

# Agenda Report

April 11, 2016

**TO:** Honorable Mayor and City Council  
**FROM:** Planning & Community Development Department  
**SUBJECT: APPEAL OF DESIGN COMMISSION DECISION: CONSOLIDATED DESIGN REVIEW—DEMOLITION OF HOUSE AT 180 SOUTH EUCLID AVENUE**

## **RECOMMENDATION:**

Staff recommends that the City Council:

1. Find that the demolition is exempt from environmental review pursuant to the guidelines of the California Environmental Quality Act (Public Resources Code §21080(b)(9); Administrative Code, Title 14, Chapter 1, Class 1 §15301, Existing Facilities). This exemption applies to demolition of up to three single-family residences or small commercial structures in urbanized areas.
2. Find that no protected native, specimen, or landmark trees under the tree protection ordinance (Ch.8.52, P.M.C.) will be removed in conjunction with this application;
3. Find that the project is consistent with the purposes of design review and the Design Guidelines in the Central District Specific Plan;
4. Find that the project will not cause a significant adverse effect on a historical resource as defined in the State CEQA guidelines; and
5. Based on these findings, approve the application for consolidated design review to demolish the house at 180 South Euclid Avenue.

## **DESIGN COMMISSION RECOMMENDATION:**

On November 24, 2015, the Design Commission denied an application for Consolidated Design Review for the demolition of the house at 180 South Euclid Avenue. The applicant appealed the Commission's decision on November 30, 2015. Prior to the City Council consideration of the applicant's appeal, the applicant submitted new information and on February 1, 2016, the City Council remanded the appeal to the Design Commission for a report on the new information submitted. The Design Commission considered the new information at its February 23, 2016 meeting and retained its previous determination that the house is a historical resource and that its demolition should be denied.

### **EXECUTIVE SUMMARY:**

The issue presented in this report for the City Council's determination is whether the house at 180 South Euclid Avenue qualifies for designation as a historic resource based on the City's criteria. The Design Commission, on November 24, 2015 and February 23, 2016, determined that the building qualifies for designation as a historic resource and disapproved the application for Consolidated Design Review to demolish it. Staff has carefully reviewed the new information submitted and has extensively evaluated the integrity of the building according to the standards in National Register Bulletin #15 and recommends that the City Council approve the application for demolition based on the conclusion that, due to alterations that have been made over time, the building no longer retains integrity and does not qualify for designation as a historic resource.

### **BACKGROUND:**

The house at 180 South Euclid Avenue, known as the Pinney House, is a Mission Revival Arts and Crafts Period Bungalow that was built in 1906 to a design by Charles W. Buchanan. It was determined eligible for landmark designation in 2000 as part of the adopted historic resources survey of the Central District Specific Plan area conducted by architectural historian Leslie Heumann, then of PCR Services Corporation (Attachment A). An earlier evaluation from 1979 is also included in Attachment A, although it is unclear as to whether it was determined at that time to be eligible for historic designation. Citing changes that had been made to the house over time, and difficulties in selling the property due to its eligibility for historic designation, the previous owner, Mr. Wayne Lusvardi, requested in 2013 that staff revisit this determination and provided a report by Historian Charles Fisher and other information to support his request that the house be determined ineligible for historic designation. This documentation and staff's determination are included in Attachment B. At that time, staff found that the information provided did not warrant a change in the previous determination that the house is eligible for historic designation. Later in 2013, an independent evaluation by Galvin Preservation Associates (Attachment C) reached a similar conclusion to staff's determination earlier that year, although it should be noted that the City's evaluations described above from 1979, 2000 and 2013 were based on views of the house from the street and not a close-up or interior inspection of the property.

In conjunction with this current application to demolish the house, the current owner, Balian Investments, LLC, has provided a report from SWCA Environmental Consultants indicating that the house has lost integrity of design, materials, workmanship and setting and, therefore, no longer qualifies for designation as a landmark (Attachment D).

