



Appendix C
Historic Resources Technical Report



HISTORIC RESOURCES GROUP

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100 West Walnut Planned Development Historic Resources Technical Report June 2014

HISTORIC RESOURCES GROUP

#### 1.0 INTRODUCTION

Lincoln Property Company (the "Applicant") is proposing a new development plan to replace existing landscaped surface parking lots on the Parsons Corporation campus located at 100 W. Walnut Avenue in the City of Pasadena (the "Project").

The purpose of this technical report is to determine if historical resources¹ as defined by the California Environmental Quality Act (CEQA)² are present on or adjacent to the Project Site and, if so, to identify potential impacts to historical resources by the proposed Project. This report is intended to inform environmental review of the proposed Project.

Under 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 a significant adverse effect on the environment and, if so, if that effect can be reduced or eliminated by mitigation measures or by pursuing an alternative course of action.

The impacts of a project on an historical resource may be considered an environmental impact. CEQA states that:

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.<sup>3</sup>

Thus, an evaluation of project impacts under CEQA requires a two-part inquiry: (1) a determination of whether the project site contains or is adjacent to a historically significant resource or resources, and if so, (2) a determination of whether the proposed project will result in a "substantial adverse change" in the significance of the resource or resources. This report investigates the proposed Project Site to determine if historic resources exist either within or adjacent to its boundaries, and analyzes project impacts for any adverse change in the significance of such resources.

#### This report contains:

- A review of the existing properties within, adjacent to, and in the near vicinity of the Project Site.
- A review of any previous evaluations of properties on or in the vicinity of the Project Site through historic survey or other official action.

<sup>&</sup>lt;sup>1</sup> For the purposes of this report the term "historical" will be used in reference to CEQA. CEQA defines a historical resource as a resource listed in, or determined eligible for listing, in the California Register

of Historical Resources. Otherwise, the term "historic" will be used.

<sup>&</sup>lt;sup>2</sup> California PRC, Section 21084.1.

<sup>&</sup>lt;sup>3</sup> Ibid.

- Analysis and evaluation of any potential historic resources.
- Review of the required consideration of historic resources under the California Environmental Quality Act (CEQA).
- Analysis of potential adverse effects of the proposed Project to historic resources and suggested mitigation measures.

This report was prepared using sources related to the Project Site's development. The following primary and secondary sources were consulted:

- Sanborn Fire Insurance maps
- Historic photographs, aerial photographs, and local histories
- National Register of Historic Places Inventory nomination forms
- Architectural and Historical Inventory, City of Pasadena
- List of Designated Historic Properties, City of Pasadena
- Archival sources from the Pasadena Museum of History
- Local History Collection, the Pasadena Star-News Archives, and the Los Angeles Times Archives.

Research, field inspection, and analysis were performed by Paul Travis, Principal; with assistance from Christine Lazzaretto, Principal; John LoCascio, Senior Architect; and Robby Aranguren, Planning Associate. All are qualified professionals who meet or exceed the Secretary of the Interior's Professional Qualification Standards.4

**4** Federal Register, Vol. 48, No. 190, pp. 44738-44739, September 29, 1983.

#### 2.0 PROJECT DESCRIPTION

#### 2.1 Project Overview<sup>5</sup>

PPF OFF 100 West Walnut, LP, the Project Applicant, is proposing the 100 West Walnut development (the "Project") on a 22.67-acre site bounded by Fair Oaks Avenue on the east, Union Street on the south, Pasadena Avenue on the west and Walnut Street on the north (the "Project Site"). The proposed Project is a mixed-use development that seeks to transform the Project Site from a single-function office complex with over 900,000 square feet, which features the 12 story Parsons Corporation tower, to a mixed-use office campus and residential community. The proposed Project includes adding the following uses and buildings to the site:

- 620,000 square feet of office uses, of which up to 30,000 square feet could be used for ancillary retail uses;
- 10,000 square feet of restaurant uses; and
- 475 residential units, which include work/live units along a portion of the Fair Oaks Avenue frontage.

The Project Site is divided by Holly Street into two areas, with the new development proposed on the surface parking areas located north of Holly Street (the "North Development Area").

Parking for the proposed Project, as well as replacement parking for the existing on-site surface parking that would be displaced by the proposed Project, would be provided via a multilevel subterranean parking structure. The Project also includes improving and extending Holly Street as a traffic and pedestrian corridor connecting Fair Oaks Avenue to Pasadena Avenue. Streetscape improvements are also proposed for Holly Street as well as Leonard Pieroni Drive, between Holly Street and Union Street, to facilitate pedestrian travel and enhance pedestrian connections between the Project Site and Old Pasadena. North of Holly Street the proposed Project also includes a network of interconnected open spaces, with the largest open space being "Holly Plaza," a multi-purpose publicly accessible plaza located at the northwest corner of Holly Street and Leonard Pieroni Drive.

The Project is proposed to be developed in two phases. Phase 1 development (east of the existing Parsons Corporation tower) consists of 210,000 square feet of office uses, 10,000 square feet of restaurant space, and all proposed residential and work/live units. Phase 2 development

<sup>&</sup>lt;sup>5</sup> Excerpted from Project Description information provided by Matrix Environmental.

consists of 410,000 square feet of office uses, of which up to 30,000 square feet could be developed with ancillary retail uses. Phase 1 development is proposed to be completed in 2016, and Phase 2 development (west of the existing Parsons Corporation tower) is proposed to be completed in 2020. Based on current market conditions, Phase 2 construction would start after Phase 1 construction has been completed.

The Project is proposed to be implemented via a PD (Planned Development) Permit pursuant to the requirements set forth in Section 17.26.020.C of the Pasadena Municipal Code (PMC).

