



Memorandum

Date:	March <u>30</u> , 2012
To:	Theresa Fuentes City Attorney City of Pasadena
Cc:	Richard Starzak Senior Architectural Historian ICF International
From:	Daniel Paul Senior Architectural Historian ICF International
Subject:	Secretary of the Interior's Standards of Rehabilitation Analysis: Alternative 7 of the All Saints Church Master Development Plan Final Environmental Impact Report, January 2012

Introduction

The proposed project calls for four new buildings to be constructed to support various functions undertaken at the All Saints Church complex. The purpose of this memorandum is to analyze Alternative 7 of the January 2012 All Saints Church Master Development Plan Final Environmental Impact Report (Master Plan) against the Secretary of the Interior's Standards for Rehabilitation.

The proposed construction is located north of the All Saints Church on a site currently used for parking, a small Sunday school, and a playground. No historic buildings are located on the proposed construction site. The proposed development is within the Pasadena Civic Center National Register of Historic Places (NRHP/NR) Historic District. The church complex was listed as a district contributor in a 1980 addendum to the NR district nomination, completed in 1979. According to the Master Plan Historic Resources Report, the All Saints Church complex also appears to be individually eligible for the National Register of Historic Places. Also present upon the property proposed for development is the Maryland Hotel Wall, one of the last vestiges of the long-demolished Maryland Hotel. Wallace Neff, the potential designer of ~~the both the Hotel and~~ the Maryland Wall, is a recognized, significant architect. This object is identified as a contributing resource in the amended Civic Center Historic District National Register of Historic Places nomination. Immediately south of the All Saints Church complex, at the corner of Euclid Avenue and Union Street, is the Maryland Apartments building which was begun by John Parkinson and completed by Edward B. Rust. ~~Designed by regionally significant architect John Parkinson, who also designed Los Angeles City Hall~~

~~and Los Angeles Union Station with son Donald Parkinson, among many other significant buildings, t~~
The Maryland Apartments building is also a contributing element of the above-mentioned Civic Center Historic District.

The proposed development consists of four buildings of various heights, scale, massing and forms to be constructed along the east side of Euclid Avenue from approximately the intersection with Ramona Street running northward to Walnut Street. Among the buildings slated to be removed are a 1970s-era concrete breezeway and cupola attached to the Rectory Building and the Regas House; a recent trailer; Scott Hall, completed by Pasadena architects Smith and Williams in 1968; and a 1940s-era small commercial building located at the southeast corner of Euclid Avenue and Walnut Street. The children's playground, paved parking lot, and various mature trees are also slated for removal. Proposed materials in which the buildings would be clad include cut stone, architectural concrete, and metal—including copper and glass.

Of the 10 Secretary of the Interior's Standards of Rehabilitation, this analysis will focus upon the two standards pertinent to the proposed undertaking: Secretary of the Interior's Standards 9 and 10.

Secretary of the Interior's Standard 9 states:

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.

Secretary of the Interior's Standard 10 states:

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 would be unimpaired.

This below application of the Secretary of the Interior's Standards will focuses upon site plan, scale, and massing as proposed in the Master Plan, as they pertain to the above-mentioned historic resources. Many of the design details of the proposed construction are not finalized and therefore cannot be addressed in this memorandum except at a conceptual level.

Executive Summary

This review of applicable Secretary of the Interior's Standard of rehabilitation finds that the proposed project is consistent with Standards 9 and 10 as they pertain to the All Saints Church complex, the Maryland Wall, the Maryland Apartments, and the Pasadena Civic Center Historic District. This finding is made for the conceptual scale, massing, and placement of the proposed buildings upon the site, along with clarified or likely design features based off diagrams, site plans, verbal information, and correspondence. The size, scale, proportion, and massing of the proposed new buildings makes them clearly differentiated from the buildings contributing to the Civic Center Historic District and from the original intent of the Bennett Plan, yet they are still compatible with the surrounding historic district because they will not overwhelm the existing building nor will they detract from views of the existing buildings. The proposed new construction does not adversely affect the spatial relationships that characterize any NRHP-listed historic properties or districts. As

proposed, the preliminary plans for architectural materials of the new buildings demonstrate an ability to provide differentiation and compatibility; however, these issues must be further developed and reviewed when final plans are available. As part of the proposed project, no identified historic resources will be demolished or otherwise altered. One resource, the Maryland Hotel Wall, will be required to be restored in conformance with the Secretary of the Interior's Standards for restoration.

Historic All Saints Church Complex

Standard 9

In regards to Standard 9 as it relates to the All Saints Church complex, the proposed development is consistent with Secretary of the Interior's Rehabilitation Standard 9, based upon information available at this time.

Additions and Alterations

No historic materials or character defining features that render the All Saints Church complex NR eligible, would be destroyed by the proposed development. There will be no new additions or exterior alterations to the historic buildings composing the All Saints Church complex. There will be no change to the spatial relationship among the three historic buildings composing the All Saints Church complex.