Additional information that was submitted by the applicant and reviewed by the Design Commission at its February 23, 2016 meeting include (Attachment J):

1. A sworn statement from the previous owner, Wayne Lusvardi, indicating that the roof is not original.
2. A photographs of roof material dated 1963 taken from the northerly neighbor's property.
3. A photograph of roof tiles recently found in the basement of the house.
4. Close-up photographs of the current roof material.
5. An undated photograph of the rear of the house (likely 1950's or 1960's-era based on the size of the accessory structure at the rear and the car shown in the photograph).
6. A sworn statement from Wayne Lusvardi's brother Sean Christopher (formerly Willard Lusvardi) indicating that roof was originally clay tile and that front windows and doors are not original to the house.

The intent of this application is to obtain an official ruling from the City as to whether the house qualifies as a historic resource for purposes of CEQA in order to provide the current owner with certainty in the process for the construction of a possible new development project on the site. If the Council were to find the house is a historic resource and therefore disapprove the demolition at this time, an Environmental Impact Report, including adoption of a Statement of Overriding Considerations, would be necessary for a proposed project involving demolition of the house to move forward, or the owner could continue to explore relocation options (which have been unsuccessful to date), which could potentially avoid preparation of an Environmental Impact Report. If the Council were to find that the house is not a historic resource and therefore approve the demolition, the owner could move forward with a proposed development project and an Environmental Impact Report would likely not be required (unless other potential environmental impacts of the project were to be identified).

It should be noted that if this approval were to be granted, the replacement building permit requirement would continue to apply; therefore, the house could not be physically demolished until after a building permit is granted for a new development project on the site, unless a subsequent decision to grant relief from this requirement were to be made. This application does not include a request for relief from the replacement building permit requirement.

**ANALYSIS:**

Zoning Code §17.61.030.K.1 outlines the following findings that must be made to approve an application for design review:

The project's design is consistent with

- a. The purposes of this Section; and
- b. Any applicable design guidelines adopted by the Council.

In addition, Zoning Code §17.61.030.K.4 states, "In addition to the two findings

identified in Subparagraph 1., above, the demolition, relocation, and demolition without a Building Permit for a replacement structure in the Central District is consistent with the findings identified in Section 17.62.090 (Alteration, Demolition, or Relocation of a Historic Resource).” The finding in this section that applies to demolition projects is:

“If a project is a demolition or relocation, including demolition in a historic or landmark district, the project will not cause a significant adverse effect as defined in the State CEQA guidelines.”

Staff’s analysis of each of these findings is below:

### **Purposes of Design Review**

The purposes of design review in Zoning Code §17.61.030.A are largely related to new development projects; however, one of the purposes is to “promote the conservation, enhancement, preservation, and protection of historic resources.” If the house is determined to be a historic resource, its demolition would not be consistent with this purpose of design review. Pursuant to Zoning Code §17.62.040.A, historic resources must be evaluated using National Register of Historic Places Bulletin #15, which includes the seven aspects of integrity. Staff’s analysis of the integrity of the house is provided below. If the house is determined to not be a historic resource, its demolition would be consistent with the purposes of design review and any new construction will be required to be reviewed by the Design Commission under a separate design review application.

### **Applicable Design Guidelines**

The design guidelines that apply to this project are the design guidelines in the Central District Specific Plan (including the Civic Center/Midtown District Design Guidelines) and, if the house is determined to be a historic resource, the Secretary of the Interior’s Standards. Both of these guidelines are largely focused on new development or alterations (rather than demolition) of historic resources. The Civic Center/Midtown Design Guidelines Sub-District Character Recommendation 4 states, “Preserve and restore historic buildings and landmarks; retain the historic character of the property.” If the house is determined to be a historic resource, its demolition would not be consistent with this guideline or the Secretary of the Interior’s Standards. If the house is determined to not be a historic resource, its demolition would be consistent with the applicable design guidelines.

### **Historical Resource Analysis**

There are three types of historical resources under CEQA case law: mandatory, presumptive and discretionary. The house at issue here is not a mandatory resource because it is not listed, or determined to be eligible for listing by the State Historical Resources Commission, in the California Register of Historical Resources. The house

is also not a presumptive historical resource because it is not included in the City's local register or identified in a historical resource survey that is less than five years old and meets the requirements of state law (Public Resources Code Section 5024.1). However, the house may be a discretionary historical resource.