#### 3.0 EXISTING CONDITIONS

#### 3.1 Site Description

The Project Site is located in the City of Pasadena, directly south of the State Route 134 where it intersects Interstate 210. It occupies a superblock bounded on the north by W. Walnut Street, on the east by N. Fair Oaks Avenue, on the south by W. Union Street, and on the west by N. Pasadena Avenue and Corson Street. The Project Site contains the Parsons Corporation campus consisting of three office buildings and two parking structures constructed between 1974 and 1981.

The northern portion of the Project Site contains a symmetrically composed building consisting of a twelve-story tower flanked by three, four-story wings, all constructed in 1974 in a late Corporate Modern style. (Main Building) The building is surrounded by a surface parking lot with rows of mature trees, and is approached from the north (W. Walnut Street) by a concrete-paved plaza lined with square plaster pylons and rows of trees. The central tower has an octagonal plan and a flat roof, and is flanked to east and west by polygonal stair towers. The plans of the wings form irregular octagons with the four narrow sides projecting forward. The south wing directly abuts the tower; the northeast and northwest wings are free-standing and are connected to the tower by 3story glazed hyphens. The façades are

clad in precast concrete panels.
Fenestration consists primarily of horizontal bands of floor-to-ceiling glazed metal storefront behind angled concrete fins. The recessed façades of the wings are clad in full-height glazed metal curtain walls with tinted glass.
The primary entrance is symmetrically located on the north façade and consists of fully glazed metal storefront doors.

The southeast and southwest corners of the property are occupied by two eightstory office buildings constructed in 1977 and 1981. (Annex Buildings) The buildings are late Corporate Modern in style with rectangular plans and flat roofs. They are raised on concrete podiums and accessed by concrete steps. Their façades are clad in horizontal bands of precast concrete panels, alternating with continuous ribbons of metal-framed windows with tinted glazing. Their primary entrances are symmetrically located on their west and east façades and consist of pairs of fully glazed metal automatic sliding doors. Between the buildings are two parking structures, also constructed in 1977 and 1981, flanking De Lacey Avenue. The structures are 4 stories in height, have rectangular plans, and are of reinforced concrete construction. Their façades are clad in horizontal concrete panels.

The Project Site is located within an urbanized area dominated by commercial and

government/institutional uses. Multifamily residential development is also located in the near vicinity. The Project Site borders the Old Pasadena Historic District, which is listed in the National Register of Historic Places (1983; revised 2008). It is located directly south and east of the Project Site. An aerial view of the Project Site is shown in Figure 1. Site photographs are included in Appendix B.



Figure 1: Project Site Aerial View

#### 4.0 SITE HISTORY AND CONTEXT

#### 4.1 Development History

Located just north of Pasadena's historical downtown core, the area bounded by Walnut Street (formerly Mary Street), Union Street, Fair Oaks Avenue and Pasadena Avenue developed with commercial, light industrial and residential uses during the late 19th and early 20th centuries. The 1931 Sanborn map reveals densely developed blocks of commercial storefronts along Fair Oaks Avenue and Union Street, light industrial uses at mid-block and residential properties at the northeast.6

After World War II, Pasadena's historic downtown, centered on the intersection of Colorado Boulevard and Fair Oaks Avenue, fell into stagnation and eventual decline as the City's retail focus shifted to South Lake Avenue beginning in the late 1940s. Freeway construction beginning in the late 1950s furthered the area's decline.

By the 1960s, the City was actively promoting redevelopment in the downtown core to combat its economic decline and associated blight. In 1972, the City of Pasadena announced approval of the redevelopment of the Project Site as corporate headquarters

for the Ralph M. Parsons Company, an engineering and construction firm. The project involved the relocation of forty families and individuals living on the site as well as twenty-seven businesses.7 Completed in 1974, the project included a twelve-story office tower and three, three-story satellite office buildings surrounded by a surface parking lot. In 1977, an eight-story office building and adjacent three-story parking structure was constructed at the southeast corner of the site. A similar office building and parking structure combination was constructed at the southwest corner of the site in 1980.8

The Parsons Corporation sold the property to Morgan Stanley Real Estate Investing and Lincoln Property Company in 2011.9

#### Architect Charles Luckman<sup>10</sup>

The Parsons campus was designed by Charles Luckman Associates. The firm's founder and namesake, architect Charles Luckman (1909-1999), was born in Kansas City and trained at the University of Illinois where he was a member of Professional Engineering Fraternity Theta Tau. Unable to find architectural commissions during the Great Depression, Luckman became a salesman with the Colgate-Palmolive-

<sup>&</sup>lt;sup>6</sup> Pasadena Sanborn Insurance maps 1930-1931.
<sup>7</sup> Mann, Bert, "Pasadena Oks Plan for \$20 Million Complex," Los Angeles Times, June 28, 1972.

<sup>&</sup>lt;sup>8</sup> Los Angeles County Assessor.

<sup>&</sup>lt;sup>9</sup> Vincent, Roger, "Parsons sells Pasadena headquarters for \$320 million," Los Angeles Times, July 5, 2011.
<sup>10</sup> Biography derived from the Charles Luckman Papers at Loyola Marymount University.

Peet Company (where his marketing techniques were credited with quadrupling profits) and he rapidly ascended the corporate ladder.
Luckman soon became known as the "Boy Wonder of American Business," was featured on the cover of Time Magazine at age 27, and by age 33 he had become the president of Pepsodent Toothpaste Company. Ultimately, when Lever Brothers acquired Pepsodent, Luckman became Lever's president.