Plan, Scale, and Massing

Regarding the size, scale, proportion, and massing of the proposed buildings in relation to the All Saints Church complex, three of the proposed buildings are separated from the complex by a courtyard that will be present behind the Maryland Hotel Wall. The Forum (Building B) is the closest of all proposed buildings to the complex, approximately 37 feet north of Regas House. Building B is approximately 55 feet at its highest point—roughly nine feet taller than Regas House. Although taller, this full height appears to only be present at the rear portion of the Forum's upper ellipse; its frontal portion descends in height to a point much closer to the height of Regas Hall, though still slightly taller than it. The fact that the alternate worship center is taller than Regas House differentiates the new work and is consistent with Standard 9. As the design develops, it should be located no closer to Regas House, and should be no taller than currently proposed.

Due north of the Forum, the remaining proposed constructions are a considerable distance from the All Saints Church complex. The three-story Day Care building (Building C) appears to be slightly taller than the front gable of the All Saints Sanctuary, though not taller than its corner tower. However based off pedestrian and driving perspectives from Euclid Avenue or Ramona Street, it is unlikely that the panorama of the entire property from north to south would be taken in within a single glance or view. The massing of the proposed two story gymnasium (Building D) is minimized by its distance from the All Saints Church complex, and also by its relative smallness when compared

to the large, rectangular plan multi-story County Courts building already present in the Civic Center directly across Euclid Avenue from this particular proposed building.

Differentiation and Compatibility of New Work

Stylistically, the proposed construction, which is Modern in character, appears to be differentiated from the English Gothic design of the All Saints Church complex. In discussions the project architect referenced the use of exposed architectural concrete for the Forum, mentioning that the north elevation of Regas House is concrete, and likewise referencing, without copying, the gray tonality of the English Gothic All Saints buildings themselves. The final design details regarding how the architectural concrete would be handled will determine the appropriateness of this building material at this site. The Sanctuary and associated buildings are not concrete clad upon most of their elevations, but instead are clad in granite quarried from nearby Bouquet Canyon. Much like architectural concrete often is, the All Saints buildings are not gray alone, but many of the cut stones feature a palette of warm ochre, copper, yellow, gold, and light green tonalities.

Materials choices for the proposed construction, which include cut stone, architectural concrete, and copper metal are intended to be compatible with either the texture, color, and physicality of materials as currently present upon the All Saints Church complex and, in the case of the architectural concrete, the Maryland Hotel Wall. Just as it is present within the All Saints Sanctuary, stained glass is proposed for Building B.

Regarding the other proposed buildings which include the Social Hall (Building A), Gymnasium, and the Day Care Center, are due north of the Forum and are farther away from the historic buildings. It appears that the details of their materials are still in design phase. Stone walls and cast stone & metal facades are proposed for the Euclid facing elevation of the Social Hall. Many of the buildings apply a generous use of glass which appears to be obscured by these facades and free standing walls. Although most of this glass will be obscured by stone or copper clad walls and other materials, a generous use of glass and the dematerialized, skeletal structures with which it is associated, were originally features of the Gothic design system before they were adopted by Modernism. Both design systems are present in the proposed construction plan. A stone wall is proposed extending out of the Forum toward Regas House that would acknowledge the cladding of that resource. In front of highly visible elevations, the presence of these stone walls and other partitions balances the ambitious use of clear glass, which is not included in the church complex, the Civic Center, or the Maryland Apartments. At the present time, the specific type of metal to be used as accent features and facades is still in design phase, though there has been discussion of incorporating copper. Its use in moderation is encouraged, as copper tonalities are present in the granite stones upon the church complex buildings.

Of note with the new construction and its relation to the All Saints Church complex is the proposed overall composition of forms. To the north are rectangular, flat roofed buildings. In the middle is the circular shaped Forum, and its form is reiterated by three protruding circular sunlights atop the Social Hall and the proposed contemplative garden maze behind the Forum. The All Saints Church complex consists primarily of triangular—gable roofed buildings. Based off the proposed plans, the parts of the scheme are complimentary to one another. The use of different forms in the new construction makes the new construction easily differentiated from the existing structures but

without creating conflict between the old and new. The composition is variegated but compatible. As they pertain to the All Saints Church complex, Alternative 7 is consistent with the size, scale, proportion, and massing of the proposed construction as it relates to the historic complex. Alternative 7 would also differentiate the new work from the old and would be consistent with Secretary of the Interior's Rehabilitation Standard 9 as it pertains to the All Saints Church complex.

Standard 10

Because no new construction will be in physical contact with the extant, NR eligible complex, and because no character defining features, let alone contributing resources of the All Saints complex will be removed, the essential form and integrity of the All Saints Church complex would be unimpaired if the proposed development was removed in the future. Therefore Alternative 7 is consistent with Secretary of the Interior's Rehabilitation Standard 10 as it pertains to the All Saints Church complex.

