grayson Steam Electric Power Plant may be eligible for listing in the National Register and that it is eligible for listing in the California and Glendale Registers for its associative as well as for its design and engineering significance. We also believe the DEIR is flawed in other important ways described in detail below.

Tribal Cultural Resources

We note that the "Tribal Cultural Resources" chapter of the DEIR is incorrectly titled. This inaccuracy demonstrates a lack of basic understanding of the intent of the section and the task by preparers. The purpose of what is normally called a Cultural Resources chapter in an EIR is to identify and evaluate the potential for a project to affect paleontological, archaeological and historical resources. Resources of concern include fossils, prehistoric and historic artifacts, burials, sites of religious or cultural significance to Native American groups, and historical resources.

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.

Its essential questions should be:

- Is there a historical resource that may be affected by the proposed project; and
- Will the project result in a substantial adverse change to the extent that the resource's historical value is materially impaired or lost?

Evaluations for historic significance are not normally “negative” as stated in the document; historical resources either exist or they do not. Negative findings are an archaic term that was used in solely archaeological investigations and do not apply to the built environment. That paragraph, along with the section title, the evaluation and analysis contained therein, alerts informed readers to the fact that the entire section may have been prepared primarily by archaeologists practicing outside of their fields of expertise.

The Tribal Cultural Resources title implies that only archaeological resources and tribal concerns were considered. Under CEQA, Initial Studies and EIRs address Cultural Resources, not merely “Tribal Cultural Resources.”

Preparer Qualifications

The preparer qualifications presented in the Initial Study (1.4 Cultural Resources Project Staff Qualifications) do not demonstrate that any staff meet the Secretary of the Interior's Professional Qualifications Standards. A statement in the closing paragraph claims “The Stantec Cultural Resources *Program Manager* and *Senior Architectural Historians* directing the survey meet the Professional Qualification Standards of the Department of the Interior” but provides no particulars regarding degrees attained and more importantly does not identify any staff members' fields of expertise (emphasis added). Each provides numbers of years preparing reports, but none of the brief biographies provides evidence to corroborate meeting the Secretary of the Interior's Professional Qualifications Standards codified in CFR Part 61.

The guidance in Archeology And Historic Preservation: Secretary of the Interior's Standards and Guidelines [as Amended and Annotated] directs “The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise may be needed, depending on the complexity of the task and the nature of the historic properties involved.” The website for the Historical Architect responsible for the report states that he specializes “in custom residential architecture, and also do[es] commercial projects” (<http://www.johnterryarch.com/Introduction-1>). Enumerated experience on that website includes two “renovations” but no rehabilitations or restorations are listed. No evidence of a year or more of graduate study or of professional experience including “detailed investigations of historic structures, preparation of historic structures research reports, and preparation of plans and specifications for preservation projects” as cited in the Professional Qualifications Standards is provided. We submit that this evaluation for historic significance is a complex case, and that the preparers provide no evidence of additional levels or areas of expertise and show no demonstrated experience with successful evaluations for the National, California, or Glendale Registers.

Archaeologists are not normally qualified to prepare built environment evaluations, and historians are not interchangeable with historic architects. In the FEIR revised cultural resources technical report all preparers' professional qualifications should be clearly stated, otherwise the reviewers suspect that it was prepared by staff who have generated reports for specific numbers

of years rather than persons with demonstrated expertise necessary to perform the tasks required for this evaluation of historic significance and analysis of effects.

Laws, Ordinances, Regulations and Standards

The introductory “Laws, Ordinances, Regulations and Standards (LORS)” section is fatally flawed. The applying LORS enumerated are not demonstrated to have any specific application to the project. If federal regulations apply to the proposed project, then Section 106 of the National Historic Preservation Act (as amended) would pertain to the project. If the project has *any* federal nexus, the proper environmental document would likely be an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) rather than merely an EIR.

It is not clear that Section 106 of the National Historic Preservation Act does or does not apply to the proposed project. We expect that a project of this type requires federal permits, licenses or other approvals. If so, Section 106 applies and the appropriate clearance document may be an Environmental Impact Study and well as an Environmental Impact Report.

The federal Environmental Protection Agency (EPA) promulgated the Steam Electric Power Generating Effluent Guidelines and Standards (40 CFR Part 423) in 1974, and amended the regulations in 1977, 1978, 1980, 1982 and 2015. *The regulations cover wastewater discharges from power plants operating as utilities.* The steam electric regulations are incorporated into National Pollutant Discharge Elimination System (NPDES) permits. If a NPDES permit or any other federal approval or license is required for the proposed project, *there is a federal nexus and Section 106 applies.*

Further, the EPA released a final rule to limit greenhouse gas emissions from new power plants on August 3, 2015. The final “Carbon Pollution Standard for New Power Plants” establishes New Source Performance Standards to limit emissions of carbon dioxide from fossil fuel-fired power plants. If the “Carbon Pollution Standard for New Power Plants” applies to the proposed project or any other federal approval or license is required for the proposed project, *there is a federal nexus and Section 106 applies.*

Please explain how the National Environmental Policy Act would or would not apply to the proposed project. Can the proposed project be considered a major federal action that would be determined to significantly affect the quality of the human environment?

The “Applicable Federal, State, Local LORS for Tribal [*sic*] Cultural Resources” table and section notably contains no discussion of whether or not the listed LORS apply and why, which is an obvious necessity in such documents. Merely listing the language in LORS does not inform the public or decision-makers in making their decisions regarding the proposed project.

