IV.C HISTORICAL RESOURCES

EXISTING CONDITIONS

Culturally significant resources are generally separated into three categories: paleontological resources, archaeological resources, and historic resources. The analysis set forth below will address them accordingly.

A Cultural Resources Technical Report was prepared by Historic Resources Group, LLC for the proposed project in November 2009. The following analysis is based on this report, which is included as Appendix H.

PALEONTOLOGICAL AND ARCHAEOLOGICAL RESOURCES

The Initial Study prepared for the proposed project indicated that there are no known prehistoric or historic archeological sites on the project site, and the project site does not contain undisturbed surficial soils. The project site is currently developed with the former Constance Hotel, various one-story retail and restaurant uses, a one-story bank, and a two-story parking garage. If archaeological resources once existed on-site, it is likely that previous grading, construction, and modern use of the project site have either removed or destroyed them. The project site is not located in an area of the City that has been identified as archeologically sensitive.

The project site lies on the valley floor in an urbanized portion of the City of Pasadena. This portion of the City does not contain any unique geologic features and is not known or expected to contain paleontologicial resources. If paleontologicial resources once existed on-site, it is likely that previous grading, construction, and modern use of the project site have either removed or destroyed them. The project site is not located in an area of the City that has been identified as being sensitive for paleontological resources.

HISTORICAL RESOURCES

Regulatory Background

A property may be designated as historic by National, State, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient integrity to continue to evoke the sense of place and time with which it is historically associated.

National Register of Historic Places

The National Register is "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways.

To be eligible for listing and/or be listed in the National Register, a resource must possess

³⁶ Code of Federal Regulations, Part 60.2.

significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of an historical resource. For projects that receive Federal funding, a review process must be completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, state and local regulations may apply to properties listed in the National Register.

The criteria for listing in the National Register follow established guidelines for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

- That are associated with events that have made a significant contribution to the broad patterns of our history; or
- That are associated with the lives of persons significant in our past; or
- That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- That have yielded, or may be likely to yield, information important in prehistory or history.²

In addition to meeting any or all of the criteria listed above, properties nominated must also possess historic *integrity*. Historic integrity is the ability of a property to convey its significance and is defined as the "authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's... historic period."³

The National Park Service defines seven aspects of integrity: *location*, *design*, *setting*, *materials*, *workmanship*, *feeling*, and *association*.

Period of Significance

The National Park Service defines the period of significance as "the length of time when a property was associated with important events, activities or persons, or attained the characteristics which qualify it for... listing" in National, State or local registers. A period of significance can be "as brief as a single year... [or] span many years." It is based on "specific events directly related to the significance of the property," for example the date of construction, years of ownership, or length of operation as a particular entity.⁴

Age Threshold

The fifty-year age threshold has become standard in historic preservation as a way to delineate potential historic resources. The National Park Service, which provides guidance for the practice

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² 36 Code of Federal Regulations, Part 60.4.

National Register Bulletin 16. How to Complete the National Register Registration Form. Washington D.C.: National Park Service, U. S. Department of the Interior, 1997. p. 4.

National Register Bulletin 16A. How to Complete the National Register Registration Form. Washington D.C.: National Park Service, U. S. Department of the Interior, 1997. p. 42.

of historic preservation, has established that a resource fifty years of age or older may be considered for listing on the National Register of Historic Places:

Ordinarily...properties that have achieved significance within the past fifty years shall not be considered eligible for the National Register.⁵

California Register of Historical Resources

The California Register is an authoritative guide used by State and local agencies, private groups, and citizens to identify the State's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change. The criteria for eligibility for listing in the California Register are based upon National Register criteria. These criteria are:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
- Associated with the lives of persons important to local, California or national history.
- Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register includes the following:

- California properties formally determined eligible for, or listed in, the National Register.
- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For State Historical Landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for the California Register in accordance with procedures to be adopted by the State Historical Resources Commission (Commission).
- Points of Historical Interest which have been reviewed by the OHP and recommended for listing by the Commission for inclusion in the California Register in accordance with criteria adopted by the Commission.⁷

Other resources which may be nominated for listing in the California Register include:

Individual historical resources.

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Ibid. p. 2. The Park Service does make exceptions for properties that have achieved significance within the past 50 years that are of "exceptional importance".

⁶ California PRC, Section 5024.1(a).

California PRC, Section 5024.1(d).

- Historical resources contributing to the significance of an historic district under criteria adopted by the Commission.
- Historical resources identified as significant in historical resources surveys, if the survey meets the criteria listed in subdivision (g).
- Historical resources and historic districts designated or listed as city or county landmarks
 or historic properties or districts pursuant to any city or county ordinance, if the criteria
 for designation or listing under the ordinance have been determined by the office to be
 consistent with California Register criteria.
- Local landmarks or historic properties designated under any municipal or county ordinance.⁸

Local Designation Programs

The City of Pasadena has established an historic preservation program in order to promote "the identification, evaluation, rehabilitation, adaptive use, and restoration of historic structures." The criteria for the designation of historic monuments, landmarks, historic signs, landmark trees, or landmark districts are applied "according to applicable National Register of Historic Places Bulletins for evaluating historic properties."

These criteria are excerpted below from Section 17.62.040 of the Pasadena Zoning Code. 11

Historic Monuments

A historic monument shall include all historic resources previously designated as historic treasures before adoption of this Chapter, historic resources that are listed in the National Register at the State-wide or Federal level of significance (including National Historic Landmarks) and any historic resource that is significant at a regional, State, or Federal level, and is an exemplary representation of a particular type of historic resource and meets one or more of the following criteria:

- a) It is associated with events that have made a significant contribution to the broad patterns of the history of the region, State, or nation.
- b) It is associated with the lives of persons who are significant in the history of the region, State, or nation.
- c) It is exceptional in the embodiment of the distinctive characteristics of a historic resource property type, period, architectural style, or method of construction, or that is an exceptional representation of the work of an architect, designer, engineer, or builder whose work is significant to the region, State, or nation, or that possesses high artistic values that are of regional, State-wide or national significance.

11 Ibid.

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⁸ California PRC, Section 5024.1(e).

⁹ City of Pasadena website, Planning & Development; Design and Historic Preservation, accessed April 24, 2009. http://www.ci.pasadena.ca.us/planning/deptorg/dhp/homedhp2.asp

City of Pasadena On-line Zoning Code, Chapter 17.62 Historic Preservation, accessed April 24, 2009 http://www.cityofpasadena.net/zoning/P-6.html#17.62.040

d) It has yielded, or may be likely to yield, information important in prehistory or history of the region, State, or nation. A historic monument designation may include significant public or semi-public interior spaces and features.

Landmarks

A landmark shall include all properties previously designated a landmark before adoption of this Chapter and any historic resource that is of a local level of significance and meets one or more of the criteria listed... below. A landmark may be the best representation in the City of a type of historic resource or it may be one of several historic resources in the City that have common architectural attributes that represent a particular type of historic resource. A landmark shall meet one or more of the following criteria:

- a) It is associated with events that have made a significant contribution to the broad patterns of the history of the City, region, or State.
- b) It is associated with the lives of persons who are significant in the history of the City, region, or State.
- c) It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the City or, to the region or possesses artistic values of significance to the City or to the region.
- d) It has yielded, or may be likely to yield, information important locally in prehistory or history.

Historic Signs

A historic sign shall include all signs in the sign inventory as of the date of adoption of this Zoning Code and any sign subsequently designated historically significant by the Historic Preservation Commission that possesses high artistic values. A historic sign shall meet one or more or the following criteria:

- a) The sign is exemplary of technology, craftsmanship or design of the period when it was constructed, uses historic sign materials and means of illumination, and is not significantly altered from its historic period. Historic sign materials shall include metal or wood facings, or paint directly on the façade of a building. Historic means of illumination shall include incandescent light fixtures or neon tubing on the exterior of the sign. If the sign has been altered, it must be restorable to its historic function and appearance.
- b) The sign is integrated with the architecture of the building.
- c) A sign not meeting criteria a or b above may be considered for inclusion in the inventory if it demonstrates extraordinary aesthetic quality, creativity, or innovation. All other regulations relating to signs shall comply with Chapter 17.48 (Signs).

Landmark Districts

A landmark district shall include all landmark districts previously designated before adoption of this Chapter and any grouping of contiguous properties that also meet the following criteria:

- a) Within its boundaries, a minimum of 60 percent of the properties qualify as contributing; and
- b) The grouping represents a significant and distinguishable entity of Citywide importance and one or more of a defined historic, cultural, development and/or architectural context(s) (e.g., 1991 Citywide historic context, as amended, historic context prepared in an intensive-level survey or historic context prepared specifically for the nominated landmark district).

When considering applications to designate a landmark district, the Historic Preservation Commission shall apply the above criteria according to applicable National Register of Historic Places Bulletins for evaluating historic properties.

Historical Background

Buildings on the Project Site

The Constance Hotel Tower (940 East Colorado Boulevard)

Located on the southwest corner of Colorado Boulevard and Mentor Avenue, the former Constance Hotel is a seven-story-plus-basement hotel building. The hotel was designed by McNeal Swasey in the Mediterranean Revival Style and completed in 1926. There are 164 guest rooms above the lobby and service spaces on the ground floor and in the basement, plus retail leaseholds that under current conditions open to Mentor Avenue. An enclosed courtyard patio is located on the tower's west side. The hotel tower, currently vacant, was most recently used as a residence for seniors known as Pasadena Manor.

The hotel building was planned and owned by Mrs. Constance Perry who believed that it was time for Pasadena to have "a moderate-rate first class hotel." The hotel was leased to the Orndorff Company with Mrs. Perry and her husband taking residence on the second floor.