The Maryland Hotel Wall

Unlike earlier alternatives, Alternative 7 proposes that the Maryland Hotel Wall, along with the two palm trees symmetrically placed in front of it, will remain *in situ*. None of the proposed construction will connect or otherwise make contact with the Wall or the two palm trees in front of it. A restoration project which will follow the Secretary of the Interior's Standards for Restoration will be undertaken to repair the lamps at the top of the Wall's pillars. The Wall was designed by Wallace Neff. The majority of the space behind the Maryland Hotel Wall will be an entry garden, referencing the earlier open, yard-like space that historically was present here and was related to the earlier Maryland Hotel Bungalows.

Standard 9

There are no new additions or related new construction that would destroy historic materials and features that characterize the Wall. The closest building to the Maryland Hotel Wall is Social Hall Building A. In front of it, at present the architecture firm is proposing a standalone screen, of an as yet undetermined metal, though copper has been discussed. The screen does not touch the wall. It runs parallel to it for about 14 feet with a five-foot gap. The proposed scheme would locate Building B directly in line with the concave centered element of the wall, between two palm trees, which are being treated as historic landscape features. It is through this relationship where the use of architectural concrete may be a highly compatible approach to the Forum; it will bring out the same material qualities of the Maryland Hotel Wall, which consists of smooth painted plaster with exposed concrete quoins and molding. In this regard, the Forum may actually elevate the physical status of the Maryland Wall, which currently reads as a secondary fragment lost among much larger and more elaborate historic resources nearby. If the Forum was proposed to be of a material more akin to either the Church complex or the other proposed new construction, the Maryland Wall may continue to read as an isolated fragment. Alternative 7 would be consistent with Secretary of the Interior's Rehabilitation Standard 9 as it pertains to the Maryland Hotel Wall.

Standard 10

Because no new construction would touch the Maryland Hotel Wall, and the proposed lamp restoration project will be done in accordance with the Secretary of the Interior's Standards for Restoration, Standard 10 is readily met by the proposed project as it pertains to the Wall. Alternative 7 would be consistent with Secretary of the Interior's Rehabilitation Standard 10 as it pertains to the Maryland Hotel Wall.

The Maryland Apartments

The Maryland Apartments are located a considerable distance-- roughly 400 feet-- from the proposed construction. Driving north upon Euclid Avenue in front of the apartments, it appears that the new construction, because it will be set back under a variance for setback, would be barely visible. The relationship between the Maryland Apartments and the Hotel Wall is unchanged, as no new construction is proposed for the space between them, which is largely comprised of the historically significant All Saints Church buildings. The Maryland Apartment building would still be readily visible from any points looking toward from the Civic Center or All Saints where it is currently visible now. Alternative 7 would be consistent with Secretary of the Interior's Rehabilitation Standards 9 and 10 as they pertain to the Maryland Apartments.

The Civic Center Historic District

Standard 9

As it relates to the Civic Center Historic District, the Alternative 7 is consistent with the Secretary of the Interior's Rehabilitation Standard 9.

The All Saints Church complex, along with the Maryland Hotel Wall and the Maryland Apartments, are contributing elements of the NR district nomination focused upon the Civic Center. The Civic Center Historic District is comprised of multiple institutional buildings arranged upon a primary axis, and crossed by a secondary axis, coordinating with concepts of the City Beautiful movement and the *Ecole des Beaux Arts* principles that inform it. The majority of the buildings in the scheme are of variations on Renaissance and Mediterranean revival styles, though Turner and Stevens Company, an English Vernacular/ Arts and Crafts styled mortuary building, is also within the arrangement. The Civic Center Historic District nomination was first completed in 1979 and its historic context is heavily focused upon City Beautiful planning concepts as practiced by Daniel Burnham and later his protégé Cyril Bennett, of Bennett, Parsons, and Frost. In 1980 the All Saints Church buildings, the Maryland Hotel Wall, and the Maryland Apartments were added in as an addendum.

In discussing the City Beautiful movement and the planning concepts associated with it, the dome of City Hall is described as the climax of the composition that is arranged around the Holly Street axis due west and leading up to City Hall. In following *beaux-arts* principles, according to the nomination

the Bennett Plan was designed so that all main buildings were located "as terminations of axes....and gave a sense of interest, scale, and unity to the Center of the City, a virtue lacking in most American Town Plans, which present streets as endless corridors extending to the horizon."

The nomination presents no period of significance, and no historic contextual justification for adding in the existing All Saints Church complex and associated resources, other than to state that the buildings "contribute to the tone and scale of the district, on its perimeters." The proposed construction is within the Civic Center Historic District, but is east of the proposed public buildings in the Bennett Plan. ~~just outside the Bennett Plan eastern perimeter.~~

Additions and Alterations

No historic materials, let alone character defining features that contribute to the All Saints Church complex's inclusion in the Civic Center Historic District, would be destroyed by the proposed development. There will be no new additions or exterior alterations to the historic buildings comprising the All Saints Church complex. There will be no change to the spatial relationship among the three historic buildings comprising the All Saints Church complex.

