



**CITY OF LAGUNA BEACH
NOTICE OF APPEAL**

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City Clerk's Office
City of Laguna Beach, CA

NOTICE:

1. Appeals of decisions regarding administrative use permits, administrative design review, coastal development permits, conditional use permits, design review, interpretations, reasonable accommodation, temporary use permits and variances may be filed by the applicant or any other aggrieved property owner within three hundred feet of the subject property.
2. A CEQA determination in connection with the decisions described above are subject to Public Resources Code section 21151(c) and may be appealed by any person.
3. The appeal fee of \$2,500.00 must accompany the appeal at submittal.
4. This form must be received by the City Clerk within 14 calendar days of the appealed decision or determination.
5. All information requested below must be provided. Attach additional pages if necessary.
6. Prior to completing this form you may wish to read Laguna Beach Municipal Code section 25.05.070, which pertains to appeals.

APPEAL BACKGROUND INFORMATION: Email: lagunadi@cox.net
Name of Appellant: Stan & Diane Leemon Phone No: 949-232-5568
South Laguna Civic Ass'n, Village Laguna
Address of Appellant: 31521 Toto Loma Lane
Address of Subject Property: 31526 Valido Road
Owner of Subject Property: Chuanjie Zhou

Board/Commission/Officer responsible for Decision Appealed: (Select One)

- ☒ Design Review/Board of Adjustment
☐ Planning Commission
☐ Other: (Explain) _____

Date of Decision/Hearing: 9-25-25

Appeal of: (Select One)

- ☒ Approval
☐ Denial
☐ CEQA Determination (Pursuant to Public Resources Code section 21151(c))
☐ Other: (Explain) _____

Generally Describe:

The type of permit, relief or action originally sought for the subject property: _____

Reverse DRB decision on permits listed in attached.

REASON FOR THE APPEAL:

see attached

The foregoing statements are true and correct to the best of my knowledge and belief.

Heather J. Fumon
(Signature of Appellant)

Date *10-08-25*

PROCEDURE FOR REQUESTING A CONTINUANCE OF A PUBLIC HEARING :

Continuances may be granted at the discretion of the City Council. Either the applicant (owner of the subject property or his/her designee) or the appellant may request a continuance at or, preferably, before the time of the public hearing. If, no later than the Wednesday prior to the public hearing, the applicant submits a written request accompanied by \$684 to cover the cost of renoticing, the City staff has the authority to continue the hearing, if in the judgement of the staff, there is no valid or legal reason not to continue the hearing. Such requests are to be submitted to the City Clerk.

Appeal Received By: *[Signature]*
Date Filed: *10/8/2025*
Appeal Fee: *\$7500*
Date of Hearing: _____

Subject of Appeal: Resolution 24-0658 approving Design Review 24-0658 and Coastal Development Permit 24-0657 for property located at 31526 Valido Road and finding said action categorically exempt pursuant to CEQA Guidelines Section 15303.

General Description

To demolish a single-family house and garage and construct a new two-story single-family residence with an attached, two-car garage, elevated decks, grading, and landscaping.

Reasons for the Appeal:

The basic reason for the appeal is to request the reversal of the Design Review Board decision that “the existing single-family dwelling, detached garage, and the subject property are not historic resources.”

The appellants ask the City Council to reject the Design Review Board approval to demolish the last original homestead house (Egan Cottage, 1909-1928) within Laguna Beach, which is also the last known homestead house in all of Orange County. It is an extraordinarily important property that the City’s own historic resources consultant (HRG), who has been evaluating properties locally for several years, found to be eligible for the National Register of Historic Places under Criterion A and the California Register of Historical Resources under Criterion 1, at the local level of significance.¹ It qualifies as a historic resource for purposes of CEQA.

We ask the Council to use its authority under Cal. Code Regs. Tit. 14, § 15064.5(a)(4) to find that the property qualifies as a historic resource and that its demolition is therefore not categorically exempt from CEQA. We further ask Council to overturn the project approvals including the Coastal Development Permit. The DRB both failed to consider relevant factors and considered irrelevant factors in making its decision.

Dueling Reports In response to the evaluation from HRG, the property owner commissioned a separate report from another historic consultant, Chronicle, which found that the property is not historic. The City asked HRG to respond to Chronicle’s report. HRG did not waiver from their opinion on the property’s significance. Then the City hired another firm, GPA to examine both the HRG and the Chronicle reports; GPA found that there was insufficient information to conclude that the property is eligible for the National Register; specifically, a comparative framework for understanding its significance was required.

Rather than return to HRG for the additional information requested, the City aborted the process and issued a staff report supporting demolition on the grounds that there are facts to support a conclusion that the property does not qualify as historic.

¹ As stated in the letter from Francesca Smith (Sept. 18, 2025), “This language [“local level of significance”] can be confusing for people outside the field. Not every property listed on the National Register possesses *national* significance. Some possess statewide or local significance. That is, the National Register recognizes significant properties worthy of preservation that contribute to a local area’s or a state’s architectural, cultural, economic, social or political history. See the National Park Service-prepared *Brief 15: How to Apply the National Register Criteria for Evaluation* under ‘How to Evaluate a Property Within its Historic Context’ in the section ‘Local, State, and National Historic Contexts,’ subsection ‘Local Historic Contexts’ (1990; revised 1991, 1995, 1997. Revised for Internet 1995, p. 10).”

As is well known to Council, Laguna Beach lacks a staff member qualified in historic preservation, which puts our staff in difficult positions. If we had a qualified staff member, **this process would have unfolded differently**; HRG would not have been asked to respond separately to the report by the owner's consultant *before* GPA prepared its peer review. Instead, HRG would have been invited to provide the information requested by GPA as part of its response to both the Chronicle and GPA peer reviews.

Thus HRG has not been given the opportunity to provide the additional documentation requested in the GPA peer review.

Finally, a fourth expert, architectural historian Francesca Smith, reviewed all the documentation, did further research, and provided the missing comparative framework that established the property's rarity as the last known intact homestead house in Orange County. This report was provided to the City one week before the DRB hearing. Ms. Smith confirms HRG's conclusion that the property is eligible for the National and California registers. (See attached letter.) A preponderance of evidence supports a finding that this property qualifies as a rare and unique historic resource within Laguna Beach, highly significant to the history of our city and the region, and that demolition would cause a substantial adverse effect on the environment.

This whole package with its unanswered questions, came to the Design Review Board. The Board, without training in this subject, was asked to vote on the historic status of this property.

Process of City Historic Review After receiving the letter from Ann Christoph on September 19, 2024 reminding staff that the property is historically significant as the last remaining homestead house in Laguna Beach, staff requested a continuance of the planned DRB hearing on September 26, 2024. Then staff requested bids from consultants to prepare a historic report.

There were bids from HRG for \$4600, and another from GPA for \$9835. It appears that HRG was hired pursuant to its Professional Services Agreement with the City, which stipulates a maximum of \$75,000 in billings per year and no more than \$4,600 per project. HRG's proposal for the project included evaluation for "California and local registers" only (Proposal for 31526 Valido Road Historic Assessment, October 3, 2024).

Even though the bid from GPA was significantly higher, it also included a larger scope of work including evaluation for the *National* as well as California and local registers. Reviews of properties that may be eligible for the National Register require significantly more research. The City had received information from the South Laguna Civic Association that the property was the last known homestead house in Laguna Beach and well over 100 years old (SLCA email to Marc Wiener, July 24, 2022). Even given the absence of qualified preservation staff, City staff should have known that an evaluation for National Register eligibility would be required. Importantly GPA's proposal also included "relevant historic contexts within which the property should be evaluated."

The City rejected GPA's proposal, presumably because at \$9,835 the bid was too high. But then after HRG produced their report for a much lower fee, staff hired GPA to do a peer review of the HRG report. The missing components regarding comparison with like properties and "relevant historic context" are exactly the critical items that GPA proposed to provide and those are what

GPA says are missing from the HRG report. Even though HRG had supplied some relevant historic context information GPA pointed out that there should be more information about the rarity of homestead houses in Orange County.

The demolition of this historic building should not be authorized because there is information that can feasibly be obtained and added to the HRG report. This is what the Francesca Smith report has added for consideration. No other surviving homestead houses were found in Orange County.

Neighbor Design Concerns Frustrated Immediate neighbors were put in an awkward position not knowing how the Board would deal with the historic issue. They want to support historic preservation of the house, but, having only 3 minutes to speak, do they use all that time supporting preserving the house, leaving the detailed concerns about the proposed new construction unaddressed? If they talk about their view and other concerns with the new design, does that send the message that they don't care about the historic preservation? So as the Board comments turned from the historical discussion to the proposed project, the neighbors had already spoken, and the Board approved the project leaving some of those view concerns unaddressed.

Views of the Property It has been mentioned that this property is tucked away at the end of a driveway and is little seen by the public from Valido Road. But it is highly visible from another public vantage point, the Toovet Trail in the Aliso and Wood Canyons Wilderness Park. (Figure 1) The Egan property adjoins the Park; indeed, 24 of the 40 original homestead acres are preserved as open space as part of that Park, and look much as they would have done when William Egan established his homestead.