A discretionary historical resource can be one that a local agency deems historical despite its lack of listing on registers or its lack of identification in a relevant survey. Pursuant to State CEQA Guidelines Section 15064.5(a)(3), the criteria for determining whether a building is a historical resource is as follows:

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines 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 (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

- (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- (B) Is associated with the lives of persons important in our past;
- (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (D) Has yielded, or may be likely to yield, information important in prehistory or history.

A "significant adverse effect" on historical resources, as applied to this project and which would require preparation of an Environmental Impact Report, is defined in State CEQA Guidelines Section 15064.5(b) as:

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 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.

Two previous windshield/street view surveys have been conducted in which qualified architectural historians concluded that the house is eligible for designation (2000 Central District Survey by Leslie Heumann of PCR—which identified the building as a historic resource and resulted in its inclusion in the local register—and 2013 Galvin Preservation Associates study, prepared by Teresa Grimes). In addition, a historian hired by the previous owner in 2013 found the house to be eligible for historic designation unless extensive interior changes are considered, which they are not (Charles J. Fisher, 2013, page 8). These evaluations determined that the house is eligible for designation under criterion “C” as an example of a Mission Revival Arts and Crafts period house, as identified and described in the City’s 1999 study, *The Residential Architecture of Pasadena, CA 1895-1918: The Influence of the Arts and Crafts Movement*, and designed by significant architect Charles W. Buchanan. These previous evaluations are included in Attachments A-C.

A more recent study commissioned by the current owner and evaluated by staff finds the house to be ineligible for historic designation based on a loss of integrity of design, materials, workmanship and setting (SWCA Environmental Consultants, September 30, 2015, Attachment D). “Integrity” is defined by the National Park Service as “the ability of a historic resource to convey its significance” and is identified by seven aspects, which are location, design, setting, materials, workmanship, feeling and association. The City’s criteria for designation of a historic resource require evaluations to apply the criteria for designation according to applicable National Register of Historic Places Bulletins for evaluating historic properties, including the seven aspects of integrity, as outlined in National Register Bulletin 15 (excerpts in Attachment F). Below is staff’s analysis of the integrity of the house at 180 South Euclid Avenue:

#### *Integrity Assessment*

National Register Bulletin 15, “How to Apply the National Register Criteria for Evaluation,” chapter VIII, “How to Evaluate the Integrity of a Property,” is used as the basis of this analysis. This chapter states that “the evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property’s physical features and how they relate to its significance... To retain historic integrity a property will always possess several, and usually most, of the aspects...” The chapter goes on to define and describe each of the seven aspects of integrity (summarized and analyzed below) and to give guidance on assessing integrity, including specific guidance for each of the four designation criteria (A: significant events, B: significant persons, C: significant architecture/construction, and D:

information potential/archaeology). The house at 180 S. Euclid Avenue has been identified as being potentially significant under criterion C for its representation of a significant architectural style (the Mission Revival Arts and Crafts style). National Register Bulletin 15 provides the following specific guidance for assessing integrity of historic resources that are significant under criterion C:

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of massing, special relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

Below is a description and evaluation of each of the seven aspects of integrity as applied to 180 South Euclid Avenue:

#### 1. Location

National Register Bulletin 15 defines "location" as, "the place where the historic property was constructed or the place where the historic event occurred." The house at 180 South Euclid Avenue is in its original location and, therefore, retains integrity of location.

#### 2. Design

National Register Bulletin 15 defines "design" as "the combination of elements that create the form, plan, space, structure, and style of a property." It goes on to state that design, "results from conscious decisions made during the original conception and planning of a property (or its significant alteration)..." and that "design includes such elements as organization of space, proportion, scale, technology, ornamentation and materials...[and] includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount and style of ornamental detail..."

