

**Correspondence given to the  
Design Commission on  
Monday, February 27, 2012**

- **Email from Michael Cornwell**
- **Letter from Marsha V Rood**
- **Letter from Ann F. Scheid**
- **Color elevation from Nina Chomsky**
- **Elevation alternatives from Nina Chomsky**
- **Pasadena Heritage (Chris Peck)**

Dahl, Laura

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**From:** Michael Cornwell <cornwellm@sbcglobal.net>  
**Sent:** Thursday, February 23, 2012 3:19 PM  
**To:** Johnson, Viola  
**Cc:** Dahl, Laura; DeWolfe, Stephanie; Bertoni, Vince; Bogaard, Bill; Beck, Michael; Suzuki, Takako; Steve Madison  
**Subject:** All Saints EIR Highlights - Feb 27 Design Commission Meeting ALL SAINTS CHURCH - MASTER DEVELOPMENT PLAN - FINAL IMPACT REPORT JANUARY 2012  
**Attachments:** EIR Highlights.doc

To Viola Johnson - Design Commission Staff Rep

Hello Viola: Re the Monday Design Commission Meeting...possible the following attachment might be of some assistance. Please forward it to the Commissioners. It quotes from the EIR fairly, representing the main conclusions.

**Main Conclusions**

**Compliance with Land Use Laws**

**Cultural Heritage**

**Neither the Gray Book, the Bennett Plan nor the Civic Center Specific Plan Apply to the ASC Project Maryland Hotel Wall**

**Solids, Voids, Length, Articulation and Design**

**Other Factors**

Please let me know should you have any questions. Thank You,

Michael Cornwell cell 310 387 9248 One South Orange Grove Unit #2 91105  
Former President, Los Angeles Cultural Heritage Commission  
Member, Committee for Simon Rodia's Towers in Watts (CSRTW)  
Member, Pasadena Heritage & Los Angeles Conservancy

ps: I attend All Saints but am not a member I hope the attachment makes it. Please acknowledge.

Attached is my list of EIR highlights. Sorry for the delay. I wanted to go back and cite-check all of the quotes for accuracy.

**All Saints Church  
Master Development Plan  
Final Environmental Impact Report  
January 2012**

**Main Conclusions**

“In December 2011, the project applicant (All Saints Church) submitted additional details to the City on an alternative to the proposed project which addresses community concerns surrounding the proposed project. While the Revised Draft EIR already included a reasonable range of alternatives, [the newly submitted] Alternative 7 has been included in the Final EIR to address these community concerns.” *Final EIR 8-11*

“With mitigation, [environmental] impacts would be less-than-significant under this alternative.” *Final EIR 8-12* In other words, the All Saints preferred Master Development Plan (Alternative 7) raises no significant, unmitigatable environmental issues or problems.

- a. The Revised Draft EIR had concluded that none of the other alternatives studied (a total of 6) were environmentally superior to the ASC preferred Plan, now Alternative 7.
- b. The Revised Draft EIR had also concluded that none of the other alternatives studied (except for the originally submitted Plan) met the ASC itemized list of program objectives as well or as completely as Alternative 7.

## Compliance with Land Use Laws

The Alternative 7 Master Plan “would be consistent with applicable policies of the Central District Specific Plan and with Citywide Design Principles and Criteria, and Impact AES-1 would remain Class III, less-than-significant.” *Final EIR 8-12*

Alternative 7 “would not conflict with any applicable land use plan, policy, or regulations of any agency with jurisdiction over the project and would not conflict with the City of Pasadena’s General Plan, Central District Specific Plan or Zoning Ordinance.” *Final EIR 8-23*

“The proposed project would be consistent with and complement its surroundings within the Civic Center District, including through preservation of the existing All Saints Church, Rectory, and Regas Hall; creation of a north-south internal axis and view corridor from Walnut Street south to the Church; landscaped open spaces within this view corridor; and creation of outdoor social gathering spaces.” *Final EIR 8-138, 139*

## Cultural Heritage

Alternative 7 “would not cause a substantial adverse change in the significance of the National Register of Historic Properties district.” *Final EIR 8-21*

“The proposed project would enhance the surrounding environment by replacing select features of the existing site, including two surface parking lots, a commercial building, a trailer and Scott Hall with four buildings set amid open spaces and landscaping....The existing Church, Rectory and Regas Hall would be preserved and rehabilitated to serve the Church’s current and future program needs, thereby ensuring the continued protection of the City’s architectural heritage.” *Draft EIR 4.1-14; Final EIR 8-84*

“The scale of the project is compatible with the existing surrounding development and the height of the proposed building is within the limits called for in the zoning code...In scale and in massing, none of the proposed building would overwhelm the existing historic structures.” *Final EIR 8-30*

“The proposed project is being designed by an architectural firm that has substantial experience in building new structures in proximity to historic structures...The architectural firm has a distinguished reputation and international practice...[Their] work often integrates new architecture with historic buildings or sites and the architectural firm has won numerous awards.” *Draft EIR 4.1-16; Final EIR 8-87*

The Historic Resource analysis is based upon “the professional opinions of Rincon Consultants and City Staff” and the report “was prepared by San Buenaventura Research Associates Historic Resources Consulting, and the firm is listed in the Register of Professional Historians.” *Final EIR 8-85*

## Neither the Gray Book, the Bennett Plan nor the Civic Center Specific Plan Apply to the ASC Project

“The downtown area has, through the years, been the focus of numerous planning studies which preceded preparation and adoption of the Central District Specific Plan (CDSP). Previous plans and planning studies were generally incorporated into the CDSP during its preparation...” *Final EIR 8-104*

“The Central District Specific Plan (CDSP) was adopted on November 8, 2004. This document takes into account, but also supersedes the Civic Center/Midtown Programming Effort Report (a/k/a the “**Gray Book**”), the Civic Center Specific Plan, and previous planning documents such as the Bennett Plan.” *Final EIR 8-118*

“The **Civic Center Specific Plan** will no longer apply following adoption of the Central District Specific Plan.” *Final EIR 8-61*

“The **Bennett Plan** is not an officially adopted Land Use and Planning document (i.e. not a Specific Plan) under the Government Code...Nothing in the [Bennett Plan] addresses buildings on private property. ... Since 1925, most developments in the Civic Center, including City Hall, the 1930 expansion of All Saints Church, the County Court building from 1952, Plaza Las Fuentes in 1990, Paseo Colorado in 2000, and the 2009 expansion of the Pasadena Convention Center, have not followed the architectural design, massing or footprint of buildings illustrated in [the Bennett Plan]” *Final EIR 8-62*. “The Bennett Plan is not an appropriate baseline for environmental analysis” *Final EIR 8-104*

## Maryland Hotel Wall

“While the Maryland Hotel Wall is considered a contributing component of the Historic District, the existing spatial relationship for the Maryland Hotel Wall **remnant** to its immediate surroundings is not considered historic; all of the nearby buildings to which it was historically related have been demolished several decades ago. Furthermore, any relationship of the wall to the historic district or the Maryland Apartment would not be substantially modified. The existing setting does not currently include a garden, but rather the existing setting contains a playground, a storage building, and a trailer immediately to the east, a paved parking lot to the north and the Rectory building to the south.” *Final EIR 8-49*

“Introducing a landscaped setback between the wall and the proposed building may provide aesthetic benefits, but would not serve to restore any lost historic relationships or setting for the wall, particularly as the historic landscape design treatments are not presently known. The Secretary of Interior’s Standards specifically advise against re-created historic features if they would be based upon conjecture or speculation. Furthermore recreation of conditions that do not exist under baseline conditions is beyond the scope of the CEQA analysis” *Final EIR 8-84*

## **Solids, Voids, Length, Articulation and Design**

“While it is true that the proposed project would increase the amount of built frontage along Euclid Avenue in the location, this frontage would be broken up into several different buildings ..interspersed with openings leading into a central open space.”