Plan, Scale, and Massing

The All Saints Church complex, including the Sanctuary which predates any built aspects of the Bennett Plan but with secondary buildings designed by Cyril Bennett and Fitch Harrison Haskell is located behind City Hall; the building that serves as the culminating terminus of the Bennett Plan. As proposed, the horizontal massing of Building A and Building C parallel Euclid Ave. serve as a proper *differentiator* indicating that the proposed site is beyond the terminus of City Hall, ~~outside the perimeter of the Bennett Plan itself.~~ Building A, across the street from the Civic Center proper, is a two story building with its upper level set-back. Therefore, its massing would not overwhelm any buildings within the Civic Center Historic District. Building A is presently slated to be approximately 150 feet long, which is considerably shorter than the closest Civic Buildings within the Civic Center, which include City Hall, the County Courts Building, and its later, non-contributing addition running 300 feet along Walnut Avenue. The other north-south horizontal building, Building C, would be located approximately 320 feet from City Hall, 370 Feet from the County Courts Building, and approximately 180 feet from the Regas House. In part because of its distance from other resources, Building C does not overwhelm any of the nearby buildings in the Civic Center Historic District. Across Euclid Ave. from Building A is a lawn-covered tree-dotted space located within the Civic Center Historic District. Although they will be visible from within the Civic Center, the scale of two of the three buildings though larger than certain buildings in the Civic Center, is placed a distance from other contributors, against a backdrop of buildings that are even more sizeable (i.e. the 13 story Plaza Las Fuentes building), that the effect of their scale upon the Civic Center would be consistent with Secretary of the Interior's Rehabilitation Standard 9.

Insofar as the proposed construction is of a scale compatible with the Civic Center Historic District and would not alter it in such a way to render it ineligible for the NR, so too is the proposed construction compatible in size and proportion. The spatial relationship between the proposed construction and the Civic Center Historic District would also be acceptable as per Standard 9.

Differentiation and Compatibility of New Work

Regarding materials, the analysis of the proposed construction against this standard is not yet relevant given that the only matter before the City at this time is the size, scale, proportion and massing of the proposed buildings. Further, the City's design review process will require consistency at a later date. Nonetheless, at this preliminary stage, the following preliminary analysis can be done. The building closest to the Civic Center Historic District is Social Hall Building A that runs along Euclid Avenue. Though design details are yet to be finalized, its front elevation, and the walls associated with it, are proposed to be in cast stone, with touches of metal. The stone appears to be in reference to the All Saints Church complex, and the presence of metal, with the possible use of copper, will serve as a differentiating element that reaffirms the new building's contemporary era construction. The material for the forum is currently proposed to be architectural concrete. Although exposed architectural concrete is not a material found in the Civic Center Historic District, this building will be set back on the property behind the Maryland Hotel Wall, landscaping, and a courtyard. The texture or relative smoothness of the architectural concrete may be treated in such a manner to reference the relative smoothness of many of the Civic Center Historic District buildings. Other issues related to constructing this building in architectural concrete have already been mentioned in the Standard 9 discussion regarding the Maryland Hotel Wall. The same issues apply here as well.

In regards to the circular shape of the Forum, there are no circular plan buildings within the Civic Center Historic District. The Forum would serve as a compatible, contemporary visual echo of the City Hall dome. It appears to be roughly the same diameter, albeit just a little more than a quarter of the dome's total height. As previously mentioned, the circular shape of the building appears to also be playing off of the convex portion of the Maryland Hotel Wall, with which it is perfectly aligned.

Standard 10

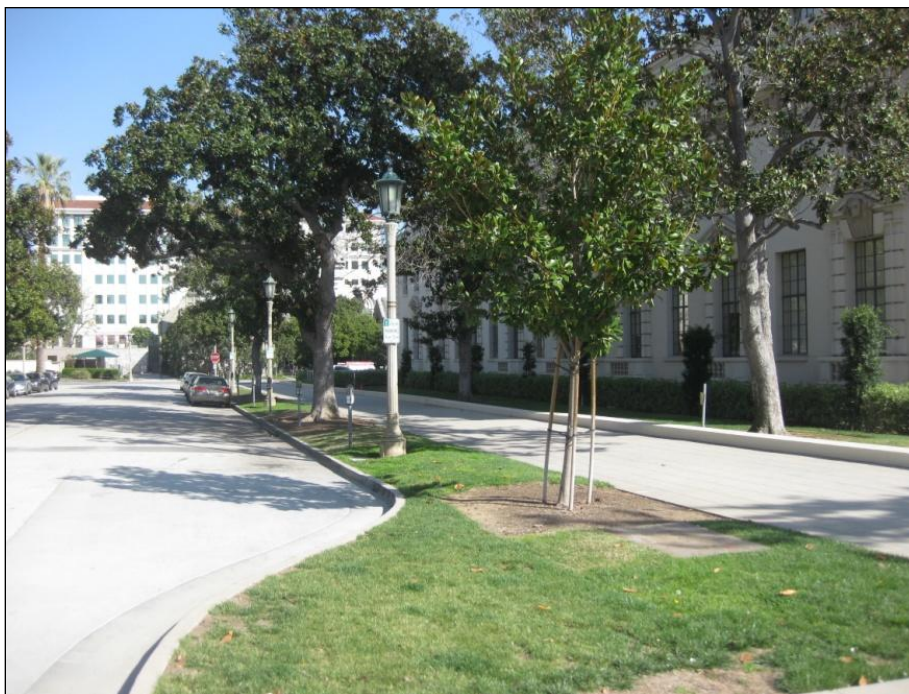
No previously identified historic resources or character defining features within the Civic center Historic District would be demolished. If the proposed construction was removed at a future date, the essential form and integrity of the Civic Center Historic District and its environment would be unimpaired.