The proportions, scale, structural system, massing, fenestration and amount of ornamentation on the house at 180 South Euclid Avenue remain intact. The arrangement of spaces is largely intact on the exterior, with the exception of the addition of stairs and a landing within the rear courtyard space (although this relates more directly to "setting," below); however, the arrangement of spaces on portions of the interior is not. The National Register Bulletin provides guidance regarding interiors and states, "Some historic buildings are virtually defined by their exteriors, and their

contribution to the built environment can be appreciated even if their interiors are not accessible... In some cases the loss of an interior will disqualify properties from listing in the National Register... In other cases, the overarching significance of a property's exterior can overcome the adverse effect of the loss of an interior." In this case, because the property is significant as a representation of an architectural style, the changes that have been made to the interior of the building do not affect its integrity.

Remaining from the list of elements of design in the National Register bulletin is "textures and colors of surface materials." The materials of this building are relatively simple and include plaster exterior walls; Arroyo stone foundation; granite at the base of the porch; wood windows, doors, trim, rafters, brackets, fasciae and eaves, and barrel tile roofing. With the exception of replacement of a few windows and doors, the majority of these materials remain evident on the building, although there is some uncertainty as to whether the current texture of the plaster is original. As this is not a specific character-defining feature of this style, staff believes that the fact that the house retains a plaster finish is sufficient to represent the original design (although integrity of materials and workmanship are affected, as described further below). However, the texture and finish of the roof material affect integrity of design.

It is unclear whether the house originally had clay or metal roofing; the current material is metal. The historical photograph does not clearly demonstrate the exact nature of the roofing material and City records for the property indicate both "tile" and "tin" under the roofing description. The information submitted by the applicant provides additional evidence that the original roofing may have been clay, rather than metal, tiles. A 1963 photograph of roofing material has been provided, which matches the physical material found in the basement of the house. The statement of the previous owner indicates that his father "removed the original roof on the building in 1963 due to water damage from rainfall..." and that "He replaced the roof with tin tiles, which he fabricated by hand to exactly match the original roof. The original tiles were stored in the basement of the building..."

This evidence is compelling and suggests that the original roofing material was clay tile. The existing metal roofing is in extremely poor condition and does not demonstrate the level of craftsmanship that would typically be found on an architect-designed building from the Arts and Crafts period, particularly when observing the transition from the roof to the dormer walls. A character-defining feature of the Mission Revival Arts and Crafts house is "Spanish terra cotta, wood or composition shingles." The house has none of these and, based on historical photographs, did not have wood or composition shingles. The roof of the house, and its material, is a significant component to the identity of the house as a Mission Revival Arts and Crafts house and is prominently visible. Based on the pictorial and physical evidence found, it appears that the current roof is a substandard replacement of the original roof, which lacks the texture and materiality that is representative of the craftsmanship of the original design, resulting in a loss of integrity of design.



The house also originally had an ornamental chimney with a high level of detailing and craftsmanship can be clearly observed in the historical photograph and is evocative of the Arts & Crafts period. The current simple plaster chimney is a modified simpler design that also diminishes the building's integrity.

### 3. Setting

National Register Bulletin 15 defines "setting" as "the physical environment of a historic property." Although similar to "location," "setting" relates to the property and its relationship to "surrounding features and open space." It goes on to state that "setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences."

The building was originally built as a house with a detached garage at the northeast corner of the property. The boundaries of the property on which the house was built have not changed and no other structures have been built on the property; therefore, the original unbuilt property setbacks reflect the original design except that the original garage is no longer extant and a small addition was built at the rear of the southern wing.

The surrounding neighborhood has changed significantly as a result of planning trends that converted the former residential neighborhood into the City's Civic Center and new buildings were built to support this change. This includes the Pasadena Civic Auditorium to the west (and later hotel, conference center and mixed-use buildings), the Masonic Lodge to the south, and the Las Flores Apartments to the north which eliminated all former residential buildings. A portion of Miss Orton's School for Girls, built in 1898, and an 1895 rear house at 120 S. Euclid Avenue remain from the time when the house was built. Despite these changes to the neighborhood, the nature of development on surrounding properties is not an essential component in understanding the significance of the house as a Mission Revival Arts and Crafts house. The immediate setting and spatial relationships between the house and property lines, as well as a detached garage, are important components of the setting and the lack of a garage detracts from integrity of setting. In addition, the construction of an addition and open stairwell within the formerly open courtyard at the rear of the house impact the property's integrity of setting.