*Final EIR 8-50*

“The Euclid Street frontage proposed by the project...would include a pattern of buildings interspersed with several openings leading into the site that would in fact create a rhythm of alternating solids and voids. The analysis contained throughout the relevant portions of the EIR supports a finding of consistency with the CDSP guidelines,...which recommend that new construction maintain the distinguishing qualities and features of a historic or architecturally significant building, structure or site and that contemporary alterations or additions to such structures be allowed provided they do not harm such distinguishing qualities and features.” *Final EIR 8-87*

“According to the preliminary design proposed by the project, the façade of this building would include a variety of materials and elements including glass doors and windows, a freestanding cast-stone colonnade, and perforated copper-mesh sunscreens. Use of these materials...would help produce a sufficiently detailed, articulated façade.” *Final EIR 8-50*

“Project design is not required to be final at this point in the Zoning Code process, nor is it required to be final for purposes of analysis under CEQA.” *Final EIR 8-41*

“The final design of the project does not have to be analyzed in the Final EIR.” *Final EIR 8-82*



## Other Factors

**Scenic Vistas.** “The project would not have a significant effect on a scenic vista.” *Final EIR 8-83*

**Noise.** “Given the configuration of the site, the existing surrounding structures, and distances of the noise sensitive receptors, the project is not expected to result in significant impacts associated with noise from [church] events. Furthermore, any such outdoor activity areas on the project site would be subject to the provisions of the City’s noise restrictions ordinance.” *Final EIR 8-67-68*

**Resources.** “The project would be constructed in accordance with the City’s Green Building Ordinance and would thus reduce the use of energy, water and other finite resources.” *Final EIR 8-84*

**Master Plan Detail.** “The EIR is not required to address final design as the Zoning code does not require that level of detail in an application for a Master Plan.” *Final EIR 8-141*

**Alternatives.** “The EIR provides a reasonable range of alternatives which reduce and avoid significant environmental impacts....It would be improper to base the alternatives ignoring the project objectives. In fact, an inability to meet most of the project objectives is grounds for finding an alternative infeasible.” *Final EIR 8-285*

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February 27, 2012

Robert Carpenter, Chair  
Members of the Design Commission  
City of Pasadena  
175 North Garfield Avenue  
Pasadena, CA 91109

c/o Ms. Viola Johnson, Staff Representative

**RE: All Saints Church Master Development Plan**

Dear Chair and Design Commissioners:

**THE CHOICE BEFORE YOU TONIGHT IS VERY CLEAR:**

Essentially, you have the choice to ***EITHER***:

**#1. APPROVE AN ALL SAINTS CHURCH MASTER DEVELOPMENT PLAN THAT CONFORMS TO THE PROJECT.** The *All Saints Church Master Development Plan* before you tonight would allow and call for the introduction of a set of buildings that are incompatible with The Bennett Plan and the long-existing land use and building pattern on Euclid Avenue. In order to conform to the long-standing Bennett Plan, the goal to be achieved in the Master Development Plan would be to call for a series of building forms that face Euclid Avenue on their narrower face, with some spacing between in the form of lawns or courtyards that are similar in character to those currently evident on the street. The proposed building forms as shown in the proposed *Master Development Plan*, however, do not exist in the Civic Center nor do their relationships to the existing Euclid Avenue pattern of green space and buildings perpendicular to the street edge.

The long façade of one of the proposed building facing Euclid Avenue lies *parallel rather than perpendicular* to Euclid Avenue without a courtyard. To approve such a *Master Development Plan* would be to repeat the mistakes of the 1960s and 1970s which saw the introduction of the *Los Angeles County Courthouse*, the *Mutual Savings Building*, and the *Plaza Pasadena*, a redevelopment project with a major public investment. As we know, the *Plaza Pasadena* project was significantly modified ten years ago with substantial public monies to create a set of buildings that better conform to the Bennett Plan's historic street pattern and relationship of existing buildings to the street.

**OR CHOOSE TO:**

2. **APPROVE A MASTER DEVELOPMENT PLAN THAT ESTABLISHES THE STANDARDS FOR A PROJECT.** The preferred approach would be to approve a *Master Development Plan* for the All Saints Church property that would allow the addition of a set of buildings to the *Civic Center National Register Historic District* that reflect and reinforce the voter-approved Bennett Plan, the recipient of the 2012 National American Planning Association Planning Landmark Award and a legacy to the City Beautiful movement, which gave birth to the of city planning movement. This *Master Development Plan* would require that all new construction on North Euclid Avenue have integral, well-designed courtyards with the narrower frontages of the buildings facing onto the street. This choice would be a logical evolution of the Civic Center and reflective of the nearly **\$400 million** in public investment to retain and enhance The Bennett Plan.

**What guidance does your approved plan for the Civic Center give you?**

The Central District Specific Plan as adopted in 2004 contains a series of general policies and design guidelines including: ***"The design of all buildings and public spaces in this precinct should reflect the highest quality, respect the permanence of civic landmark buildings, and reinforce the vision of the Bennett Plan."*** (p. 104). The Specific Plan, however, does not include a block-by-block analysis, specifications and visual illustrations of the design standards and land uses which should be implemented. In fact, the Specific Plan, as adopted, legally "superseded" all previous plans that did. The community, however, has spoken consistently on the subject three times: (1) once in the voter –approved *Bennett Plan* in 1925; (2) again in the Council-approved *Civic Center Master Plan* in 1989 and then again (3) in the *Civic Center/Mid-town Area Programming Effort Report*

approved by City Council in 1998 (commonly known as the "Grey Report"). Basically, those plans and programs said that additions to Euclid Avenue should respect and enhance the existing and planned site plan pattern of green space, perpendicular building; green space, perpendicular building; green space, perpendicular building, and so on. (Please see the Attachment for a more detailed analysis).