The public view of this historically significant property adjacent to the Wilderness Park should be considered a "coastal scenic resource" and protected as such.



Figure 1. Egan homestead from Toovet Trail, 2022.

Abuse of Discretion Board members abused their discretion in making the finding that the property is not a historic resource, basing their decision on irrelevant factors while they failed to consider relevant factors.

Making a decision on historic significance is not normally in the scope of Design Review and they have not been trained on this topic. It can be very complex, especially when the applicant hires his own historic consultant. This issue requires more consideration than this Board gave it.

Only Board Member Tom Gibbs did an extensive analysis. But he started out with this conflicted statement, “There’s no question it’s historic. But the question is, is it protectable?” He makes an unfounded distinction between “Historic” and “Historic Resources.” If the property is historic it is the City’s obligation, and the Board’s duty to protect historic resources, under the General Plan, and under CEQA. He based his final decision on “condition”, which is not one of the evaluation criteria for a historic resource. “I get the feeling an association of a very old, dilapidated, not well-built home.” He says that doesn’t read homestead to him. “And in fact, the way it was built in pieces. Maybe that’s part of the historical charm, but it did not create a homestead house. In my mind, it created more of a hodgepodge, of building without design.”

Yes, the way it was built in sections at different times does tell the story of the homestead and the family—starting out with a cabin, then adding another portion with a fireplace when children were born, and then the later addition which made it possible for the whole family to live there permanently. It is not a hodgepodge. This is how the “west was won,” not with architect-designed buildings, but with pioneers coping as best they could with the challenges they faced. That is the homestead story the house tells.

Gibbs relied heavily on the quotation from National Park Service Bulletin 15 cited in the GPA peer review. GPA stated: “Technical Brief 15 cautions that ‘a property must be more than simply be associated with a historical trend. It must clearly illustrate that trend to be one of the most important properties associated with it.’” The problem is this language is nowhere to be found in Bulletin 15 or in any other historic preservation publications. Even if this guidance existed, as the *last remaining homestead house*, 31526 Valido is by default one of “the most important properties associated with” the 1862 Homestead Act at the local level. Nothing else exists to illustrate this trend.

M. J. Coveny stated she agreed with Mr. Gibbs and that “clearly it’s not significant...And it’s not of anything unique. It’s basically something they threw together to kind of work the land.” She went on to say that this Egan family couldn’t be found by ChatGPT, and that this family didn’t have “any real significant impact on South Laguna.” She also discounted the property because South Laguna was not part of Laguna until much, much later,² and that her opinion might be different if it “was in a more predominant place downtown.”

² It is repeated in both Chronicle and GPA peer reviews that a historic resource in South Laguna is much less relevant to Laguna Beach because South Laguna wasn’t annexed to Laguna Beach until 1987. This is also an error. The Homestead period in the area that is now Laguna Beach was all unincorporated during the Homestead period which began with George Thurston’s homestead, begun in 1871, and ended with the Russell Wallace claim in 1916. Laguna Beach was not incorporated until 1927. All of these homesteads are within the triangle of hillside and coastal land that was left out of the adjacent ranches—Rancho San Joaquin on the north and Rancho Niguel on the east and south.

These statements illustrate remarkable ignorance of what qualifies a property as a historic resource. ChatGPT is not a substitute for reading the historic reports and letters that had been submitted. And the bias in favor of downtown is irrelevant.

Jessica Gannon said she agreed with Mr. Gibbs and said she had looked into whether Village Laguna had featured this property on a tour, and couldn't find it. "I did the whole ChatGPT and Google and try to find where Village Laguna is or other, you know, historical references were ever, included this address and I could not find any I concur with, you (Gibbs), on it, regardless of whether it was part of a tour or not."³ Tours are irrelevant to findings of historical significance.

Louis Weil

"I concur with the two (Board members) that said, it's not significant. And I do so with two main reasons."

"One, the structure as outlined by Chair Gibbs does not meet the criteria, for local, national or state in the elements that, you know, the prior ownership, that prior sold it in 2022, held the property for more than 50 plus years. Might have been the original owners. I don't know, but I, I looked at the sales records, and at any point they could have voluntarily assigned this to some sort of historical component, making it eligible locally and components of that, look, for the state and national, and that was never done.

And nor is that being sought with the application here. So the voluntary nature, I think, throws out a few of the components. Nor do I see an architectural integrity with the current shape, nor did the reports find that, and the reports note the property fails to retain the design or some sort of historical significance in the structure as well."

Whether prior owners had or had not applied for historical recognition is not relevant, as is the provision in the Historical Preservation Ordinance regarding owner consent for local listing. The original city consultant found the property eligible for State and National listing which does not require owner consent to be so recognized.

Imer Bauta was the only supportive vote for preservation.

"I, you know, I think, Ann, with her long-standing history in town, demonstrated clear evidence of historical significance, in addition, Francesca Smith also identified this as, you know, rare, unique, which would give it, you know, additional governance?? to preserve in this home. I think there's a value here that, you know, from a historical standpoint that we can't lose.

You know, a homestead is a big part of our culture as Americans and as Californians as well. The push west. Right. The push to the coast was part of this movement. This is a rare and unique property. And I'd like to see (it) preserved."

³ In fact, Ruben Flores *had just testified* that he had included it in his garden walk. The property was also included in the South Laguna walking tour as part of the statewide conference of the California Garden and Landscape History Society in October 2024.

Property Owner Notification. In relation to the property owner being notified of the historic issue related to this property the Board ignored the document in the agenda package, a letter from Greg O’Loughlin, president of the South Laguna Civic Association dated July 22, 2022 to Marc Wiener, Director of Community Development informing the City of the historical significance of 31526 Valido Road and requesting that this information be added to the property file. This letter was also copied to the listing realtor.

It has come to the attention of the South Laguna Civic Association that the above property is on the market for sale. In the process of researching and preparing a history of South Laguna we have become aware of the historical significance of the property. The file at the City on this residence says that it was built in 1910 but that doesn’t tell the whole story. This house is the oldest house in South Laguna and the last known surviving homesteader’s house in the city of Laguna Beach. Laguna Beach south of Broadway was granted by the Federal Government to various pioneers under several homestead acts. The earliest was the Thurston homestead begun in 1871 in nearby Aliso Canyon. The Egan homestead of 40 acres was filed in 1910 with the papers signed by President William Howard Taft. The 40 acres today includes the site of the South Coast Water District reservoir, and the subdivision including the streets Paso del Sur, Valido, Toto Loma and Rico Roads. In the early 1900s it was a farm where the Egan family and Uncle James Shrewsbury dry farmed beans and melons. The Egan home on the property was where William and Bertie Egan raised their two daughters, Frances Egan Chatham and Esther Egan Hind. We have an extensive collection of photographs of the family and house over the years. We are attaching a few of them. The house was overlooked in the historical inventory of 1981, perhaps because of its almost hidden location at the end of a driveway. Clearly it qualifies as a historic resource of statewide significance that merits preservation.

Please place this information in the property file so that potential purchasers will be aware of the historic significance of the property and so the staff can inform them of the potential benefits of historic preservation.

The Board ignored this early and timely letter and concentrated on the letter to the City less than a week before the scheduled second DRB meeting on the proposed new house, advising the same information—that 31526 Valido should be considered a historic resource, implying it was late to the table.

The lapses at City Hall—not seeing the SLCA letter and deleting the 1910 date of construction in the property file—is not the fault of the public concerned about historic preservation. As for the owner, prospective buyers of this property received the following disclosure on their RPR report, dated June 30, 2022.

The City is currently in the process of updating its Historic Preservation program. On August 11, 2020, the City Council approved a locally voluntary preservation

program, but the revised program will not be in effect until a Local Coastal Program Amendment is approved by the California Coastal Commission. Please be advised that pursuant to the California Environmental Quality Act (CEQA) and the associated CEQA Guidelines, during the City's review of a development application, a **Historic Resources Assessment Report prepared by a qualified historic preservation consultant may be required in order to determine if there will be any proposed change, alteration or relocation of a historic resource.**

The buyer was made aware of the possibility that the property might qualify as a historic resource.

Thank you for your consideration of this important opportunity to preserve this important example of our town's early history.

Attachments:

1. Francesca Smith report of 9-18-25
2. Ann Christoph letter of 9-19-24
3. South Laguna Civic Association letter of 9-19-25
4. Village Laguna letter of 9-19-25
5. HRG proposal of 10-3-24
6. GPA proposals of 9-27-24 and 7-15-25

MEMO

10/06/2025

from lee hanson

To: the City of Laguna Beach:

Attached is a check (#2272) for \$1000. This is the amount donated by several people who would like to see the historic Egan homestead house preserved for future generations. It is our hope that the City Council will concur and vote to purchase the city's last remaining homestead.