Conclusion

Alternative 7 of the Master Plan is consistent with the Secretary of the Interior's Standards for Rehabilitation 9 and 10, pertinent to its relationship to the All Saints Church complex, the Maryland Hotel Wall, the Maryland Apartments, and the Pasadena Civic Center Historic District. This finding is made for the conceptual scale, massing, and placement of the proposed buildings upon the site, along with clarified or likely design features based off diagrams, site plans, verbal information, and correspondence.



Project site viewed northeast from Ramona Street.



Project site viewed east-southeast from Ramona Street.



Project site viewed northeast from the corner of Ramona Street and North Euclid Avenue.



**The Maryland Hotel Wall, with project site and pre-existing recent buildings.
View: East-Northeast.**

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**Project viewed southeast from corner of Walnut Avenue and Euclid Ave.
Small commercial building in the foreground is slated for removal.**



Project site viewed south from Walnut Avenue.



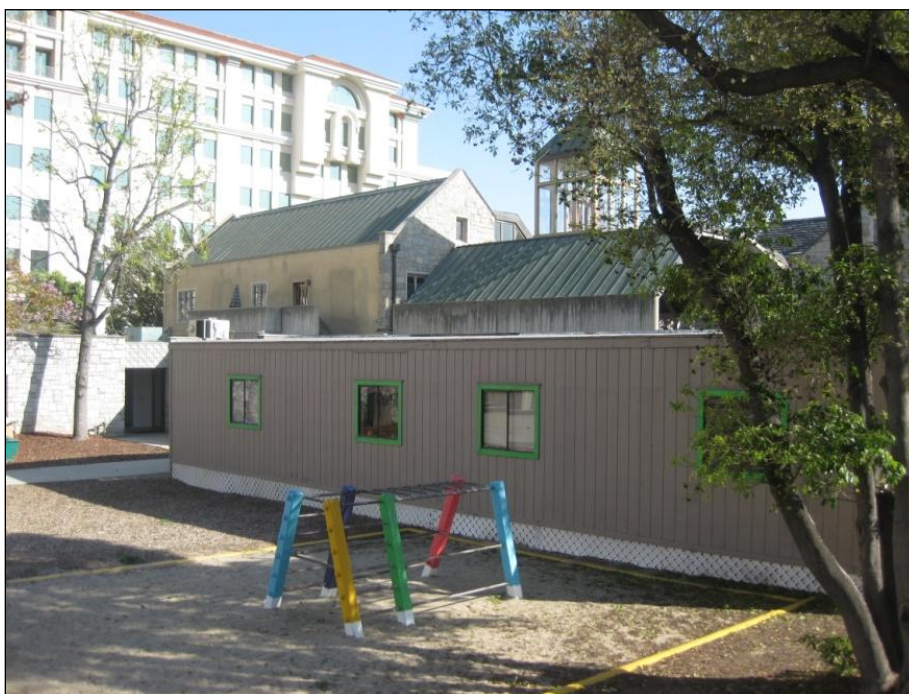
County Courts addition and portion of Civic Center viewed northwest from project site.



Ramona Street viewed west from project site.



City Hall and Maryland Hotel Wall/Fountain viewed from within project site. View: southwest.



Exposed concrete side elevation of Regas House behind trailer and poured concrete breezeway with cupola slated for removal. View: southeast.



View from within All Saints Church complex courtyard looking north towards project site. 1970s era breezeway and cupola behind arcade are slated for removal.