So ..... upon what basis do you have to interpret the *words* in the Central District Specific Plan to allow a set of buildings whose longest length is parallel to the street with no alternating pattern of green space? Based upon the evidence, none whatsoever. Once this *Master Development Plan* is approved, it would be exceedingly difficult to "take it back". Any master development plan approved for the Civic Center now and in the future must be an expression of deeply held community values with respect to the Civic Center.

As a final note, my comments should not be seen as "anti-Church expansion plans". Rather, my comments should be seen as pro-Civic Center and pro-City of Pasadena. After all, it is the heart of the city.

Respectfully submitted,

***[Marsha V. Rood]***  
**MARSHA V. ROOD, FAICP**

ATTACHMENT: Rationale for Recommendations

## ATTACHMENT: RATIONALE FOR RECOMMENDATIONS

Given the weight of the evidence of Pasadena – the distinguished history of architecture and planning in Pasadena, the long-standing community-based plans and the continuing value that the community places on historically important buildings - the proposed *All Saints Church Master Development Plan* must:

- A. Prioritize compatibility of the All Saints Church proposed expansion project with the existing national historically significant buildings and environment over differentiating old buildings from the new building.** The bias in the All Saints Church Master Development Plan Final Environmental Impact Report ("*Final EIR*") is to interpret the Secretary of the Interior's Standards for Rehabilitation of Historic Structures ("Secretary of the Interior's Standards") in terms "differentiation" rather than "compatibility", clearly favoring a project that is much more contemporary or "of its time" rather than one that is a contextual or "of its place". Although modernist style buildings quite easily solve the problem of "differentiation" from a standards perspective, it does not solve it from a "compatibility" standards perspective.
- B. Evaluate the Project against the long-standing plans since the 1920s and recent community General Plan update outreach efforts point to evaluating the new project in terms of how compatible it is with the existing and historically significant and community-valued setting.** The impacts that must be evaluated in the *Final EIR*, among other impacts, are:
1. How do the new buildings, arrangement of buildings, architectural form, and associated open space most respect and harmonize with the existing architectural and historic environment of the All Saints Church and Pasadena's historically significant City Hall?
  2. How do the massing and building volumes best fit with the existing pattern of "solids and voids" along Euclid Avenue?

3. How does the proposed *Master Development Plan* respect the architectural design of the existing historic landmarks – the existing All Saints complex and City Hall – including the use the palette of material and colors currently found in the area?
4. Does the *Master Development Plan* disrupt the visual context and historic set of All Saints complex and City Hall by calling attention to the new work, rather than blending with the old? Would the new buildings *stand out and overwhelm* rather than *fit in and enhance* their surroundings? Would they minimize the church's historic importance as a campus within and to the Civic Center?

The City should develop a broader and more robust range of reasonable Alternatives than those contained in the *Final EIR*. The Alternatives developed should feasibly attain most of the basic objectives of the project, comply with the *Secretary of the Interior's Standards* and avoid the significant effects of the Project.

In the historic resources section, the *Final EIR* states that the Project is located within the boundaries of the national register *Pasadena Civic Center District*. It also states that the All Saints Episcopal Church complex (Church, Parish Hall and the Rectory) and the Maryland Hotel wall should be regarded as historic resources for the purposes of the California Environmental Quality Act ("CEQA"). This means that the *Secretary of the Interior's Standards for Rehabilitation of Historic Structures* must be applied when looking at the proposed new buildings. Standard "9" states the following:

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

This standard is reflected in the requirements of the *Central District Specific Plan* (2004), "**The design of all buildings and public spaces in this precinct should reflect the highest quality, respect the permanence of civic**

**landmark buildings, and reinforce the vision of the Bennett Plan.”** (p. 104)  
The Specific Plan further states that the **“...setting for these buildings is no less important, and therefore, realization of the 1920s ‘City Beautiful’ Vision should be advocated through 1) preservation of historically significant buildings; 2) requirements for new buildings that are complementary to existing landmarks; and 3) reintegration of the Beaux-Arts axial plan”.**  
(p.102)

The Specific Plan’s Sub-District Design Guidelines for the Civic Center/Mid-Town area further call for the new development to:

**“Respect the architectural design of historic buildings and protect the monumentality of landmark civic buildings; limit the scale and massing of larger building by employing articulated sub-volumes.”**  
(p. 172) It also calls for using **“... the palette of materials and colors currently found in the area; masonry (non-brick), stucco, colored concrete and tile decorative elements are prominent materials, and the use of intense colors should be severely limited.”** (p. 172)

Therefore, on this basis of the Secretary of the Interior Standards and the Specific Plan, a new developments: (a) shall not destroy historic materials; (b) must be differentiated from the old, and (c) must be compatible to protect the historic integrity of both **the Property** and its **Environment**. On the basis of the Specific Plan, new developments should respect the prominence of civic landmark buildings and the preservation of historically significant buildings, be complementary to existing landmarks, respect the architectural design of historic buildings, and use the palette of material and colors currently found in the area.

The questions for the environmental impact analysis are: (1) How should these standards and guidelines be interpreted and applied in the *Final EIR*? (2) Is “differentiation” or “compatibility” the dominant emphasis when considering the existing historic buildings not only on the property, but also with historic Civic Center buildings across the street? (3) What the weight of the evidence in Pasadena

- is keeping record of the time the new architecture is added more important than maintaining and enhancing the place in which it is built?

**A. The Property:** The **All Saint Episcopal Church complex of buildings** are the products of renowned architects - Johnson, Kaufmann, and Coates - who designed the *English Gothic Revival* sanctuary; and Bennett and Haskell who designed the Parish and Rectory addition in the same style. Additions designed by Whiney Smith and Wayne Williams were made in the 1960s in a more "modernist" interpretation of the *English Gothic Revival* style, thus creating an identifiable campus of church buildings and context for future additions. According to the *Final EIR*, the **Maryland Hotel Wall**, a section of the wall that enclosed a portion of former resort hotel grounds, is also a contributing element to the designated historic district.

**B. The Environment:** The importance of the Civic Center to the city is indisputable. The "City Beautiful" *Bennett Plan* established its foundations in the 1920s with creation not only of the City Hall, Central Library and Civic Auditorium but also the relationships among them. The firm that did the plan - Bennett, Parsons & Frost - was the successor firm to *Burnham & Bennett*, who did the *Plan for Chicago* and founded the city planning movement in America. After several incompatible modernist buildings were added to the Civic Center in the 1960s and 1970s, the City rededicated itself to the full realization of the Civic Center "City Beautiful" plan in the late 1980s *Civic Center Master Plan (the "Master Plan")* and the late 1990s *Civic Center/Mid-Town Programming Effort Report (commonly referred to as the "Grey Report")*.