Respectfully submitted,
Lee Hanson, PhD

FRANCESCA SMITH

September 18, 2025

Design Review Board
City of Laguna Beach
via e-mail

RE: Agenda Item 5.9, Design Review 24-0658, Coastal Development Permit 24-0657

Dear Chair Gibbs and Members of the Design Review Board:

I am writing to offer my expert opinion on the historical significance of the Egan Homestead Cottage at 31526 Valido Road in Laguna Beach, and to provide a comparative framework, as requested by GPA Consulting in their Peer Review dated July 28, 2025.

I have forty years' experience preparing and reviewing hundreds of successful nominations of properties to the National, California, and local registers as well as other relevant experience in historic preservation. I am qualified under the Secretary of the Interior's Professional Qualification Standards in Architectural History and History. The State of California recognizes me as "Professionally Qualified Staff" at its highest level, as a Principal Architectural Historian. I am providing this letter as a volunteer who cares deeply about the history and future of Laguna Beach.

I have read the final draft of HRG's Historic Resource Assessment (February 12, 2025), the Chronicle Historic Resource Assessment (April 2025), with HRG's response Memo (June 3, 2025), and the GPA peer review referenced above. I performed a site visit to the subject property on September 15.

HRG's conclusion is correct. The subject property is eligible for listing in the National and California registers under criteria A and 1, for its association with the Homestead Act, at the local level of significance.¹ The Egan Cottage also possesses sufficient integrity to communicate that significance.

A guiding question for integrity considerations is: would the original owner, William Egan recognize his home today? The answer is resoundingly "*Yes, he would.*"

¹ This language can be confusing for people outside the field. Not every property listed on the National Register possesses *national* significance. Some possess statewide or local significance. That is, the National Register recognizes significant properties worthy of preservation that contribute to a local area's or a state's architectural, cultural, economic, social or political history. See the National Park Service-prepared *Brief 15: How to Apply the National Register Criteria for Evaluation* under "How to Evaluate a Property Within its Historic Context" in the section "Local, State, and National Historic Contexts," subsection "Local Historic Contexts" (1990; revised 1991, 1995, 1997. Revised for Internet 1995, p. 10).

The Reports

GPA is correct in its conclusion that the HRG evaluation could benefit from a more developed context and that comparison with like properties would bolster the claim of this property's significance, although it is worth pointing out that a deficiency of comparisons is, in part, a result of the notable rarity of this property type.

Given that HRG and GPA are the City's consultants, it is surprising that upon receipt of GPA's peer review, the City appears not to have gone back to HRG to request additional research to address GPA's comments. That is standard practice; an issue with the report was identified, and HRG can, and should, have the opportunity to address it. *GPA did not conclude that the property is ineligible for listing in the National and California registers.* Extant homestead properties in California are exceptionally rare; so this property should be considered with the utmost thoughtfulness.



Figure 1. Photo of Egan Cottage, 31526 Valido Rd., view southeast, taken from public right of way, on Toovet Trail.

As GPA noted, the Chronicle report is not really, as it purports to be, a historic resource *assessment* of the subject property. Chronicle used few primary sources and, while faulting HRG's detailed historic context, only provided a "limited historic context." Thus, GPA is correct to assert that the Chronicle report is "largely" "a peer review of HRG's report and an assessment of integrity of the property" (GPA Peer Review, July 28, 2025, p. 3).

There are significant flaws in the Chronicle review, not only its limited reliance on primary evidence but also its claim of gaps in HRG's research that a proper evaluation would take steps to fill. The goal of the Chronicle Report is transparently to refute claims of historical significance. More specifically, key to Chronicle's claim that the property is not eligible for the National or California registers is that "[n]umerous homesteads were established within the County, and the enactment [*sic*] of the Egan

homestead is not a rare or unique event” (Chronicle Report, April 2025, p. 32). This statement is totally off the mark. There were numerous battlefields in the Civil War too.

The relevant questions are: of the “numerous” homesteads created in the past, how many retain their original homestead residences? How many of those properties can communicate their significance? Chronicle’s failure to even take a stab at answering those crucial questions is fatal to its conclusion that the property is ineligible for National and California register listing.

It would take too long to deflate every irrelevant statement marshalled in the Chronicle report, but one more example is particularly illustrative: “There was no information to assert that any profits gained from farming his homestead were allocated to the City or to the immediate area of South Laguna for further development that would promote economic growth in the area” (p. 32). There are no grounds to disqualify a resource type as rare as an extant homestead house on what is, frankly, a manufactured criterion of promoting economic growth.

All of the consultants note that the setting of the subject property has been compromised. But HRG is correct that Chronicle overstates the setting impacts and their effect on the property's integrity. Chronicle states: “based on digital photographs, the Egan homestead land and surrounding parcels were *completely* developed by the 1970s” (p. 33, emphasis added). This statement is wildly inaccurate. As HRG points out, a majority of the Egan Homestead, 24 of 40 acres, *remains open space to this day*. Indeed, it is part of the Aliso and Woods Canyon Wilderness Area and is a wildlife conservation area that will presumably remain open space in perpetuity (compare images below). Moreover, much of this land was not suitable for agricultural purposes because of the steep hillsides. As HRG notes: “This large undeveloped area is preserved and reflects

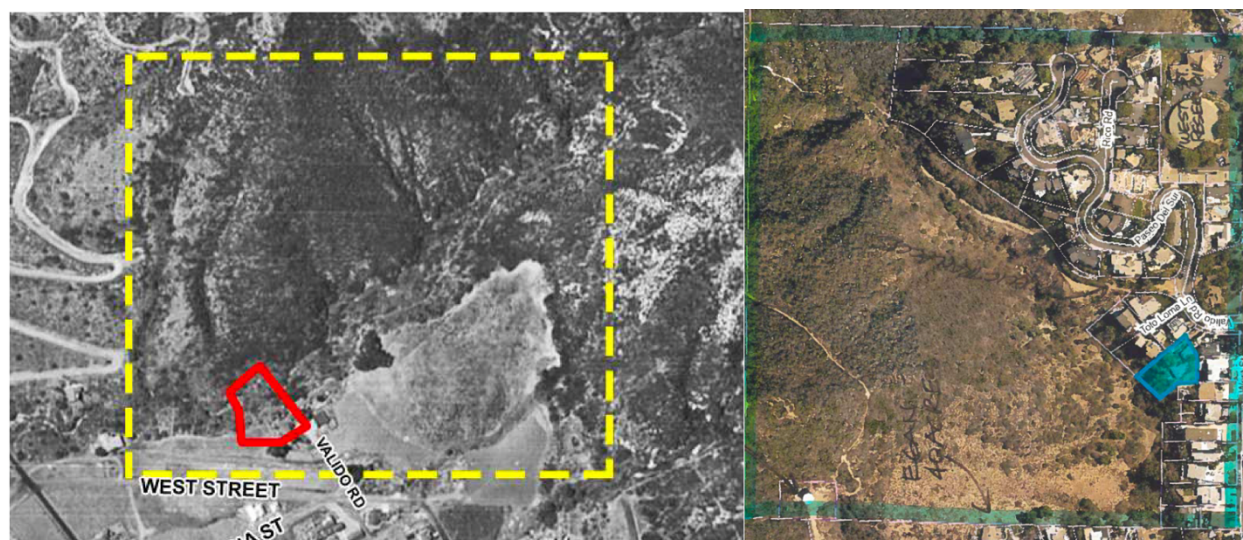


Figure 2. On the left: aerial photograph with Egan Homestead outlined in yellow and subject property 31526 Valido Rd. in red, north at top, 1938. (HRG Evaluation, p. 41.) On the right: Egan Homestead outlined in light blue and subject property in dark blue, north at top. (Google maps, 2025.)

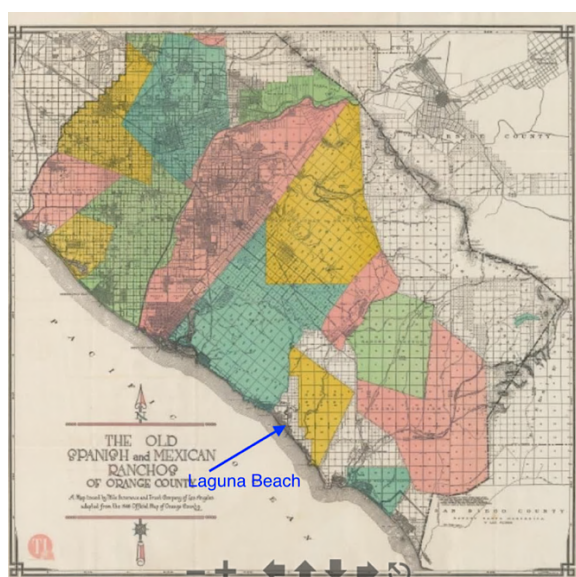
the original setting of the homestead in its period of significance” (Response to Chronicle, p. 3-4).

Thus, while I agree with HRG that the property has lost some integrity of its larger setting, it is not the fatal issue Chronicle makes it out to be; nor would it be fatal even if the Egan Homestead were surrounded on all sides by development, as their report suggests, given the rarity of an intact homestead house. Setting is one of seven aspects of integrity. HRG is correct that despite alterations it meets the other six aspects: location, design, materials, workmanship, feeling and association. Therefore, it still possesses sufficient integrity to communicate its significance under criteria A and 1.