In the “Applicable Federal, State, Local LORS for Tribal Cultural Resources” table, there are significant errors and omissions. The administering agency column is incorrect *in each entry*. For instance, Section 106 is not administered by the Code of Federal Regulations (CFR). CFR is not and has never been an administering agency; it is codification of the general and permanent rules and regulations (or administrative law) published in the Federal Register by the executive departments and agencies of the federal government. Applicable Federal Agency Programs administer Section 106 with the Advisory Council on Historic Preservation. If that table, which provides no information of value to the analysis, remains, it must be corrected in the Final EIR or a supplemental EIS/EIR. We strongly recommend that it be completed (most of it is blank) and corrected to list correct administering agencies.

Further, where each of the LORS is enumerated in the narrative sections below, applicable language was merely cut-and-pasted into the document. There is notably no description of how the listed LORS apply to the proposed project, and why, or what it means to the project or analysis, which is critical to understanding what the document is and why preparers came to whatever conclusions they did. Absent this information, the “Tribal Cultural Resources” section of the document is useless, devoid of worthwhile information for decision makers and the public. Reviewers are left wondering what laws, ordinances, and regulations apply to the proposed project, why and how that fits into the analysis at hand.

Archaeology

Neither the “Existing Conditions” section nor the other parts of the larger “Tribal Cultural Resources” chapter make reference to any archaeological surveys being performed, presenting the property only above-ground when whatever does or does not exist below grade is undeniably part of the subject property’s cultural resources existing conditions. No reference was made to any archaeological surveys being performed for the proposed project, to the likelihood of encountering archaeological resources, or to what the expected impacts of effects would be on those resources.

Review of the Initial Study, where the technical reports are sequestered, provides an overview of archaeological surveys being performed in 2003 and 2016, providing no further details. What methods were used? How much of the subject property was surveyed? More importantly, who at the City of Glendale has the appropriate credentials (meeting the Secretary of the Interior’s Professional Qualifications Standards in Archaeology) to critically review the reports that ostensibly resulted? Was a subcontractor engaged to review whatever reports resulted from those surveys? Please provide the name and professional qualifications of the archaeologist who reviewed the confidential section of the Initial Study for the City.

Methodology

The “Methodology” section of the EIR is inadequate as well. The two sentences describing Senate Bill 52 efforts is not equivalent to what should be a description of how project Cultural Resources procedures were carried out. Inserting words that do not apply into a section does not satisfy the requirements of CEQA. The methodology section is intended to explain how the evaluation and analysis were prepared that lead the preparers to arrive at the conclusions they did.

Evaluation for Historic Significance

We additionally submit that because the evaluation of the subject property’s historic significance is not included in the document or the appended technical reports, decision makers cannot review the evaluation. Because of that omission, decision-makers and the public cannot make their own conclusions based on information presented as to whether or not the Grayson Steam-Electric Power Plant is historically significant. Thus decision-makers and the public are not able to judge whether substantial adverse change to a historical resources would be materially impaired or entirely lost. The California Code of Regulations (CCR) directs under Technical Detail:

The information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. *Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as*

appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review (emphasis added, CCR Section 15147).

The applicable cultural resources analysis is not contained in the technical report section, or in an appendix, but was secreted in the Notice of Preparation. Once TGHS was able to locate the “Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California” it was reviewed for adequacy by a professional qualified under the Secretary of the Interior’s Qualifications Standards in both history and architectural history and was found not to be correct in its conclusions.

Other EIR reviewers will not know where to find the evaluation for historic significance. Because that analysis is not “readily available for public examination” it does not “assist in public review” as required. We strongly stress that the conclusion that the Grayson Steam-Electric Power is not historically significant was made in error and that the revised, corrected evaluation should be a technical appendix to the FEIR and that the FEIR should address alternatives to the project that would retain the historical resource and/or mitigate its loss if it were proven not to be feasible, based on facts.

The evaluation failed to consider the power plant as a contributor to a larger, previously unevaluated historic district as well, which is a fundamental component in any such survey.

Like the archaeological investigation, no evidence is provided of any lead agency review of the conclusions in the report being performed by qualified staff or consultants for the City of Glendale. The conclusions in the EIR that are based on incorrect finding in the Initial Study must be peer-reviewed for accuracy by professionally qualified professionals with demonstrated expertise in the applicable fields.

Reconnaissance Survey

The evaluators note in the survey type on the DPR form that the evaluation is an “Architectural Inventory and Evaluation *Reconnaissance* Survey.” We strongly assert that an intensive evaluation must be prepared by local qualified architectural historians who have clear understanding of the Grayson Steam-Electric Power Plant’s place in local and regional history and who have demonstrated experience in applying the criteria for Glendale Register of Historic Resources to evaluations for significance. We assert that the property’s National, California Register and local significance were not properly considered and that its conclusions are incorrect.

National Register guidance prepared by the Department of the Interior provides a definition in “Guidelines for Local Surveys A Basis For Preservation Planning: “*Reconnaissance* may be thought of as a ‘once over lightly’ inspection of an area, most useful for characterizing its resources in general and for developing a basis for deciding how to organize and orient more detailed survey efforts.”

Likewise directions in “The Secretary of the Interior's Guidelines for Identification” state

Reconnaissance survey might be most profitably employed when gathering data to refine a developed historic context—such as checking on the presence or absence of expected property types, to define specific property types or to estimate the distribution of historic properties in an area... *In most cases, areas surveyed in this way will require resurvey if*

more complete information is needed about specific properties” (emphasis added, Archaeology and Historic Preservation: Secretary of The Interior's Standards and Guidelines, as Amended and Annotated, 48 Federal Register 44716, effective 1983).

We believe a reconnaissance survey, buried in the Initial Study was not the correct level of evaluation, which should rightly be an intensive survey in a technical appendix to the EIR that would allow reviewers the opportunity to consider the logic of a full evaluation for historic significance.

Is the Grayson Steam-Electric Plant a Historical Resource?