The seven-story hotel tower was one of three related buildings on the property. Mrs. Perry originally planned to enlarge the Hotel with the addition of a second tower along Colorado Boulevard. In the meantime, a multi-storefront retail building was constructed in 1926 along Colorado Boulevard. This building contained the Hotel's dining room, which was accessible from the interior lobby of the hotel tower, and a garage was built at the back of the property. While the second tower was never realized, all three related buildings (hotel tower,1926 multi-store front building, and garage) remain extant.

Publicized in newspaper advertisements as "Pasadena's new million dollar hotel," the Constance Hotel was designed taking seismic considerations into account and was advertised as completely fireproof. 14 Mrs. Perry was so convinced that the nearby Pasadena business district was growing eastward that she not only chose to situate her hotel there but she also purchased other parcels of land in the area.

Figure IV.C-1, show views of the hotel from 1926.

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New Hotel is Definitely Planned, Pasadena Star-News, March 19, 1926.

bid.

References to the hotel's seismic considerations are made in many of the hotel's advertisements but it is unclear what the exact method of seismic strengthening was employed.



(a) Constance Hotel Construction 1926



(b) Constance Hotel 1926
SOURCE: Historic Resources Group

The architect, McNeal Swasey, designed a number of buildings in southern California including a residential structure at 320 Orange Grove Avenue; a Spanish Colonial Revival home at 201 Hillside Road, South Pasadena; and a sound stage at Twentieth Century Fox, 10200 Santa Monica Boulevard, Los Angeles. He designed the Busch Building alterations at the corner of Wilshire Boulevard and Vermont Avenue; the Barker Brothers store at Seventh and Figueroa Streets; the auto sales building for Stanley W. Smith, Inc. in Hollywood at Gordon and Sunset Boulevard; and in 1922 he designed a twelve-sided dance pavilion at Lake Arrowhead Village. ¹⁵

As Swasey & McAfee, he partnered with Henry C. McAfee to develop the Arrowhead Village Plan, the Arlington Lodge, and Norman Village at Lake Arrowhead from 1922 to 1923. In another partnership, he developed Bank of America branch buildings in Bakersfield and Redlands, both constructed in 1928. In 1941 Swasey was included in a team of architects appointed by the Los Angeles International Airport to design a new administration building but the project was canceled with the start of World War II. McNeal Swasey intended the design of the Constance Hotel to be a Southern Californian adaptation of Mediterranean architecture.

Pasadena became a popular tourist destination in the late nineteenth century. Increased railway access to southern California allowed wealthy vacationers, attracted by benign weather and dramatic landscapes, to abandon the harsh winters of the Northeast and Midwest and spend the winter in Pasadena. A number of grand hotels, lavishly appointed and offering every amenity, were built to accommodate the winter influx.

By the turn of the century, Pasadena was well-established as a winter resort for the nation's wealthy elite. After World War I, Pasadena's tourist clientele expanded beyond the very wealthy to include the merely well-to-do and the middle class. The booming economy and rapid growth of the 1920s brought impressive civic projects and cultural institutions to Pasadena, increasing its allure for a broader spectrum of visitor. The Great Depression effectively ended Pasadena's reign as a fashionable destination. Many of Pasadena's hotels went into decline and were eventually razed or adapted for other uses. Today, few of the hotels from the resort era remain.

Swasey's design for the Constance Hotel is a good example of the Mediterranean Revival Style, with notable Romanesque features. The Mediterranean Revival style is distinguished by its symmetrical massing and balanced arrangements of entrances, windows and architectural details. These characteristics, however, were often creatively incorporated with Spanish influences, resulting in the eclectic combinations and variations often found in commercial buildings, apartments, and hotels. More fanciful variations might also incorporate North African and Middle Eastern influences. Character-defining features include symmetrical façade arrangements, cement plaster wall finishes, arched door and window openings, and red clay tile roofs. Wrought iron and grilles and railings, balconies, decorative columns, and applied decoration are common.

The seven-story hotel tower is rectangular in plan and has a classical composition with a base, shaft and capital. Fenestration is largely six-over-six double hung square-edged windows that appear to be original. Applied decorative features are used sparingly, and occur most often on the top and bottom floors. There are storefronts at the base of the building on the north and east sides.

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Roger G. Hatheway, Russell L. Keller, Lake Arrowhead. (Charleston, SC: Arcadia Publishing, 2006).

Architect Database: https://digital. lib.washington.edu

David Gebhard, Robert Winter, Los Angeles: An Architectural Guide. (Layton, Utah: Gibbs Smith Publishers, 1994).

The top floor, on portions of the north and east facades, has rectangular cast-stone bas relief panels between the windows below the cornice. A belt course with a semi-circular profile aligns with the window sills under the top floor windows, marking the "capital" of the neoclassical composition. A decorative parapet with a corbel-form recalling a Romanesque cornice is continuous under the eaves. The roof finish is terra cotta barrel mission tile. An elevator penthouse with a tile roof rises above the eaves line. The east elevation of the penthouse has a decorative grill.

The main entrance on Colorado Boulevard is framed by a pair of cast-stone engaged columns with a chevron pattern. There are three bas-relief medallions depicting mythical figures above the entrance portal. Metal wall sconces flank both sides of the main entrance. The exterior double doors are non-original metal-framed glass doors with sidelights and a fixed transom above. Two additional entrances to the left and right of the main entrance have been closed but the decorative cast-stone surrounds remain. The north façade is stepped back at the east and west bays above the ground floor, creating two small terraces flanking the former "game room" on the second floor. Originally open to the outdoors, but shown enclosed early on in archival photographs, this loggia at the second level had three large round-arched openings with grilles at the base. The closure of the openings has a solid infill at the arch, and windows below. The terraces retain the original cast-stone grille railings.

Archival photographs illustrate vertical signage and flagpoles that are no longer extant. The tower's eastern façade has another public entrance and flanking storefronts facing Mentor Avenue. This entrance is framed by an arched, decorative surround with engaged columns with a chevron pattern that continues on the face of the arch. Each of the storefront entrances have decorative cast stone surrounds. There is a small balconette above the Mentor Avenue entrance at the fourth floor. The balconette is supported by decorative beams.

At the west façade there is a fire escape near the north wall of the building that is recessed into the volume of the building; this bay has double arched openings without wood frames and sash. There is a rectangular courtyard patio on the ground floor.

The flagpoles and exterior signage that appear in archival photographs are no longer extant. The west façade has, in addition to the typical fenestration at upper level rooms, one bay of double-arched openings that align with a fire escape within the building wall at the tower's north end. The top opening is a double window opening with a colonette. The south façade has an iron fire escape attached to the center bay of the building, and a narrow vehicular loggia at the ground level that provides for passage of cars from Mentor Avenue to the rear parking, services areas, and parking garage. The historical main entry to the building at Colorado Boulevard leads through a vestibule to original metal-framed double doors. Columns with the chevron surface pattern typical of the Romanesque Revival details found on the exterior flank the interior doors. The main entry doors lead to a wide hallway that opens onto the lobby.

The center bay of the lobby is framed by four piers. Each pier has engaged columns at each corner and a non-significant sconce surface mounted on each side. The floor has both carpeting and composition tile. A door at the northwest side of the lobby connects to the Hotel's former dining room in an adjacent building. The east side of the lobby leads to a major, secondary entrance on Mentor Ave. The southeast corner of the lobby is furnished with an "L"-shaped reception counter with what appears to be a black stone counter top, and painted wood front.

At the southeastern quadrant of the first floor, forming the southern wall of the reception area, are two retail/office spaces (with rear doors opening to the lobby area), and a pair of elevators

with stops at all floors. There is a service lobby at the southwestern corner that opens to the south driveway and vehicular loggia passage near the parking garage.

The six upper floors of the tower have 164 guest rooms and several suites, each with a private bathroom en suite and at least one window to the exterior. A double-loaded corridor bisects the typical floor from north to south. There are stairways near the north and south ends that are enclosed by partitions and fire doors; they appear to have been originally open stairwells. There is a skylight at the ceiling above the corridor and stair at the north end of the building. There is a short corridor "L" at the northwest corner that leads to the fire escape that is recessed within the volume of the tower. The central corridor terminates at the south end at a door leading to a fire escape landing.

As of May, 2009, the corridors, guest rooms, and bathrooms, in general, have many features that appear to be original. These include cast iron radiators, door transoms (not operating), internal doors and door hardware, white ceramic mosaic floor tile in bathrooms, white glazed tile wainscots in bathrooms (running bond pattern "subway" tile), built-in bathtubs, lavatories, water closets, and bathroom accessories such as medicine cabinets, towel bars, cup holders, toothbrush holders, and semi-recessed soap dishes. Interior partitions are constructed primarily of plastered unreinforced gypsum block, with some unreinforced terra cotta (the terra cotta blocks are found primarily near the floor line and near plumbing chases where there are wet applications). Many of these features have been altered or selectively removed up to the third floor, whereas there has been little alteration or removal above that level on guest room floors.

There is one level of basement, plus steps down to a mechanical room that contains boilers, heat exchangers, and the main power panel. The other basement spaces appear to have been used for storage and service to the hotel operations, and are substantially vacant, with storage shelving and some plastered partitions having been removed.

The former Constance Hotel and its courtyard, as seen today, are shown in **Figure IV.C-2**. An additional view of the former Constance Hotel as seen today, as well as an historical image of the hotel lobby from 1926 is provided in **Figure IV.C-3**.