Comparison with Like Properties

None of the consultants identified *any* properties with which the Egan Homestead might be compared. This omission is connected to the historical significance of the subject property: extant homes associated with homesteading in Laguna Beach, Orange County, and California are *extremely rare*.

The vast majority of land in present-day Orange County was portioned into ranchos (figure 4). The import of this fact for what is now Laguna Beach is noted in documentation provided to the National Park Service, which recognized the entire city, including South Laguna and its greenbelt, as one of very few Historic American Landscapes in 2017 (HALS CA-123). As stated in the documentation, “most of what is now Laguna Beach was excluded from the two surrounding land grants, (Rancho San Joaquin, later the Irvine Ranch [located north of what is now Laguna Canyon Road], and the Rancho Niguel, later the Moulton Ranch)...This exclusion has everything to do with the development of the city and the landscape in its present location and pattern” (rpt. as *Laguna Beach and the Greenbelt: Celebrating a Treasured Historic American Landscape*, 2017, p. 13).



54. Annotated map of Orange County Ranchos; colored portions signify land apportioned to ranchos. Title Insurance and Trust Company of Los Angeles, 1946.

The Egan Cottage is the only intact original homestead house within the present-day area of Laguna Beach. We know of one other existing homestead house, which was owned by Egan's uncle James Shrewsbury. That house was relocated in 1938 from its original location near the top of 3rd Avenue to 31511 Eagle Rock Way and was converted into a two-story residence (figure 5, and see attachment). While it is a beautiful home, that house has been substantially altered, unlike the 31526 Valido Road cottage. And the Shrewsbury home was relocated to its current location, unlike 31526 Valido Road. It is not eligible at this time for listing in the National or California registers.



Figure 5. Relocated and remodeled James Shrewsbury house at 31511 Eagle Rock Way.

Review of current National Register listings reveals that no properties associated or identified with homesteading in Orange County are listed. Neither HRG nor Chronicle identified other intact homestead houses with sufficient integrity to communicate historical significance in Orange County (or elsewhere). This is almost certainly because there are none. Apart from the relentless pressures of development, one reason for the absence of intact examples is because so much of Orange County *was not homesteaded*.

Modjeska House in Santiago Canyon is a designated National Historic Landmark and is listed in the National Register at the national level of significance. Internationally renowned Polish-American Shakespearean actress Helena Modjeska (1840-1909) and her husband purchased 1,400 acres there, including a homestead residence from Joseph E. Pleasants. The nomination states that Pleasants' "pioneer cabin" was "incorporated" into (encased within) the Modjeska residence, the elegant design of which is attributed to Stanford White, an eminent East Coast architect (National Register Nomination, p. 3, <https://npgallery.nps.gov/GetAsset/acc7a5f7-8f92-4c44-bc18-abe9b05e31c9>). This property is not significant for its association with homesteading.

The Renaissance Revival brick home of Richard Egan (no relation) is listed in the National Register at the local level of significance. Egan received a patent for a 160-acre homestead in 1874. But the homestead was located north of San Juan Capistrano; the house listed in the National Register was built in San Juan Capistrano in 1883, on 600 acres he purchased later, near the Mission (Revised National Register Nomination, p. 8,

[https://ohp.parks.ca.gov/pages/1067/files/nrhp%20revised%20egan%20house%20nomination%20\(002\)%207-19-16.pdf](https://ohp.parks.ca.gov/pages/1067/files/nrhp%20revised%20egan%20house%20nomination%20(002)%207-19-16.pdf), see figure 6). This property at 31892 Camino Capistrano is not significant for its association with homesteading.

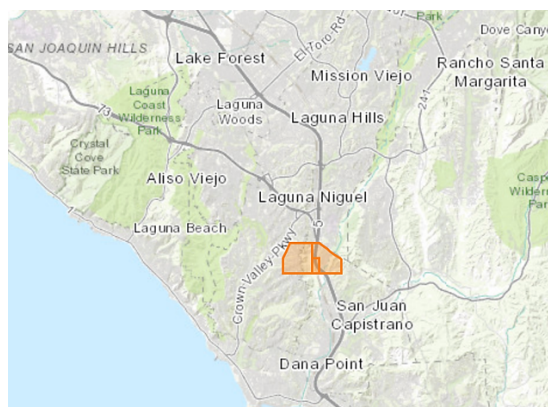


Figure 6. Map of Richard Egan Homestead, Bureau of Land Management records, https://gloreCORDS.blm.gov/details/patent/default.aspx?accession=CA0500__122&docClass=STA&sid=2cjlsep.gvw

Historic Context

Finally, the question of whether the proper context is Laguna Beach, Orange County or something else is resolved in favor of the former. The National Park Service recognized *the entire city* of what is now Laguna Beach, *including South Laguna* and its greenbelt, as a Historic American Landscape. None of the consultant reports mention this important fact (although HRG includes the documentation in the bibliography [pp. 37 – 38]). South Laguna’s history *is* Laguna Beach history, as recognized by the National Park Service. They area shared unique patterns of development as a result of the barrier created by the San Joaquin hills, which precluded absorption of most of the current city into the ranchos that dominated Orange County.

As the HALS documentation states: “The enclaves formed by hills are the basis for the city’s character. The slopes on the coastal side are composed of terrace material eroded over the years from the hillsides and include relatively deep soils that were farmed by early homesteaders” (p. 19). It asserts:

Ranch boundaries and the constraints posed by local hillsides and canyons discouraged or precluded development and created the opportunity for the conservation of the large areas of preserved open space. What is now known as the Laguna Greenbelt encompasses some 22,000 acres within and outside of the city limits and includes city-owned open space parcels, Laguna Coast Wilderness Park, Crystal Cove State Park, and Aliso and Wood Canyons Wilderness Park” (p. 20).

It further states that, like the Egan Homestead, “The oldest sections of Laguna Beach developed at the turn of the twentieth century. Small plots of homesteaded land were individually subdivided, patchwork-style, and often did not match the street patterns of adjacent parcels” (page 22).

Conclusion

31526 Valido is indeed eligible for the National and California registers as a very rare example of an extant homestead house. Homesteading was at the core of Laguna Beach's development, as proved throughout the Historic American Landscapes documentation. The absence of extant homestead houses in Orange County imparts regional importance on the 31526 Valido Road property as well. The house possesses sufficient integrity to communicate its significance.

I hope these comments and added research aid staff and decision-makers in understanding why this property is so important.

Thank you for your consideration.

Sincerely,

Francesca Smith

Francesca Smith

Attachment

Ann Christoph landscape architect asla

31713 coast highway, south laguna, california 92651

949-499-3574

fox 499-1804

September 19, 2024

Mr. David Contreras and staff
Community Development Department
City of Laguna Beach

RE: 31526 Valido Road

Today I noticed posting for a DRB hearing on September 26 for a new house to be built at the above address. The notice didn't mention anything about the historic status of this house and property.

The project file on the city's website used to note that the house was built in 1910, but couldn't see that notation when I looked at the file today. That notation led me to believe that surely staff would notice the date and require a historic resources report. In any case there is also the attached letter from the South Laguna Civic Association in 2022 alerting the staff and any potential buyers of the historic status of this property.

The house dates from at least 1910 since it is the house built by William and Bertie Egan in conjunction with establishing their 40-acre homestead on the property which was filed in 1910. They were active on the property before that filing. Thus the house is the oldest house in South Laguna, and possibly the last remaining homestead house in the city of Laguna Beach. It is truly historically significant.

Sincerely,

A handwritten signature in blue ink that reads "Ann Christoph". The signature is fluid and cursive, with the first name "Ann" and last name "Christoph" clearly legible.