The “Tribal Cultural Resources” [*sic*] EIR section commences with a statement where the authors refute their own justification for finding the Grayson Steam-Electric Power not to be historically significant:

While the [Grayson Steam-Electric Power] Plant does possess potential significance under the... [California Register] and Glendale Register of Historic Resources Criteria [*sic*] 1, 2, 3, and 4, a lack of integrity under all aspects of integrity recognized by the... [California Register], and implemented for the City of Glendale Register... *which is silent on aspects of integrity*, undermines the property’s ability to convey importance/significance for either the state or local registers.

The Glendale Register has no requirement for integrity. Finding a property not eligible for the Glendale Register because of supposed alterations is not supported in the stated requirements for designation on the local register. Because the Glendale Register has no specific requirements for integrity a property’s significance should not be dismissed because of alterations, particularly when the facility being evaluated remains absolutely recognizable to its original appearance.

When properties are significant for associations with the development of the community or with important persons they need not retain the same aspects or level of integrity as a property that is significant only for its design. That concept is a fundamental principle in evaluating properties for historic significance and was markedly not recognized by the document preparers. Furthermore, the addition of separate cooling towers, maintenance and storage buildings, oil tanks and trailers over time would be essential to its continued use as a power plant and would be well-known to qualified, experienced practitioners.

The inadequate evaluation in the Initial Study does not make clear where the described, overly emphasized alterations are, or how they would collectively reduce the property’s integrity of design. Table 4 in the Initial Study curiously lists more than 57 building permits (only post 1964), but after review, it is discovered that few, if any are actual alterations to the Grayson Steam-Electric Power Plant that would affect its integrity. The document states “Some of the projects associated with these permits are visible in the aerials...” but no connection between listed building permits and actual alterations that would affect the ability of the property to convey its significance, which is central to the claim of the property not being eligible, has been made.

Supposed alterations such as “Constructed a new concrete block chemical pump house with concrete roof” (1964), “Constructed one metal shed” (1970) and “Constructed a foundation (only) for a temporary modular trailer” (2012) demonstrate the consultant’s lack of

understanding of the crux of an evaluation for historic significance. Does the property have historic significance and if it does, is it recognizable, depending on the type of significance?

None of those predominately separate actions described as alterations in the Initial Study table or annotated aerials affected the design, location, materials, workmanship, feeling or association of the power plant. Its setting may have changed since it was completed, but its setting in an industrial yard is not as essential to its significance as would the setting of other buildings such as a barn in an open field or adjacent to a barnyard. The subject property remains in a utility yard setting as it has been historically. The additional small buildings and other structures and objects that have been added to the subject property are located on the northwest and southwest, non-character-defining, secondary and rear sides of the plant as demonstrated in Figure 1.

Figure 1 makes evident the fact that there are no alterations on the façade or northeast side, none are shown on the southeast end wall (a carport was added sometime after 1950 that does not affect its integrity), various small additions on the non-character-defining southwest side and only a ramp was added on the northwest side.¹ Further text will describe why other small changes do not affect its integrity. The building's principal cladding materials remain, its original ribbon, hopper-type and glass block multi-story windows remain, the original metal sign on stand-outs and the distinctive, staggered, horizontal corner fillets remain intact. An experienced architectural historian would have exercised appropriate professional judgment and omitted items that were not alterations that affected the actual resource under consideration. The Grayson Steam-Electric Power Plant structure retains more than adequate integrity to its original design by Daniel A. Elliott, AIA, and remains recognizable.

¹ An "addition to boiler room" at the southwest corner is noted in the Initial Study Figure 15 annotated aerial photographs incorrectly as being added around 1979 (Aerial 4). That small addition is clearly evident in Aerial 2, the 1964 aerial photograph.