The City did more than adopt plans in the 1980s and 1990s. *These plans became living documents*, resulting in a massive infusion of public and private investments in the Civic Center/Mid-town area over the past three decades. The City alone spent **nearly \$400 million dollars** from the 1980s through the 2000s on seismic upgrades and restoration of City Hall, construction of the new Police Building, upgrades and re-landscaping of the



Central Library, development of Plaza las Fuentes and the Holly Street Village Apartments, rehabilitation of the Hale Building, expansion of the Convention and upgrades to the Pasadena Civic Auditorium upgrades, and redevelopment of the Plaza Pasadena into the Paseo Colorado.

**C. Community Values:** Has the community's view of preserving historically significant architecture changed since these plans were approved? This is not the case. The General Plan Update Outreach Summary Report dated May 2010, speaks to how much the community values the design and architecture of the city. Participants highlighted the importance of historic architecture, describing the city's buildings as "unique" and "iconic" with "quality" and "richness". However, participants expressed much dissatisfaction when discussing developments that are more recent. Many worried that Pasadena's "sense of place" was slowly being eroded with the addition of the many new building in this decade. Although some unilaterally supported a broad range of architectural styles, many believed that context and historic setting should be the driving factor in determining appropriate architectural style. They felt like new development should look like Pasadena, not the other way around.

The proposed *Master Development Plan* should require that the new expansion project buildings fit in a harmonious way with the existing historically significant landmark setting and with the existing North Euclid Avenue street pattern that is characterized by interplay of green spaces and buildings. The Civic Center's foundational documents offer some *guidance* in developing Alternatives - the City Council-approved *Pasadena Civic Center Master Plan* (1990) ("Master Plan") [Lyndon/Buchanan Associates, consulting planners/architects] as reinforced by the City Council-approved *Civic Center/Mid-Town Programming Effort Report* (1998) (commonly known as the "Grey Report") [Moule and Polyzoides Architects and Urbanists, consultants]. Unlike the Specific Plan that addressed the Civic Center/Mid-Town area as a whole rather than on a block-by-block basis, both the Master Plan and the Grey Report focused on the Civic Center/Mid-Town area in

detail and on a block-by-block basis, including North Euclid Avenue. Although the Specific Plan states that these plans have been superseded, these prior City Council-approved planning documents are instructive and can be used to more accurately interpret and apply the Guideline statements contained in the Specific Plan. Importantly, they can be used to develop more robust Project Alternatives that more accurately reflect the intent of the Specific Plan

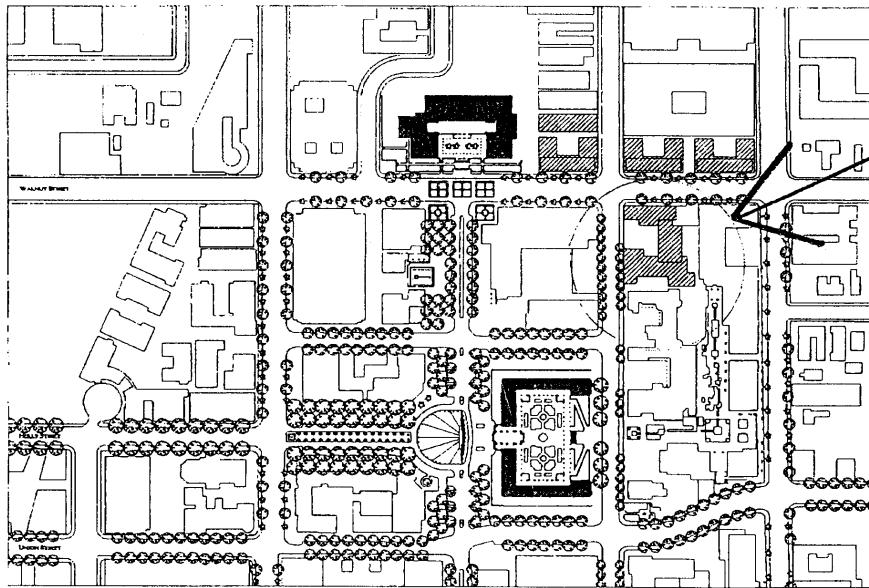
With respect to the site under consideration, the Master Plan required *courtyards* along North Euclid Avenue in order to reinforce the combination of "all of the elements of the Civic Center" and the existing green space/building footprint pattern along North Euclid Avenue as follows:

- **"EUCLID AVENUE:** With City Hall, the Maryland Apartments, All Saints Church and rectory, and the mix of housing and offices on Euclid, it is a street which combines all of the elements of the Civic Center (government, religious institutions, housing and commercial) in an attractive way though somewhat sporadic way. It is particularly important that this street, with its diverse registered monuments, serve to mediate between the rest of the Civic Center and the large scale development of Plaza las Fuentes." (excerpt) "Formally, Euclid Avenue can be characterized by an interplay of building and green space for which the City Hall courtyards, the lawns of All Saints Church, and the copse of trees intended for the Euclid Avenue frontage of Plaza las Fuentes provide models" (excerpt). (p. 83)
- **"Building Form Along Euclid:** The object is to achieve a series of building forms that come to the street, with some spacing between them in the form of lawns or courtyards, that are evident on the street." (p. 95)

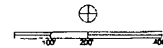
The Grey Report reinforced this street pattern as follows:

**"g. Walnut/Euclid Street Parcels**

"(2) Design and Land Use Standards: All new construction facing Euclid Avenue shall have integral, well-designed courtyards facing onto the street. This continues the existing courtyard pattern already existing at Euclid Avenue." (p. 53)



W A L N U T / E U C L I D



Notwithstanding the lack of carry forward of these key Civic Center documents, the *All Saints Church's Master Development Plan* must reflect the purposes, intent and provisions of the *Specific Plan* and the *Pasadena General Plan* because they are an expression of deeply held community values with respect to the Civic Center. Also, the proposed *Master Development Plan* must be compared against and meet the more detailed guidelines and standards contained in the *Specific Plan*, including "respecting the street-oriented development patterns of existing building", and the "incorporation of courtyards and other urban outdoor spaces, height limits, respect for the scale and massing of existing historic structures, reinforcing historic development patterns, reinforcing the architectural context, using the palette of materials and colors currently found in the District."

27 February 2012

Dear Members of the Design Commission:

As you are sitting for the Historic Preservation Commission, which is excluded from this decision-making process,<sup>1</sup> which affects the most important historic district in Pasadena, I am sharing with you my concerns about the deficiencies and internal contradictions of the revised Historic Resources Report submitted as part of the Final environmental Impact Report.

**The Maryland Hotel Wall:** The report omits information I provided to the City, at their request in May 2011. The wall served as the rear boundary of the garden of Keith and Eudora Spalding, who built a house designed by Wallace Neff on the Maryland Hotel grounds in 1926, concurrent with the construction of City Hall. The wall, also by Neff, is in the California Mediterranean style (not Georgian Revival as stated in the HRR). The Spaldings lived there until the Maryland closed (c 1934-35), when they moved to a bungalow at the Huntington Hotel where they lived under a similar arrangement on the hotel grounds. The attached photograph from Diane Kanner's book on Wallace Neff shows the garden and wall with City Hall in the background.