Ann Christoph
Landscape Architect FASLA



To preserve and enhance the unique village character of Laguna Beach

September 19, 2025

RE: Design Review for Egan homestead property at 31526 Valido Road

Design Review Board members:

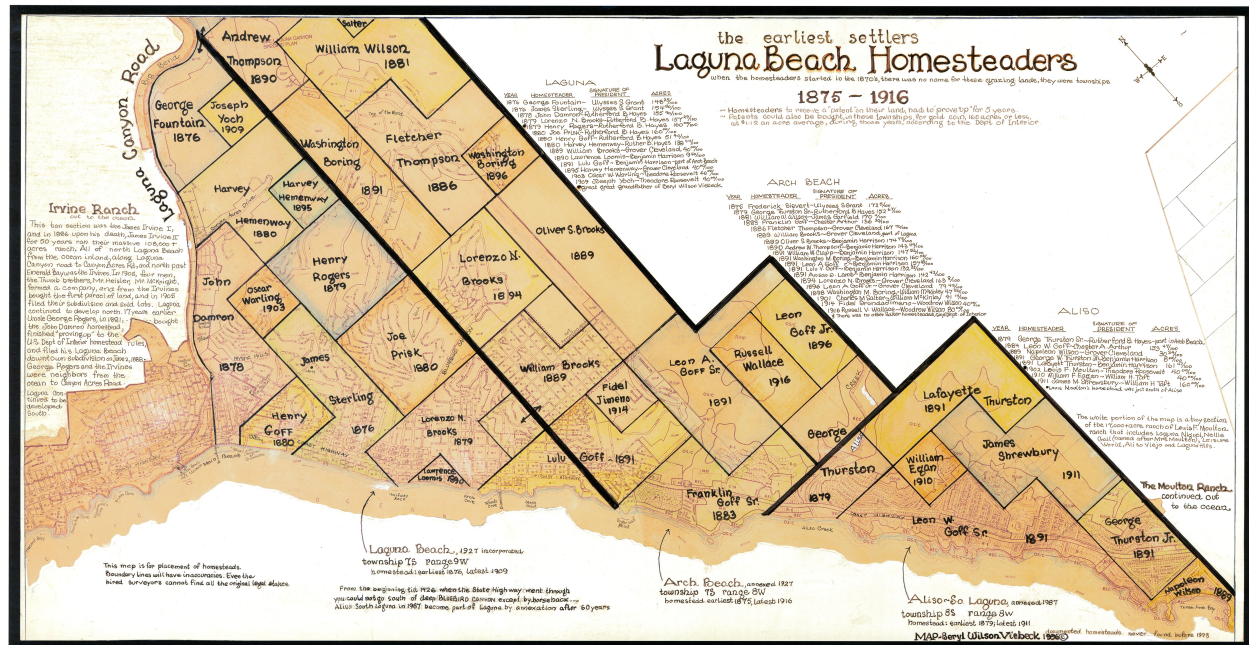
Village Laguna urges you to accept the fact-based, expert opinion of the City's consultant Historic Resources Group (HRG) that this property is eligible for listing in the National Register of Historic Places under criteria 1 and the California Historic Register under criteria A. Their conclusions are supported and amplified in the September 18, 2025 letter submitted by Principal Architectural Historian Francesca Smith, which offers additional research and comparisons with like properties as requested in the peer review by GPA.

Clearly the goal of the Chronicle report was to refute HRG's conclusions of historical significance (otherwise there would have been no reason to prepare a second report). As pointed out by the peer reviewer, GPA, Chronicle did very little original research. It is important to emphasize that GPA does not find that the property is ineligible for the National and California Registers, only that additional information and a comparative framework are necessary.

Chronicle maintains that the setting of the Egan house has been irredeemably impaired because part of the site around it has been changed from fields to a residential area. That is like saying the Hotel Laguna is not historic because Main Beach Park now takes the place of the bath house, dance hall and restaurants that were once next door. And Chronicle ignores that the major portion of the 40-acre Egan homestead is just as the family experienced it in the early 1900s—naturally vegetated hillside land with a view of Aliso Peak and the ocean from the house. The photo below shows the view of the house as seen from the Aliso and Wood Canyons Wilderness Park, the County preserved area that includes much of the former Egan property.



Village Laguna participated in the preparation of the Historic American Landscape Survey submittal to the National Park Service that resulted in the book “Laguna Beach and the Greenbelt Celebrating a Treasured Historic American Landscape.” This research and documentation on the relationship of the natural landscape to the development of the Laguna Beach community relates the importance of the filing of homesteads that divided up all of what became Laguna Beach south of Broadway into a patchwork of square and rectangular parcels. These homestead claims were organized into three townships—Laguna Beach, Arch Beach and Aliso. Part of the Arch Beach township was incorporated into Laguna Beach in 1927. The rest of Arch Beach and Aliso townships were annexed as South Laguna in 1987. (See Beryl Wilson Viebeck’s homestead map below.)



In studying that map you can see how those homestead lines influenced the pattern of development in our city. Subsequent subdivisions follow those lines in many cases and developers scrambled to organize streets that connect in various and quaint ways. The Egan development follows the pattern, using the homestead line that became West Street as its southern boundary and arranging the rest of the lots within the east and west boundaries of the homestead lines—and designing roads with the topography at the same time.

Thus the Egan property and the adjacent preserved open space tells one part of the story—what the Egan experienced when they formed the homestead and their home buildings during the decades they lived there, and the developed area that ensued in the latter years. Two important water reservoirs were built on their land to serve the South Coast Water District community and the residential lots of Tract 1243.

Rather than looking at the community improvements that have come about on the Egan homestead as impairing the significance of the historical buildings, we should consider that the setting presents the whole story, a microcosm of the transition from homesteading to community that exemplifies the story of Laguna Beach as a whole. Without the historical buildings that story line has no beginning.

Please direct staff to follow up on whatever further documentation is needed to confirm the historical significance of this property, which clearly qualifies as a historic resource as HRG reported.

Sincerely,

Merrill Anderson

Merrill Anderson
President



P.O. BOX 9668
SOUTH LAGUNA, CA
92652-7639
southlaguna.org

September 19, 2025

Design Review Board
City of Laguna Beach

RE: Item 5.9, 31526 Valido Road

The Egan House is the only remaining intact homestead residence in Laguna Beach. We ask the DRB to recognize its historical significance to our community for its association with homesteading. It should not be demolished.

Please note that the South Laguna Civic Association has done all it could to alert potential buyers to the historical significance of this property when it was listed for sale in 2022. We filed the memo for inclusion in the project file at the City, and this memo was also sent to the listing real estate agent. (See attached.)

For years the South Laguna Civic Association has been researching and preparing a book on the history of South Laguna. During that process we conducted interviews, discovered and studied primary documents, and prepared maps of relevant property boundaries, including homesteads.

We interviewed Esther Egan Hind, William Egan's daughter. her husband Russ Hind, and Russ' cousin Jim Hind who spent many of his childhood moments with the Egans. Through that work we learned the location and significance of the Egan homestead house. They further revealed what life was like on the homestead around the early part of the last century. In an interview in 1992, Esther Egan Hind described her childhood:

Somebody might think it was a dreary life. It wasn't. It was great. There were wildflowers in the springtime just all over everything. Mother and Daddy had several very wealthy friends that had great big cars and chauffeurs. It seemed like a lot to us because we farmed, we worked. But they loved to come to our house. Everybody was welcome. . . It was a real good life. I can never remember being anything but happy.

The review of the plans for this house is an opportunity to share what we have learned so that you and others can appreciate the buildings and the site that help tell that story. **It is important to preserve it.** The buildings convey the feeling and story of what this kind of life was like and how the early pioneers of Laguna and their homesteads led to the community we have now.

The entire area of South Laguna is made up of former homesteads, as is most of the rest of Laguna Beach south of Broadway. This was an island of government land surrounded by ranchos: Rancho San Joaquin on the north and Rancho Niguel to the east and south. The rest of the available land was related to the Mission San Juan Capistrano and in the foothills below what became Cleveland National Forest.

The homesteads created an essential framework for our city that led to the development of the charming, diversely designed city we so appreciate today. The interface between homestead boundaries and the landforms challenged early developers to find creative street and lot designs, resulting in the individualistic approach to land development—Laguna charm.

The vast majority of Orange County was not homesteaded. In Laguna Beach, 43 patents were filed. Of those, we know of only a few that had surviving houses on them—the Rogers house (where city hall is now); the Hemenway house (near Canyon Acres), the Thurston house (where the third hole of Ben Brown's golf course is now), the Robert Anderson house at the top of 8th Avenue (where Hillhaven Ranch was developed). None of these homes or their outbuildings remain. The Shrewsbury/Beach house at the top of Third Avenue was partially demolished and partially moved and incorporated into another residence on Eagle Rock Way. Unlike 31526 Valido, it lacks integrity to communicate its significance as a homestead house.

We have mapped the homestead lines of South Laguna and overlaid them onto U.S. Coast and Geodetic Survey map of 1885 and the later USGS map which shows topography and structures. The attached map shows the boundaries and the locations of small structures derived from that mapping. Of all of these, the Egan house and its outbuilding are the only ones remaining.

It is truly unique that one remaining house of a homestead family is still preserved on its original homestead property. **We ask that this information be evaluated and incorporated into the historic reports as providing some of the context that the peer reviewers are seeking.**

No attention has been given to Bertie McCoy Egan in the historical reports, but Mrs. Egan survived her husband by 19 years and during that time she was important to the development of the community water system and made decisions on the development of the homestead property. Mrs. Egan had offers to sell her property for development, but she refused to unless the developer could assure her that they would do proper development—with utilities. This level of community services was not supplied by the developers of Coast Royal and Three Arches (Tract 849) and she observed the problems that came from that for the community. The first developer couldn't do it and so the land came back to Mrs. Egan, as related by Jim Hind. The Egan homestead land supplied the sites for two reservoirs that were essential to the development of those two South Laguna neighborhoods as well as the tract on the

Egan land, Coast Royal (reservoir above Ceanothus Drive) and Three Arches (West Street reservoir).

Bertie McCoy was born in West Virginia and traveled with her family as a young girl to Spadra (now Pomona) in a covered wagon. Jim Hind explained that the railroad was running at that time, but the family couldn't afford that method of transporting themselves and their possession. There is more to be told in this story. See attached newspaper article relating the Egan story and demonstrating the importance of the family in the early years of the community.