### 4. Materials

National Register Bulletin 15 defines "materials" as "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." It goes on to state "The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies... A property

must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved...”

As stated under “design,” above, some original materials remain on the building while others have been replaced or covered. The house originally had plaster exterior walls; however, a new coating of sand-finish plaster has been applied, including over the single round porch post (the remaining porch supports are arched openings). It is not known whether the plaster was originally sand texture; however, it is very likely that the porch post was not plastered. Most of the original windows and doors remain intact. A few have been replaced or changed from doors to windows or vice versa. It is not known whether the two large first-floor windows on the front of the house are original; they are not visible in the historical photograph. The previous owner has indicated that his father built these windows with similar characteristics as other windows on the house including wood framing, leaded glass transoms, trim, sills and recess. A small original pergola at the southwest corner of the building is no longer extant and a small flat-roofed addition was built at the southeast corner. The original, highly articulated chimney has been replaced with a simple plaster chimney. These changes are relatively minor when taken individually; however, the combination of these changes with the apparent change in the roof material is significant and impacts the building’s integrity of materials given the prominence of the roof and the importance of the material to the representation of the architectural style of the building. As previously stated, the current metal material does not reflect the level of craftsmanship that would typically be associated with an architect-designed Arts & Crafts period house and the evidence of clay tiles found in the basement of the house suggests that the original roofing may have been clay tiles. As such, it appears that the house does not possess integrity of materials.

#### 5. Workmanship

National Register Bulletin 15 defines “workmanship” as “the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.” It goes on to state that workmanship “is the evidence of artisans’ labor and skill in constructing or altering a building, structure, object or site. Workmanship can apply to the property as a whole or to its individual components... Examples of workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery...”

The house has experienced alterations and maintenance that have diminished its integrity of workmanship. The current plaster coating appears poorly applied and not indicative of the period of construction. In addition, as previously stated, the workmanship of the metal roofing also appears substandard when compared to other tile-roofed houses from this period. Tiles applied to the porch also appear poorly installed, particularly when viewed on the north side of the porch where the original concrete is exposed beneath the surface material. The simple plaster chimney clearly reflects lower-quality workmanship than the original chimney it replaced. Gable-end

eave brackets and original windows and stonework are the most intact examples of workmanship on the building and these are relatively minor features overall.

## 6. Feeling

National Register Bulletin 15 defines “feeling” as “a property’s expression of the aesthetic or historic sense of a particular period of time.” It goes on to state that feeling “results from the presence of physical features that, taken together, convey the property’s historic character...”

Despite the changes in materials, the building retains integrity of feeling. Unless one looks closely at the details and materials, the property overall continues to express a sense of the Mission Revival style as uniquely interpreted on the house during the Arts & Crafts period.

## 7. Association

National Register Bulletin 15 defines “association” as “the direct link between an important historic event or person and a historic property.” Generally, integrity of association does not apply to properties significant under criterion C, such as the subject property.

Based on the above analysis, staff has further considered the arguments made in the recent report by SWCA Environmental Consultants and has carefully reviewed the integrity chapter of National Register Bulletin #15, *How to Apply the National Register Criteria for Evaluation*. The following statements from this publication are important for evaluating the integrity of the property:

All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both why a property is significant...and when it was significant. They are the features without which a property can no longer be identified...

Criterion C: ...Retention of design, workmanship and materials will usually be more important than location, setting, feeling and association. Location and setting will be important, however, for those properties whose design is a reflection of their immediate environment (such as designed landscapes and bridges)...