**Design (Criterion C) as basis for the significance of the Civic Center as a National Register District:** The design, its overall axial layout, public open spaces, courtyards, and the recognized excellence of its architecture in the California Mediterranean style form the setting for the proposed project. The Secretary of the Interior's Guidelines do not recommend "introducing a new building that is out of scale or otherwise inappropriate to the setting's historic character." The long expanse of building along Euclid is not appropriate along Euclid, which is a series of rectangular buildings with their short ends to the street, alternating with open spaces/courtyards. The Guidelines recommend "new work should be compatible with the historic character of the setting in terms of size, scale, design, material, color, and texture." The proposed flat-roofed rectangular buildings ("simplistic blocks"<sup>2</sup>) with their long sides parallel to Euclid and the tall circular building are forms incompatible with the historic character of the setting, particularly in their lack of significant articulation, incompatible materials, color and texture. Even if clad in traditional materials, these forms will still be massively incompatible with the historic setting.

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<sup>1</sup> Although the Pas Municipal Code states:

17.62.110 - Review of Major Projects Affecting City-Owned Historic Resources

1. **Designated historic resources.** The Historic Preservation Commission shall review major projects affecting City-owned, designated historic resources, including changes to designated public and quasi-public interior spaces, and forward its recommendation on these projects to the Design Commission.

<sup>2</sup> Lyndon/Buchanan Associates. *Civic Center Master Plan*. 1988.

In the discussion of **National Register District Significance** (pp 6 ff), the author refers to the Robert A.M. Stern Police building (1990) as an alteration to the district. More accurately it is an addition to the district, designed to be compatible with the existing contributors to the District.

The discussion about All Saints Church (pp. 7 ff.) hardly seems relevant, since the historic buildings of the campus are purposely not included in the Master Plan. Also in this section some facts are incorrect. The property north of the church purchased in 1961 included the Spalding House (1926) which at that time served as Chamber of Commerce headquarters, as well as the garden wall, now known as the Maryland wall. The house was demolished by the church in 1965. I provided the relevant historic research to the City at their request in May 2011. Why were they not included in this report?

In the section **Eligibility of Historic Resources**, page 8 "The Setting", the author argues that the setting is compromised because of the Plaza Las Fuentes project to the east. That project by Moore Ruble Yudell, architects experienced in dealing with historic contexts, was specifically conceived as complementary to the Civic Center by providing large public open spaces, by preserving the eastern axis that leads from City Hall, concentrating the height and massing at the northwest portion of the site, as far away from City Hall as possible, and by using design, materials, color and texture that are compatible with the historic architecture and setting.

In the section **Project Impacts, Impact 2** (pp 11 ff). As is shown by the photograph of the Spalding/Neff wall (Maryland Wall) attached, that the area east of the wall was open space (a garden). Although that open space has been encroached on by a temporary trailer to the south and Scott Hall to the east, there is still considerable open space between the wall and Scott Hall. The Master Plan proposes the removal of both the trailer and Scott Hall. Relocating the wall is not consistent with the Guidelines.

**Impact 3** (pp 12 ff). As has been argued elsewhere, the size, massing, proportions, bulk and scale of the proposed project are inconsistent with the size, massing, proportions, bulk and scale of buildings contributing to the District. The proposed building along Euclid is low in height, but with its long side parallel to the street and to the long building behind it, it is incompatible with the Euclid streetscape with features rectangular buildings (Maryland Hotel apts, All Saints Church, All Saints rectory), which are sited perpendicular to the street, not parallel, creating ample space for courtyards and open space. They do fill an existing void, but the site plan does not create the courtyards called for in the Gray Report or the Lyndon Buchanan Civic Center Master Plan. The effect is to close off the property to the public, both physically and visibly.

To argue that City Hall is larger in scale is to set up a straw man, since City Hall is intended as the central dominant building of the District, and so must be significantly

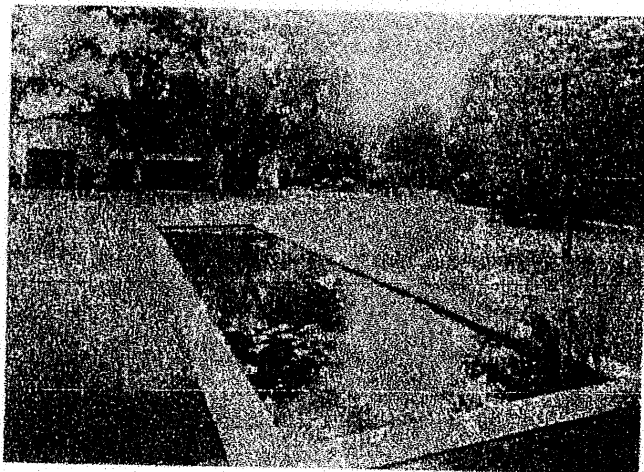
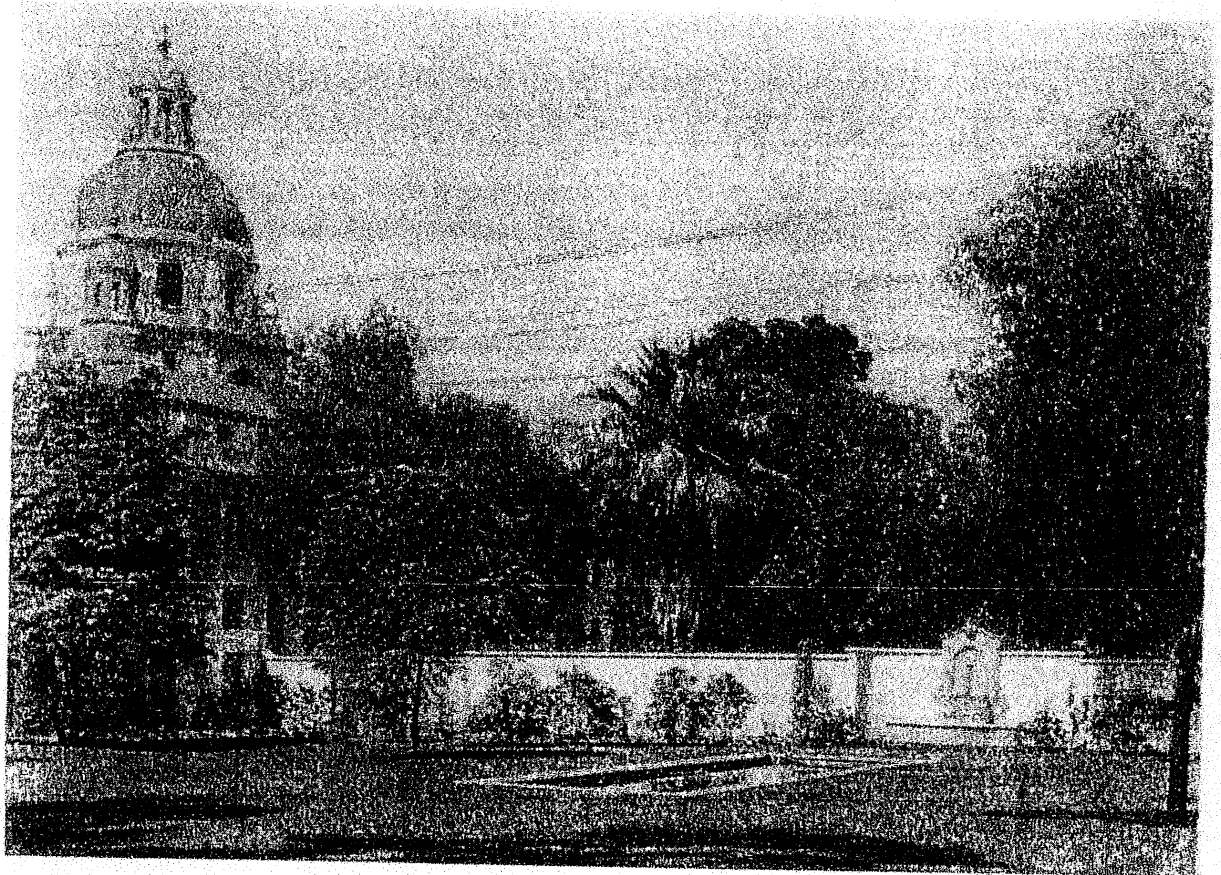
larger in scale. Showing that there are other buildings in the District of comparable or greater length than the proposed Building A ignores the specific context of the Euclid Avenue setting, which is discussed above. And to say that this project (i.e., any project on this site) is an improvement over the existing parking lot and small scattered buildings currently on the site is disingenuous at best. A poorly conceived project does not improve any site.