Clearly there is much history that this property can elicit, and the historical reports are only the beginning. **DRB members, please continue this project. Direct staff to require the City's consultant HRG to provide the additional information requested by GPA.** Much additional information has already been provided in the letter dated September 18 from architectural historian Francesca Smith, who agrees with HRG that the property is eligible for the National and California Registers.

Clearly this property is historic and qualifies under the state and national criteria. We ask that you provide for **preservation**, not demolition of this important property.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "G. O'Loughlin". The signature is fluid and cursive, with the first name "Greg" and last name "O'Loughlin" clearly distinguishable.

Greg O'Loughlin
President.

From: Greg O'Loughlin grego@southlaguna.org
Subject: Egan Homestead House in South Laguna For Sale
Date: July 24, 2022 at 8:21 PM
To: Marc CD Wiener mwiener@lagunabeachcity.net
Cc: erinocrealestate@gmail.com
Memo re: 31526 Valido Road

It has come to the attention of the South Laguna Civic Association that the above property is on the market for sale. In the process of researching and preparing a history of South Laguna we have become aware of the historical significance of the property. The file at the City on this residence says that it was built in 1910 but that doesn't tell the whole story. This house is the oldest house in South Laguna and the last known surviving homesteader's house in the city of Laguna Beach. Laguna Beach south of Broadway was granted by the Federal Government to various pioneers under several homestead acts. The earliest was the Thurston homestead begun in 1871 in nearby Aliso Canyon. The Egan homestead of 40 acres was filed in 1910 with the papers signed by President William Howard Taft. The 40 acres today includes the site of the South Coast Water District reservoir, and the subdivision including the streets Paso del Sur, Valido, Toto Loma and Rico Roads. In the early 1900s it was a farm where the Egan family and Uncle James Shrewsbury dry farmed beans and melons. The Egan home on the property was where William and Bertie Egan raised their two daughters, Frances Egan Chatham and Esther Egan Hind. We have an extensive collection of photographs of the family and house over the years. We are attaching a few of them. The house was overlooked in the historical inventory of 1981, perhaps because of its almost hidden location at the end of a driveway. Clearly it qualifies as a historic resource of statewide significance that merits preservation.

Please place this information in the property file so that potential purchasers will be aware of the historic significance of the property and so the staff can inform them of the potential benefits of historic preservation.

Sincerely,
Greg O'Loughlin
President
1-949-212-1417
cc: Erin Sullivan
Reliance Real Estate Services
2226 N State College Blvd, Fullerton, CA 92831 (714) 255-1554

William and Bertie Egan with their daughters Frances (left) and Esther



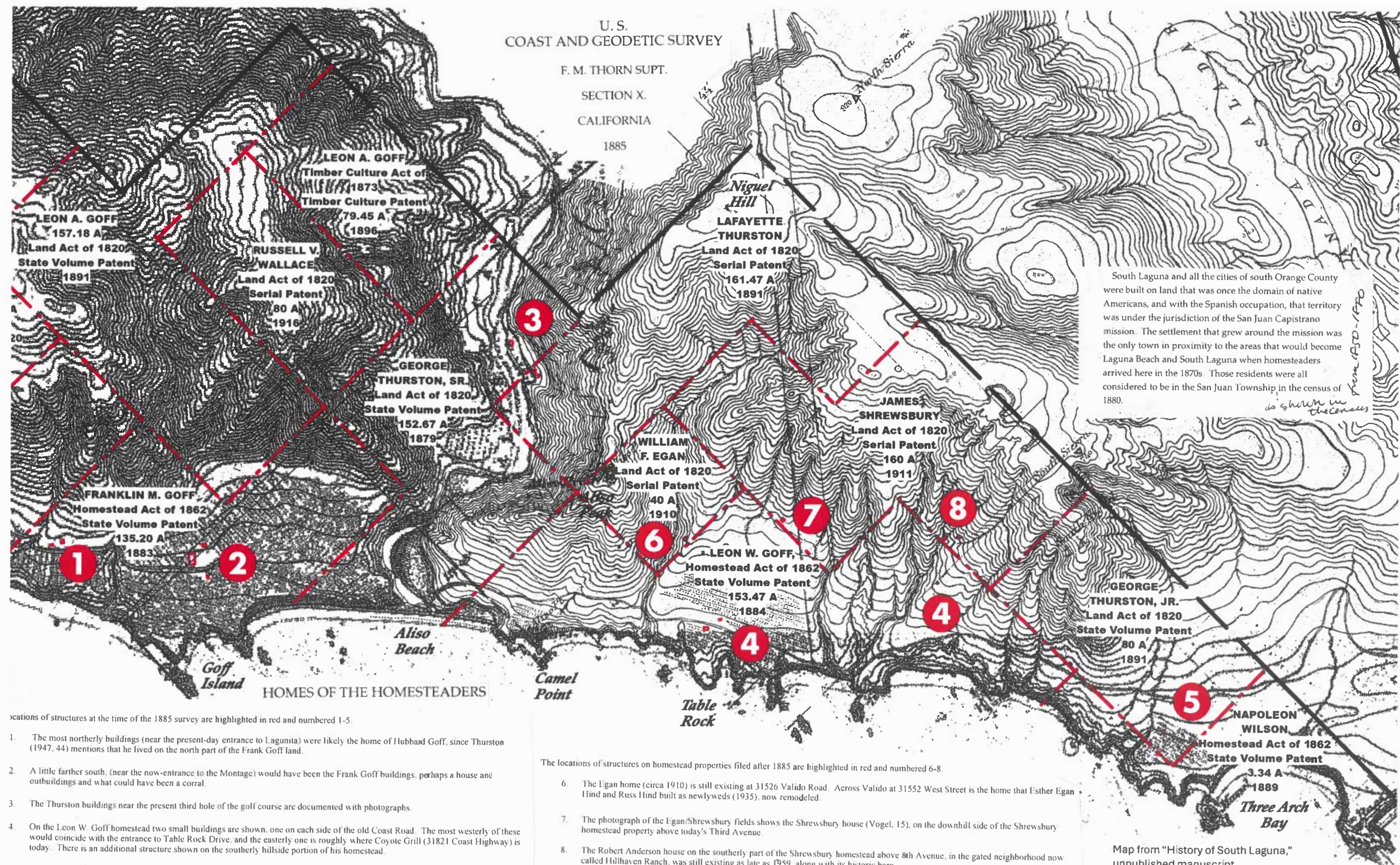
U. S.
COAST AND GEODETIC SURVEY

F. M. THORN SUPT.

SECTION X.

CALIFORNIA

1885



South Laguna and all the cities of south Orange County were built on land that was once the domain of native Americans, and with the Spanish occupation, that territory was under the jurisdiction of the San Juan Capistrano mission. The settlement that grew around the mission was the only town in proximity to the areas that would become Laguna Beach and South Laguna when homesteaders arrived here in the 1870s. Those residents were all considered to be in the San Juan Township in the census of 1880.

is shown in the census from 1850-1870

Locations of structures at the time of the 1885 survey are highlighted in red and numbered 1-5.

1. The most northerly buildings (near the present-day entrance to Lagunita) were likely the home of Hubbard Goff, since Thurston (1947, 44) mentions that he lived on the north part of the Frank Goff land.
2. A little farther south, (near the now-entrance to the Montage) would have been the Frank Goff buildings, perhaps a house and outbuildings and what could have been a corral.
3. The Thurston buildings near the present third hole of the golf course are documented with photographs.
4. On the Leon W. Goff homestead two small buildings are shown, one on each side of the old Coast Road. The most westerly of these would coincide with the entrance to Table Rock Drive, and the easterly one is roughly where Coyote Grill (31821 Coast Highway) is today. There is an additional structure shown on the southerly hillside portion of his homestead.
5. A structure is shown on the George Thurston Jr. homestead at Three Arch Bay, now North Portola near Vista del Sol

The locations of structures on homestead properties filed after 1885 are highlighted in red and numbered 6-8.

6. The Egan home (circa 1910) is still existing at 31526 Valido Road. Across Valido at 31552 West Street is the home that Esther Egan Hind and Russ Hind built as newlyweds (1935), now remodeled.
7. The photograph of the Egan/Shrewsbury fields shows the Shrewsbury house (Vogel, 15), on the downhill side of the Shrewsbury homestead property above today's Third Avenue.
8. The Robert Anderson house on the southerly part of the Shrewsbury homestead above 8th Avenue, in the gated neighborhood now called Hillhaven Ranch, was still existing as late as 1959, along with its historic barn.

14703

Map from "History of South Laguna," unpublished manuscript
Copyright South Laguna Civic Association and Ann Christoph

MRS. EGAN SPENT HONEYMOON HERE ON 200-ACRE HOMESTEAD

Pioneer Resident Reminisces About Early Days Of This Area

By BERNICE FOLEY

SOUTH LAGUNA—"Mother, in what year was the fire that almost destroyed this house?" asked Esther, one of the two "Egan girls" of her mother, Mrs. Bertie McCoy Egan, pioneer resident of this area.