Commercial Storefronts (926, 924, and 920 East Colorado Boulevard)

A single-story, multi-storefront, unreinforced brick masonry and wood roof joist commercial building is contiguous with the ground floor, north end only, the west façade of the hotel tower facing Colorado Boulevard. The hotel tower and this building are two freestanding buildings, each with four primary structural walls and with different construction systems. There is a single opening between the two buildings at the east wall of the single-story building that leads to the ground floor entrance lobby area of the hotel tower. There is a fire-rated overhead door, self-closing by gravity and a fusible link, at this personnel opening. This type of door is a typical construction feature that mitigates the risk of the spread of fire between two separate buildings when an opening is provided between two buildings that have independent but contiguous structural walls. These two structures (the hotel tower and the commercial building) are, by all standard descriptions in normal building codes, two buildings, not one building. The storefront facades are variously clad with a mix of masonry, brick, stucco, metals, and glazed storefronts. This building is closely related historically and architecturally to the development, design, and construction of the Constance Hotel tower building.



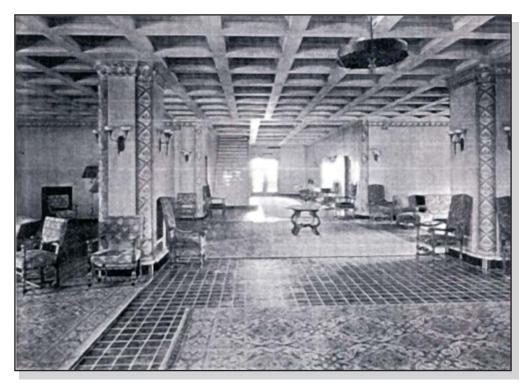
(A) Constance Hotel



(B) Constance Hotel Courtyard



(a) Constance Hotel 2009



(b) Constance Hotel Lobby 1926

The building has six storefront bays, originally separated by a uniform design of engaged piers with high relief figures at the pier caps. Decorative details included a string course running the length of the building below the parapet. The original owner's development scheme, of which only about half was realized, was to have been "bookended" by a tower similar to the Constance Hotel tower at the southwest corner of Colorado Blvd. and Lake Ave. The original façade features are no longer recognizable. However, the majority of the original front façade architectural features that can be clearly recognized in archival photographs of the front of the building on Colorado Blvd. have been discovered in place by a systematic and comprehensive probing behind the newer retail storefronts. This information is documented by recent photographs. Therefore, the retail building retains a high level of integrity in its exterior design and materials. The retail leasehold directly to the west of the Hotel tower (currently occupied by a mattress store) is the space that was occupied by the Hotel's dining room. The former dining room was accessed from the Hotel lobby through an opening in the west wall that was protected by the overhead fire door described above. The interior of the former dining room retains many original features including the boxed ceiling beams, the wood paneled wainscot along the west wall. There is a utilitarian rear bay addition constructed of unreinforced brick masonry where a commercial kitchen was located; this addition is not a part of the original construction of the storefront building to which it is attached and is not a significant, character-defining space or feature of the commercial storefront building.

The upper portions of all walls and each ceiling beam have decorative molding.

Other retail spaces are much altered, with no original features and no subsequent notable architectural or interior design features.

Parking Garage

Constructed in 1926, a single-story unreinforced brick masonry and reinforced concrete decked parking garage is located at the rear (southwest) of the hotel tower. There is a pedestrian entrance at the northeast corner of the garage. Automobiles enter the first level of the garage through an opening at the southeastern corner. An exterior ramp, approached from the east, allows access to an open concrete roof deck surrounded on all sides by a metal safety railing. All window openings and glazed steel sash have all been previously filled with brick or covered with plywood. Remaining openings and sash are in fair to poor condition.

The parking garage has been significantly altered since its construction in 1926. Originally constructed as a single-story brick building with an auto entrance on the eastern façade, an opening has been cut at the southeastern corner of the east wall and an exterior vehicular ramp added at the south. The upper portion of the building is a much newer poured-in-place reinforced concrete parking roof and deck supported by new interior columns as well as what remains of the original unreinforced brick masonry bearing walls. The brick walls are in poor condition due in part to water damage.

In summary, most (approximately 50% or more) of the original material fabric of this building has been removed and replaced, the south wall is obscured by an addition, and the remaining original walls and openings are in fair to poor condition.

Commercial Storefront (908 East Colorado Boulevard)

Located mid-block fronting Colorado Boulevard, this single-story, brick storefront building was constructed in 1924, before the hotel tower and adjacent retail building. The building and the

contiguous 1926 storefronts (see above) form a continuous row of stores along Colorado Boulevard. Although the building was originally clearly distinguishable from the contiguous 1926 storefronts and occupied by a separate retail tenant, they now appear as if they were a single row of stores, occupied by several retail tenants, due to alteration of the facades. Unlike the multi-tenant commercial storefronts in the building, a systematic probing of the front façade of the building revealed that there is no significant historic material fabric remaining.

The building no longer retains integrity of design, materials, workmanship, feeling, or association. The building does not appear to be a significant example of an architectural style, period, or type and no important historic associations have been discovered. For these reasons, this 1924 building does not appear to be eligible for listing in the National Register, California Register, or as a City of Pasadena Landmark and therefore does not appear to qualify as an historical resource under CEQA.

Bank of America Building (880 East Colorado Boulevard)

A two-story bank and office building is located on the southwest corner of Colorado Boulevard and Lake Avenue, at the northwestern corner of the project site. The building is located near the building lines, bound on two sides by major streets and the building's side and rear by asphalt-paved surface parking lots that primarily serve the bank and office building. The building is clad with a mixture of Spanish-textured cement plaster and a split-faced travertine masonry veneer with dark bronze glazing and metal framing. Piers with the same travertine masonry veneer divide the windows bays. The first and second floor fenestration is separated by a tall fascia in front of five-foot overhangs above the first floor window walls. The low pitched, hipped roof is cantilevered beyond the building line, with a flat plaster soffit and terra cotta roof tile that emulates California mission barrel tiles. In an unusual application, large modular brown glazed tile units are applied in a simple running bond pattern both at the fascia below the eaves at the roof, and at the window sills and the planter boxes of the building.

The "Bank of America building," was constructed in 1974 as a design/build project by the O.K. Earl Corporation. The original building permit for the building is missing. Originally owned by Security Pacific Bank, Bank of America purchased the property and renamed the branch in 1992. The previous bank building on the site, a Pacific-Southwest Trust and Savings Bank, was built in 1927 by Marston, Van Pelt & Maybury, and was demolished in 1974.

The Bank of America building is less than fifty years old and therefore does not meet the age threshold applied as a screening device as a standard of the practice in cultural resource evaluation. There is no age restriction in the City of Pasadena for landmark designation. The National Park Service allows exceptions for the 50-year minimum age standard for resources of exceptional significance when evaluating the eligibility of building for listing on the National Register of Historic Places. The building does not appear to be a significant example of

¹⁸ The O.K. Earl Planner, Vol. 2, No. 4, Fall 1974.

The Pasadena permit office historic resources desk was unable to locate the original construction permit for the Bank of America Building. The permit office asked the Pasadena public library to perform a search for records of the building. The library checked the following resources: Pasadena Centennial Room Collection and Vertical Files, Pasadena News Index, Los Angeles Times historical, and iMap. HRG staff was able to find two records of the building in the Pasadena Public library Centennial Room these were: news clippings in the Pasadena architecture binder and company newsletters describing the project in the O.K. Earl Corp. file.

Building Permit, Department of Building and Safety, Pasadena. Issued February 19, 1974. "Demolish existing building down to existing grade – leaving basement and ground floor slab." Owner: Security Pacific Bank, Pacific Southwest Realty Company.

architectural style, period, or type and no important historic associations have been discovered. There is, likewise, no evidence of exceptional significance that can be a consideration for buildings that are less than fifty years old. For these reasons, the Bank of America building does not appear to be eligible for listing in the National Register, California Register, or as a City of Pasadena Landmark and therefore does not appear to qualify as an historical resource under CEQA (see subsequent discussion of Identification of Historical Resources).

Figure IV.C-4 identifies all of these structures within an aerial photograph of the project site.

Buildings in the Surrounding Area

A variety of buildings and uses, primarily office and retail, surround the project site. Buildings located on parcels immediately facing, i.e., across the street from, the project site were investigated in the Cultural Resources Technical Report prepared by Historic Resources Group, LLC in November 2009. **Table IV.C-1** includes a summary of the building and uses investigated in the Cultural Resources Technical Report.

The location of the structures identified in **Table IV.C-1** are shown in **Figure IV.C-5**.

All of these buildings and uses are described in detail in Appendix H to this EIR, however, a few important immediately adjacent/neighboring structures are also described in further detail as follows:

2. Office building (Pasadena Star-News) (909-911 East Colorado Boulevard)

Historically known as the Lieberg Building, this two-story, masonry Gothic-Revival commercial building was constructed in 1926. Designed by architect W. W. Warren, the structure's street front is clad with glazed architectural terracotta that simulates cut stone and emulates Gothic motifs. The storefronts are formed of glass window walls with copper colored or copper alloy finished metal frames. All other windows are in wood. The first level covered entrance is set back from the street and paved with terrazzo. The two-story, masonry-shell, Gothic-revival style building is an unusual architectural style for a Pasadena commercial structure.