Luckman distinguished himself as a patron of modern architecture when he commissioned a new headquarters building for Lever Brothers on Park Avenue. The resulting building, Lever House, was one of the first glass curtain wall skyscrapers in Manhattan. The tower was completed in 1956 and remains a landmark example of the International Style. This experience reminded Luckman of his passion for architecture, and he resigned the Lever presidency and moved to Los Angeles to start an architecture firm of Luckman Pereira with architect and fellow University of Illinois graduate William Pereira in 1950.

During his partnership with Pereira, Luckman routinely told clients that he was the businessman, while Pereira was the architect. Luckman was successful in bringing large-scale projects to the firm, including CBS' Television City in 1953. The firm became known for solving big architectural problems, and addressed a series of unprecedented programmatic challenges. Pereira & Luckman carried out the planning and design for the modernization of the Los Angeles International Airport and a series of large military projects for air and naval bases, including NASA's manned-spacecraft center in Houston. Luckman and Pereira spilt up in 1958, and Luckman formed his own firm, Charles Luckman Associates, which continued to land large commissions in Southern California and around the country.

Luckman quickly developed a reputation as a "businessman architect" who consistently delivered competently designed buildings on time and within budget. He was quoted as saying, "I am firm in my belief that architecture is a business and not an art," an attitude that endeared him to corporate executives, government officials, and civic leaders desiring architectural services without the aesthetic agenda and temperament of a self-styled architectural visionary."

<sup>11</sup> Muschamp, Herbert, "Charles Luckman, Architect Who Designed Penn Station's Replacement Dies at 89," *New York Times*, January 28, 1999.

In 1968, Luckman sold his firm to the Ogden Corporation, a major real estate developer in Southern California, and became president of its subsidiary, Ogden Development. His projects included major buildings in downtown Los Angeles, including the headquarters for the Pacific Coast Stock Exchange.

Some of Luckman's prominent Los Angeles-area buildings include the LAX Theme Building (1961) (with William Pereira, Paul R. Williams, and Welton Becket); 9200 Sunset Boulevard (Luckman Plaza) (1964); Century Park East Condominiums, Century City (1966); The Forum, Inglewood (1967); Federal Building, West Los Angeles (1969); and the Aon Center, Los Angeles (1974)

Projects outside of Los Angeles include the Lyndon B. Johnson Space Center, Houston, Texas (1961); the Prudential Center, Boston (1964); Madison Square Garden, New York City (1968); Phoenix Civic Plaza, Phoenix, Arizona (1972); and Aloha Stadium, Honolulu, Hawaii (1975).

In addition to his architecture and business pursuits, Luckman has a notable record of public service and was the director of Freedom Train – part of President Truman's program for rebuilding Europe after World War II. In recognition for his work, Luckman was awarded France's Legion of Honor, England's Order of St. John, and Italy's

Star of Solidarity. An active supporter of public service, Luckman served on the California State Board of Trustees from 1960-1982, and chaired the board twice.

Luckman penned a detailed autobiography of his life and accomplishments at the age of 79: Twice in a Lifetime -- From Soap to Skyscrapers. He passed away in Los Angeles in 1999.

#### 5.1 Historical Resources under CEQA

CEQA requires that environmental protection be given significant consideration in the decision making process. Historic resources are included under environmental protection. Thus, any project or action which constitutes a substantial adverse change on a historic resource also has a significant effect on the environment.

For the purposes of CEQA, the term "historical resource" includes the following:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.
- (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not

- historically or culturally significant.
- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource. provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.
- (4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources, or identified in an historical resources survey, does not preclude a lead agency from determining that the resource may be an historical resource.

A project with an effect 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. Substantial 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.

The significance of an historical resource is materially impaired when a project:

- (1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not

- historically or culturally significant or;
- (3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

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 historic 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 "historic resource" for purposes of CEQA.

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

#### 5.2 Historic Designations

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 architectural 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 of Historic Places 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.12 The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects: eligibility for federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or listed in the National Register, a resource must possess 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 historic resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive Federal funding, a clearance 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:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. 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

<sup>&</sup>lt;sup>12</sup> 36CFR60, Section 60.2.

- distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.<sup>13</sup>

In addition to meeting any or all of the criteria listed above, properties nominated must also possess integrity of *location, design, setting, materials, workmanship, feeling,* and *association.* 

#### Historic Districts

Standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as historic *districts*. The National Park Service defines a historic district as "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." <sup>14</sup> A historic district derives its significance as a single unified entity.

According to the National Park Service, "a district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the Resources that have been found to contribute to the historic identity of a district are referred to as *district contributors*. Properties located within the district boundaries that do not contribute to its significance are identified as *non-contributors*.

#### <u>California Register of Historical</u> <u>Resources</u>

The California Register is an authoritative guide in California used by State and local agencies, private groups, and citizens to identify the State's historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.<sup>16</sup>

The criteria for eligibility for listing in the California Register are based upon

components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole." Some examples of districts include business districts, college campuses, large estates, farms, industrial complexes, residential areas and rural villages. 15

<sup>13 36</sup>CFR60, Section 60.3.

<sup>&</sup>lt;sup>14</sup> National Register Bulletin 15. How to Apply the National Register Criteria for Evaluation. Washington

D.C.: National Park Service, U. S. Department of the Interior, 1997.

<sup>15</sup> Ibid.

<sup>&</sup>lt;sup>16</sup> California PRC, Section 5023.1(a).

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.
- 3. 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.
- 4. 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 (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1

- in the State Inventory), the National Register of Historic Places.
- 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.<sup>17</sup>

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

- Individual historical resources.
- Historic resources contributing to the significance of an historic district.
- Historic resources identified as significant in historic resources

<sup>&</sup>lt;sup>17</sup> California PRC, Section 5023.1(d).

- surveys, if the survey meets the criteria listed in subdivision (g).
- Historic 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.

