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**Julianna Delgado, MArch, PhD, AICP**

Home Address: 982 N. Mentor Avenue, Pasadena, CA 91104-3818

February 22, 2021

Honorable Mayor and Members of the City of Pasadena City Council

RE: February 22<sup>nd</sup> City Council Meeting **Agenda Item #21** – Historic Preservation Ordinance Revisions

Dear Mayor Gordo and City Councilmembers,

Staff has done a commendable job in listening to the community and recommending much-needed amendments to PMC Title 17 regarding Historic Preservation (HPO). They support the 2015 General Plan Update that reaffirmed Guiding Principle #2: “Change will be harmonized to preserve Pasadena’s historic **character and environment**.” It should be noted that during the Update outreach process the single most overarching theme heard was concern about maintaining **community character**, the built environment that makes Pasadena unique, especially in its historic districts.

Some further slight revisions to the proposed HPO with respect to review and approval of **alterations to non-contributing properties or additions of new structures in historic districts that are visible from the public right-of-way**, may maintain and improve further over time the **character** of our historic districts.

**RECOMMENDED REVISIONS**

These additional revisions are recommended for consideration to increase clarity and transparency for the public and reviewing authorities to achieve that intent:

1. Insert a definition for *neighborhood compatibility* in Sec. 17.62.030, “Definitions.” The definition should explain ‘neighborhood’ explicitly based on the smallest unit of reference: adjacent properties, street, and tract.
2. Amend Sec. 17.62.090.E.4.b. [findings to approve a Certificate of Appropriateness for all projects, including ‘Minor’ or ‘Major’] to read:

*If a project is an alteration or new construction, the project complies with the Secretary’s Standards and any adopted guidelines based on the Secretary’s Standards, and is compatible in terms of design, size, height, massing, scale and use of materials with contributing structures on adjacent properties, along the same street segment, or within the same tract when viewed from the public right-of-way.*

3. Amend Sec. 17.62.090.E.6.a. [additional finding for the Historic Preservation Commission to approve exceeding 35% of *neighborhood compatibility* yet curb mansionsization] to read:

*The design, location, and size of proposed new structures and/or additions to existing structures will be compatible with existing contributing structures on adjacent properties, along the same street segment, or within the same tract and anticipated future development within the landmark or historic district in terms of height, massing, ~~and~~ scale, and use of materials when viewed from the public right-of-way.*

4. Amend Sec.17.62.130.B. [incentives for historic properties] to read:

*Preservation incentives shall be made available to owners of properties that are individually designated historic monuments or landmarks, individually listed in the National Register of Historic Places, or properties that are contributing or through an alteration project are intended to become contributing to designated landmark districts, or districts listed in the National Register through:....*

## DISCUSSION

### Protecting the Character of Historic Districts by Prioritizing Immediate Context

It is at street level, at eye level, that we experience a sense of place and **character** of a neighborhood, which necessarily relies on the appropriate relationship between a series of buildings and the street. Thus, in historic districts especially, attention must be given to the cumulative impact of **street-facing facades to ensure the result of development is harmonious and retains the setting's integrity.**

The proposed HPO revisions may protect against *mansionization*, structures that through alteration become out of scale, too large and not in character with their surroundings. The HPO subjects remodeling or additions of all properties to the *neighborhood compatibility* analysis outlined in Section 17.22.050.E of the proposed Mansionization Ordinance (MO). For the sake of transparency and ease of use and reference by the public, the definition of *neighborhood compatibility* should be added to Sec. 17.62.030, "Definitions." To be most protective, the definition should be based on the smallest unit of reference: compatibility with adjacent properties, street segment, and tract.

The MO analysis is generally a reasonable first step to determine the maximum allowable envelope, the amount of square footage that may be added to a remodeling or new structure project without subsequent review. However, the MO standards may not go far enough to protect the **character** of historic districts and prevent adverse impacts, especially for larger ones. The amended findings listed above are needed. As proposed, the COA finding, per Sec. 17.62.090.E.4.b., relies largely on the Secretary's Standards and subsequent guidelines based on them. However, the Standards are recommendations only. They are descriptive of best practices but not prescriptive, thus not requirements and open to discretion and interpretation in their application. Additionally, they are not included as an attachment and the public in general is not familiar with its recommendations. Thus, in approving both minor and major projects, additional language is needed for clarity and public transparency to ensure compatibility with the **character of the immediate, historic setting.**

