

**CITY COUNCIL  
CHRIS HOLDEN  
COUNCILMEMBER  
DISTRICT 3**

**April 13, 2004**

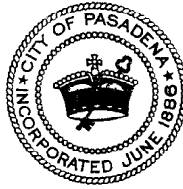
**TO: Jane Rodriguez, City Clerk**  
**FROM: Chris Holden, Councilmember, District 3**  
**RE: Call Up – Raymond Theatre**

**I would like to call up the April 13, 2004, decision of the Design Commission regarding Raymond Theatre.**

**RAYMOND THEATER**



**DECISION LETTER**



PLANNING AND PERMITTING DEPARTMENT

April 14, 2004

Mr. Gene Buchanan  
Buchanan Perkins Ltd. Partnership/ AJB Enterprises  
87 North Raymond Avenue  
Pasadena, CA 91103

Re: **NOTICE OF DECISION  
APPLICATION FOR CONCEPT DESIGN  
121-129 North Raymond Avenue**

**Council District #3**

PLN2004-00002

Dear Mr. Buchanan:

At a public hearing held in the Pasadena Conference Center on April 12, 2004, the Design Commission reviewed your application for Concept Design Review for the Raymond Theater Mixed-use Development Project (conversion of the existing theater into retail/commercial space, residential units, and parking and new construction of a six-story building on the surface parking lot adjacent to the theater).

At the conclusion of the public hearing, the Commission—acting in accordance with §17.92.060 of the *Pasadena Municipal Code*—voted to issue the following decision:

**Environmental Determination and Land-use Entitlements**

1. Acknowledged that on January 7, 2002 the City Council certified a revised final environmental impact report (revised FEIR) with findings of fact and a statement of overriding considerations for the Raymond Theater Reuse and Mixed-Use Project.
2. Supported any appeal that challenges a finding that the current project is consistent with the reuse and mixed-use project approved by the City Council in January 2002.

**Findings for Compliance with the Tree Protection Ordinance**

1. Acknowledged that none of the trees on the site qualifies as a protected native, specimen, or landmark tree.

**Findings for Concept Design Approval**

1. Acknowledged that the memorandum from Historic Resources Group (ATTACHMENT B) documents the rehabilitation/restoration of the Raymond Theater building and analyzes its compliance with the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings.
2. Found that the proposed **rehabilitation and restoration of the exterior of the Raymond Theater building** is consistent with the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings;
3. Confirmed that the brickwork on the façade of the Raymond Theater shall be restored to its original unpainted condition.

4. Found that the design of the **adjacent new construction**—if modified to comply with the recommended conditions of approval—is consistent with the Citywide Design Principles in the General Plan, the Design Guidelines for the Central District Specific Plan, the Purposes of Design Review in the municipal code, the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings (new construction adjacent to a historic resource); and
5. Based on these findings, **approved** the application for concept design for the rehabilitation/restoration of the theater and the adjacent new construction with the following conditions:
  - a) The proportions and window framing of the **roof-top monitors** shall be studied further, and this study shall include the possibility of introducing a canopy or similar sun-shading device at the sixth-floor terraces to reduce the scale of the tall window. *[Central District guidelines, BD 8.1 Express roofs in a visually interesting manner that complements the composition of the building and the surrounding area; sculpted roof forms are encouraged.]*
  - b) To add more transparency to the building walls, and to improve the overall proportion of solid-to-void, some of the **window openings** shall be enlarged vertically or reconfigured on the primary elevations (including, possibly, the corner tower). *[source: City-wide Design Principles, Pasadena Design Qualities, "integrated planning," "functional and visual integration."] Central District Guidelines, BD 2.3 Employ strong building forms such as towers to demarcate important gateways, intersections, and street corners; strong corner massing can function as the visual anchor for a block.]*
  - c) The windows on the face of the recessed **hyphen**, connecting the new building to the Raymond Theater, shall be redesigned to relate more closely to the windows in the new building. *[source: BD 1.3 Establish a harmonious transition between newer and older buildings.]*
  - d) To strengthen the compatibility of the new design with retail stores in Old Pasadena, the **storefronts** shall have a substantial bulkhead (12" to 24") consistent with durable materials as found in Old Pasadena. *[Secretary of the Interior's Standards for Rehabilitation #9, "New work...shall be compatible with the massing, size, scale and architectural features to protect the historic integrity of the property and its environment."]*
  - e) The base, middle, and top **cornices** of the new building shall align with these features on the Raymond Theater.
  - f) The **cornice** elements shall be strengthened.
  - g) The clipper **corner** shall be designed as the smaller of the two options (but not to the detriment of the rest of the proportions on the new buildings).
  - h) The **ground-floor retail** planes shall be aligned with the public sidewalks.
  - i) Restudy **Holly Street "Portal"** elevation to unify the elevation.
  - j) The new building shall have further simplification with a more unified and **consistent use of materials**.
  - k) Responding to the characteristic change in buildings in Old Pasadena between formal street-facing elevations and secondary walls, the **alley elevation** shall be redesigned to express more of the utilitarian industrial/warehouse aesthetic of the alley walkways. *["Old Pasadena's alleys have...an ambiance that is distinctly different from the district's streets." Streetscapes and Alley Walkways Plan, p. 2]*
  - l) Large **blind openings at ground level** shall be treated with features such as glazing, recesses, ornamental grillework, simulated doors, and other features that typify alleys in Old Pasadena and that are inviting to pedestrians. *["New elements...must be...compatible with the existing features...and enhance the historic context." "creat[e] significant pedestrian-generating activities..." "Alley walkways should be capitalized upon as they are improved to become more functional...to become more inviting and accommodating to pedestrians." "Alley walkways should become exciting pedestrian*