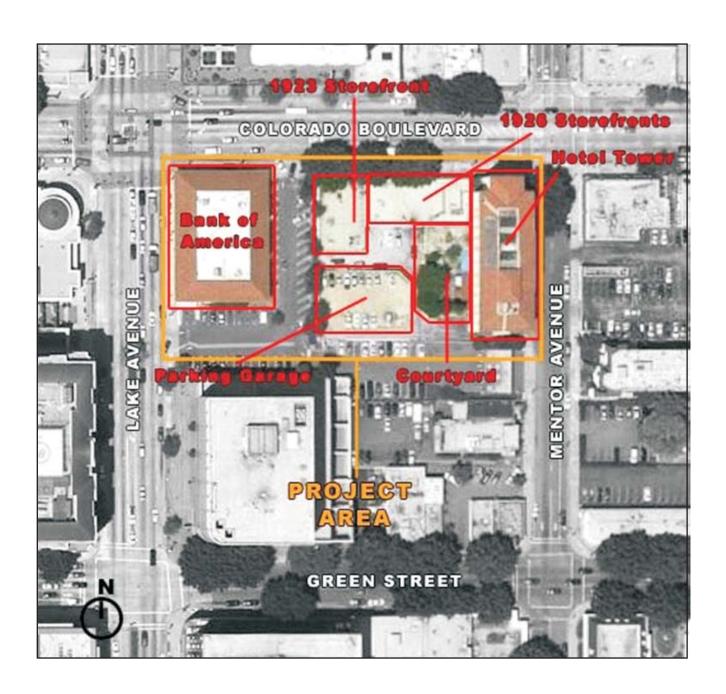
The Gothic architecture of the building was obscured for many years by aluminum panels attached to the façade. The building was restored to its original appearance in 1985. In 1987 the State of California surveyed the building for the HRI and evaluated the building as a 5 (ineligible for the NR but still of local interest). In 2001 the State of California HRI updated the building evaluation finding that: "the Lieberg Building appears to qualify for individual listing in the National Register of Historic Places under Criterion C, for its embodiment of the distinctive characteristics of period revival commercial design during the 1920s. It is particularly notable for its Gothic Revival Style terra cotta façade." The building is listed in the HRI as 7R (Submitted as part of a recon level survey: not evaluated). The building maintains a high level of material integrity.

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Historic Resources Inventory, February 1987.

City of Pasadena Website, California Historical Resources Inventory Database, accessed May 14, 2009, http://pasadena.cfwebtools.com/search.cfm

Los Angeles County Historic Resources Inventory, December 2008.



SOURCE: RTKL

TABLE IV.C-1 Summary of Adjacent Properties				
Bldg. No.	Address	Date of Construction	Previous Evaluation	CEQA Resource? Current Eval.
1	2 North Lake Avenue	1984	None	No
2	909-911 East Colorado Boulevard	1926	Yes- 1987, 2001, 5, 3C, 7N	Yes- 3C
3	917-921 East Colorado Boulevard	1939	No	No
4	925-927 East Colorado Boulevard	1924	No	No
5	937 East Colorado Boulevard and 11 North Mentor Avenue	C 1936	No	No
6	953-963 East Colorado Boulevard and 10-18 North Mentor Avenue	1923	Yes-1987, 2000, 6,6L,7R	No
7	950 East Colorado Boulevard and 10 South Mentor Avenue	1990	No	No
8	10 South Mentor Avenue	1990	No	No
9	34 South Mentor Avenue	1926	Yes- 1992,2002, 4X,5S1, 3S	Yes
10	44 South Mentor Avenue	1943	No	No
11	951 East Green Street	1928	Yes – 1994, 2004, 5D2, 6L	No
12	960 East Green Street	1947	Yes – 1994, 2004, 6Z, 6L	No
13	936 East Green Street	Ca. 1957	No	No
14	922-928 East Green Street	Ca. 1950	No	No
15	918 East Green Street	Ca. 1950	No	No
16	80 South Lake Avenue	Ca. 1965	No	No
17	89 South Lake Avenue	2002	No	No
18	55 South Lake Avenue	1990	No	No
19	860 East Colorado Boulevard	1990	No	No
20	865 East Colorado Boulevard	Ca. 1955	No	No
21	45 South Mentor Avenue	1935	Yes-2000, 3S	Yes
22	937 East Green Street	1951	No	No
23	935 East Green Street	Unknown	No	No
24	921 East Green Street	1947	Yes – 2000, 6Z	No
25	909 East Green Street	1950	Yes – 2000, 6L	No
26	70 South Lake Avenue	1982	No	No
Sign	937 East Green Street (Historic Sign)	Unknown	Yes	Yes
Sign	985 East Colorado Boulevard Colorado at Lake Development Project – Cultural R	Ca. 1950-55	Yes – 2002 7R; designated city resource	Yes



SOURCE: RTKL and Google Maps

Colorado at Lake
Environmental Impact Report

9. MULTIPLE UNIT RESIDENTIAL APARTMENT BUILDING (34 SOUTH MENTOR AVENUE)

This four-story, masonry apartment building was constructed in 1926 as Le Chateau Apartment Hostelry in a simplified French Chateauesque style. There is painted stucco finish and divided light casement windows. The high-pitched hipped roofs on the front bay of the building are finished with mineral-surfaced asphalt composition shingles. The building is located just east of the project site on the east side of Mentor Avenue. The building was evaluated by the State of California HRI in 1992 and granted 4X status (may become eligible for NR as contrib. to district that has not been documented) under criterion A, C and the 1920s tourism theme.²⁴ In 2002 the building was reevaluated and granted the status code 5S1 (eligible for local listing only-listed or eligible separately under local ordinance) under criterion C.²⁵

A latter Primary Record continuation sheet lists the status code as 5S2 (eligible for local listing only-likely to become eligible under local ordinance) stating that "[t]his apartment building is included in the 2002 multiple-family residential survey. It is ineligible for listing in the National Register but is eligible for designation as a local landmark. Originally constructed in 1926, this apartment hotel is a locally unique example of the French Chateau style in a multiple-family type that is eligible for designation under Criterion 3."²⁶ The building is listed in the HRI as 3S (appears eligible for national register to person completing or reviewing form).²⁷ The building maintains a high level of material integrity.

18. Office building (Pasadena Towers) (55 South Lake Avenue)

This is a high-rise nine-story office building constructed in 1991. Refer also to 19 below for additional information regarding this complex.

19. CHASE BANK BUILDING (860 EAST COLORADO BOULEVARD)

Designed by AC Martin and constructed in 1992, the three-story building anchors the southwest corner of Colorado Boulevard and Lake Avenue. Though uniquely designed for this site, it also has many of the characteristic features and finishes of the numerous travertine clad Home Savings branches that are found in the greater Los Angeles area. This former Home Savings branch later became a Washington Mutual branch, and that business was recently purchased by Chase. There is a cylindrical corner volume with a metal-finished dome.

Decorative gold mosaic tile forms a frieze at the top of the building directly below a metal cornice. Coarsely finished stone is used for the knee wall. The bank building is part of a mid-rise office building development that denotes the 1980s period of "post-modernism" that arose following the post WWII decades of mid-century modernism of the 1950s through the mid-1970s. In style, materials, and motifs, the complex is not an amplification of the "Home Savings" style, but certainly a ensemble designed for compatibility with those features.

21. COMMERCIAL BUILDING (BISTRO 45 RESTAURANT) (45 SOUTH MENTOR AVENUE)

The small commercial building was designed by Walter C. Folland with Art Deco forms and motifs. Constructed in 1935, the building is finished with painted stucco and characteristic

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Historic Resources Inventory, May 1992.

State of California Department of Parks and Recreation Primary Record, August 2002.

City of Pasadena Website, California Historical Resources Inventory Database, accessed May 14, 2009, http://pasadena.cfwebtools.com/search.cfm

Los Angeles County Historic Resources Inventory, December 2008.

geometric bas reliefs. The street façade features a double height central bay. Evaluated in 2000 for the State of California Primary Record the property was granted a status code of 3S (appears eligible for listing in NR as a separate property) under criterion C.²⁸ The building was classified as of "major significance" in the Pasadena Central District Architectural and Historical Inventory. The building maintains a high level of material integrity.

25. Office building (Phelps-Clark Building) (909 East Green Street)

Constructed in 1950, the two-story building has a brick facade, arched entrance, and a setback entry door with sidelights. The fenestration is multi-light, wood-framed and metal sash. Fixed louvered shutters are attached at second floor windows. There is a simple white cornice at the eaves. The design loosely recalls features of the American Colonial (Georgian) Revival and Federal styles. The building was designed for the Phelps-Clark Corporation by architect E. M. Bennetsen. The structure sits to the south of the project site.

The Primary Record notes that according to newspaper reports the façade was completely remodeled in 1982; however, this could not be verified by building permits. Evaluated in 2000 for the State of California Primary Record the property was granted a status code of 6L (appears ineligible for listing in the National Register and for local designation. However, it should be given special consideration in the local planning process).²⁹

26. OFFICE BUILDING (UNION BANK OF CALIFORNIA) (70 SOUTH LAKE AVENUE)

Constructed in 1982, this high-rise eleven-story concrete office building has metal cladding and multiple setbacks on the secondary facades. Fenestration is large dark bronze glazed windows walls on the ground floor and similarly glazed windows on the upper floors set in buff colored flush metal panels.

SIGN. 937 EAST GREEN STREET (HISTORIC SIGN)

Historic Sign Designation for pylon and parapet sign.³⁰

SIGN. 985 EAST COLORADO BOULEVARD (PASHGIAN RUGS/FRANK COLLINS CO., HISTORIC SIGN)

Pashgian Rugs historic sign metal, roof sign; neon façade. The sign was constructed around 1950-1955.³¹ The sign is listed in the HRI as 7R (submitted as part of a recon level survey: not evaluated).³² The sign was designated on November 4, 2002.³³

Identification of Historical Resources

A resource is considered historically significant, and therefore an "historical resource" under CEQA, if it falls into one of the three following categories as defined by Section 21084.1 of the California Public Resources Code:

State of California Department of Parks and Recreation Primary Record, August 2000.