The public comments and suggestions for improvements re the project have been consistently ignored or turned on their heads by legalistic arguments. The intent of the environmental process is to hear the public and to improve the project. The approach here has been to willfully defend the project and to ignore the public's concerns and suggestions for possible alternatives and to ignore the intent of the Secretary's Standards and Guidelines for additions to historic districts.

Furthermore, the Design Commission requested at its last hearing on this project that all alternatives be analyzed for their compliance with the Secretary of Interior's Standards and Guidelines and for their compliance with local rules and guidelines. This request has not been fulfilled by this report.

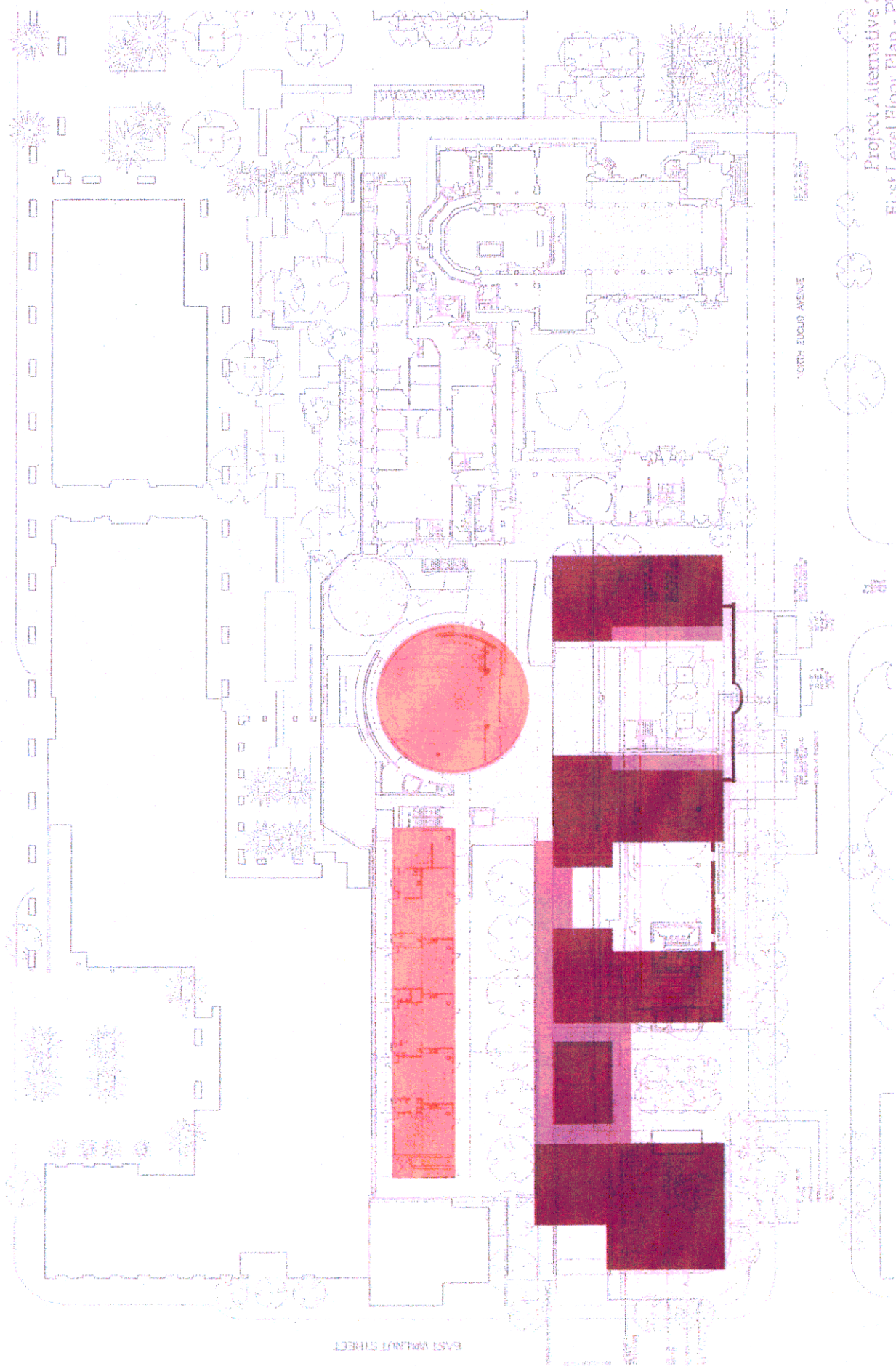
I urge the Design Commission to stand by its earlier request for a full analysis and reject the current Final Environmental Impact Report as inadequate.