#### **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 17.62.40 of the Pasadena Zoning Code.<sup>19</sup>

#### 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

<sup>&</sup>lt;sup>18</sup> California PRC, Section 5023.1(e).

<sup>&</sup>lt;sup>19</sup> City of Pasadena Online Zoning Code Title 17. http://ww2.cityofpasadena.net/zoning/

- values that are of regional, State-wide or national significance.
- 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 use the National Register of Historic Places Bulletin #21: "Defining Boundaries for National Register Properties".

## 5.3 General Plan and Central District Specific Plan

#### General Plan

Development in the City of Pasadena is governed by the General Plan. The General Plan includes a Historic and Cultural Preservation Element ("Preservation Element") which "seeks to identify and protect areas, sites and structures having architectural, historical or cultural significance and to reaffirm their continuing value as a resource contributing to the vitality and diversity of the present."20 The goal of the Preservation Element is the "preservation and enhancement of the City's cultural and historic buildings, streets and districts, not merely as gentle reminders of a pleasant past but also as relevant and unique alternatives for the present and the future - a source of

<sup>20</sup> City of Pasadena, General Plan: Historic and Cultural Preservation Element, available online: http://cityofpasadena.net/Planning/CommunityPlannin g/General\_Plan\_Historical\_and\_Cultural/. Accessed April 2014.

community identity, social, ecological and economic vitality."21

#### Central District Specific Plan

Development in central Pasadena is governed by the Central District Specific Plan which contains detailed development standards, distribution of land uses, infrastructure requirements, and implementation measures. Area Specific Plans are designed to implement the goals and policies of the City's General Plan. The Project Site is located within the Central District Specific Plan area.

The Central District Specific Plan divides the area into several subdistricts. The Project Site is located just outside of the Old Pasadena Subdistrict. The objective of the Old Pasadena Sub-district is to protect the numerous historic resources in the area, and to support the long term viability of its core as a regional retail and entertainment destination through the development of nearby complementary uses, including urban housing near light rail stations and parks.<sup>22</sup>

In order to guide development within the Central District, the Specific Plan includes a series of design guidelines. The design guidelines are divided into sections to address "private realm" concerns, including site planning, building design, and urban development patterns; and "public realm" concerns, including community character and the street environment. Specific guidelines are also included for each Sub-district within the plan area, including the Old Pasadena Sub-district.

The primary component of the site planning guidelines is to encourage integrated site planning for projects throughout the Central District, so that any new development contributes to a coherent sense of the whole. This is accomplished by reinforcing the architectural context, placing a strong visual emphasis on the street, and supporting active public space.<sup>23</sup>

Other site planning-related guidelines include defining public space, siting plazas and courtyards appropriately, creating comfortable outdoor rooms, maintaining landscape traditions, controlling vehicular access, and making service facilities unobtrusive.

The guidelines related to building design emphasize the notion of historical continuity and the relationship of built

http://cityofpasadena.net/Planning/Design\_Guidelines/Accessed April 2014.

<sup>21</sup> Ibid.

<sup>&</sup>lt;sup>22</sup> Central District Specific Plan, Section 7.

<sup>&</sup>lt;sup>23</sup> City of Pasadena, *Central District Specific Plan Section 9: Private Realm Design Guidelines,*" 145. Available online:

structures over time.<sup>24</sup> These guidelines mandate that new development:

- respect the surrounding character;
- mitigate massing and bulk with the proper consideration of scale, massing, and detail of individual buildings;
- unify and articulate building facades through a set of responsive, regulating proportions;
- activate the street edge;
- demarcate building entrances;
- encourage high quality construction;
- emphasize human-scale design;
- design roof silhouettes; and
- require compatible parking structures.<sup>25</sup>

The Old Pasadena Sub-district Design Guidelines do not specifically govern the Project Site, as it is located outside of the historic district. However, due to the proximity of the Project Site to the Old Pasadena Historic District, guidelines related to new construction may be considered to improve the compatibility of the proposed new construction and the historic district.

The Old Pasadena Sub-district Design Guidelines include guidelines related to the character and street environment:

- reinforce the urban character;
- enhance historic settings by responding sensitively to the historic buildings in the district;
- build multiple connections, including paths between parking, buildings, and outdoor spaces;
- promote active streets;
- give pedestrians priority; and
- contribute to the local identity.<sup>26</sup>

Guidelines related to site planning and building design include:

- hold to the sidewalk edge;
- provide mid-block passages;
- encourage outdoor uses;
- continue building rhythm and forms:

<sup>24</sup> Ibid, 152.

<sup>&</sup>lt;sup>25</sup> Ibid, 152-160.

<sup>&</sup>lt;sup>26</sup> City of Pasadena, *Central District Specific Plan Section 10: Sub-district Design Guidelines – Old Pasadena Design Guidelines*, 168.

- generate street-level interest;
   and
- improve alley facades.27

#### 5.4 Historic Significance and Integrity

#### **Significance**

The definition of historic significance used by the California Office of Historic Preservation (OHP) in its administration of the California Register is based upon the definition used by the National Park Service for the National Register:

Historic significance is defined as the importance of a property to the history, architecture, archaeology, engineering, or culture of a community, state, or the nation.<sup>28</sup> It is achieved in several ways:

- Association with important events, activities or patterns
- Association with important persons
- Distinctive physical characteristics of design, construction, or form
- Potential to yield important information

A property may be significant individually or as part of a grouping of properties.

#### **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." The National Park Service defines seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular

29 Ibid. (3).

<sup>27</sup> Ibid, 169.

<sup>&</sup>lt;sup>28</sup> 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, (3).

- culture or people during any given period in history or prehistory.
- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.
- Association is the direct link between an important historic event or person and a historic property.<sup>30</sup>

3º National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation. Washington D.C.: National Park Service, U.S. Department of Interior, 1995.