spaces..." *Streetscapes and Alley Walkways Plan*, pp. 2, 4. BD 3.6 Avoid uninterrupted blank wall surfaces along all building facades; *Human Scale: A building should contribute to a more pleasant and humane living environment.* K8-6437BD 7.4 Give greater attention to detail at the street level of a building to satisfy the pedestrian; emphasize details that modulate the light and provide evidence of artistry and craft.]

- m) To impart more individuality and visual interest to the buildings on the alley, the **balconies and windows** on the two buildings shall vary in their design. [source: BD 1.3 Establish a harmonious transition between newer and older buildings.]
- n) To diminish the mass and scale of the new building along the alley, **the top floor** shall be stepped back equal to (or greater than) the stepback on the top floor of the Raymond elevation. [source: *Secretary of the Interior's Standards for Rehabilitation #9, "New work...shall be compatible with the massing, size, scale and architectural features to protect the historic integrity of the property and its environment."*]
- o) The exit-corridor **stairwells** shall be eliminated from the exterior of the existing north wall.
- p) The swimming **pool** shall be eliminated from the interior of the auditorium space (as represented by the applicant in a message on file dated 04-09-04);
- q) The proposed new **skylights** shall be eliminated from the roof of the theater auditorium.
- r) The Commission shall conduct **final design review**;
- s) Before filing an application for final design review, the Commission shall conduct at least one advisory, **50% design review** to evaluate the progression of the design and the materials and detailing of the project. Among the items that that are to be considered during 50% review are:
  - Pasadena Heritage must have signed off on their **façade easement** (historic preservation easement).
  - A final resolution of any inconsistencies between the **plans and elevations and unit plans** for of the interior floors to coordinate exterior window/door openings with interior spaces.
  - the **materials** and finishes (e.g., plaster cement; GFRC panels; storefront framing and doors; glazing, the brick corners, edge caps, angles and color ranges) and the possibility of introducing **metal cladding** on more portions of the new building (e.g., spandrels, elevator tower, gabled rooftop projections) beyond a small area of the ground floor facing the alley.
  - the layout, dimensions, and material of the **control joints** in the plaster.
  - the **window** framing, operation, and recess—including the tall greenhouse windows on the new building and the restored tall windows on the front elevation of the Raymond Theater.
  - the detailing, projection, and proportions of the **overhanging fixed canopies**.
  - **Eye-level perspective drawings** of the **storefronts** and of the partial elevation visible through **Kendall Alley**.
  - **Distant views of both buildings**—concentrating on visible features on the exposed roofs—as viewed from the interior of **Memorial Park**.
  - The profile and cladding of the **elevator/stair tower** above the hyphen connecting the theater with the new building (and the possibility that the this feature should relate better in form to other roof-top features on the new building).
  - the installation details of the **awnings**, which according to the City's design guidelines should be mounted within piers along ground floor and not overlap onto the face of the piers.
  - The locations for **tenant signage and signage**.