Sincerely,  
Ann Scheid



*The Spalding House yard and reflecting pool, adjacent to the Pasadena City Hall and the Maryland Hotel*

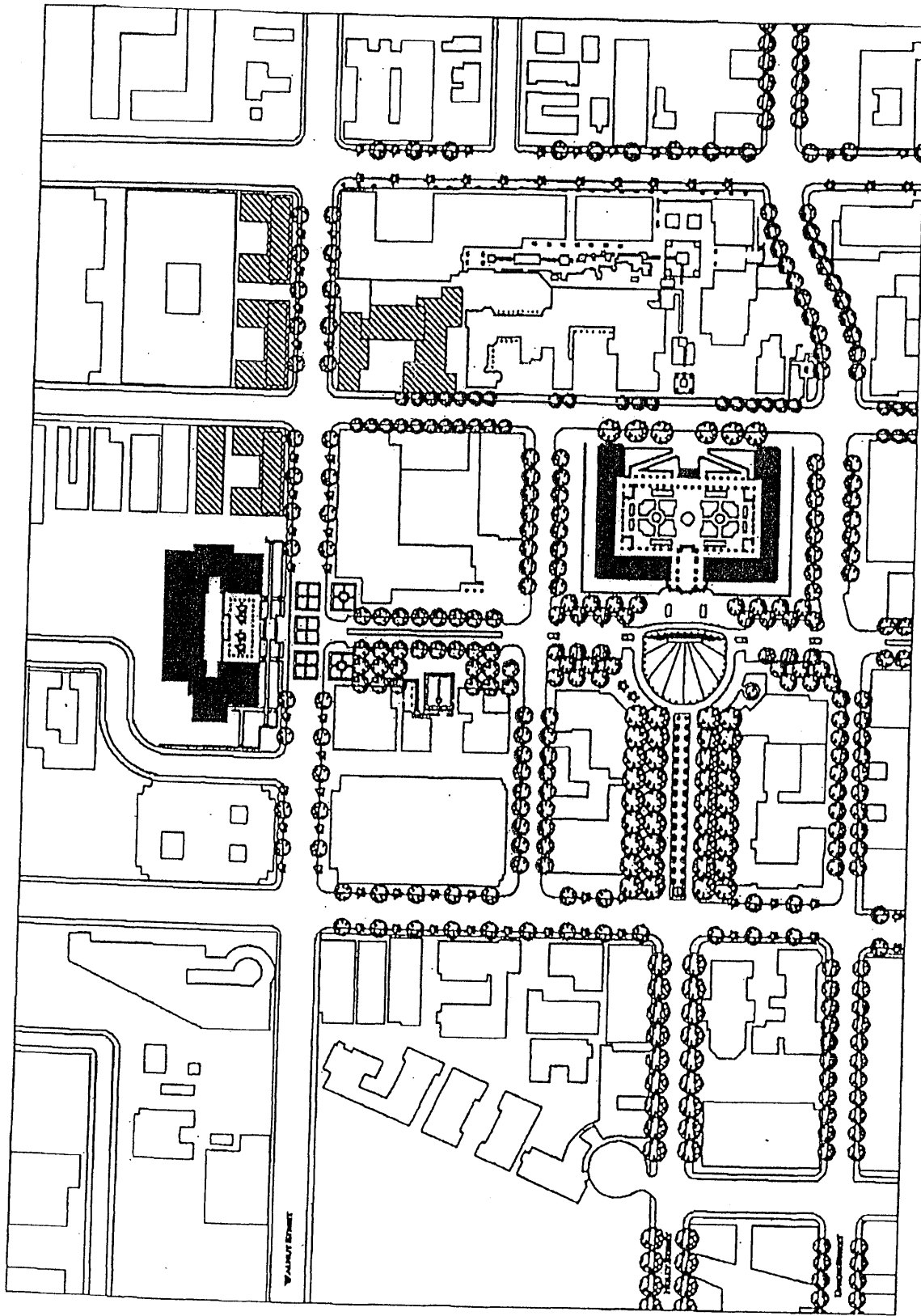




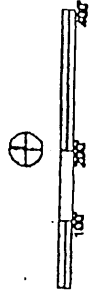
Project Alternative 7  
First Level Floor Plan - Phase 1