#### 6.0 IDENTIFICATION OF POTENTIAL HISTORICAL RESOURCES

Buildings, structures, objects and sites located both within and immediately outside the Project Site are examined in the following analysis for the purposes of identifying potential historic resources. Historic context, previous evaluations, criteria for significance and integrity issues are explored.

#### 6.1 Project Site Evaluation

The Parsons Corporation campus at 100 West Walnut Avenue has not been previously evaluated for historic significance through survey evaluation or environmental review. The following historic evaluation analyzes the property for its potential historic significance using criteria for the National Register, California Register and City of Pasadena Landmarks.

## Assessment of Eligibility for the National Register of Historic Places

Opened in 1974, the oldest portions of the Parsons Corporation campus will be forty years old in June of 2014. As a general rule, properties that are less than 50 years old are not eligible for National Register listing. According to the National Register Criteria for Evaluation, properties that have achieved significance within the past 50 years may be listed in the National Register of Historic Places only if they are of "exceptional importance" under criteria consideration "g." Because the Parsons Campus does not meet the fifty year threshold at this time, it needs to be evaluated under the "exceptional importance" consideration.

The Parsons campus is not known to be associated with any historically significant events or significant persons and therefore, would not be considered significant under National Register Criteria A and B. Any historic significance for the property would fall under National Register Criterion C which recognizes resources 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."

Although Charles Luckman and his firm made a significant contribution to the built environment, there is considerable debate about his overall contributions as an architect. Instead, he is primarily characterized as a businessman and much of his design work was not

31 "National Register Bulletin #22 Guidelines for Evaluating Properties That Have Achieved Significance Over the Past Fifty Years." Washington D.C.: National Park Service, U.S. Department of the Interior

favorably reviewed by his contemporaries.

William Pereira ultimately ended their partnership because he did not approve of Luckman's determination to expand the firm, and felt that architecture could not be "managed in a bureaucratic fashion, but should be rendered with craft by the architect." When their partnership ended in 1958, William Pereira stated, "It is my conviction that I should limit the number of projects which my associates and I hope to undertake to those which we can contribute the most and which we can follow through personally from beginning to end." 33

In a 1954 interview with *New Yorker* magazine, Luckman reinforced the idea architect as businessman:

I am firm in my belief that architecture is a business, and not an art. . . . I handle the programming of a job. I organize it. What is the problem? What is the client trying to achieve? If we do a project that is mostly engineering, I staff it with engineers. If it is mostly architectural. I staff it with architects.<sup>34</sup>

In 1962, *Time Magazine* ran a profile of Luckman that took this one step further, and included criticism from other architects: "'He is successful,' says one top Chicago architect coolly, 'because he produces anonymous architecture in a prescribed time and at the least cost and fuss to his clients.'"<sup>35</sup> The *Time* article referred to his architecture as mass production, coming off the assembly lines. A 1968 *Business Week* article declared that Luckman "sold architecture the way he sold soap: in bulk."<sup>36</sup>

Writing Luckman's obituary for the New York Times in 1999, Herbert Muschamp asserted that although designs from Luckman's firm "adhered closely to the functionalist creed of modern design... his buildings highlighted the thin line that separated good modern architecture from mundane obedience to the bottom line." 37 Such assertions by colleagues and critics reinforce the general belief that much of the architectural work produced by Luckman's office missed the mark as examples of good architecture.

Rubin, Elihu James. *Insuring the City: The Prudential Center and the Reshaping of Boston,* "Dissertation, University of California, Berkeley, 2004. (256)
 Rubin. (257)

<sup>34 &</sup>quot;Repeat Performance," New Yorker, August 28, 1954. (16)

<sup>&</sup>lt;sup>35</sup> "Corporations: The Second Time Around," *Time,* March 30, 1962.

<sup>36 &</sup>quot;He Sells Architecture the Way he Sold Soap," Business Week, October 28, 1967. (78)
37 Muschamp, Herbert, "Charles Luckman, Architect Who Designed Penn Station's Replacement, Dies at 89," The New York Times, January 28, 1999

Although Charles Luckman was highly prolific and was certainly responsible for several iconic and distinguished buildings over his long career, no consensus has been established as to his status as a "master architect." By 1974, Luckman was fully established as the president of Ogden Development Corporation and his influence on the design of individual commissions was probably minimal.

The Parsons Campus was designed in an architectural style best described as "Late Modern," a blanket term used to describe the evolution of Modern architecture from the mid-1950s through the 1970s. It is typically applied to commercial and institutional buildings. Unlike the strict geometric, simplicity of the International Style and Corporate Modernism, Late Modern buildings exhibit a more deliberate sculptural quality with bold geometric volumes, uniform surfaces such as glass skin or concrete, and a sometimes exaggerated expression of structure and systems. Sub-types of Late Modernism include New Formalism which referenced and abstracted classical forms such as full-height columns, projecting cornices, and arcades; and Brutalism, noted for monolithic

structures that stretched the limits of concrete construction.

Celebrated local examples of Late Modern architecture of the same period include the 1966 Liberty Savings and Loan building in Beverly Hills, designed by architect Kurt Meyter in a surprisingly engaging Brutalist style; the 1970 Ahmanson Center (now Wilshire Colonnade) on Wilshire Boulevard, a striking example of New Formalist architecture by Edward Durell Stone; A.C. Martin & Associates' 1971 "Blue Cube" office building for Sears, Roebuck and Company in Alhambra, a 12-story glass skin office building perched atop canted concrete pedestals; and A. Quincy Jones' elegant 1975 office building for Warner Bros. Records, a low, horizontal building integrated within a garden landscape.38

The Parsons campus, while competently executing the programmatic needs for a corporate headquarters, is not particularly distinctive as a signature work of architecture or site planning, nor is it a distinctive example of period, style or type. Despite some efforts to distinguish the massing with a grouped octagonal plan, and articulate the façade with recessed areas and angled concrete fins in front of the window bands, the result is a fairly perfunctory example of

<sup>38</sup> The Los Angeles Conservancy website, accessed April 4, 2014. https://www.laconservancy.org/architectural-style/late-modern

corporate architecture that lacks the expressive qualities and formal innovations of highly regarded architecture from the same period throughout Southern California and the United States.