"Honey, that was in the late summer of 1916 or '17. We had been living in this house only a few years, and when we saw the smoke and flames come billowing over the hills about two or three in the afternoon, we thought that everything we'd worked for was going to be burned up!"

That was the way in which Mrs. Egan, now 73, began to talk about life as she had lived it in this part of the world shortly after the turn of the century.

Honeymoon in 1909

She and her husband, William F. (Will) Egan, honeymooned here in 1909. They camped out on the site where now stands the family home. However, first claim to the acreage had been made by "Will" Egan and his uncle, James Shrewsbury, in 1902. They saw it while they

were on a camping trip, and inquiry had disclosed that some of it was open to homesteaders. Between them they ultimately homesteaded 200 acres running roughly from Aliso canyon south to Honeycomb canyon near what is now Fifth avenue. President Taft signed their final papers. In all, including transportation for witnesses, they paid \$1.68 per acre.

One-Room Dwelling Built

The first dwelling on the site was one room, approximately 10 feet by 16 feet. It was built prior to 1909 and is the present kitchen of the Egan home. When their first daughter, Frances, was born, a living room and bedroom were added, and finally, in 1923, the present dining room and guest bedroom.

"That fireplace," said Mrs. Egan, nodding in its direction, "is the same one on which you girls hung up your first Christmas stockings!"

Mrs. Egan had to be wife, mother, nurse, and school teacher in the early years for, soon after they came to live here permanently in 1914, the girls were ready for school, and there was none available. Textbooks obtained from relatives in Los Angeles helped her teach the three R's to the youngsters who did not begin their formal schooling until they were in the third and fourth grades respectively.

Nursing had to be undertaken for anyone who was not mortally sick, for the only doctor available had to be called from the one telephone in the vicinity which was at the old hotel in Laguna Beach.

A Forenoon Trip!

"And that road into Laguna!" laughed Frances. "It was almost a forenoon's trip to go there and back!"

"It used to take your daddy an hour each way," explained Mrs. Egan, "except the time the horses got scared by the mountain lion! Oh yes," she continued, "we had those, too. And coyotes! I can still remember their howl-

ing. As well as rattlesnakes! But that's another story.

"The road into town was a dirt wagon track and about the windiest road I've ever seen. I remember there was a very steep hill just this side of Victoria Beach, and the stretch from here to Three Arch bay was about as dangerous as you'd find anywhere. To get up to the house from town we had to cross Aliso creek over a rickety wooden bridge. If you know where to look, you can see the remains of that old bridge today."

Farmed Coast Royal Land

"Will" Egan farmed all of the present Coast Royal land from the ocean to the foothills. Some of it, the part that lay between the Egan property and the sea, belonged to Miss Blanche Dolph, who lived at Arch beach, and was the first caller Mrs. Egan had when she came here as a bride. Crops were string beans, melons, squash, and lima beans.

For help at harvest time, they depended upon itinerant Mexicans who camped with their families under the cypress trees that used to line the wagon road that is now Coast highway. Food, in addition to what was grown, was brought at "Nick" Ick's general store, located at what is now Laguna avenue and Coast boulevard, Laguna Beach, or was sometimes sent by mail order from Santa Ana.

"Why didn't the great fire burn us out?" asked Esther returning to what she had called one of the most vivid memories of her childhood.

"It was your prayers," said Mrs. Egan, "yours and Frances'. I was too busy helping your father that afternoon and evening to mind you children, so I told you to stay in the house and keep all the doors and windows shut and to ask God to help us not to lose our home."

Fought Fire All Day

"I worked outcoors all that day. Your father tried to make a back fire. I helped but sometimes the smoke was so thick we bumped into one another going back and forth. I pumped bucketsful of water for your daddy to use on the roof. Whenever I glanced in the windows, I could see you two down on your knees praying. Your prayers certainly were answered, for, the next morning everything around us burned except our house!"

Mrs. Egan is proud to be living on the same land and in approximately the same house into which she moved soon after she became a bride. She is happy to have seen some of their dreams for the growth of this community come true. Her "girls" too, are still close to her. They are now Mrs. Russell Hind, Coast Royal, and Mrs. L. A. Chatham, Laguna Beach.

House Guest Hurt In Heavy Surf

SOUTH LAGUNA—Miss Iris Wolbert, San Diego, house guest of Mrs. Sylvia MacLean, Three Arch Bay, was badly injured while bathing in the heavy surf on Sunday.

Both knees were hurt to such an extent that she could not walk. An ambulance from San Diego called for her on Monday morning. Pending x-rays, the full extent of her injuries will not be known.

Attend Luncheon For Scout Directors

SOUTH LAGUNA — Among South Laguna residents attending the Girl Scout luncheon last Friday at Laguna Beach were Mmes. Norman L. Redman, Tenth avenue, John B. Enfield Jr., and Russell Hind, Coast Royal, A. L. Dillon, and Miss Margaret Sawyer, Three Arch Bay.

The luncheon honored former Girl Scout director, Lorraine Ames, as well as incoming director, Jean Taylor.

HISTORIC RESOURCES GROUP

12 S. Fair Oaks Avenue, Suite 200
Pasadena, CA 91105 - 3816

Tel 626-793-2400

historicrosourcesgroup.com

October 3, 2024

City of Laguna Beach
ATTN: Heather Steven, Senior Planner
505 Forest Ave
Laguna Beach, CA 92651
hsteven@lagunabeachcity.net
(949) 497-0332

Dear Ms. Steven:

Thank you for the opportunity to provide a historic assessment report for 31526 Valido Road in Laguna Beach.

SCOPE OF WORK:

Historic Resources Group, LLC ("Consultant") shall provide historic preservation consulting services for the above-referenced project as requested by City of Laguna Beach ("Client"). Please see Exhibit A for specific tasks.

SCHEDULE FOR COMPLETION:

Consultant will endeavor to conform to the Client's schedule when it is known and when reasonable notice and period to complete is provided.

TERMS OF COMPENSATION:

Historic preservation consulting services will be billed according to Exhibit A up to a total not-to-exceed amount of \$4,350. Consultant will neither incur nor bill services in excess of this amount without the prior approval of Client. Reimbursable expenses, such as mileage, parking, overnight delivery, reproduction/photographic supplies and processing, etc., shall be billed in addition to services, at cost, up to \$250.

Consultant shall be paid for services rendered and customary and/or agreed upon reimbursable expenses incurred in the performance of the work. Payment shall be considered late if not received within 30 days of the date on the invoice.

HOURLY RATE SCHEDULE:

Managing Principal/Principal Architect	\$225
Principal	\$200
Senior Architectural Historian/Preservation Planner/Architect	\$150
Staff Photographer	\$100
Staff Architectural Historian/Preservation Planner/Architect	\$100
Associate Staff Architectural Historian/Preservation Planner/Architect/GIS Specialist	\$75
Clerical	\$60

COMPANY CONTACTS:

Inquiries related to invoices and billing: Andrea@HistoricResourcesGroup.com
or Extension 103

Inquiries related to other administrative matters, including contract signatures,
COIs, etc.: HRG@HistoricResourcesGroup.com

We will proceed with the above scope of work upon approval of this agreement in writing by both parties.

HISTORIC RESOURCES GROUP, LLC

CITY OF LAGUNA BEACH


Andrea Humberger (Oct 16, 2024 13:03 PDT)
Andrea Humberger Date
Business Operations Principal

Heather Steven 10/3/2024
Heather Steven Date
Senior Planner

Historic Resources Group, LLC

Exhibit A

TASK DESCRIPTION		Fees
1.0 HISTORIC ASSESSMENT REPORT		
1.1	Review previous evaluations and existing documentation of the property, including any information supplied by owner. Conduct additional research to develop narrative history and historic context, as needed, including primary and secondary sources, permit research, Sanborn maps, etc.	\$1,050
1.2	Site visit and photography to document existing conditions.	\$600
1.3	Evaluate eligibility for California, and local registers. Prepare written report documenting findings.	\$2,700
Subtotal		\$4,350
REIMBURSABLE EXPENSES - Including, but not limited to mileage (IRS rate), parking, overnight delivery, reproduction/photographic supplies and processing. Billed at cost.		\$250
TOTAL		\$4,600

This proposal is valid for six months from the date below.

prepared for **City of Laguna Beach**

31526 Valido Road, Laguna Beach

Historic Assessment #24-0179



Proposal for Historic Preservation Consulting Services
31526 Valido Road
City of Laguna Beach

Prepared for:

Heather Steven
Senior Planner
City of Laguna Beach
(949) 497-0332
hsteven@lagunabeachcity.net

Prepared by:

Audrey von Ahrens
Senior Architectural Historian
GPA Consulting
audrey@gpaconsulting-us.com
(310) 792-2690 ext. 125

September 27, 2024



FIRM PROFILE

GPA Consulting (GPA) is pleased to present this proposal for historic preservation consulting services for the property at 31526 Valido Road in the City of Laguna Beach. GPA is an environmental planning firm with teams specializing in biological and historical resources. Founded in 2003, GPA is a certified woman-owned, disadvantaged, and small business enterprise registered as a California Corporation. Our company values are quality, integrity, and reliability. With these values we are able to work collaboratively with our clients to meet their project objectives. Our clients include government agencies, architects, developers, and non-profit organizations. We provide a full range of historic preservation services including:

- Historic Context Statements
- Historic Resource Surveys
- Mills Act Applications
- Federal Rehabilitation Tax Credit Applications
- National, State, and Local Landmark Nominations
- Historic Structures Reports
- NEPA, CEQA, and Section 106 Compliance Reports
- HABS/HAER Reports
- Design Guidelines
- Public Outreach, Training, and Educational Programs
- Professional Peer Reviews

The GPA team consists of several highly qualified professionals who have experience in all aspects of historic preservation. Each GPA team member meets the Secretary of the Interior's Professional Qualifications Standards for architectural history as outlined in 36 Code of Federal Regulations Part 61.