- The projection of the **balconies on the alley elevation** and any walkway, curbing, bollards, planters, and lighting in the alley (pending final approval from the Fire Department, Public Works Department, and Building Division).
- Impacts on the exterior architecture of **structural considerations** such as of cutting openings into the existing reinforced concrete wall of the fly lot for windows and underpinning of existing floors for to support subterranean parking, pool, etc., shall be submitted for review during 50% review.
- the **gutter/downspout** system and materials.
- the **ornamental grating** in the second-level openings for the interior parking.
- any specialty **paving** in five-foot setback on N. Raymond elevation and the paving at the entrance to the Raymond Theater building.
- The reconstruction of the original **marquee** on the Raymond Theater
- The proposed location for the **public art** component.

**In addition, the Commission directed the chair to write a letter to the City Council and Mayor with concerns about the inconsistencies with the approval by the City Council and with the environmental impact report—and to express disagreement with the inaccurate consistency finding of this project with the environmental impact report.**

<b>Effective Date • Appeals • Call for Review</b>
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This decision becomes effective on Friday, **April 23, 2004**. Before the effective date, the City Council may call for a review of this decision. If the Council calls for a review this decision, the application will be considered as a new item at a public hearing.

In addition, you or any interested person may appeal this decision to the City Council before the effective date by filing an appeal in writing with the City Clerk (rm. 236, City Hall) along with an appeal fee equal to 65 percent of the original application fee. Appeals must cite a reason for objecting to a decision. Please note that appeals and calls for review are conducted as de novo hearings, meaning that the lower decision is vacated and the entire decision is review anew.

This approval expires one year from the effective date. The approval period may be extended once—for a second year—by filing a written request with the Planning Director before the expiration of the one-year effective date (along with the fee for renewal of an approval). **Any changes in the approved design of the project, whether before construction or during construction, must be submitted to City staff for review and approval.** The municipal code authorizes the staff to approve minor changes to the project including the conditions of approval. Major changes, however, must be reviewed as part of a separate application for modifications to the project (for which the filing fee is equal to one-half the original fee). A maximum of two applications for major changes to a project may be filed during a calendar year. Major changes may be approved only if there are findings of changed circumstances that justify the revisions.

Sincerely,



Jeff Cronin, Principal Planner  
 Design and Historic Preservation Section  
 Tel 626-744-3757; fax 626-396-8520  
 Email: [jcronin@cityofpasadena.net](mailto:jcronin@cityofpasadena.net)

cc:	address file	chronological file	Tidemark
	City Council	City Manager	City Clerk
	Togawa-Smith Architects	Sue Mossman,	Richard Bruckner
		Pasadena Heritage	

*NOTICE OF DECISION, 121-129 N. Raymond Avenue, Concept Design  
 April 14, 2004*

# **STAFF REPORT**



**APRIL 12, 2004**

## REVISED STAFF REPORT

**TO:** Design Commission  
**FROM:** Richard J. Bruckner, Director, Planning & Development Department  
**SUBJECT:** **Application for Concept Design Approval** PLN 2004-00002  
121-129 North Raymond Avenue (Council District 3)  
**DATE:** Revised for meeting on April 12, 2004

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### RECOMMENDATION:

The staff recommends that the Commission:

#### Environmental Determination and Land-use Entitlements

1. Acknowledge that on January 7, 2002 the City Council certified a revised final environmental impact report (revised FEIR) with findings of fact and a statement of overriding considerations for the Raymond Theater Reuse and Mixed-Use Project.
2. Acknowledge the conclusions of the environmental consultants ("Consistency Finding, Raymond Theater Reuse and Mixed-Use Development Project," March 8, 2004, Cotton/Bridges/Associates and "Raymond Theater Reuse Consistency Finding," March 8, 2004, San Buenaventura Research Associates, **ATTACHMENT A**) that the current project is consistent with the certified EIR.