For these reasons, the property does not meet the National Register "exceptional importance" consideration necessary for properties that are less than fifty years old and is therefore not eligible for the National Register.

## Assessment of Eligibility for the California Register of Historical Resources

The California Register is an authoritative guide in California 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.<sup>39</sup> As noted in Section 4 of this report, the criteria for eligibility for listing in the California Register are based upon National Register criteria. Similar to the National Register criteria, the California State Office of Historic Preservation (OHP) has established a "special (criteria) consideration" for resources

that have achieved significance within the last fifty years: 40

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.

Again because the Parsons campus does not meet the fifty year threshold at this time, it needs to be evaluated under the special consideration. The Parsons campus is not known to be associated with any historically significant events or significant persons and therefore, would not be considered significant under California Register Criteria 1 and 2. Any historic significance for the property would fall under California Register Criterion 3 which is based on National Register Criterion C and recognizes a resource that "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."

<sup>39</sup> California PRC, Section 5024.1(a).

<sup>40 &</sup>quot;California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register)." California Office of Historic Preservation Technical Assistance Series #6: 1.

As discussed in the National Register evaluation above, no consensus has been established as to Charles Luckman's status as a "master architect," and the Parsons campus is not a distinctive example of period, style or type. For these reasons, the property does not meet the California Register "special consideration" criteria necessary for properties that are less than fifty years old and is therefore not eligible for the California Register.

## Assessment of Eligibility for Local Designation by the City of Pasadena

The City of Pasadena does not specify any particular age threshold for historic resources. The City's Preservation Ordinance does state, however, that the criteria for the designation of historic resources are applied "according to applicable National Register of Historic Places Bulletins for evaluating historic properties."

In June 2006, the City of Pasadena received a grant through the Certified Local Government (CLG) program to prepare a historic context report for cultural resources of the recent past, as well as an accompanying reconnaissance survey of properties under this context. For the purposes of the context report, the "recent past" was defined by the City as the period 1935

to 1965. The resulting historic context report was completed in 2007.41

The Cultural Resources of the Recent Past Context Report identifies a "Commercial Building subtype: Large Office Building" as a property type under the Corporate/ Industrial/Institutional Development theme.42 Although the Parsons campus was constructed after 1965, the registration requirements provided for the Large Office Building subtype are helpful for local evaluation of the Parsons campus. Registration requirements state that "a commercial building that would qualify under this theme would typically be a large office, civic, institutional, or industrial building that is a good example of a particular architectural style associated with the period, and/or the work of a significant architect or designer. This property type would usually meet local or California registration requirements under Criterion C (3) as an individual resource."

As noted in the National Register and California Register evaluation above, no consensus has been established as to Charles Luckman's significance as an architect, and the Parsons campus buildings are not a distinctive example of period, style or type. Therefore, they

<sup>&</sup>lt;sup>41</sup> Cultural Resources of the Recent Past, prepared for the City of Pasadena by Historic Resources Group and Pasadena Heritage, 2007.

<sup>42</sup> Ibid. (58-59)

would not be eligible under Criterion C. Likewise, the Parsons Campus is not known to be associated with any historically significant events or significant persons and would not qualify under Criteria A or B. For these reasons, the property is not eligible for listing as a Pasadena Historic Monument, Landmark or Landmark District.

#### 6.2 Old Pasadena National Register Historic District<sup>43</sup>

The Project Site is located just outside of the Old Pasadena Historic District (the "District") which is bordered by Union Street and Fair Oaks Avenue just south and east of the Project Site.

The District is significant under National Register Criteria A and C. As the historic commercial center of Pasadena. Its physical form documents the economic development of the city and its various phases of growth between 1886 and 1936. The District also contains an important record of the evolution of architectural design in southern California as well as the work of many prominent regional architects.

The District boundaries are irregular and incorporate Fair Oaks and Raymond Avenues, the main north-

south streets, and Colorado Boulevard, the main east-west street. It is generally bound on the north by Chestnut Street, on the west by Pasadena Avenue, on the south by Del Mar Boulevard and on the east by the MTA Gold Line tracks. The District contains 154 contributing and 40 noncontributing resources, which form the historic downtown of the City of Pasadena. Predominantly commercial in nature, the District also includes a few residential buildings, a train station, some light industrial concerns, several churches, and a park. The strong stylistic eras of Old Pasadena can be discussed using three streets within the District as examples: Fair Oaks Avenue (1880s), Raymond Avenue (1890-1915), and Colorado Boulevard (1929-30). Surrounding streets, especially Union Street and Green Street, offer small-scale buildings, which reflect their industrial and service support to businesses along the major commercial streets. Since the District was originally listed in 1983, many of the contributing buildings have been extensively rehabilitated in a manner consistent with the Secretary of the Interior's Standards. A few contributing buildings have been demolished, and several new noncontributing buildings have been constructed. Most of the

<sup>43</sup> United States Department of the Interior, National Park Service, "Old Pasadena Historic District (Additional Documentation/Boundary Change)" National Register of Historic Places Registration Form, 2008.

new construction occurred on vacant and surface parking lots, and is generally compatible with the historic architecture of the District. Overall, the District retains a high-level of integrity and continues to convey its historic significance.