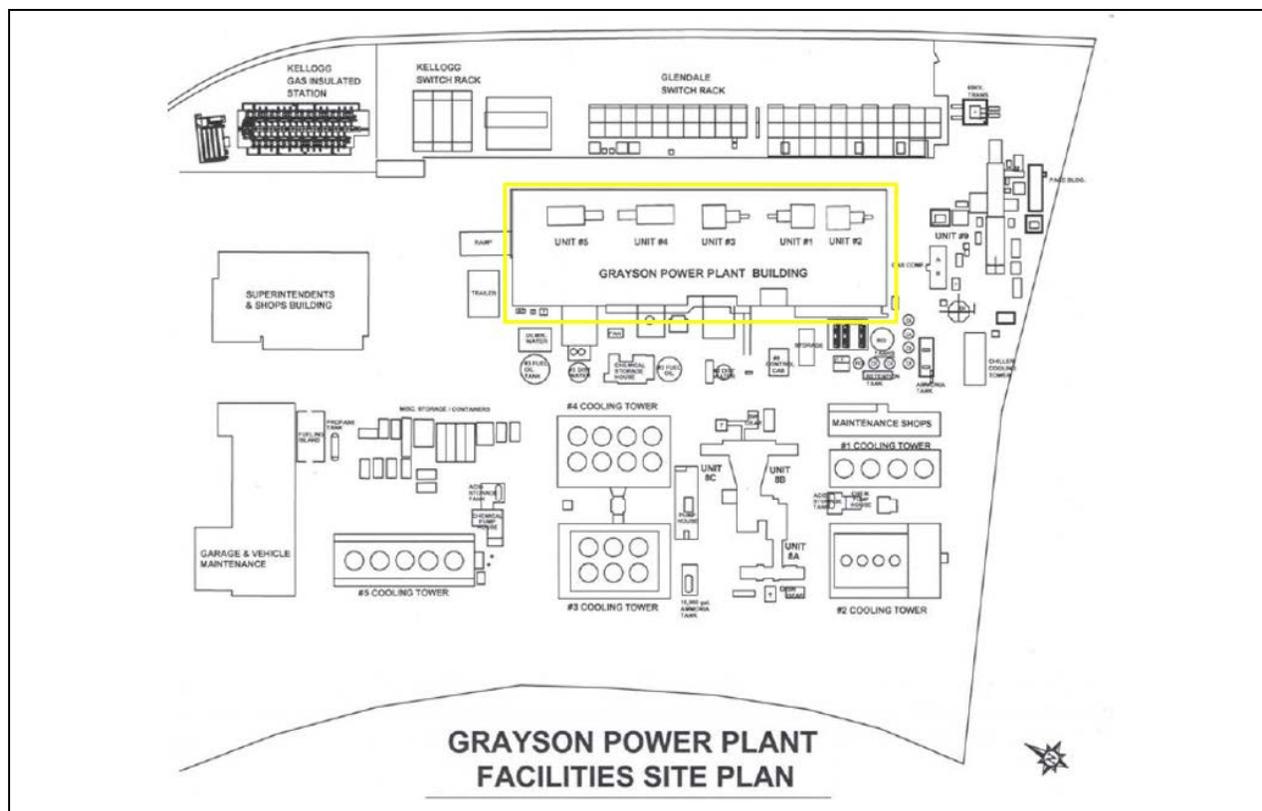


Figure 1: Excerpted and annotated from Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California, showing only a ramp and trailer on the northwest (left-hand) side of the main building and various additional facilities at the back or southwest side of the Grayson Steam-Power Plant Building. Note that very few alterations in this figure are connected to the main, Grayson Steam-Power Plant Building, which is highlighted in yellow.

Grayson Steam-Electric Power Plant Significance

The Grayson Steam-Electric Power Plant is significant for its association with the development of the community, for its direct association with Lauren W. Grayson, likely for its Stripped Classicism design, as the work of a master architect, and as the first earthquake-proof power plant. Its integrity of design remains, clearly visible from all but one nearby street, the large, metal and stucco-clad building is visible, and the inventive, original design remains easily distinguishable.

Association with the Development of the Community

The power plant’s connection to the development of Glendale is reasonably straightforward and is undeniable. Almost immediately after Glendale’s incorporation, locals recognized the importance and costs savings of establishing independent utilities. Once street lighting became an issue, the new city government took action to establish a “light and power” entity, holding a bond election to acquire and construct an electric works system for the city by 1909 (Winston W. Crouch and Beatrice Dinerman, *Southern California Metropolis: A Study of Development of a Government for a Metropolitan Area*, 1964). An expanded distribution service and the establishment of the Glendale Light and Power Company were part of the consequences of that election. Without the existence of the subject property power plant, the community would not have had the necessary utility capacity to grow as it did after the second World War. In 1938,

the *Los Angeles Times* substantiated the assertion that the power plant made development of the community possible, reporting “City officials have maintained steadily that there are no available sources of power and that erection of the generating plant is necessary” (“City Officials Deny Charges in Glendale Power Plant Plan” 26 May 1938:14). The resulting power plant was built at an estimated cost of \$1.5 million.

In the two decades spanning its construction, the population of modern Glendale increased by more than 50 percent between 1930 and 1950, from approximately 63,000 to 96,000 (U.S. Census). Neighboring Pasadena and other comparable communities’ populations did not grow by nearly as great a percentage as Glendale’s unfettered growth during that period. The stratospheric evolution of Glendale as a population and business center was spurred partly by annexation but as much by its increased ability to independently provide inexpensive power to newly expanding and establishing businesses and the thousands of new homes and apartments that were built during that time. That tendency continued “between 1980 and 2000, Glendale grew significantly more than neighboring areas” (City of Glendale, Government Departments, Economic Development, “Great Demographics,” “Top 10 Reasons You Want Your Business in Glendale” at <http://www.glendaleca.gov/government/departments/glendale-economic-development-corporation-/top-10-reasons-you-want-your-business-in-glendale/analytic-information>). Sustaining that trend that was made partly possible by the existence of an independent power source, the population of Glendale soared by nearly 40 percent during that 20-year period, significantly more than any other single city in Los Angeles County and more than the county itself. Without an autonomous power source providing economical electricity, the unbridled population growth and expansion of Glendale after World War II would not have been possible. The power plant shaped that development rather than merely reflecting it. Because of that direct connection between Glendale’s growth and the Grayson Steam-Electric Power Plant, it is eligible for listing in the California and Glendale Register under each Criterion 1 for its essential role making the postwar development of the community possible.

Distinctive Stripped Classicism Design, Work of a Master, and Engineering Significance

Stripped Classicism was a twentieth century architectural style that reduced all, or nearly all superfluous ornamentation. It was favored primarily by government agencies for public building designs and was widely used by the Works Progress Administration during the Depression. The style embraced simplified but recognizable classicism in its overall massing, scale and proportions while eliminating traditional decorative detailing.

The significance of the restrained design by architect Daniel Anthony Elliot, A.I.A. for the main building remains plainly visible and recognizable, but it is not adequately explored in the reconnaissance level evaluation. The original, remaining design placed a large amount of equipment inside a metal-clad, deftly stepped shell that articulated a large volume from what could have been an ungainly multi-street block shape into human-scaled units, reducing its apparent mass and creating an elegant solution to what could well be an entirely utilitarian facility. In addition the electrical turbines, which are entirely functional apparatuses used to drive generators to transform mechanical energy into electrical energy by electromagnetic induction, are cloaked in cleverly designed covers that supplement the large scale Stripped Classicism design elements of the facility into smaller units. At least three pencil-drawn renderings were made to demonstrate design alternatives that would camouflage the practical features.