²⁹ City of Pasadena Website, California Historical Resources Inventory Database, accessed May 14, 2009, http://pasadena.cfwebtools.com/search.cfm>

³⁰ City of Pasadena, building file.

³¹ City of Pasadena, Designated Historic Properties List.

Los Angeles County Historic Resources Inventory, December 2008.

City of Pasadena, building file.

- Mandatory historical resources are resources "listed in, or determined to be eligible for listing in, the California Register of Historical Resources."
- Presumptive historical resources are resources "included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1" of the Public Resources Code, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.
- Discretionary historical resources are those resources that are not listed but determined
 to be eligible under the criteria for the California Register of Historical Resources.4 The
 fact that a resource is not listed in, or determined eligible for listing in, the California
 Register, not included in a local register of historical resources, or not deemed significant
 pursuant to criteria set forth in subdivision (g) of Section 5024.1, does not preclude a
 lead agency from determining that the resource may be an "historical resource" for
 purposes of CEQA.

Properties formally determined eligible for listing in the National Register of Historic Places (National Register) are automatically listed in the California Register. Properties designated by local municipalities can also be considered historical resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

Project Site

Constance Hotel

Four components comprise the original Constance Hotel property: the seven-story hotel tower, the courtyard patio, the parking garage, and the 1926 multi-tenant commercial building (including an attached 1924 storefront that now reads as a single row of stores due to alteration of the facades). All of these components except for the parking garage retain integrity of *location, design, materials, workmanship, feeling*, and *association*. The interior portion of the 1926 storefront building that originally contained the hotel dining room has also retained integrity of *location, design, materials, workmanship*, and *feeling*.

The related parking garage has sustained significant alterations and no longer retains integrity of *design, materials, workmanship, feeling*, or *association*. With respect to the 1924 storefront, subsequent façade alterations have covered over all the original features and the building has no obvious exterior features and finishes from 1924 on the front. However, an investigation has confirmed that the original front façade, except for storefront framing, doors, and windows, is substantially intact.

The evaluation of the Constance Hotel as eligible for listing in the National Register also qualifies it for listing in the California Register under Criteria 1 and 3. The integrity of the Constance Hotel tower and its related buildings is analyzed below using the following seven aspects.

LOCATION

The hotel tower, parking garage, and the 1926 multi-storefront building all retain their original location.

SETTING

The hotel tower, parking garage, and the 1926 multi-tenant commercial building were all constructed as an extension of Pasadena's burgeoning central business district. While much of the original setting has been altered through demolition and replacement new construction within the immediately surrounding area, the concentration of office and retail uses remain. The mountain views, which were available to the original hotel guests remain, though partially obstructed by tall new buildings to the north.

DESIGN

The architectural design of the hotel tower remains substantially unaltered since its construction. The tower's plan, elevations, entrance and window openings, and internal spatial configurations remain substantially unaltered; the Mediterranean Revival features are apparent. Alterations, including the early enclosing of the second floor loggia facing Colorado Boulevard, the enclosure in of the loggia facing the patio on the west, and the removal of cast and wrought iron colonettes and cresting at the ground floor windows and entrances are largely reversible and do not represent permanent design changes. The courtyard patio has retained its original spatial configuration, central fountain, concrete perimeter wall and visual relationship to the hotel lobby. The 1926 multi-storefront building retains its original storefront facades behind later additions. The majority of the interior features from the original Hotel dining room remain intact, but interior features from the remaining storefronts have been removed. The parking garage has been substantially altered with the construction of the open second-floor parking deck and a ramp addition.

MATERIALS

The hotel tower has retained a majority of its original materials including the steel and concrete construction, smooth stucco cladding, and applied cast-stone decorative details. Paving, decorative tiles, and decorative panels also present in the courtyard patio. The 1926 multi-tenant commercial building has maintained its original brick construction and most of the original exterior features, though the front is hidden by new, non-unitary commercial designs. The former dining room portion of the building has retained many of its original interior finishes and materials. The parking garage retains the minority of its original construction materials.

WORKMANSHIP

The workmanship of the hotel tower and courtyard patio has been retained with the substantial surviving structure, materials and finishes. Original exterior features include windows, window and door openings, decorative entrance surrounds, cast stone panels, cornices, grilles, friezes, and band courses. Original interior features include columns, moldings, coffered ceilings, skylights, staircases, railings, wood doors, transoms, door hardware, cornices, bathroom fixtures, and bathroom tile. Some of the interior finishes of the lobby have been covered while others have been removed. There remain, however, enough features and finishes to demonstrate a great similarity between the existing lobby spaces and the original space illustrated in archival photographs.

The 1926 multi-tenant commercial building retains the majority of its original exterior materials and finishes such that the original workmanship is discernable, though hidden below later additions. The former dining room portion of the building has retained many of its original interior finishes and materials.

FEELING

The massing, fenestration, and decorative features of the exterior of the building allow for the historic street presence of the hotel tower to be retained. From the exterior the hotel tower retains its historic feeling. The majority of historic spatial configurations as well as many original materials and finishes remain extant in the hotel tower. Today's spatial experience is similar to that shown in historic photographs. The courtyard patio has also retained both its historic spatial pattern and the majority of historic features.

Though remaining in their original locations, the 1926 multi-storefront building and the parking garage have lost the majority of their original materials and finishes and no longer retain their historic feeling. Only the western leasehold that has features of the hotel's dining room retains the feeling of the original hotel's public spaces.

ASSOCIATION

The location, massing, spatial relationships, and intact decorative features of the hotel tower and courtyard patio continue to convey historic associations as (1) a hotel from Pasadena's historic period as a fashionable resort; (2) the eastward movement of Pasadena's commercial development during the 1920s; and (3) an example of Mediterranean Revival Style commercial architecture in Pasadena, and as a representative work of architect McNeal Swasey. Though remaining in its original location, the multi-storefront building's original front façade is mostly extant but the majority of its original materials and finishes are hidden below later additions. Its historic relationship with the Hotel and its historic associations can be understood if later additions are removed. Though remaining in its original location, the parking garage has lost the majority of its original materials and finishes. Its historic relationship with the Hotel and its historic associations cannot be understood.

Summary of On-site Elements/Structures That Retain Integrity

Only the seven-story hotel tower, the courtyard patio, and the 1926 commercial storefronts building at 926, 924, and 920 East Colorado Boulevard, a multi-storefront building retain integrity of *location, design, materials, workmanship, feeling*, and *association*. As such, the hotel tower building, its courtyard patio, and the 1926 multi-storefront building to meet the criteria for listing in the National Register. The evaluation of the Constance Hotel as eligible for listing in the National Register also qualifies it for listing in the California Register. It qualifies under Criteria 1 for its association with the development of tourism and the resort hotel, in addition to the eastward movement of commercial development in Pasadena and under Criteria 3 as an excellent example of Mediterranean Revival Style commercial architecture in Pasadena and as a representative work of architect McNeal Swasey.

The 1924 retail building and the parking garage do not retain integrity.

Adjacent Buildings

2. Office building (Pasadena Star-News) (909-911 East Colorado Boulevard)

The building was restored to its original appearance in 1985. In 1987 the State of California surveyed the building for the HRI and evaluated the building as a 5 (ineligible for the NR but still

of local interest).³⁴ In 2001 the State of California HRI updated the Lieberg building evaluation finding that: "the Lieberg Building appears to qualify for individual listing in the National Register of Historic Places under Criterion C, for its embodiment of the distinctive characteristics of period revival commercial design during the 1920s. It is particularly notable for its Gothic Revival Style terra cotta façade."³⁵ The building is listed in the HRI as 7R (Submitted as part of a recon level survey: not evaluated).³⁶ The building maintains a high level of material integrity.

9. Multiple unit residential apartment building (34 South Mentor Avenue)

The building was evaluated by the State of California HRI in 1992 and granted 4X status (may become eligible for NR as contrib. to district that has not been documented) under criterion A, C and the 1920s tourism theme.³⁷ In 2002 the building was reevaluated and granted the status code 5S1 (eligible for local listing only-listed or eligible separately under local ordinance) under criterion C.³⁸

21. Commercial building (Bistro 45 Restaurant) (45 South Mentor Avenue)

Evaluated in 2000 for the State of California Primary Record the property was granted a status code of 3S (appears eligible for listing in NR as a separate property) under criterion C.³⁹ The building was classified as of "major significance" in the Pasadena Central District Architectural and Historical Inventory. The building maintains a high level of material integrity.

25. Office building (Phelps-Clark Building) (909 East Green Street)

Evaluated in 2000 for the State of California Primary Record the property was granted a status code of 6L (appears ineligible for listing in the National Register and for local designation. However, it should be given special consideration in the local planning process).⁴⁰

Sign. 937 East Green Street (Historic Sign)

Historic Sign Designation for pylon and parapet sign. 41

Sign. 985 East Colorado Boulevard (Pashgian Rugs/Frank Collins Co., Historic Sign)

Pashgian Rugs historic sign metal, roof sign; neon façade.

The sign is listed in the HRI as 7R (submitted as part of a recon level survey: not evaluated). 42 The sign was designated on 11/4/2002. 43

³⁴ Historic Resources Inventory, February 1987.

³⁵ City of Pasadena Website, California Historical Resources Inventory Database, accessed May 14, 2009, http://pasadena.cfwebtools.com/search.cfm

Los Angeles County Historic Resources Inventory, December 2008.