Due to the changes that occurred within the District since it was first designated in 1983, it was re-evaluated in 2008. At that time, the boundaries were expanded, and individual buildings within the District were reclassified as necessary.

The District is formally listed in the National Register and is listed in the California Register. Because it is listed in the National and California Registers, the District is considered a mandatory historical resource under CEQA.

Contributing buildings to the Old Pasadena Historic District are located south of the Project Site along Union Street and east of the Project Site along Fair Oaks Avenue. Contributing resources in the immediate vicinity include:

## 1. 34 N. De Lacey Avenue also 100 W. Union Street (Penn Oil Building)

Two-story Art Deco building with forty-seven foot tower. Constructed 1930.

#### 2. 45-47 N. Fair Oaks Avenue

Two-story commercial brick building with Renaissance Revival. Constructed 1887.

#### 3. 72 N. Fair Oaks Avenue

Two-story commercial brick vernacular building. Constructed 1904.

#### 4. 76-82 N. Fair Oaks Avenue

Two-story Mission Revival style building. Constructed 1904.

## 5. 118-128 N. Fair Oaks Avenue (Marine Hotel)

Two-story commercial brick vernacular building. Constructed 1884. Altered 1904.

## <u>6. 130-134 N. Fair Oaks Avenue</u> (Morison Transfer and Storage)

One-story commercial vernacular brick building located on the east side of Fair Oaks Avenue. Constructed in 1918.

#### 7. 11-15 E. Holly Street (Pierce Hotel)

Two-story commercial brick vernacular building. Constructed 1924.

#### 8. 2-20 E. Holly Street (Holly Hotel)

Two-story commercial brick vernacular building. Constructed 1914.

#### 9. 26-32 W. Union Street

Single-story commercial brick vernacular building. Constructed 1902. Altered 1908.

## 10. 34-36 W. Union Street (Model Grocery Stables)

Two-story vernacular brick livery building. Constructed 1905.

## 11. 62-64 W. Union Street (Schneider & Black Blacksmith Shop)

One- and two-story vernacular brick building. Constructed in two phases 1888-1900.

## 12. 70 W. Union Street (James Black Garage)

Single-story commercial vernacular brick building. Constructed 1920.

## 13. 78 W. Union Street (Detroit Battery and Supply Company)

Single-story commercial vernacular brick building. Constructed 1919.

#### 14. 114-120 W. Union Street

Single-story commercial vernacular brick building. Constructed 1924.

#### 15. 130 W. Union Street

Single-story commercial vernacular brick building. Constructed 1925.

#### 16. 132 W. Union Street

Single-story commercial vernacular brick building. Constructed 1904.

#### 17. 136 W. Union Street

Single-story commercial vernacular brick building. Constructed 1923.

#### 18. 140 W. Union Street

Single-story commercial vernacular brick building. Constructed 1923.

Historic resources located adjacent to, and within the immediate vicinity of the Project Site are shown in Figure 2.



Figure 2: Historic Resources in the vicinity of the Project Site.

HISTORIC RESOURCES GROUP

#### 7.0 POTENTIAL HISTORICAL IMPACTS

#### 7.1 Framework for Analysis

The following analysis is informed by National, State and local guidelines.

#### **CEQA Thresholds**

The CEQA Guidelines (2013) indicate that a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of a historical resource. A substantial adverse change in significance occurs if the project involves:44

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

The State Legislature, in enacting the California Register, amended CEQA to clarify which properties are significant,

as well as which project impacts are considered to be significantly adverse.

A project with an effect that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment.<sup>45</sup> A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.<sup>46</sup>

The Guidelines go on to state that "[t]he significance of an historic resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources... local register of historic resources... or its identification in a historic resources survey."47

## 7.2 Analysis of Impacts to Historic Resources

Potential impacts to historic resources are analyzed here using the thresholds defined by CEQA.

<sup>44</sup> CEQA Guidelines, section 15064.5(b).

<sup>45</sup> CEQA Guidelines, section 15064.5(b).

<sup>46</sup> CEQA Guidelines, section 15064.5(b)(1).

<sup>47</sup> CEQA Guidelines, section 15064.5(b)(2).

## 1. Would the Project involve the demolition of a significant resource?

The Project would not demolish a significant historical resource. No historically significant buildings, structures, objects or sites are contained within the Project Site and all potential new construction governed by the Project will be confined within the boundaries of the Project Site

All proposed development under the Project would be constructed on the existing surface parking lots and streets located on the Project Site. This includes the construction of new buildings, improvements to pedestrian circulation and the extension of Holly Street west to connect with Pasadena Avenue. Leonard Pieroni Drive would also be realigned approximately 16 feet to the west. The Project would, therefore, involve demolition of existing surface parking lots located on the Project Site as well as demolition of portions of the existing streets. These parking lots and streets, however, are not considered historically significant. Therefore, there are no historical resources that would be demolished as part of the proposed Project.

# 2. Would the Project involve relocation that does not maintain the integrity of a significant resource?

The Project does not involve or anticipate the relocation of any historical resources. The Project will realign Leonard Pieroni Drive approximately 16 feet to the west, but Leonard Pieroni Drive is not considered a historical resource. Therefore, the Project would not relocate any significant historical resource on or in the vicinity of the Project Site.

# 3. Would the Project involve conversion, rehabilitation or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings?

The Project does not involve the conversion, rehabilitation or alteration, of any historic resource. As noted above, all proposed new development will be confined within the Project Site and no historically significant buildings, structures, objects or sites are located on the Project Site. Moreover, the Project does not involve the conversion, rehabilitation or alteration of any historic resources located in the vicinity of the Project Site. Therefore, the Project does not involve the conversion, rehabilitation, or alteration of any historic resource.