It would be helpful to reviewers to understand the architect's remarkable career. Elliott was a designer for Gilbert Stanley Underwood, a recognized master architect, between the years 1925 and 1932, was a contributor to the Colorado Aqueduct Project (1932-'41), and was responsible for the designs of various other water and power plants (see "Experience Record," Daniel A. Elliott, AIA, Architect at <http://dbase1.lapl.org/webpics/calindex/documents/04/515676.pdf>). Elliott designed the Burbank Water & Power Building (1949, 164 W. Magnolia Bl, Burbank) which is a noted example of Late Moderne design, as illustrated by the Los Angeles Conservancy on its website (Explore LA, Historic Places <<https://www.laconservancy.org/locations/burbank-water-and-power>>). His utility portfolio was described in the "Public Imagery and Its Uses" section of *Los Angeles In the Thirties: 1931-1941*, which is considered an expert source on local architecture during that period (Gebhard and Von Bretton 1989).

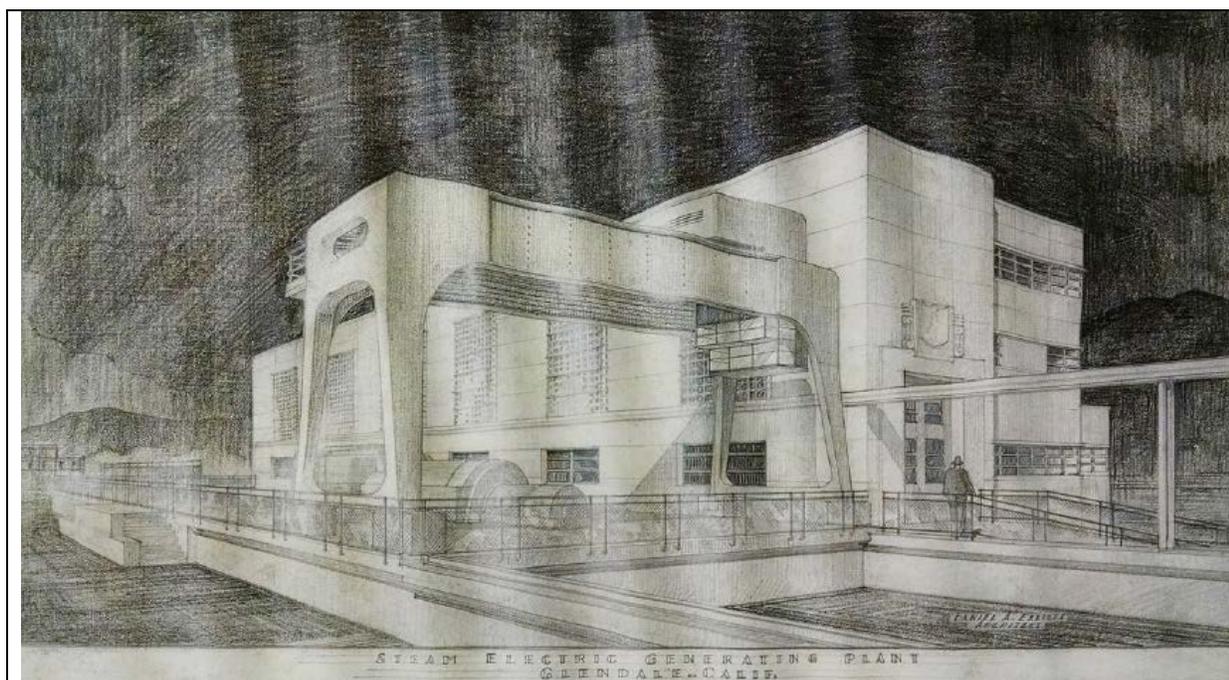


Figure 2: Pencil rendering of Glendale "Steam Electric Generating Plant" by Daniel A. Elliott, AIA excerpted from Initial Study, Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California, Figure 9 (page 4.5). Compare with the recent photograph in Figure 3 that shows a series of multi-story, glass block windows in the boiler building portion of the Grayson Steam-Electric Power Plant building. If the crane in the foreground was at the south rather than the north end, the rendering and the power plant as it exists today would appear nearly the same, clearly expressing its distinctive Stripped Classicism design. The design treatment for the endwall in the above rendering was ultimately executed without the cartouche or the inset entrance. It is mistakenly called an "architectural drawing" rather than a rendering in the Initial Study.

The still-recognizable, Stripped Classicism design of the Grayson Steam-Electric Power Plant is understated, exquisitely proportioned, and was undeniably futuristic for its time. The three staggered, green horizontal strokes that wrap around the southeast corner skillfully punctuate the otherwise staid building composition and assert the Modernism of the design. At the north façade, left-justified bronze letters on stand-outs primly identify the facility: "City of Glendale Public Service Department Steam Electric Generating Plant." Most power plans in the 1930s and

now have no architectural design, reducing their aesthetic effects on the community, which is part of the significance of the Grayson Steam-Electric Power Plant's design.