Historic Resources Inventory, May 1992.

State of California Department of Parks and Recreation Primary Record, August 2002.

State of California Department of Parks and Recreation Primary Record, August 2000.

⁴⁰ City of Pasadena Website, California Historical Resources Inventory Database, accessed May 14, 2009, http://pasadena.cfwebtools.com/search.cfm

⁴¹ City of Pasadena, building file.

Los Angeles County Historic Resources Inventory, December 2008.

⁴³ City of Pasadena, building file.

Summary of Adjacent Off-site Elements/Structures That Retain Integrity

Of the 20 buildings and structures evaluated in the Cultural Resources Technical Report prepared for the proposed project, 5 (3 buildings, 2 signs) meet the CEQA threshold as historic resources. They include building at 909-911 East Colorado Boulevard, 34 South Mentor Avenue, and 45 South Mentor Avenue, and signs at 937 East Green Street, and 985 East Colorado Boulevard.

ENVIRONMENTAL IMPACT

THRESHOLD OF SIGNIFICANCE

Under the California Environmental Quality Act (CEQA), the potential impacts of a project on historical resources must be considered. The purpose of CEQA is to evaluate whether a proposed project may have an adverse effect on the environment and, if so, if that effect can be reduced or eliminated by pursuing an alternative course of action or through mitigation measures.

The impacts of a project on a historical resource may be considered an environmental impact. Section 21084.1 of the California Public Resources Code states: *A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.* Moreover, Section 15064.5 of the CEQA Guidelines provides that "[s]ubstantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."⁴⁴ Pursuant to CEQA Guideline Section 15064.5(b)(2)(A),(B) and (C), the significance of a historic resource is materially impaired when the project "demolishes or materially alters in an adverse manner those physical characteristics: (A) of an historic resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in the California Register of Historical Resources; (B) that account for its inclusion in a local register of historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources."

Generally, a project that follows the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (the Standards) shall be considered as mitigated to a level of less than a significant impact on the historical resource. ⁴⁵ The intent of the *Standards* is to assist the long-term preservation of a property's significance through the preservation of historic materials and features. The Standards pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and interior of the buildings. They also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction. To meet the Standards, a rehabilitation or new construction project must be determined to be consistent with the historic character of the structure(s), and where applicable, the district in which it is located. ⁴⁶

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California CCR Title 14, Chapter 3, Section 15064.5(b)(1).

⁴⁵ California CCR, Title 14, Chapter 3, Section 15064.5 (C)(3).

Weeks and Grimmer, The Secretary of the Interior's Standards for the Treatment of Historic Properties.

In determining the impact of a project on a "historic resource," CEQA regulations apply the Secretary of the Interior's Standards to the question of whether the project results in a substantial adverse change to the resource and in particular those physical characteristics, or character defining spaces and features, that convey historic significance. Potential impacts are examined below using the Standards.

The local landmark ordinance does not regulate interior spaces except for public or semi-public spaces at the monument level of designation. None of the structures on the project site rise to this level of designation. The proposed hotel would remain privately owned and could be closed to the public at any time. The proposed hotel lobby and courtyard could arguably be called semi-public space so long as the owner of the hotel chose to hold it out as such, but even then it would not rise to the level of "semi-public" space as regulated by the City's local landmark ordinance. The proposed hotel rooms would be considered private space.

Under CEQA the threshold question is whether a project will affect the environment of persons in general. Alterations to interiors of private structures are generally not considered to have a physical impact on the environment of persons in general. Nonetheless, for purposes of CEQA disclosure and for analysis of historic resource impacts, alterations to the interior of the hotel are evaluated herein.

IMPACTS OF THE PROPOSED PROJECT

Constance Hotel Rehabilitation

The Constance Hotel tower was designated as a landmark in accordance with criterion in P.M.C. Section 17.62.40, of the City of Pasadena Municipal Code ("PMC"), for its association with events that have made a significant contribution to the broad patterns of the history of the City, region, or State. This designation means that any future construction activities involving the subject property are regulated in accordance with Section 17.62 of the PMC. The purpose of the designation is to prevent significant impacts to a Historic Landmark through the application of the standards set forth in the PMC. Without the regulation imposed by way of the designation, the historic significance and integrity of the subject property could be lost through incompatible alterations and new construction and the demolition of irreplaceable historic structures. The Standards are expressly incorporated into the PMC and provide standards concerning the historically appropriate construction activities, which will ensure the continued preservation of the subject property.⁴⁷

Hotel Tower

The proposed project would retain and restore significant character-defining features of the Constance Hotel tower's exterior. The project would remove incompatible alterations and substantially restore the tower's exterior to its original appearance, including replication of documented but missing exterior features. The tower's exterior facades would be repaired and original door and window openings on the ground floor would be restored, including the replication of missing iron colonettes and cresting at door and window openings. Wood windows would be surveyed, repaired, and replaced on a case-by-case basis. Existing windows that cannot be repaired would be replicated. All original windows would be retrofitted with laminated clear glass to improve sound transmission performance, and with weatherstripping to improved thermal performance. Cornices, decorative cast-stone panels depicting mythic beasts

⁴⁷ City of Pasadena Planning and Development Staff Report, November 3, 2008.

and angels, cast-stone door surrounds, decorative friezes, engaged columns, and grilles would be repaired and retained.

The proposed project would include substantial alterations to the interior of the historic hotel tower. The primary spaces, circulation pattern, features, and finishes of the main level lobby would be substantially retained and restored.

A new dining room would be separated from the main lobby with full height glass partitions integrated between columns to maintain the scale and open character of the ground floor. The basement spaces would be demolished and redeveloped. Hotel rooms would be re-designed to meet contemporary standards. A mix of opaque and transparent partitions would be installed, between the restrooms and the bedrooms, and casework, wardrobes, nightstands, and desks Interior finishes would be upgraded and technology would be built-in to each room. All of the interior features of the 2nd floor through 7th floor would be demolished, except for the original stairway that extends from the lobby up to a skylit space at the top level. The new corridor materials would replicate the location and pattern of the original north-south corridor, except that guest room doors would be set back from the corridor wall line.

Rehabilitation would require the removal of all original, structurally unsound, hollow clay tile and gypsum block partitions, and also original doors and frames, wood trims, ceramic tile, and plumbing fixtures and fittings. The proposed exterior work on the hotel tower would retain and repair the significant character-defining features of the tower's façades. Important character-defining interior features would also be retained in the ground-floor lobby spaces. The demolition of original interior materials, features, and spatial configurations on the upper floors of the building would result in the loss of those character-defining features.

The hotel tower, however, would continue to convey its historic significance despite this loss, and the demolition of interior features in the private spaces on the 2nd through 7th floors would not result in a significant adverse affect.

Exterior Courtyard

During the first phase of the proposed project, the courtyard would be retained. In subsequent phases, however, the courtyard would be demolished in order to construct a subterranean parking facility. Selected architectural features of the courtyard would be salvaged, stored, rehabilitated, and reinstalled in a reconstructed courtyard. The features to be salvaged are the glazed tile at the fountain pool, glazed tile at two wall panels, and those portions of the flagstone pavers that are original. The form, materials, and finishes of the courtyard walls, planters, fountain, and paving would be substantially replicated in its original location upon completion of the subterranean parking structure. The finished elevation of the flagstone paving would be raised to the finished floor elevation of the existing loggia in order to provide accessibility for wheelchairs and eliminate steps and ramps between the interior floor level and the courtyard level. The salvaged features would be reinstalled in their original locations within the reconstructed courtyard.

Despite the efforts to salvage selected character-defining features, the demolition and reconstruction of the courtyard would result in a significant loss of character-defining features. Without mitigation, demolition and reconstruction of the courtyard would result in a substantial adverse effect to the historic hotel tower.

Demolition of Storefronts

The proposed project would demolish the 1926 multi-storefront building and the parking garage in order to allow for new construction on the site. Both buildings are related to the Constance Hotel and date from the Hotel's period of significance. The demolition of these buildings would alter the hotel's historic setting. Historic spatial relationships among the three buildings would no longer exist. Demolition of the parking garage would also obscure the fact that the original design included accommodation of automobiles. The demolition of the portion of the 1926 storefront building that contains the hotel's original dining room would remove a significant character-defining space that remained in use as the hotel's dining room until its recent adaptive reuse for a retail tenant.

The exterior of the 1926 multi-storefront building is substantially intact below later additions, though its interiors other than the original dining room have sustained significant alterations and do not retain integrity of design, materials, workmanship, feeling, or association. As such, the multi-storefront building is a historic resource. The Constance Hotel tower and courtyard would not continue to be eligible for listing in the National Register of Historic Places and convey their historic associations with the demolition of this related building. Therefore, demolition of the 1926 multi-storefront building would result in a significant adverse effect to historic resources on the site.

Similarly, as the 1926 multi-storefront building in its current condition appears individually eligible for listing in the California Register, and therefore does appear to qualify as an historical resource under CEQA, its demolition would result in a significant adverse effect on historic resources on the site.

As the 1924 retail building and the parking garage in their current condition do not appear individually eligible for listing in the California Register, and therefore do not appear to qualify as historical resources under CEQA, their demolition would not result in a significant adverse effect on historic resources on the site.

Proposed New Construction

Because the proposed project would include a large addition and new construction adjacent to an historical resource, three types of impacts are examined: impacts related to construction methods, impacts related to the design of adjacent new construction, and the impacts related to the location, scale, and massing of new construction. These are examined below.