The proposed HPO revisions also ensure that further review is required for alterations greater than 500 square feet to non-contributors or new structures and exceed the 35% threshold for *neighborhood compatibility* per the MO analysis. Per Title 17, these are 'Major' projects, and in addition to the standard COA findings in Sec. 17.62.090.E.4., the Historic Preservation Commission as the reviewing authority is required to make the additional finding in Sec. 17.62.090.E.6.a. This also needs to be amended. To ensure *neighborhood compatibility*, given that all projects are bound to a specific site and context, 'anticipated future development' is irrelevant, unknown, and should be struck. The proposed finding needs to be revised further to halt mansionization of non-contributing or inappropriate new

structures when considered in their immediate context, protecting against deterioration of the **character** of the surrounding setting. Thus, like for the COA finding, it should be amended to read:

*“...will be compatible with existing contributing structures on adjacent properties, along the same street segment, or within the same tract within the landmark or historic district in terms of height, massing, scale, and use of materials when viewed from the public right-of-way.*

### **Large Historic Districts Have Multiple Tracts Developed with Different Characters**

For historic districts, using the MO’s 500-foot radius test to measure *neighborhood compatibility* and prevent mansionization means considering structures within the entire district’s boundaries. This assumes that there is a typical design with consistent materials, height, scale, massing, and square footage of structures within a particular district. While this may be true for the smallest districts, (i.e. those designated along a particular street or within the same tract), in larger, multi-street and multi-tract districts, certain streets or tracts with homes built during the same period have distinct characteristics that may not be compatible with others in the district at large.

For example, in Bungalow Heaven, the City’s oldest and largest historic district in terms of number of residential properties, the homes along Mentor Avenue south of Mountain Street, most of which were built during the City’s earliest period, are more massive with two stories and thus incompatible in terms of scale and square footage with the more modest, one-story homes on blocks further east, although 500 feet away. For this reason, although contributors to the local landmark district they were excluded from the State and National Register districts. Some streets also have varying yet distinct styles of architecture that also involve scale and massing. On Chester Avenue, for example, the Kenneth Gordon-designed homes in the Woodworth tract have a distinct 1920s Colonial revival style and are different in size and scale from the smaller Craftsman homes built earlier by various builders along Michigan Avenue, although less than 500 feet away. Because of its consistency in style and scale, prior to adoption of Bungalow Heaven, Michigan Avenue had been considered to become its own historic district. Similarly, Edward Daniell, the district’s most prolific designer/builder, constructed about 30 homes from 1916 to 1925. Should one of his many small, English-influenced ‘cottages’ built in 1916 on the small lots along the east-west Claremont Street become a non-contributor, it would make more sense in terms of compatibility to compare a proposed remodel or alteration with other Daniell homes along the same street than with homes on other blocks 500 feet away. Conversely, on Holliston Avenue, the most recently added street to Bungalow Heaven’s landmark district boundaries, all homes that are contributors to the local landmark district were nonetheless excluded, along with most homes along Chester Avenue north of Mountain Street, from the National Register district because of their generally larger scale and style (two-story, many with Spanish Revival influences, built after the period of significance). It would make no sense to analyze homes within a 500-foot range that are generally smaller in scale when considering alterations to a non-contributor along Holliston.

The goal of a historic preservation program should be to safeguard against non-contributors becoming more non-contributing and adversely impact the **character** of historic districts. There are two main types of non-contributing properties: those built within the period of significance but through subsequent alterations of original character-defining features have resulted in a loss of integrity; and those that were not built during the period of significance (i.e. infill, post-period of significance Depression era, post-WWII, and ranch-style homes in Bungalow Heaven that are nonetheless relatively of the same height, scale, and massing of adjacent contributors). In some cases, the latter are

replacement dwellings or were constructed in later years when larger lots were subdivided. It makes most sense to restore the former instead of demolishing them so they become contributors, increasing the integrity of the district. It makes little sense to alter the latter to mimic earlier historic styles, especially if they maintain their original, integral design. Alterations to both types need a more fine-tuned review and should be carefully considered to be consistent with their design yet contribute to the **character** of their context--of their street segment or tract--when viewed from the public right-of-way.