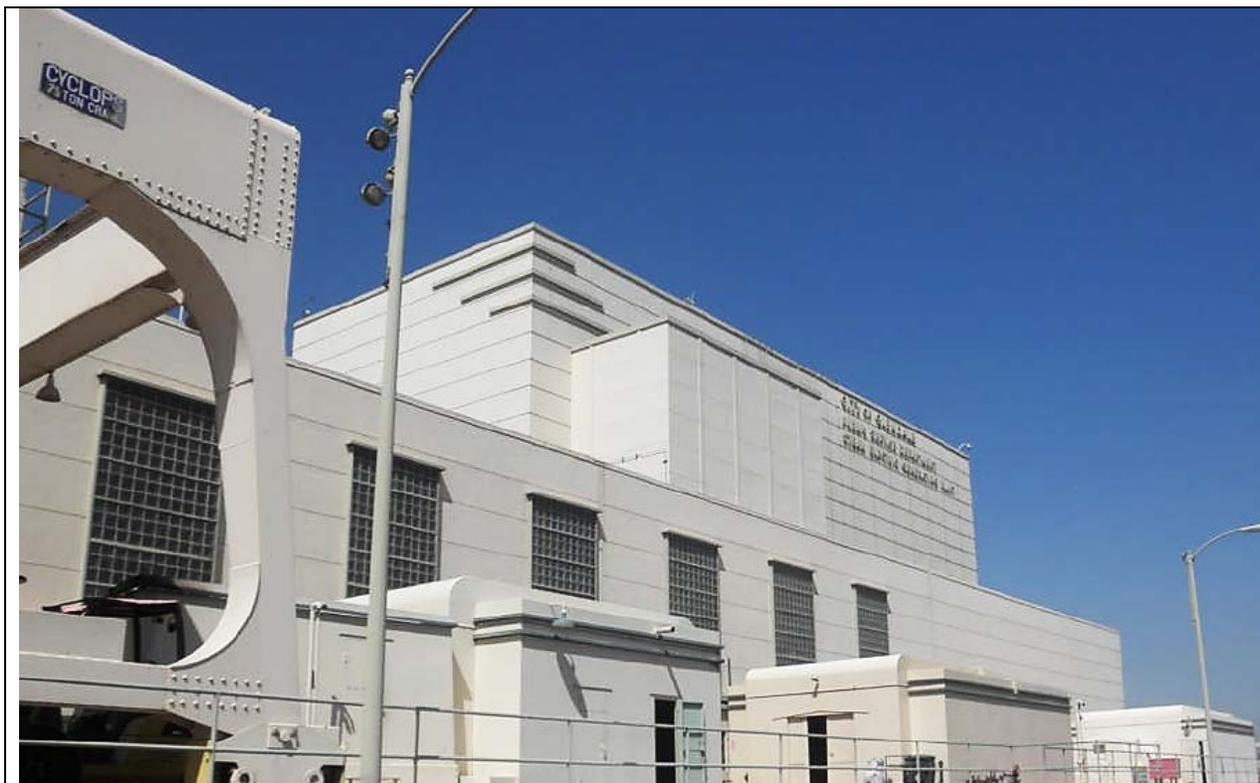


Figure 3: Excerpted, cropped photograph from Initial Study, Architectural Resource Evaluation of The Grayson Power Plant For City of Glendale, California, Figure 18 (page 6.6). View is of the northwest, main façade, no date (estimated 2016). Note the staggered green horizontal bands at the left corner of the tower, the sign at the right side, sets of multi-story, glass block windows of the boiler portion of the building, original, riveted “Cyclops” crane at left foreground and Units 3, 2 and 1 (left-to-right) in the foreground. The turbine covers for Units 1-3 have radiused roof-wall connections on the main volumes at each endwall, modulating the appearances of otherwise entirely utilitarian structures. Double fillet bands wrap around their lower cornices and corners, emphasizing the carefully expressed scale and proportion.

At the cornice of the boiler building, a simple, dimensioned band interposes the roof-wall junctions. The band motif is repeated in pairs on the turbine covers for Units 1-3, the small, utilitarian structures in the foreground of the main elevation (Figure 3). In the design for the Grayson Steam-Electric Power Plant, different volumes are manipulated using varying scale and proportion strategies. The factory-painted, metal exterior of the main tower is clad in small rectangles that together form a grid. The lower, “Boiler Building” main portion of the plant is has a stucco-finished exterior divided by stacked horizontal scoring lines. The turbine covers for Units 1-5 are painted metal, single-story housings with curved ends and lower, filleted endwalls. The Initial Study cultural resources evaluation mistakenly identified the exterior metal panel material as asbestos, which is likely incorrect as well as needlessly alarming (Figure 20, 6.7). Nearly 15 years after its completion, the unique exterior shell on the turbine covers at Glendale Power Plant was described in *Power Plant Management*, “the housing is fabricated of steel and is lifted in a piece from over the turbine- generator”(Robert Henderson Emerick, 1955). We assert that the Stripped Classicism design of the power plant is an outstanding example of a rare

type of architecture, the architect-designed power plant. The Stripped Classicism design should be considered the work of a master architect, Daniel A. Elliot, AIA (1898-1978). California Register Criterion 3 includes properties that "...represent... the work of an important creative individual." The Grayson Steam-Electric Power Plant is eligible for listing in the California and Glendale Registers under both Criteria 3 for Stripped Classicism design and as the work of a master architect. The subject property is further significant for its engineering and construction methods. The Grayson Steam-Electric Power Plant was described in the *Los Angeles Times* as "the world's first completely earthquake-proof ... plant... Among its unique features is the location of the huge turbo-generator on an uncovered deck... the only building is a shell built of light steel and stucco filter walls that will more or less cover the unsightly appearance of boilers."² R.R. Martel, a Caltech professor and widely recognized international authority on seismic engineering collaborated on the design. Martel (1890-1965) was among the first engineers in the nation to concentrate on earthquake-resistant buildings and is considered the first in California.³ He was one of two founders of the Earthquake Engineering Research Institute, an independent, nonprofit organization which was established "to promote research on safe and economical earthquake resistant structures" worldwide and continues to thrive, providing that service on an international scale to this day.