Construction Methods

Construction methods have the potential to directly affect the historic materials of the Constance Hotel tower and courtyard. Standard 5 of the Secretary of the Interior's Standards states that "distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved." Damage caused by adjacent new construction could potentially violate this Standard, resulting in an adverse impact. In order to meet the Secretary of the Interior's Standards, methods used for the new construction could not damage the historical resource. In particular, construction involving excavation, such as excavation required for the subterranean parking, would have the potential to cause vibration, undermining of walls and footings, and an increase in seismic risk.

Although unlikely, archaeological resources could be identified during construction, protected

and preserved in place, or documented, in accordance with a mitigation program. The potential for construction methods to damage historic and cultural (including archaeological) resources can be avoided by adopting mitigation measures as outlined in the Mitigation Measures discussion. Without mitigation, adjacent construction may result in significant adverse impacts.

Design of Addition and Adjacent New Construction

The design of the addition to the hotel tower and the adjacent new construction would have the potential to disrupt or distract from the historic character of the complex. Design issues are referenced in Standards 9 and 10 of the Secretary of the Interior's Standards. Standard 9 requires that new construction be "differentiated from the old" and "compatible" with the historical resource. Guidelines for implementing the Standards further state that the scale, massing, height, materials, and color of new construction should be visually compatible with the character of the adjacent buildings, and should preserve the relationships between the buildings and the landscape features. This allows for flexibility in applying the Standards to local conditions and specific circumstances. New additions that are compatible with historic buildings should not necessarily mirror the surface appearance of the existing building, but may respond to, and can reveal underlying principles in the adjacent historic architecture and the setting of the site.

The addition proposed at the south wall of the hotel tower would remove a small landscaped buffer area and alter the hotel tower's southern façade. The addition would be oriented east-west and forms an "L" in plan by attaching to the north-south tower plate. The addition would have three floors of guest rooms above a vehicular portal, and a roof deck with a swimming pool. The addition would be three stories shorter than the eaves line of the existing historic hotel and is invisible from the Colorado Blvd. face of the building, which reads as the building's front. The addition's massing would be represented as a connection articulated by an architectural "hyphen" along the side elevation on Mentor Avenue. Stone cladding on the addition would be compatible with the hotel tower's facades. The horizontal rhythm of the "punched" window openings in a solid masonry wall and the vertical alignment of floor elevations follows the pattern of the fenestration on the existing historic façade on Mentor Ave. The addition's ground floor would be differentiated by a recess in the wall that aligns with a belt course marking the base of the historic hotel tower. The orthogonal design (north-south grid; straight, perpendicular lines) of the new massing would be compatible with the fundamental massing of the historic hotel tower.

The addition would be three stories shorter than the historic tower, and would be located at the hotel tower's rear façade, mediating between the taller historic tower and the shorter buildings to the south on Mentor Ave.

The addition would extend to the south property line on Mentor Avenue. The proposed addition would have minimal impact on the materials of the hotel tower, and those minimal impacts are on the rear façade of the building. The addition would have no substantial impact on the visual character of the hotel tower as observed and experienced from the east, north, and west, along both Colorado Blvd. and Mentor Avenue, because it is much smaller in scale than the volume of the hotel tower. The historic hotel tower can also still be viewed from the south, where its facade and roof line is still visible from Mentor Avenue and properties to the south.

The new buildings to the west would touch the west wall of the historic hotel tower at the first floor. However, this addition occurs at the same location as the existing contiguous retail building that would be demolished. Therefore, there would be no notable change in the physical

or visual condition at this portion of the historic building. While the designs for the new construction in the proposed project are conceptual, the current plans indicate that the new construction would be clearly differentiated from the existing historic structures. Architectural materials utilized for the new retail and office spaces would include steel framing, panels, glass, and curtain walls. Standard 10 requires that new construction would be "undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired." As planned, all new construction would be designed as separate elements that potentially could be removed in the future, with minimal impact to the Constance Hotel tower.

Location, Scale, and Massing of Additions and Adjacent New Construction

In addition to requiring compatibility of design, Standard 9 also states that new construction should be compatible in "size, scale, proportion, and massing to protect the integrity of the property and its environment." The addition to the hotel tower would be appropriately located in the southweastern portion of the site at the rear of the building. The addition would also be smaller in scale than the hotel tower. The majority portion of the proposed new construction would consist of a mixed-use tower that would be approximately 90 feet at its highest point, roughly equaling the height of the Constance Hotel tower. Because the Constance Hotel tower has been the tallest building on the block to date, the prominent vertical massing of the new tower would alter the hotel tower's historic setting.

The taller volumes of the new construction would be set back from Colorado Boulevard towards the southwestern corner of the site leaving substantial space between the original hotel tower and the newly constructed tower. New construction along Colorado Boulevard consists of single-story storefronts, maintaining the street wall pattern of the original 1926 storefront building. A small open plaza where the new construction meets the hotel tower on Colorado clearly differentiates the new construction. Vistas and view corridors to and from the Constance Hotel tower from along Colorado Boulevard, would be maintained and the hotel tower's Mentor Avenue elevation would remain unchanged.

The alteration of the hotel tower's setting through construction of a new mixed-use tower, and the location, scale, and massing of new construction would not result in a significant adverse affect to historic resources on the site.

Analysis of the Project Using the Secretary of the Interior's Standards

Analysis of the entire proposed project using the Standards is summarized below.

Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

The Constance Hotel would be used as it was historically. Therefore, acknowledging that contemporary hotel standards are different than they were in the early twentieth century, the proposed use would be substantially the same as the historical use.

Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

Despite the loss of several doors and windows on the hotel tower's south elevation, the

proposed project would retain and restore the majority of the hotel tower's significant exterior features, and replicate some missing original features. Significant character-defining features within the ground-floor interior spaces would be retained and restored. The double-loaded corridor width, configuration of rooms, and basic spatial relationships of the hotel tower's upper floors would also remain very similar to their original configuration. Remaining interior features of the original hotel dining room would be lost with the demolition of the adjacent 1926 multistorefront building, but the building itself no longer retains sufficient integrity to be considered a historic resource.

Individual hotel rooms would be reconstructed to accommodate contemporary hotel standards and incorporate new technology, resulting in the loss of historic features. The proposed reconstruction of the courtyard, despite using some salvaged features from the original courtyard, would remove most of the existing materials and alter some characteristics of an important character-defining space. Without mitigation to protect more of the hotel's historic character, the project would not meet Standard 2.

Additionally, demolition of the multi-storefront retail building does not meet Standard No. 2.

Standard 3: Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

The proposed project would retain the character-defining features that represent a physical record of the property's historic time, place, and use. No alterations and additions are proposed that would be confused as original features. Therefore, the rehabilitation would meet Standard 3.

Standard 4: Changes to a property that have acquired historic significance in their own right will be retained and preserved.

There are no changes to the property that have acquired historic significance. Standard 4 is not applicable.

Standard 5: Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

Distinctive decorative features on the hotel tower's exterior facades including cornices, caststone panels, cast-stone door surrounds, friezes, engaged columns, and grilles would be retained and repaired. Missing features such as the iron window colonettes and cresting would be replicated.

The distinctive interior craftsmanship of the ground-floor lobby features would also be retained. Although trim and bathroom finishes would be removed for the renovation of upper hotel rooms, these are factory manufactured products that characterize the period of significance, but are not considered distinctive examples of craftsmanship. Distinctive decorative features would be lost with the demolition of the hidden façade of the multi-tenant storefront building, the original hotel dining room within the adjacent 1926 multi-storefront building, and the demolition and reconstruction of the hotel courtyard. Without mitigation to preserve more distinctive examples of craftsmanship, the proposed project would not conform to Standard 5.

Standard 6: Deteriorated historic features will be repaired rather than replaced. Where the

severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

Existing historic features, including upper floor windows, are generally in fair to good, not poor, condition. Therefore, in general, significant features can feasibly be repaired rather than replaced. Missing features, particularly the iron colonettes and cresting at door and window openings on the ground floor, have been substantiated by archival photographs and would be replaced in kind.

However, demolition of the multi-storefront retail building does not meet Standard No. 6.

Standard 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

Any surface cleaning or paint and coatings removal at the Constance Hotel tower would be undertaken using non-abrasive detergent or appropriate chemical materials applied at relatively low pressure. Mitigation measures are provided to ensure that the rehabilitation of the exterior and interior materials and finishes would comply with the Standards. Accordingly, the project would conform to Standard 7.

Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

The proposed project would conform to Standard 8 if archaeological resources are protected and preserved in place. If any resources are to be disturbed, mitigation measures must be undertaken.

Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

The proposed addition and adjacent new construction has minimal impact on the materials of the hotel tower, and those minimal impacts are on the rear façade of the building. The proposed addition and adjacent new construction has no substantial impact on the visual character of the hotel tower as observed and experienced from the east, north, and west, along both Colorado Blvd. and Mentor Avenue. As currently represented, the wall finishes, window types, and roof details are highly differentiated from those of the original tower building creating a clear visual distinction between the old and the new construction. The addition conforms to Standard 9.

Standard 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment will be unimpaired.

The majority of the character-defining features of the Constance Hotel tower would remain. Construction of an addition attached to the hotel tower's south end would require minimal alteration to the hotel tower's southern façade. If the tower addition and new construction were removed, the hotel tower would remain substantially as it appears today. Therefore, the tower addition and the new buildings on the site would conform to Standard 10.

Impacts to Adjacent Structures

2. Office building (Pasadena Star-News) (909-911 East Colorado Boulevard)

This building is a historic resource. It is across the street from the proposed new construction, and nearer non-historic buildings that are larger than the proposed new structures. Given its location and distance to the project, there is a less than significant potential impact.