#### Findings for Compliance with the Tree Protection Ordinance

1. Acknowledge that none of the trees on the site qualifies as a protected native, specimen, or landmark tree.

#### Findings for Concept Design Approval

1. Acknowledge that the **memorandum** from Historic Resources Group (ATTACHMENT B) documents the rehabilitation/restoration of the Raymond Theater building and analyzes its compliance with the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings.
2. Find that the proposed **rehabilitation and restoration of the exterior of the Raymond Theater building** is consistent with the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings;
3. Find that the design of the **adjacent new construction**—if modified to comply with the recommended conditions of approval—is consistent with the Citywide Design Principles in the General Plan, the Design Guidelines for the Central District Specific Plan, the Purposes of Design Review in the municipal code, the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings (new construction adjacent to a historic resource); and
4. Based on these findings, **approve** the application for concept design for the rehabilitation/restoration of the theater and the adjacent new construction with the following conditions and recommendation:

Conditions of Approval. [note: shaded items are no longer recommended as conditions of approval; boxed items are new recommendations]



### East Holly Street and North Raymond Elevations

- a) The proportions and window framing of the **roof-top monitors** shall be studied further, and this study shall include the possibility of introducing a canopy or similar sun-shading device at the sixth-floor terraces to reduce the scale of the tall window. *[Central District guidelines, BD 8.1 Express roofs in a visually interesting manner that complements the composition of the building and the surrounding area; sculpted roof forms are encouraged.]*
- b) To add more transparency to the building walls, and to improve the overall proportion of solid-to-void, some of the **window openings** shall be enlarged vertically or reconfigured on the primary elevations (including, possibly, the corner tower). *[source: City-wide Design Principles, Pasadena Design Qualities, "integrated planning," "functional and visual integration."] Central District Guidelines, BD 2.3 Employ strong building forms such as towers to demarcate important gateways, intersections, and street corners; strong corner massing can function as the visual anchor for a block.]*
- c) The windows on the face of the recessed **hyphen**, connecting the new building to the Raymond Theater, shall be redesigned to relate more closely to the windows in the new building. *[source: BD 1.3 Establish a harmonious transition between newer and older buildings.]*
- d) To strengthen the compatibility of the new design with retail stores in Old Pasadena, the **storefronts** shall have a substantial base. *[Secretary of the Interior's Standards for Rehabilitation #9, "New work...shall be compatible with the massing, size, scale and architectural features to protect the historic integrity of the property and its environment."]*

### Electric Alley

- e) Responding to the characteristic change in buildings in Old Pasadena between formal street-facing elevations and secondary walls, the **alley elevation** shall be redesigned to express more of the utilitarian industrial/warehouse aesthetic of the alley walkways. *["Old Pasadena's alleys have...an ambiance that is distinctly different from the district's streets." Streetscapes and Alley Walkways Plan, p. 2]*
- f) Large **blind openings at ground level** shall be treated with features such as glazing, recesses, ornamental grillework, simulated doors, and other features that typify alleys in Old Pasadena and that are inviting to pedestrians. *["New elements...must be...compatible with the existing features...and enhance the historic context." "creat[e] significant pedestrian-generating activities..." "Alley walkways should be capitalized upon as they are improved to become more functional...to become more inviting and accommodating to pedestrians." "Alley walkways should become exciting pedestrian spaces..." Streetscapes and Alley Walkways Plan, pp. 2, 4. BD 3.6 Avoid uninterrupted blank wall surfaces along all building facades; Human Scale: A building should contribute to a more pleasant and humane living environment. K8-6437BD 7.4 Give greater attention to detail at the street level of a building to satisfy the pedestrian; emphasize details that modulate the light and provide evidence of artistry and craft.]*
- g) To impart more individuality and visual interest to the buildings on the alley, the **balconies and windows** on the two buildings shall vary in their design. *[source: BD 1.3 Establish a harmonious transition between newer and older buildings.]*
- i. To diminish the mass and scale of the new building along the alley, the **top floor** shall be stepped back equal to (or greater than) the setback on the top floor of the Raymond elevation. *[source: Secretary of the Interior's Standards for Rehabilitation #9, "New work...shall be compatible with the massing, size, scale and architectural features to protect the historic integrity of the property and its environment."]*