Hence, to maintain neighborhood **character** compatibility should rely on comparisons with adjacent contributing properties, along the same street segment, and in the same tract in historic districts, information readily available to City Staff. This is a key to maintaining the **character** of the street and immediate neighborhood when non-contributors are altered or new structures constructed. The historic context and character, like historic structures, is also considered a resource per the Secretary's Standards:

*Identifying, retaining, and preserving building and landscape features which are important in defining historic character of the setting. [From page 54, Secretary of Interior's Standards]*

### **Incentives to Encourage Restoration of Non-Contributors**

Finally, the HPO should be revised further to encourage restoring non-contributors to become contributors. There have been a number of examples over the years and, gratefully, now a process in the revised HPO to change their status. Bungalow Heaven created a Home Restoration Grant Program to support financially the conversion process. While the HPO provides incentives to individually-designated and designated contributing structures to historic districts, these should be extended to property owners who desire to restore their non-contributing properties so they become contributors. Hence, there is a need to amend Sec.17.62.130.B.

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Thank you for considering carefully the additional recommended revisions to the HPO and your commitment to strengthening protection of the character and integrity of our historic districts.

Sincerely,



**Julianna Delgado, MArch., PhD, AICP**

President, Southern California Planning Congress  
Planning Commissioner, City of Pasadena  
Professor Emerita, Dept. of Urban and Regional Planning, Cal Poly Pomona  
Co-Director, California Center for Land and Water Stewardship  
Co-Author, with John G. Ripley, *Pasadena's Bungalow Heaven*  
Past President, Bungalow Heaven Neighborhood Association  
Past Chair, City of Pasadena Design Commission  
Past Chair, City of Pasadena Transportation Advisory Commission  
Member, City of Pasadena 2015 General Plan Update Advisory Committee

**APPENDIX I: Examples of Varying Character within Bungalow Heaven and Restoration**



Apparent character of Michigan Avenue and plan indicating its one-story homes with similar footprints (right). Note larger homes along Chester not on the National Register but less than 500 feet away.

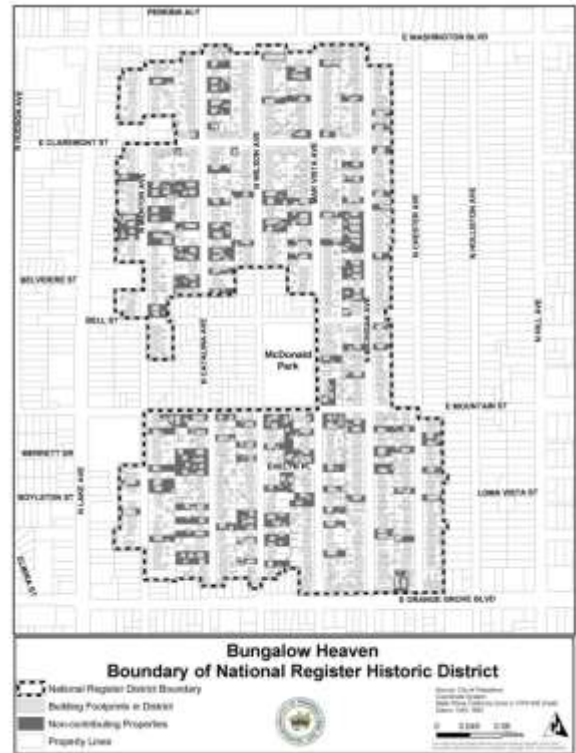
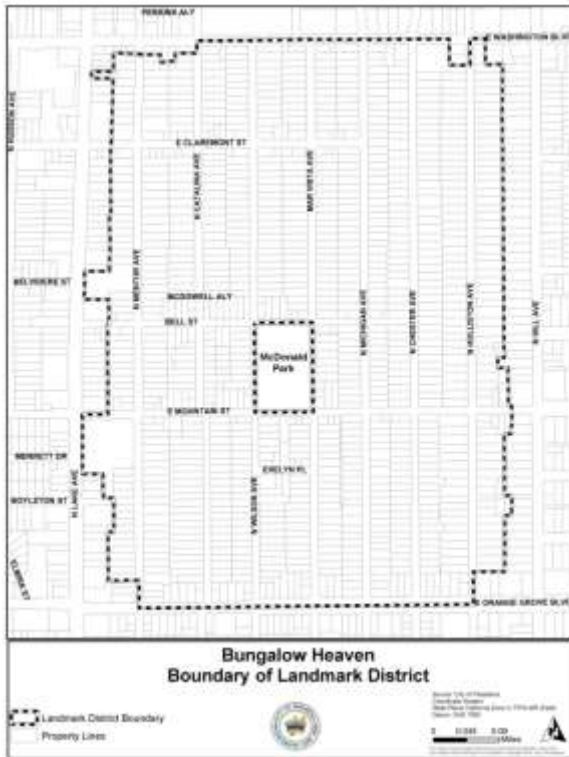


Typical Edward Daniell-designed, 1916 'cottage' (left) and plan indicating similar small-scale homes along southeast Claremont Street by the same builder.