9. Multiple unit residential apartment building (34 South Mentor Avenue)

This building is a historic resource. It is across the street from the proposed new south addition to the historic hotel. It is similar in height, width, and setback to the proposed addition to the Constance Hotel tower. The adjacent building and the new addition to the Constance Hotel tower are both characterized by masonry walls with rectangular windows. The new construction would be differentiated, but compatible in location, scale, and character with the adjacent resource. There would be no significant impact. Subsequent review by the City of Pasadena Design Commission during the approval process is required. As a subsequent discretionary action in the approval process, the Design Commission will be asked to find that there are no changed circumstances or new information that would require further CEQA review of the project, based on the proposed design. In order to make that finding, the Design Commission has the authority to require changes to the future design of the new construction so that the final design does not have an unmitigable significant impact on historic resources. For that reason, subsequent design review would ensure that the impacts of the new construction remain less than significant.

21. Bistro 45 Restaurant (45 S. Mentor Avenue)

The proposed project would add a multi-story hotel use very close to the low one-story north of the adjacent historic building. The 45 S. Mentor Building is already impacted by taller commercial buildings to the south and west. There are no door or window openings that face north from the adjacent building to the proposed addition. The composition of the adjacent building places a double height entry pavilion at the center of the property, well south of the new building addition. The only potential significant impact is that of design compatibility between the new and old buildings as they are viewed on the South Mentor Avenue streetscape. The adjacent building and the new addition to the Constance Hotel tower are both characterized by masonry walls with rectangular windows and decorative features. The new construction's details would be differentiated from the older adjacent building but would provide exterior expression that reflects the Constance Hotel's classical roots (i.e., base, shaft, and capital). The addition steps down in scale between the Constance Hotel tower and the adjacent building.

Proposed construction is differentiated, but compatible in location, scale, and character with the adjacent resource. This would not be considered a significant impact. Subsequent review by the City of Pasadena Design Commission during the approval process is required. As a subsequent discretionary action in the approval process, the Design Commission will be asked to find that there are no changed circumstances or new information that would require further CEQA review of the project, based on the proposed design. In order to make that finding, the Design Commission has the authority to require changes to the future design of the new construction so that the final design does not have an unmitigable significant impact on historic resources. For that reason, subsequent design review would ensure that the new construction would have no significant impact.

SIGN. 937 East Green Street (Historic Sign)

By virtue of its location well south of the project site, adjacent to other larger new structures, no significant impact is anticipated to occur.

SIGN. 985 East Colorado Boulevard (Pashgian Rugs/Frank Collins Co., Historic Sign)

By virtue of its location across Colorado Boulevard, adjacent to other larger new structures, this is considered a less than significant impact.

MITIGATION MEASURES

The proposed project would result in adverse changes to the Constance Hotel and its related buildings. Impacts would be reduced, but not to less-than-significant levels, with implementation of the following mitigation measures:

- IV.C-1 The Constance Hotel and related buildings shall be photographed according to HABS standards for photography prior to any demolition, abatement or rehabilitation work. Views shall include all exterior elevations for each building, important interior features, key spatial relationships among buildings, and exterior hardscape features. These photos will also serve as graphic documentation for the Historic Structures Report described in mitigation measure IV.D-2. The negatives and archival quality prints will be donated to the Pasadena Public Library.
- IV.C-2 A Historic Structures Report (HSR) shall be prepared which will include all the original components of the Constance Hotel property (hotel tower, courtyard, one-story retail building, and garage). The HSR will provide documentary, graphic, and physical information about both the property's history and its existing condition including a reproduction of the hotel's original drawings. Measured drawings of as-found conditions are not required. The report will also include appropriate methods for treatment of the existing historic fabric, a recommended scope of work, and provide information and recommendations for further treatment. This report will be prepared according to the National Park Services *Preservation Brief 43: The Preparation and Use of Historic Structures Reports.* A copy of this report will be donated to the Pasadena Public Library.
- IV.C-3 The exterior rehabilitation of the Constance Hotel tower will follow the Secretary of the Interior's Standards and have specifications for the treatment of character defining features as identified in the HSR contained in the general specifications for the project. The specifications will include (but are not limited to), sections for treatment of historic fabric; quality control; substitution procedures; demolition; selective removal and storage of historic materials; protection, patching, and cleaning; determination of repair options and potential replacement of severely deteriorated features. Materials conservation plans shall be incorporated into the plans and specifications if necessary.
- IV.C-4 Original character-defining features on the exterior of the Constance Hotel tower and certain courtyard features (glazed tile and flagstone paving) will be substantially retained and rehabilitated according to the Secretary of the Interior's Standards in order to ensure that all remaining historic fabric is appropriately treated and returned to its original appearance wherever possible.

- IV.C-5 The historic Constance Hotel courtyard will be partially salvaged through the removal of distinctive features that are examples of craftsmanship, reconstructed to substantially replicate the existing form and finish, and the salvaged features shall be reinstalled in their original locations. The features that shall be salvaged intact, using such expertise and care as is necessary for intact removal without loss and damage, are (a) glazed ceramic tiles at the fountain pool and glazed ceramic tile panels on the concrete walls, and (b) flagstone pavers. In addition to the HABS photographs that shall be provided, the courtyard shall be documented by measured drawings of the floor plan and north, east, south, and west elevations to HABS standards prior to demolition. The reconstructed courtyard shall match the demolished courtyard in size, shape, form, material, and finish, as documented by the HABS photographs and measured drawings. The features that shall be replicated accurately include the footprint of the walls, planters, and fountain, and materials such as the board-formed poured-in-place concrete walls. The only aspect that may vary in the replicated courtyard is the finished elevation of the flagstone pavers, which will be raised to accommodated the parking structure below and matching the elevation to the interior first floor level to accommodate wheelchair users without the need to add a ramp and railing at the loggia such as occurred at the existing incompatible addition.
- IV.C-6 There are potential construction impacts that are mitigated to a less than significant level by monitoring by a qualified professional. These impacts are demolition of buildings and landscaping, shoring, excavation, new buildings below and above grade near and attached to historic resources on the site, and temporary shoring to mitigate weaknesses of interior removals and additional seismic risk that occur only during the construction phase. A structural engineer with qualifications in completed historic preservation projects that conform to the Secretary of the Interior's Standards for Rehabilitation will be consulted and provide monitoring and written review of the engineering and construction of work that is on site and contiquous with historic resources that are to remain to ensure that the work being done is consistent with the Standards. If the engineer concludes that the work being done is not consistent with the Standards, the engineer shall give immediate verbal notice to the owner and contractor, followed by written notice of nonconformance. If there is no satisfactory response within one calendar week, then the engineer shall notice the City's mitigation monitor immediately, verbally, followed in writing and the City shall take any action as may be necessary to halt the work until such consistency is re-established.
- IV.C-7 A historic <u>preservation</u> professional with qualifications in completed historic preservation project that conform to the Secretary of the Interior's Standards for Rehabilitation will be consulted and provide monitoring and written review of the work that is related to historic preservation to ensure that the work being done is consistent with the Standards. If the historic <u>preservation</u> professional concludes that the work being done is not consistent with the Standards, they shall give immediate verbal notice to the owner and contractor, followed by written notice of non-conformance. If there is no satisfactory response within one calendar week, then the historic <u>preservation</u> professional shall notice the City's mitigation monitor immediately, verbally, followed in writing and the City shall take any action as may be necessary to halt the work until such consistency is re-established. This professional shall meet the Secretary of the Interior's professional qualifications standards for a historic architect.

- IV.C-8 Using materials gathered for mitigation measures IV.C-1 and 2, an interpretive program including photographic exhibits and written descriptions shall be developed to chronicle the history of the site, original configurations, architects, technological innovations, and uses. These materials shall be placed in the historic hotel tower building at a location that is reasonably accessible to the general public.
- IV.C-9 Archaeological monitoring shall be conducted by a qualified archaeologist in all areas of grading or ground alterations on the project site. The archaeological monitor shall have the authority to halt any activities impacting potentially significant archaeological resources and the monitor/archaeological consultant must be permitted to adequately evaluate the find in accordance with CEQA criteria. In the event potentially significant archaeological materials are encountered, work shall be stopped immediately or redirected until the significance of the find can be evaluated. If materials are found to be significant, measures must be taken to preserve such materials in place or relocate the material off site for further study.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the mitigation measures listed above, the project would result in adverse affects to the Constance Hotel property (specifically, the related Colorado Boulevard storefronts) such that it will no longer convey its historic significance. Implementation of the mitigation measures would not reduce impacts to historic resources to a less-than-significant level and the Constance Hotel would <u>likely</u> not continue to remain eligible for the California Register of Historical Resources and the National Register of Historic Places. Consequently, the project, as currently proposed, would have a significant and unmitigated impact to historical resources, even with preservation of the former Constance hotel tower and related elements including the hotel courtyard.

CUMULATIVE IMPACTS

The mitigation measures set forth above fall within the limits of the City's ability under its local landmark ordinance to require mitigation to exteriors of historic structures. Significant impacts would remain after mitigation measures for the proposed project are implemented. Furthermore, no significant impacts to adjacent resources as a result of the proposed project have been identified. No related projects are located immediately adjacent to the proposed project which could compound the effects of the project on on- or off-site resources. There would be significant loss to the pool of historical resources in the City of Pasadena, above and beyond those specific to the project site and proposed project, and no significant cumulative impacts when these effects are considered in addition to other proposed projects. Consequently, significant cumulative impacts to historical resources would not occur as a result of the proposed project.