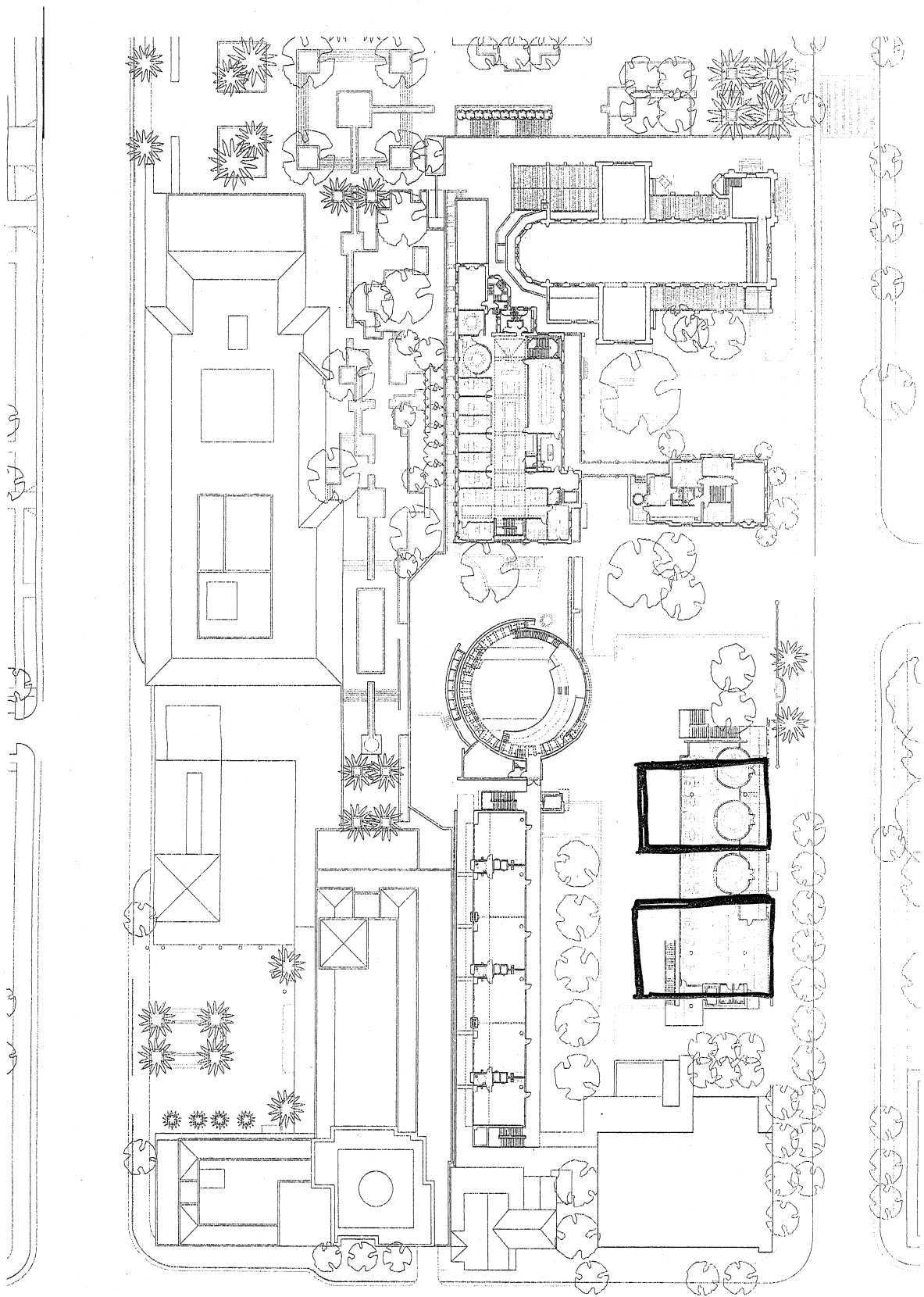
DEVELOPMENT ENVELOPE DIAGRAM



PLAN



WALNUT / EUCLID  
BLOCKS

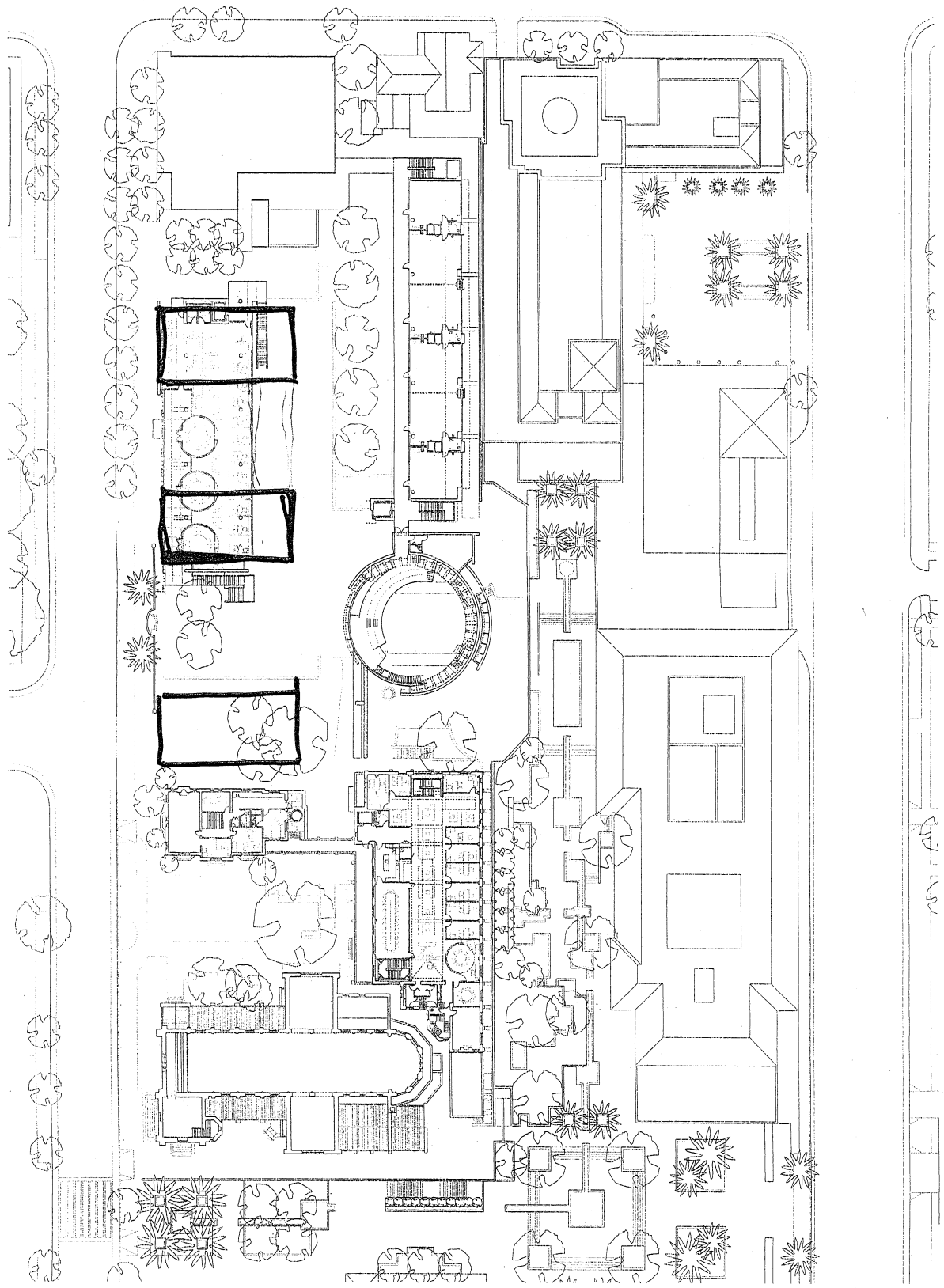


Second Level Floor Plan  
 Revised Interior Plan Option  
 2014.08.01  
 2014.08.01  
 2014.08.01

All Saints Church  
 1500 10th St. N  
 Minneapolis, MN 55412  
 (612) 338-1234

Architect: [Faint text]  
 Designer: [Faint text]  
 Date: [Faint text]





Notes:  
1. See Section 01050 - Masonry  
2. See Section 02000 - Electrical  
3. See Section 03000 - Carpentry  
4. See Section 04000 - Paints and Coatings  
5. See Section 05000 - Hardware  
6. See Section 06000 - Metal Fabrications  
7. See Section 07000 - Woodwork  
8. See Section 08000 - Windows and Doors  
9. See Section 09000 - Millwork  
10. See Section 10000 - Stairs and Railings  
11. See Section 11000 - Specialties  
12. See Section 12000 - Finishes  
13. See Section 13000 - Mechanical  
14. See Section 14000 - Plumbing  
15. See Section 15000 - Electrical  
16. See Section 16000 - Telecommunications  
17. See Section 17000 - Security  
18. See Section 18000 - Fire Protection  
19. See Section 19000 - Life Safety  
20. See Section 20000 - Furniture, Fixtures, and Equipment  
21. See Section 21000 - Specialties  
22. See Section 22000 - Miscellaneous

All Saints Church  
1000 North 10th Street  
Anchorage, Alaska 99503

Second Level Floor Plan  
Revised Massing Plan Option  
Date: 11/13/13  
Scale: 1/8" = 1'-0"  
29

The design of the new structures will be subject to the Secretary of the Interior's Standards and the Central District Private Realm Design Guidelines.

This is a finding – not a condition. It says that all this will happen, but can it happen given that the site plan is fixed upon approval?

**Add a Condition:**

The design of the new buildings must comply with the Secretary of the Interior's Standards and Guidelines and with the Central District Private Realm Design Guidelines and must be compatible with the adjacent historic buildings and the Civic Center Historic District. The Design Commission is responsible to determine conformance with the Standards and Guidelines and determine compatibility; therefore the Design Commission will have the discretion to require the alteration of building footprints or exact locations, if necessary, in order to achieve conformance and compatibility.