- j. The Commission shall conduct **final design review**;
  - k. Before filing an application for final design review, the Commission shall conduct at least one advisory, **50% design review** to evaluate the progression of the design and the materials and detailing of the project. Among the items that may be considered during 50% review are:
    - A final resolution of any inconsistencies between the **plans and elevations** and **unit plans** for of the interior floors to coordinate exterior window/door openings with interior spaces.
    - the **materials** and finishes (e.g., plaster cement; GFRC panels; storefront framing and doors; glazing, the brick corners, edge caps, angles and color ranges) and the possibility of introducing **metal cladding** on more portions of the new building (e.g., spandrels, elevator tower, gabled rooftop projections) beyond a small area of the ground floor facing the alley.
    - the layout, dimensions, and material of the **control joints** in the plaster.
    - the **window** framing, operation, and recess—including the tall greenhouse windows on the new building and the restored tall windows on the front elevation of the Raymond Theater.
    - the detailing, projection, and proportions of the **overhanging fixed canopies**.
    - **Eye-level perspective drawings** of the **storefronts** and of the partial elevation visible through **Kendall Alley**.
    - **Distant views of both buildings**—concentrating on visible features on the exposed roofs—as viewed from the interior of **Memorial Park**.
    - The location and detailing of the new roof-mounted **skylights** in the ceiling of the atrium in the Raymond Theater (and the extent to which these features are visible from Memorial Park and other pedestrian-level sight lines).
    - The profile and cladding of the **elevator/stair tower** above the hyphen connecting the theater with the new building (and the possibility that the this feature should relate better in form to other roof-top features on the new building).
    - the installation details of the **awnings**, which according to the City's design guidelines should be mounted within piers along ground floor and not overlap onto the face of the piers.
    - The locations for **tenant signage and signage**.
    - The projection of the **balconies on the alley elevation** and any walkway, curbing, bollards, planters, and lighting in the alley (pending final approval from the Fire Department, Public Works Department, and Building Division).
    - Impacts on the exterior architecture of **structural considerations** such as of cutting openings into the existing reinforced concrete wall of the fly lot for windows and underpinning of existing floors for to support subterranean parking, pool, etc.
- Full elevational and section-through drawings of the proposed exit corridor **addition on the north elevation** (off Electric Alley).

- the **gutter/downspout** system and materials.
  - the **ornamental grating** in the second-level openings for the interior parking.
  - any specialty **paving** in five-foot setback on N. Raymond elevation and the paving at the entrance to the Raymond Theater building.
  - The reconstruction of the original **marquee** on the Raymond Theater
  - The proposed location for the **public art** component.
- Recommendation: As an amenity for residents of units in the converted theater, restudy access to light and air for the fifth-floor units (e.g., unit E1, Sheet 7).  
*[source: Pasadena Design Qualities, "integrated planning," "functional and visual integration." ]*

**BACKGROUND.**

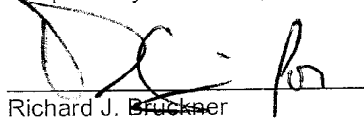
At a public hearing on March 15, the Commission heard presentations from City staff, the design architects, and the preservation consultant for the project as well as comments from the public. The Commission decided to continue the public hearing and approved a motion to voted to continue its review of the application to the meeting on Monday, April 12 to allow additional time to:

- evaluate the environmental performance and the suitability of **opening the interior auditorium space to outside air** and sunlight and to moisture from the interior pool;
- analyze the **change in square footage** between the plans reviewed by the City Council in December 2001 and January 2002 (the "modified project") and the current project submitted for concept design review;
- analyze the conditions between the **interior floor levels of the storefronts** on the Raymond and Holly elevations and the at-grade sidewalks;
- review an itemized list of all **historically significant items on the interior** that will remain and those that may no longer be preserved;
- identify clearly **what is being changed in the building:** i.e., which walls are being opened, what is new and what is old, what is happening to the historic fabric of the building (including the secondary elevations and the openings in those walls for the new building at Raymond & Holly and the proposed exit corridors on the north elevation); and
- identify how the new construction adjacent to the theater may be built with **six stories instead of the five stories** described in the revised final environmental impact report certified by the City Council in January 2002.