Individual résumés and client references are included in Appendix A of this proposal. Current and recently completed projects, as well as sample work products, are available upon request.



SCOPE OF WORK

Background

It is our understanding that the City of Laguna Beach (City) received an application to demolish an existing single-family residence and detached garage on the property at 31526 Valido Road, Orange County Assessor's Parcel Number 056-062-25. The property is not listed on the City's Historic Register, nor was it identified in any previously completed historic resource surveys conducted by the City. However, it has been brought to the City's attention that the property may have potential significance. As such, the City is seeking a qualified historic preservation consultant to prepare a Historical Resource Assessment Report (HRAR) to ascertain whether the subject property qualifies as a historical resource under the City's new Historic Preservation Ordinance, and ultimately whether or not it would be considered a historical resource as defined by the California Environmental Quality Act (CEQA).

Work Plan

Following is a scope of work to prepare an HRAR that will evaluate the property for eligibility in the national, state, and local registers.

Task 1. Project Management and QA/QC— GPA will consult with the City as needed to complete the HRAR. All work products will be internally peer-reviewed for quality control. No work products will be shared with parties outside of GPA without the express consent of the City.

Task 2. Research/Review Existing Information — GPA will conduct general research to confirm the context(s) in which the property should be evaluated. Property-specific research will be conducted to determine the potential significance of any associated individuals, builders, and architects, as well as a development history indicating how the site and building may have changed over time. GPA will also review existing information provided by the City, such as building permit records, plans, documents submitted by members of the public, and research compiled by the South Laguna Civic Association.

Task 3. Site Visit and Repository Research — GPA will visit the property to ascertain the physical condition and assess the integrity of the property and buildings thereon. Permission to access the property will be required so all sides of the buildings can be inspected and photographed and will be pre-arranged by the City. Access to the interior is not required but may allow for a more complete understanding of the property. Any repository research requiring in-person records review will be conducted on the same day as the site visit.

Task 4. Draft Report — GPA will prepare a draft HRAR which will be written and formatted in accordance with best practices industry standards. The draft report will be submitted electronically to the City as a Word document for review and comment. The report will include, but not necessarily be limited to:

- A. An executive summary.
- B. An explanation of the methodology and research techniques.
- C. Regulatory setting, including the criteria for determining historic significance and integrity for listing in national, state, and local registers.
- D. A brief physical description of the property.
- E. A detailed history of the property.
- F. Relevant historic contexts within which the property will be evaluated.
- G. An evaluation of the building for listing in national, state, and local registers including a statement of significance and assessment of integrity.
- H. A concluding summary of findings for historical resources relative to CEQA.
- I. Supplemental attachments such as current photographs and relevant historical documentation (photographs, newspaper articles, maps, and building permits, as available).

SCOPE OF WORK



Task 5. Final Report – GPA will revise the draft HRAR based upon one round of consolidated comments from the City. The final report will be submitted electronically as a PDF document.

Assumptions

The cost estimate is based on the following assumptions. Should any assumption prove false, GPA will submit a request for a change order to cover additional time and materials:

- Attendance at public hearings, meetings with City staff, reviewing cultural resources section of any associated CEQA environmental document, and responding to comments on a CEQA environmental document would be considered an addition to the Scope of Work.
- The cost estimate for Task 2. Research/Review Existing Information assumes that the City will obtain the historical documents and property research already compiled by the South Laguna Civic Association, which will be shared with GPA for review and use in the HRAR. These documents are assumed to include maps and grant deeds associated with the 40 acre Egan family homestead act claim, and historical photos of the Egan family house.

FEES AND TERMS



FEES AND TERMS

The fees for the services described in this proposal are outlined in the table below. It should be explicitly understood that hours may be allocated differently among tasks and staff persons.

Task	Employee	Hours	Rate	Cost	Subtotal
1. Project Management and QA/QC	Senior Assoc. AH	1	\$ 210.00	\$ 210.00	
	Senior AH	2	\$ 175.00	\$ 350.00	
	Task Subtotal	3			\$ 560.00
2. Research/Review Existing Information	Senior AH	8	\$ 175.00	\$ 1,400.00	
	Task Subtotal	8			\$ 1,400.00
3. Site Visit and Repository Research	Senior AH	8	\$ 175.00	\$ 1,400.00	
	Task Subtotal	8			\$ 1,400.00
5. Draft Report	Senior Assoc. AH	4	\$ 210.00	\$ 840.00	
	Senior AH	28	\$ 175.00	\$ 4,900.00	
	Task Subtotal	32			\$ 5,740.00
6. Final Report	Senior Assoc. AH	1	\$ 210.00	\$ 210.00	
	Senior AH	3	\$ 175.00	\$ 525.00	
	Task Subtotal	3			\$ 735.00
	Total Services	54		Total Cost	\$ 9,835.00
Expenses			Quantity	Rate	
	Mileage		140	\$ 0.670	\$ 93.80
				Expense Total	\$ 93.80

Schedule

The anticipated schedule for Tasks 1-5 would be five weeks from the receipt of a fully executed contract and notice to proceed.

Terms

The proposal is valid for 60 days for the proposed project and tasks as described in the scope of work above. Changes to the proposed project may result in additional work and therefore may result in additional costs, which would be mutually agreed upon in writing prior to commencing the additional work. If you agree to these fees and terms, please let us know and we will issue a contract. If you have any questions or require any additional information, such as proof of insurance, please contact us.

**Scope and Cost
Professional Peer Review
31526 Valido Road, Laguna Beach, CA
July 15, 2025**

Prepared For:

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Project Understanding:

The City has requested a proposal from GPA to conduct a peer review of a Historic Assessment prepared by HRG for a property located at 31526 Valido Road in Laguna Beach, CA. HRG prepared an assessment that concluded that this property qualifies for the historic register due to its association with the Homestead Act.

The City has a pending application to demolish the existing building and construct a new detached SFR on the property. In response to HRG's conclusion, the applicant hired Chronicle and submitted their own historic assessment. The applicant's assessment concludes that the property does not qualify for the historic register due to lack of integrity because of the changed setting.

Due to the conflicting conclusions, the City is seeking a fair and honest assessment as to whether the conclusion drawn in HRG's assessment is well-supported by the facts. The City is not seeking a new (and 3rd) independent assessment of the property, but, rather, a memo analysis based on the reports provided to the City.

Scope of Work:

To assist the City with a professional peer review, GPA will review both reports prepared by HRG and Chronicle and provide the City with a non-biased opinion on which conclusion is well supported by facts. GPA's professional peer reviews are prepared in a memorandum format assessing the adequacy of the reports in terms of methodology, accuracy, and completeness of the report. GPA will determine if the preparer's of the reports meet the professional qualifications standards (36 CFR 63), and if there are deficiencies in the report, GPA will identify them and provide recommendations for improvement. GPA can commence work upon written receipt of a Notice to Proceed and will complete the review within ten (10) business days.

Cost:

The estimated fees for the peer review memo and associated shall not exceed **\$2,400** (8 hours at the Principal Rate of \$300/hr.). They will be billed on a time and materials basis. It should be explicitly understood that hours may be allocated differently among tasks and staff. We do not anticipate any direct expenses associated with this scope of work.

Assumptions:

This scope and cost is based on the following assumptions:

1. A new assessment is not requested. The peer review will be concerned with the methodology, accuracy, and completeness of the report and will not re-evaluate the property.
2. Extensive property-specific or contextual research will not be conducted. GPA will review existing documentation available from the City and/or GPA's past projects in the vicinity.
3. A site visit will not be conducted.
4. This scope and cost does not include attendance at meetings.

If the City requests GPA to perform other additional tasks, GPA will submit a separate scope and cost proposal.

Terms:

This proposal is valid for the proposed project and tasks as described in the Scope of Work section above. Changes to the proposed project may result in additional work and therefore may result in additional costs, which would be mutually agreed upon in writing prior to commencing the additional work.

Invoices will be sent on or about the first of the month for work performed during the previous month. Invoices over 60 days due will be subject to a 10% late fee.