Memorandum

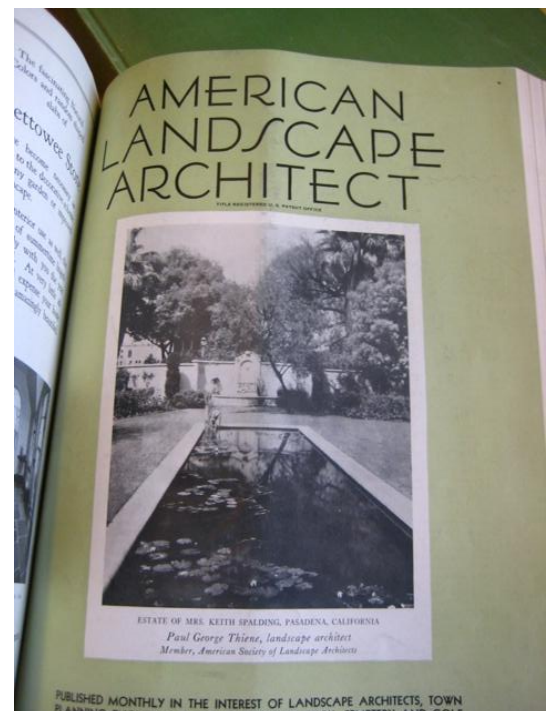
Date:	March 14, 2012
To:	Theresa Fuentes City Attorney City of Pasadena
Cc:	Richard Starzak Senior Architectural Historian ICF International
From:	Daniel Paul Senior Architectural Historian ICF International
Subject:	Response to memo dated March 13, 2012 from Ann Scheid

This memo has been prepared as a response to comments included in a memo dated March 13, 2012 from Ann F. Scheid in which the reliability of a March 9, 2012 report from ICF International (“ICFI Report”) is questioned.

The comment letter does not substantively change the analysis or conclusions in the ICF Report.

Clarification of Historic Building Architects

- The Maryland Hotel property had multiple buildings with different architects, including Wallace Neff (Spalding House) and Myron Hunt (main hotel building)
- The designer of the Maryland Hotel wall is unknown. Wallace Neff designed the house and landscape architect Paul Theine designed the gardens (American Landscape Architect, date unknown – see image at right). Typically site features such as landscape walls and fountains are the work of landscape architects, but there is no definitive evidence of the actual designer of the wall.
- The addendum to the National Register Nomination of the Pasadena Civic Center Historic District that added the All Saints Church property indicates that the “Maryland Hotel Apartments complex was begun in 1902 by the architect John Parkinson the northwest corner of





Los Robles and Colorado.” It also indicates that the extant Maryland Apartments building was built in 1926 by Edward B. Rust.

- There is no distinction between a “contributor” and a “contributing element” to a historic district. National Register Bulletin 15 uses the term “contributing resource.” The terms are interchangeable.

Page 1 of the Report is revised to clarify this issue as follows:

Revision (page 1 of 14): “Also present upon the property proposed for development is the Maryland Hotel Wall, one of the last vestiges of the long-demolished Maryland Hotel. Wallace Neff, the potential designer of ~~the both the Hotel and~~ the Maryland Wall, is a recognized, significant architect.

The Maryland Hotel is no longer in existence and the analysis in the ICFI Report was based upon the existing historic resources, therefore this revision does not substantively change the analysis or conclusions in the ICFI Report.

The commenter also states that the Maryland Hotel Apartments building was designed by Edward B. Rust not John Parkinson. As discussed in the Civic Center Historic District Nomination Addendum, the Maryland Arms Apartments Complex “was built in 1926 by Edward B. Rust...*this complex was begun in 1902 by the architect John Parkinson.*”

The following revisions have been made to the ICFI Report:

Revision (pages 1 and 2 of 14): “Immediately south of the All Saints Church complex, at the corner of Euclid Avenue and Union Street, is the Maryland Apartments building which was built by Edward B. Rust and begun by John Parkinson. ~~Designed by regionally significant architect John Parkinson, who also designed Los Angeles City Hall and Los Angeles Union Station with son Donald Parkinson, among many other significant buildings, t~~The Maryland Apartments building is also a contributing element of the above mentioned Civic Center Historic District.”

The Maryland Arms Apartments building was treated as a historic resource and this revision does not substantively change the analysis or conclusions in the ICFI Report.

The comment states: “The report is in error when it states: ‘the proposed construction is within the Civic Center Historic District, but it just outside the Bennett Plan eastern perimeter.’ In fact, the Bennett Plan extends east to Los Robles, so the proposed project is well within the Bennett Plan which is now bounded by the Plaza Las Fuentes complex on the east.”