'Non-contributing' bungalow on Mar Vista with added Spanish-style arches and stuccoed (left). Restoration to original Craftsman façade and sketch of the original from the local newspaper (right).

**APPENDIX II: Comparison of Bungalow Heaven’s Local Landmark and National Register District Boundaries**



The map on the left shows the boundaries of the **Bungalow Heaven Landmark District**, adopted by the City Council in 1989, and revised to include Holliston Avenue in 2005, with about 1,100 homes.

The map on the right shows the boundaries of the **Bungalow Heaven National Register Historic District**, adopted in 2008, with a period of significance of 1888 - 1929. The map shades the non-contributing properties.

In comparing the two maps, note that the National Register district is considerably smaller in area and number of structures than the local landmark district, with about 400 homes less. The National Register district includes 521 contributing properties and 165 non-contributing based on loss of integrity or having not been built within the period of significance.

Some of the non-contributors within both district boundaries have been restored and may be eligible to be designated as contributors under the revised provisions of the HPO.

## Martinez, Ruben

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**From:** John G. Ripley <[john.ripley@pasadenacounty.org](mailto:john.ripley@pasadenacounty.org)>  
**Sent:** Monday, February 22, 2021 9:41 AM  
**To:** PublicComment-AutoResponse  
**Subject:** City Council Meeting Feb 22 Agenda Item #21 (HPO revisions)

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To the Mayor and City Council Members.

I am writing in support of the HPO revisions drafted by staff that triggered a repeat of the "first reading." Those changes are necessary clarifications and corrections. They will make a better ordinance, and one that properly reflects the earlier staff reports and discussions.

In addition, I want to urge you to incorporate the suggestions made by Professor Julianna Delgado as follows:

- Add a definition of neighborhood compatibility
- Add the suggested compatibility requirements to the findings needed to approve a CoA
- Add the suggested compatibility requirements to the findings needed to approve exceeding 35% of neighborhood compatibility
- Add the suggested language to make restoration projects eligible for incentives if the projects are intended to make the resource contributing to a district

I believe that these changes are necessary so that the character of districts is preserved when non-contributing buildings are altered or new structures are built.

Thank you for your work on this.

Sincerely,

John Ripley  
Pasadena

02/22/2021  
Item 21

**Martinez, Ruben**

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**From:**  
**Sent:** Monday, February 22, 2021 1:32 PM  
**To:** PublicComment-AutoResponse  
**Cc:** jdl426@nyu.edu  
**Subject:** February 22 Agenda Item #21 - Historic Preservation Ordinance Revisions

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Mayor Gordo and City Council Members:

We would like to offer our support for the comments submitted by Julianna Delgado to improve the Historic Preservation Ordinance.

Those changes are very important to Landmark Districts such as Washington Square Landmark District where we are residents.

The comments on treatment of neighborhood character and non-contributors are very relevant. We submitted related comments emphasizing non-contributors last summer.

Sincerely,

Joe and Pepi Feinblatt

Pasadena, CA 91104

**02/22/2021**  
**Item 21**



## Martinez, Ruben

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**From:** Ann Scheid <[ann.scheid@cityofpasadena.net](mailto:ann.scheid@cityofpasadena.net)>  
**Sent:** Monday, February 22, 2021 12:41 PM  
**To:** PublicComment-AutoResponse  
**Cc:** Ann Scheid; Julianna Delgado; Julianna Delgado  
**Subject:** Agenda Item #21

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Dear Members of the City Council,

I'm writing in support of the points made by Julianna Delgado in her letter to you of Feb 21. In historic preservation, as in many other situations, context is everything, and Ms Delgado makes several important points about the necessity of making sure that alterations and new buildings in historic districts are compatible with adjacent properties and with the existing streetscape.

Pasadena was once a leader in historic preservation, but we seem to have fallen behind in protecting our city's unique legacy of historic buildings and streetscapes. I hope this revised ordinance will help to get us back on track in preserving and protecting Pasadena's neighborhoods and districts.

Sincerely,  
Ann Scheid

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