## **ATTACHMENT B**

**DRAFT** 

April 15, 2021

California State Parks
ATTN: Office of Historic Preservation
Julianne Polanco, State Historic Preservation Officer
1725 23<sup>rd</sup> Street, Suite 100
Sacramento, CA 95816

Dear Ms. Polanco:

In response to your request for comments, the Historic Preservation Commission and City Council urge your favorable consideration on April 30<sup>th</sup> of the National Register nomination of the Pasadena Avenue Historic District. The nominated historic district is important for its representation of turn-of-the-twentieth century, Arts and Crafts period and period revival era residential architecture in Pasadena. The attached technical comments are intended to further assist the Commission in ensuring the accuracy of the documentation provided for the district.

We look to your support on April 30<sup>th</sup> to provide the attached comments to the preparer and advance the nomination to the Keeper of the Register.

Sincerely,

VICTOR GORDO Mayor

KNJ:knj

Attachment: Technical Comments on Draft Pasadena Avenue Historic District

National Register of Historic Places Registration Form

## Technical Comments on Draft Pasadena Avenue Historic District National Register of Historic Places Registration Form

- 1. <u>Location</u>: Section 2 on page 1 of the registration form identifies the City of the proposed district as Pasadena; however, a small portion of the district also extends into the City of South Pasadena. As such, both cities should be noted.
- District Period of Significance/Mid-Century Architecture Inclusion: The 2. justification for the proposed period of significance terminating in 1938 is unclear in the registration form. It identifies three early Ranch style and Minimal Traditional buildings built in or prior to 1938 as being contributing and similar buildings built after 1938 as non-contributing. The properties at 216 Arlington Drive, 181 Columbia Street, and 1100 S. Pasadena Avenue, all Ranch or Minimal Traditional style houses built in 1937 and 1938, are identified as contributing and 1171 Avoca Avenue; 180 West Glenarm Street (incorrectly classified as Tudor Revival); 926-966, 1062, 1128, 1141, 1151 and 1175 S. Pasadena Avenue; and 240 W. State Street are all Ranch or Minimal Traditional style houses identified as non-contributing due to post-1938 construction. While some of these post-1938 buildings may be altered from their original appearance, other Ranch style houses listed as non-contributing are intact and architecturally similar to those identified as contributing. In addition, there are houses representing period revival-era architectural styles that were built in 1938 (231, 269 and 1105 Columbia Street) and none built after that date, which may be the reason this date was identified as the end of the period of significance, although this is not clearly stated. The registration form should include further analysis of the potential significance of examples of architectural styles from the mid-twentieth century to further justify the proposed end date of the period of significance and determine whether architectural styles from this period are contributing to the district.
- 3. <u>District Boundaries</u>: Further justification for the proposed district boundaries should be provided. For example, it is unclear as to why additional properties built within the period of significance, of similar architectural style and apparently architecturally intact, along Arlington Drive east of the proposed boundary are not included in the district.
- 4. <u>Description/Sketch Map Agreement</u>: The Sketch Map on page 107, Section 9 outlines in different colors the contributing properties (light blue), properties with contributing primary structures and non-contributing secondary structures (pink) and non-contributing properties (salmon), which correlate to the architectural descriptions of each property in Section 7. The following properties have conflicts between the description and the map:
  - a. 1183 Avoca Avenue (property number 26-27, Section 7 page 13) is shown on the Sketch Map in pink but described as having two contributing structures, one of which is a turn-of-the-twentieth-century carriage house. As such, this property should be rendered in light blue.
  - b. 232 West State Street (property number 167-168, Section 7, page 60) is described as having two contributing structures, but it is rendered in pink rather than light blue on the Sketch Map.
  - c. 261 Wigmore Drive (property number 185-186, Section 7, page 66-67) is described as having one contributing structure and one non-contributing

structure, but it is rendered in light blue rather than pink on the Sketch Map.

- 5. Recommended Contributing Status Change: 1210 Avoca Avenue (property number 38-39, Section 7, page 16) is described as having two contributing structures; however, 1949 additions and alterations to the front façade (including a projecting bay window and application of wood siding) significantly elongate the original volume of the house to give it a Ranch style appearance that confuses its original historical configuration and character. Staff recommends this property be changed to non-contributing due to these inappropriate alterations.
- 6. <u>Alterations</u>: The description of the property at 1171 Avoca Avenue does not include several apparent alterations from its original appearance, and the description of 866 S. Pasadena Avenue references "many alterations" that are not fully described.
- 7. <u>Summary Table</u>: It would be helpful for the City's future administration of the district if the summary table starting on page 71, Section 7 could also include construction date, architectural style and architect information.
- 8. <u>Additional Architect:</u> The original building permit for the house at 160 W. State Street indicates that it was designed by significant architect Arthur S. Heineman. This should be noted in the description of the property and he should be included in the list and biographies of architects represented in the district.