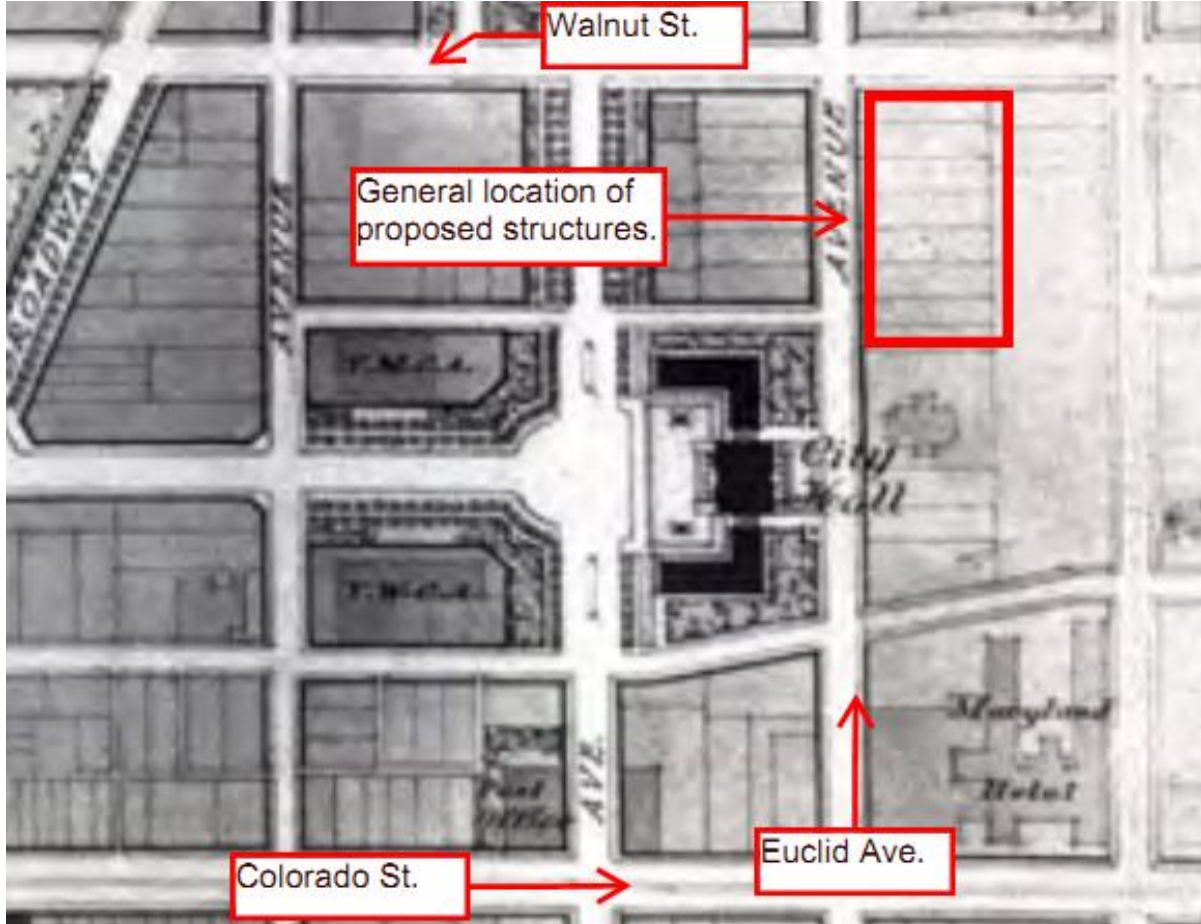


Figure PC-1 – Portion of image in the Comment Letter titled “Location Plan of Proposed Public Buildings with their Approaches”

The “Report on a Plan for the City of Pasadena, California” by Bennett, Parsons and Frost (April 30, 1925) does not define a specific boundary for the Civic Center. The plan covers a wide range of citywide planning topics and the inclusion of a drawing envisioning an axial arrangement of public buildings does not infer a defined boundary or that other properties not shown are excluded from potential future development. The plan does not suggest potential schemes for private property development in the vicinity of the envisioned public buildings and does not specify a succession of solids, voids, and courtyards on Euclid Avenue.

While the project site is geographically located within Figure PC-1, the purpose of the figure was to display the location of the “proposed public buildings with their approaches” and the project site does not contain a proposed public building or a proposed approach (such as the “Proposed Holly Street Extension”) contemplated in Figure PC-1, and is in fact located east of the easternmost building.

Furthermore, the nomination papers describe City Hall as being “at the end of the axis [of the Bennett Plan]... at the end as the climax of the composition.” (Civic Center Historic District Nomination, Item 7, page 1.) The nomination papers further note that



“the designers managed to locate the main buildings [including City Hall] as terminations of axes....at the end of formal axes.” (item 8 page 1.)

Nevertheless, the text of the document has been revised as follows:

Revision (page 7 of 14): “The nomination presents no period of significance, and no historic contextual justification for adding in the existing All Saints Church complex and associated resources, other than to state that the buildings “contribute to the tone and scale of the district, on its perimeters.” The proposed construction is within the Civic Center Historic District, but is **east of the proposed public buildings in the Bennett Plan just outside the Bennett Plan eastern perimeter.**”

Revision (page 7 of 14): “As proposed, the horizontal massing of Building A and Building C parallel Euclid Ave. serve as a proper differentiator indicating that the proposed site is beyond the terminus of City Hall, **outside the perimeter of the Bennett Plan itself.**”

The ICFI Report addressed impacts to the Civic Center Historic District, and these revisions do not substantively change the analysis or conclusions in the ICFI Report.