The house at 180 South Euclid Avenue represents a combination of two property types identified in the City's 1999 study, *The Residential Architecture of Pasadena, CA 1895-1918: The Influence of the Arts and Crafts Movement*: the California Bungalow and the Mission Revival Arts and Crafts Period House. Character-defining features of this house are:

- One-and-one-half-story form
- Rectangular plan with extended rear wings forming a central courtyard space
- Low-pitched roof
- Wide over-hanging eaves with exposed rafters and eave brackets
- Side-facing gable roof
- Large single-gable dormer
- Full-width front porch with extended porte cochere
- Barrel tile roof shingles, likely originally terra cotta material
- Stone foundations, chimneys and retaining walls
- Open sleeping porches
- Exterior walls in rough finish stucco
- Terra cotta tile, roof shingles
- Curving Mission parapet
- Paneled and partially glazed wood front door
- Arcaded front porch with arched openings
- Wood windows with lozenge-shaped muntins
- Decorative plaster work

Although the house retains many of the essential features of its original design, alterations that have been made over time have affected its integrity of design, materials and workmanship, which are cited in National Register Bulletin #15 as the most essential aspects of integrity for historic resources that are significant under criterion C, such as this house. Physical evidence submitted that suggests that the roof was originally a clay tile roof, in combination with other alterations to windows/doors, plaster work, the chimney, and later additions, result in a loss of integrity. As such, staff believes that the house no longer qualifies for landmark designation and that its demolition would not result in a significant adverse effect as defined in the state CEQA guidelines. The demolition would not conflict with one of the purposes of design review and the one design guideline in the Central District Specific Plan (Civic Center/Midtown Subdistrict Design Guidelines) that applies to the project. As such, staff recommends that the City Council approve the demolition of the house at 180 South Euclid Avenue.

**COUNCIL POLICY CONSIDERATION:**

The General Plan Land Use Element – Policy 8.1: “Identify and Protect Historic Resources. Identify and protect historic resources that represent significant examples of the City’s history;” Policy 8.2: “Historic Designation Support. Provide assistance and support for applicants applying for designation of a historic resource through a clear,

thorough, and equitable process that identifies if monuments, individual or landmark districts, historic signs or landmark trees are eligible for designation based on adopted evaluation criteria;” and Policy 8.8: “Evolving Preservation Practices. Continue to implement practices for historic preservation consistent with community values and conformance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, California Historical Building Code, State laws, and best practices.”

**ENVIRONMENTAL ANALYSIS:**


If the City Council determines that the building is not a historical resource, the demolition would be exempt from environmental review pursuant to the guidelines of the California Environmental Quality Act (Public Resources Code §21080(b)(9); Administrative Code, Title 14, Chapter 1, Class 1 §15301, Existing Facilities). This exemption applies to demolition of up to three single-family residences or small commercial structures in urbanized areas.

If the City Council determines that the building is a historical resource and intends to disapprove the application, no action is necessary under CEQA. However, such a conclusion will require that, if the applicant wished to move forward with demolition, the applicant would have to prepare an Environmental Impact Report and set forth justifications for adoption of a Statement of Overriding Considerations.

**FISCAL IMPACT:**

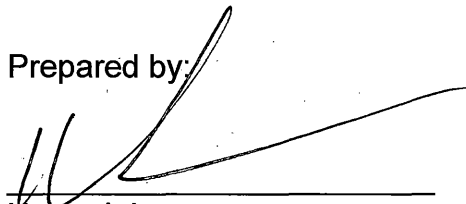
There is no fiscal impact to the City as a result of this action.

Respectfully submitted,



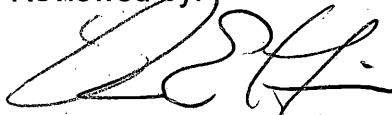
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**Attachments (9):**

- Attachment A – 2000 & 1979 Windshield Survey Documentation
- Attachment B – 2013 Property Owner Re-evaluation Request & Staff Determination
- Attachment C – 2013 Galvin Preservation Associates Evaluation
- Attachment D – 2015 SWCA Environmental Consultants Evaluation
- Attachment E – Excerpts from *The Residential Architecture of Pasadena, CA 1895-1918: The Influence of the Arts and Crafts Movement*
- Attachment F – Excerpts from National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*
- Attachment G – Sanborn Maps, Permit Records, Building Description Blank
- Attachment H – Historical Photograph & Current Photographs of 180 S. Euclid Avenue; Photographs of other Mission Revival Arts & Crafts Period houses
- Attachment I – Appeal Application to City Council
- Attachment J – Additional Information Submitted After Filing of Appeal