Its earthquake-proof structure was prescient for the late 1930s. An engineering periodical by the Earthquake Engineering Research Institute focused on seismic safety. "Earthquake Spectra: The Professional Journal of the Earthquake Engineering Research Institute" ran numerous articles specifically describing earthquake-related damage to power plants in the greater Los Angeles area fifty years later, between 1987 and 1994. While Glendale's Power Plant is listed in data and tables with plants that sustained significant damage, no damage to Grayson Steam-Electric Power Plant from those events is enumerated. Similarly, "Seismic Experience Data--Nuclear And Other Plants: Proceedings Of A Session," prepared by the American Society of Civil Engineers, describes Glendale's Power Plant remaining "on-line" during the 1971 earthquake, despite its proximity to Sylmar, which was considered the epicenter (1985). We are not saying the subject property building can withstand all earthquakes; in the past it demonstrated superior seismic strength compared to its peers in the Los Angeles area. The Grayson Steam-Electric Power Plant was designed to be "earthquake-proof" before any other facilities of its type were, which is overridingly consequential in California engineering. The property possesses significance as the earliest known example of an earthquake-proof power plant in California or anywhere else.

Both the California and the local register recognize construction and engineering innovation. California Register Criterion 3 states "It embodies the distinctive characteristics of a type, period, region, or *method of construction*; represents the work of an important creative individual." The Grayson Steam-Electric Power Plant is eligible for listing in the California and Glendale Registers under each Criteria 3 for its method of early earthquake proof construction. None of those avenues of its significance was addressed in the reconnaissance level survey prepared for the Grayson Steam-Electric Power Plant.

² "Power Plant Built In Open: Glendale Will Have First Completely Quake-Proof Setup." *Los Angeles Times*. June 30, 1940: A10.

³ "R. R. Martel, Professor of Structural Engineering Staff" *Engineering and Science*, Volume 19, 1956: 22-24.

Direct Association with Lauren W. Grayson

The significance of Chief Engineer and General Manager Lauren W. Grayson (1907-1972) is also not adequately evaluated. When Grayson retired in 1970, he had served the city for nearly two decades and expanded water and power capacity by 400 percent and the budget by an even higher percentage during his tenure (“Public Services Head in Glendale to Retire” *Los Angeles Times*. 25 January, 1970: SG-B2). The visionary civil servant was responsible for bringing together other agencies for collaboration in the northwest. That joint power alliance was considered monumental in the field, and brought electrical capacity diversification, as well as lower costs, to Glendale-based users. He oversaw both water and power utilities, constantly interpreting and planning for future community needs.

Lauren Grayson was responsible for the addition of cleaner technologies, including a steam-electric generating unit (1965) and the nation’s first gas turbine peaking unit in his final year. Grayson served as president of American Water Works and California Municipal Utilities associations and was elected American Water Works Man of the Year (1959). He was considered a national leading authority on public utilities and delivered academic papers on a wide variety of utility-based subjects throughout his career. Grayson was published on subjects ranging from visionary long-range planning to the unique needs of car wash and drive-in usage in a number of national and regional industry periodicals, including *The American City*, *Engineering News & Record*, *Western City* and *Aqueduct News*. Under his leadership, Glendale was one of the first local communities to require subterranean power lines. The *Times* succinctly described his career at retirement as an “outstanding achievement in the field of water and power” (Don Snyder “Glendale Official: Public Service Chief to End Long Career” *Los Angeles Times*. 6 July 1970:B9). The Power Plant was named in his honor in 1972. Mr. Grayson lived in Glendale after 1951 was buried at Forest Lawn. The Grayson Steam-Electric Power Plant is eligible for listing in the California and Glendale Registers under each Criteria 2 for its direct association with Lauren W. Grayson during his period of significant, local utility-related achievements.

The period of significance of the Grayson Steam-Electric Power Plant commenced in 1941 when it was completed and ended in 1970, when Loren W. Grayson retired. Neither the California nor the Glendale Register has requirements that a property be completed more than 50 years ago. For the purposes of National Register eligibility, the period of significance would end in 1967, because it does not meet the requirements in Criterion Consideration G for properties that have achieved exceptional significance in the past 50 years.

Because the California Register Technical Assistance Bulletin 7 is currently under review for updates and revisions, there is no current state guidance for nominating California Register properties and National Register of Historic Places guidance is used in its place. In the National Park Service-prepared National Register Bulletin “How to Prepare the National Register Criteria for Evaluation,” under “Determining the Relevant Aspects of Integrity” for properties associated with important events or persons it states:

A property important for association with an event, historical pattern, or person(s) ideally might retain *some* features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. *Integrity of design and workmanship, however, might not be as important to the significance*, and would not be relevant if the property were a site. A basic integrity test for a property associated with an important

event or person is whether a historical contemporary would recognize the property as it exists today.

Grayson Steam-Electric Power Plant retains integrity to its location. The building remains on the original site where it was completed in 1941. The power plant building's original Stripped Classicism design is intact, the painted stucco walls and metal panels that camouflage day-to-day operations of the facility, including the three staggered, green bands that wrap around the southeast corner and original signage, are visible and recognizable to the general public from the public right of way. Its setting in an essentially flat yard among other large utility apparatuses has changed over time, reflecting upgrades, increases in capacity, and new technologies, but continues to be the basic, recognizable surroundings of a power plant. Its distinctive painted metal and stucco exterior materials endure, as do other visible elements from its original design including multi-story glass block banks of windows, awning-type steel sash windows, decorative fillets, metal sign letters, decorative turbine covers and the essential building configuration. The condition of those materials reflect the passage of 77 years, as should be expected. The fit, finish and connections of those original materials remains impeccable, revealing its inventive, Depression-era workmanship. Because the other aspects of integrity remain intact, the feeling and associations of the Grayson Steam-Electric Power Plant, while somewhat reduced by the additions of new outbuildings and facilities, remains. The property maintains its original, intended use, and judging by publicly visible portions of the building, it retains essential qualities that evoke the aesthetic and historic senses it would have had in 1941 when it was completed.