The comment suggests that the ICFI Report leaves the compatibility issue to be solved by the Design Commission. As noted on page 2 and 8 of the ICFI Report:

“This below application of the Secretary of the Interior’s Standards will focuses upon site plan, scale, and massing as proposed in the Master Plan, as they pertain to the above-mentioned historic resources. Many of the design details of the proposed construction are not finalized and therefore cannot be addressed in this memorandum except at a conceptual level.”

“Regarding materials, the analysis of the proposed construction against this standard is not yet relevant given that the only matter before the City at this time is the size, scale, proportion and massing of the proposed buildings. Further, the City’s design review process will require consistency at a later date. Nonetheless, at this preliminary stage, the following preliminary analysis can be done.”

Discussion of Compatibility with Historic Resources

The Scheid memo identifies “failure to use the Secretary’s Guidelines in the evaluation” as a flaw in analyzing the project’s compatibility with historic resources in the vicinity. The Secretary of the Interior’s *Guidelines for Rehabilitating Historic Buildings* were developed “to help property owners, developers, and Federal managers apply the Secretary of the Interior’s Standards for Rehabilitation during the project planning stage by providing general design and technical recommendations. Unlike the Standards, the Guidelines are not codified as program requirements.” Although the analysis in the ICF



memo does not directly reference the guidelines, it clearly considered the principles in the guidelines. The following information is provided to reinforce the ICF analysis:

- The Secretary of the Interior's *Guidelines for Rehabilitating Historic Buildings* contains the following chapters of recommended treatments for historic building components: masonry, wood, metals, roofs, windows, entrances/porches, storefronts, structural systems, spaces/features finishes, mechanical systems, site, setting, energy, new additions, accessibility, and health/safety. Each chapter has the following sections: Identify, Retain, and Preserve; Protect and Maintain; Repair; Replace; Design for Missing Historic Features; Alterations/Additions to Historic Buildings; and Energy Efficiency/Accessibility Considerations/Health and Safety Considerations.
 - The only chapter of the Guidelines that would apply to the All Saints Church Master Plan project would be "Setting.". The "Site" chapter provides guidance for treatment of historic landscapes, of which there are none on the project site that are being affected by the project and the "New Additions" chapter provides guidance for treatment of attached additions to historic buildings, of which there are none proposed in the project.
 - The area of the proposed development contains only one historic feature: the Maryland Hotel wall. This feature is proposed to be preserved in place and, thus, meets the guideline that recommends "identifying, retaining and preserving building and landscape features which are important in defining the historic character of the setting."
 - The remainder of the development area is currently used for surface parking and non-historic buildings. As such, the historic features of this area of the campus are missing and the guidelines related to "design for missing historic features" would apply.
 - The guidelines recommend "Designing and constructing a new feature of the building or landscape when the historic feature is completely missing, such as row house steps, a porch, a streetlight, or a terrace. It may be a restoration based on documentary or physical evidence; or be a new design that is compatible with the historic character of the setting."
 - The guidelines recommend against "Creating a false historical appearance because the replaced feature is based on insufficient documentary or physical evidence" and "introducing a new building or landscape feature that is out of scale or otherwise inappropriate to the setting's historic character."
 - The section "Additions/Alterations for the New Use" also has guidelines that apply to this project, as follows:
 - The guidelines recommend against "Introducing new construction into historic districts that is visually incompatible or that destroys historic relationships within the setting."
- The discussion in the March 9, 2012 memo from ICF International appropriately addresses each of these guidelines and fully explains how the new buildings are compatible with, but differentiated from, the historic buildings on the All Saints



Church campus and the Pasadena Civic Center Historic District. The key factors discussed that promote compatibility with historic features are:

- Proximity to historic buildings – new buildings are a substantial distance from historic buildings on the All Saints Church campus (page 3), the Maryland Hotel wall (page 5) and the Pasadena Civic Center Historic District (page 7)
 - Height relationship to historic buildings – new buildings are within the range of heights within the All Saints Church campus and the Pasadena Civic Center Historic District
 - Massing of new buildings as compared to massing of historic buildings – new building masses, including the proposed circular element, are consistent with building masses in the Pasadena Civic Center Historic District and the All Saints Church campus and do not overwhelm any of the historic buildings.
 - Because building materials are not fully known at this time, it cannot be said with certainty that the materials are compatible; however, the ICF memo outlines the compatibility of materials that have been discussed and indicates that they may be compatible upon further review of details during design review.
- On additional factor—not discussed in the ICF memo—that promotes compatibility is the provision of similar levels of open space to surrounding historic properties. The new buildings are placed in such a way as to allow for open space to be provided between buildings in a similar fashion as in the surrounding historic district. In addition, the west building's relationship to the street is similar to other buildings in the historic district, most of which are placed at the street edge or behind small front landscaped areas.