# 4. Would the Project involve construction that reduces the integrity or significance of important resources on the site or in the vicinity?

The Project does not propose the demolition, destruction, relocation or alteration of any historical resource

either on the Project Site or in the vicinity of the Project Site.

The Project will, however, alter the immediate surroundings of historic resources in the vicinity of the Project Site by constructing new buildings directly north and west of the Old Pasadena Historic District. Alteration of the immediate surroundings of a historic resource such that its significance would be materially impaired constitutes a substantial adverse change according to CEQA guidelines.<sup>48</sup> Because the Project will potentially add new buildings in areas currently used for surface parking, the immediate surroundings of the adjacent historic resources discussed above will be altered. In order for this alteration to be considered a substantial adverse change, however, it must be shown that the integrity and/or significance of the historic resources would be materially impaired by the proposed alteration.

The Project Site is located north and west of the Old Pasadena Historic District. Contributing buildings to the Old Pasadena Historic District are located south of the Project Site on the opposite side of Union Street and east of the Project Site on the opposite side of Fair Oaks Avenue.

No new buildings are proposed for Development Area E which contains

the southern portion of the Project Site below Holly Street. Development in this area is confined to the realignment of Leonard Pieroni Drive and sidewalk and pedestrian improvements. The existing office buildings and parking structures will remain. Because no new buildings are planned in Development Area E, the setting and surroundings of the contributing buildings located on the south of Union Street will not substantially change.

The construction of new buildings is proposed along Fair Oaks Avenue between Holly and Walnut streets. Four contributing buildings to the Old Pasadena Historic District are located on the east side of Fair Oaks Avenue at the southern end of the block. The Historic District is characterized by a diverse collection of buildings of varying heights and densities, with heights ranging from one story up to eight stories. The Project plan allows for buildings up to 60 feet high in Development Area A, which is directly across from the contributing buildings on the east side of Fair Oaks Avenue, and up to 70 feet high in Development Area B located north of Area A. These heights are similar to the taller contributing buildings distributed throughout the Historic District.

<sup>&</sup>lt;sup>48</sup>CEQA Guidelines, section 15064.5(b) (1).

The four contributing buildings to the Old Pasadena Historic District located on the east side of Fair Oaks Avenue are one- and two-story buildings. Because the Project allows for buildings up to 70 feet in height, the proposed new buildings facing Fair Oaks Avenue have the potential to be significantly taller than the contributing buildings across the street. This contrast in scale, however, would not adversely affect the Historic District as a diversity of heights is in keeping with the overall character of the Historic District.

Although the Project does not include final design of individual buildings, the Project will be governed by the Central District Specific Plan Design Guidelines which provide measures to ensure, among other things, that new development within the Central District "respect the surrounding character" through "proper consideration of scale, massing, and detail of individual buildings." The Project includes setback and building articulation standards that incorporate those set forth in the Central District Specific Plan Design Guidelines.

For instance, the Project mandates a 5-foot setback from Fair Oaks Avenue in Development Area A and setbacks between 0 and 10 feet in Development Area B. While allowing for some variation, this fairly narrow range of allowable setback will help create a building street wall on the west side of

Fair Oaks Avenue more in keeping with the existing building street wall on the east side of Fair Oaks Avenue.

If designed in accordance with the Central District Specific Plan Design Guidelines and the Project guidelines and standards, the proposed Project will result in new construction that is compatible with the overall character of the Historic District, and the integrity of the District will not be materially impaired by alterations to its setting caused by the Project. The proposed new construction will not diminish the ability of any district contributor to convey its significance as a contributor to the Historic District. After implementation of the Project, the Old Pasadena Historic District will continue to convey its historic significance.

## 7.3 Summary of Potential Impacts on Historical Resources

Analysis of potential impacts using the CEQA thresholds reveals the following:

- No historic resources are present on the Project Site.
- The Project would not demolish, relocate or alter any historic resources adjacent to or in the near vicinity of the Project Site.
- The Project does not involve construction that reduces the integrity or significance of historic resources either

adjacent to or in the near vicinity of the Project Site.

For these reasons, the Project will not result in significant adverse impacts on identified historic resources located within or in the immediate vicinity of the Project Site. Because the Project will not result any significant impacts to historic resources no mitigation measures are required.

#### **SOURCES**

- 2013 California Environmental Quality Act (CEQA) Statute and Guidelines; California Association of Environmental Professionals, www.califaep.org
- California Public Resources Code (Sections 21000-21177).
- California Code of Regulations, (Title 14, Division 6, Chapter 3, Sections 15000-15387).
- "Central District Specific Plan." City of Pasadena Planning and Development Department. Adopted November 8, 2004.
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- "Cultural Resources of the Recent Past Historic Context Report." Prepared by Historic Resources Group and Pasadena Heritage for the City of Pasadena, October 2007.
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**Project Site**Exterior looking south from Walnut St.



**Project Site**Looking southwest from the corner of Fair Oaks
Ave. and Walnut St.



**Project Site**Looking west from Fair Oaks Ave.



**Project Site**Looking northwest from Fair Oaks Ave. and Holly St.



**Project Site**Looking northwest from Fair Oaks Ave. and Union St.



**Project Site**Looking north from Union St. and De Lacey Ave.



**Project Site**Looking northwest from Union St. and De Lacey Ave.



**Old Pasadena Historic District**East side of Fair Oaks Ave. Looking northeast from corner of Fair Oaks Ave. and Union St.



**Old Pasadena Historic District**East side of Fair Oaks Ave. Looking northeast from corner of Fair Oaks Ave. and Holly St.



**Old Pasadena Historic District** South side of Union St. looking west from Fair Oaks Ave.



**Old Pasadena Historic District** South side of Union St. looking southwest from De Lacey Ave.