National Register guidance clearly states "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 Grayson Steam-Electric Power Plant retains its original inventive massing, its essential spatial relationship with the larger yard, the carefully designed proportions, the original, visible, main fenestration, the textures of painted metal, stucco and other materials and its distinctive, austere ornamentation (Figures 2-5)

The improperly prepared evaluation for historic significance in the Initial Study expended an inordinate amount of research to justify the misguided point that the power plant has impaired integrity because of alterations. The architect-designed power plant is the resource in question-not the not the entire surrounding yard. The Initial Study ardently describes the addition of switching yards, additional units, cooling tanks and towers, sheds, a warehouse, storage buildings and a garage which are not connected to the Grayson Power Plant and are immaterial to the evaluation of the building. Those non-contributing features comprise the setting of the subject property and do not affect its integrity or significance. To the average reader, hurrying through the document to achieve a basic understanding, their assertion that the power plant is not historically significant would seem well justified. Professionally qualified reviewers who are experienced as performing such evaluations arrive at entirely different conclusions as described in this letter.

We assert that if Lauren W. Grayson, for whom the property was named, were able to see the subject property today, he would plainly recognize the Grayson Steam-Electric Power Plant. Whether or not a person associated with the property during its period of significance would find it recognizable is among the National Register thresholds for integrity. It remains clearly recognizable to its original appearance. The addition of buildings, cooling towers, fuel tanks and other equipment is typical of and are necessities to continuously operating a power plant,

particularly in a community where its existence made population growth possible. It can be assumed that no public power plant dating from 1941 that remains in operation would be devoid of any alterations made since its completion. Keeping up with requirements, particularly those for life safety, requires inevitable alterations to buildings and structures. Comparison between the photographs in Figures 3 and 4 as well as others validates that the building is absolutely recognizable to its original design, and claims of its loss of integrity are exaggerated and not based in facts.



Figure 4: Grayson Steam-Power Plant Building, view northwest of south endwall, circa 1950s. Source: https://commons.wikimedia.org/wiki/File:Grayson_Power_Plant.jpg, not for publication.



Figure 5: Excerpt from Initial Study, Architectural Resource Evaluation Of The Grayson Power Plant For City of Glendale, California, undated photograph estimated 2016, (Figure 26 Grayson Boiler Building page 6.10, same view as Figure 4 above). Note all visible awning-type, steel sash windows, exterior materials, the building configuration and Stripped Classicist design remain recognizable. Carport at lower center is an addition (year unknown). Note the stucco scoring bands at the right-hand boiler building tower and the dimensioned continuous sill and header on the left-hand bank of ribbon windows that enunciate the endwalls, providing visual interest and relief. Other than the carport, no alterations are visible.

A brief review of National Register-listed power plants in the United States revealed that all remaining in use contain non-contributing buildings and structures and that nearly all of the main buildings had been altered.⁴ In Pasadena, the Glenarm Power Plant was determined eligible for the National Register for its associative and design significance, despite hundreds of alterations made to the building and larger power plant complex over time and numerous changes to the building since it was completed in 1928. The very visible, east facing, rear side of the Glenarm Power Plant is entirely concealed by alterations made in the past 20 years. Comparison against like types is one of many tests for significance and the Grayson Steam-Power Plant stacks up favorably against its significant peers in terms of its importance to the development of the community, its design significance, and its retention of integrity. We believe that the Grayson Steam-Electric Power Plant is eligible for listing in the National Register as well as the California and local registers, but the property is not publicly accessible to make site visits and perform a complete, intensive evaluation of its significance.

Previously Recorded Resources

In the Initial Study, the preparers included a list of “previously recorded” built environment resources, mistakenly applying what is normally archaeological methodology to the built environment. Not only does the section not inform the evaluation, it demonstrates their misunderstanding of the task. The absence or presence of built environment resources within a half a mile is not a predictor as it can be in archaeology, of whether or not built environment resources can be expected to be encountered. Moreover, the list provided does not enumerate whether or not the studied properties were found to be significant or not, rendering it even less useful.

The only “previously recorded resources” that should be considered in this evaluation would be on the subject property (including any previous evaluations), or would be other power plants against which this property should rightly have been compared. See National Register guidance on “Comparing Similar Properties” in “VIII. How to Evaluate The Integrity of A Property” (National Park Service, “How to Apply the National Register Criteria For Evaluation”)

Conclusion

CEQA strongly encourages early consultation with interested or affected parties, which includes local historic advocacy groups. No consultation efforts were made with TGHS. We were asked for information early in the process but have not otherwise been consulted on the project.

Predicated on the facts and issues presented above, TGHS believes that the Grayson Steam-Electric Power Plant must be re-evaluated for historic significance in a supplementary document and that the Cultural Resources section of the environmental document must be revised to reflect a good faith and more reasoned analysis of the property’s historic significance. We have presented “substantial evidence” for the lead agency to change its conclusion and find that the Grayson Steam-Electric Power Plant building is a historical resource for the purposes of CEQA.

⁴ National Register-listed power plants include: Adams Power Plant Transformer House (Niagara Falls, NY); American Falls Power Plant Transformer House (American Falls, IA); Moran Municipal Generating Station (Burlington, VT); Murray City Diesel Power Plant (Murray City, UT); Pratt Street Power Plant (Baltimore, MD); Power Plant No. 1 (McPherson, KS); Seaholm Power Plant (Austin, TX) and Spaulding Power Plant and Dam (Greely City, NB). The Adams Power Plant Transformer House is no longer in use; its contributing buildings are notably no longer extant. Seaholm Power Plant contained a non-contributing structure when it was listed in the National Register. It has since been redeveloped and is no longer used as a power plant.

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Thank you for your consideration.

Sincerely,

Greg Grammer

President
The Glendale Historical Society

cc: Jay Platt