▪ Motion (3/15/04)	Response to Motion (4/12/04)
<ul style="list-style-type: none"> <li>▪ <b>Opening the interior auditorium space to outside air</b></li> </ul>	<p>City Council approval of the project authorizes the environmental administrator to review changes to the auditorium of the theater. The atrium with a covered roof is interior space; under the building code openings in the new walls are subject to energy and exiting requirements for exterior walls. The City's Building Official is responsible for interpreting the building code and determining the habitability of dwelling units open to the atrium. The Commission has design review of only one interior space in the Central District: the first floor of the Castle Green. Applicants have told staff that the pool will be relocated to the interior courtyard of the new building, which is open to the sky.</p>

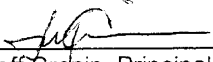
▪ Motion	Response
<ul style="list-style-type: none"> <li>▪ <b>Change in square footage</b> between the plans reviewed by the City Council in January 2002 and the current project</li> </ul>	<p>See attached table. The change in square footage is primarily additional retail space added along the ground floor Holly Street.</p>
<ul style="list-style-type: none"> <li>▪ <b>Interior floor levels of the storefronts</b> and the at-grade sidewalks</li> </ul>	<p>Project architects are working on a resolution to omit the change in grade at the storefront entrances.</p>
<ul style="list-style-type: none"> <li>▪ Itemized list of all <b>historically significant items on the interior</b> that will remain and those that may no longer be preserved</li> </ul>	<p>The mitigation measures in the environmental impact report authorize the zoning administrator to evaluate treatments to the interior of the theater, with the exception of the lobby, where the Design Commission also participates in reviews of the changes to the space. Full details about the interior of the lobby will be presented during 50% design review.</p>
<ul style="list-style-type: none"> <li>▪ <b>What is being changed in the building:</b> i.e., which walls are being opened, what is new and what is old, what is happening to the historic fabric of the building and the proposed exit corridors on the north elevation).</li> </ul>	<p>Changes to secondary walls will be presented during 50% review; developers may redesign the interior floor plan to contain exit stairs within the envelope of the existing theater.</p>
<ul style="list-style-type: none"> <li>▪ Identify how the new construction adjacent to the theater may be built with <b>six stories instead of the five stories</b> described in the revised final environmental impact report certified by the City Council in January 2002</li> </ul>	<p>Plans and elevations on file with the City Clerk document that the project reviewed and approved by the City Council has six stories.</p>

Respectfully submitted,

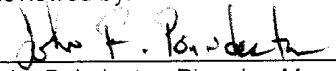


Richard J. Bruckner  
 Director of Planning and Development Department

Written by:

  
\_\_\_\_\_  
Jeff Cronin, Principal Planner

Reviewed by:

  
\_\_\_\_\_  
John Poindexter, Planning Manager

**RAYMOND THEATER**  
**COMPARISON OF COUNCIL-APPROVED PROJECT AND REVISED PROJECT**

	<b>Council-Approved Project</b>	<b>Revised Project</b>	<b>Changes</b>
<b>Number of Residential Units</b>	61 units	36 units (2)	-25 units
<b>Height</b>	65 feet	65 feet	No Change
<b>Number of Stories – New building(1)</b>	6 stories	6 stories	No Change
<b>Number of Stories – Theater Building (1)</b>	7 levels in flyloft; 5 levels in theater	6 levels in flyloft; 5 in theater	- 1 story in flyloft;
<b>Commercial Square Footage (including Holly Street)</b>	28,566 sq. ft.	32,500 sq. ft. (3)	+ 3,924 sq. ft.
<b>Retail Along Holly Street</b>	2,089 sq. ft. – located only at corner	5,193 sq. ft. – at corner and along Holly	+ 3,104 sq. ft
<b>Residential Square Footage</b>	49,232 sq. ft.	50,031 sq. ft.	+ 799 sq. ft.
<b>Total Square Footage</b>	77,798 sq. ft.	82,531 sq. ft.	+ 4,733 sq. ft.
<b>Number of Parking Spaces Required</b>	157 Parking Spaces	116 Parking Spaces (4)	- 41 spaces
<b>Number of Parking Spaces Provided</b>	157 Parking Spaces	102 Parking Spaces (5)	- 55 spaces
<b>Inclusionary Housing</b>	6 percent	6 percent	No Change
<b>Areas to be preserved</b>	Raymond Ave. Façade; Second Story Lobby; portion of Theater Auditorium as feasible	Raymond Ave. Façade; Second Story Lobby; portion of Theater Auditorium as feasible	No Change

- (1) The number of stories is calculated using plans submitted to Council and heard on January 7, 2002.
- (2) This calculation does NOT include the 13 work/live units.
- (3) This calculation includes the 13 work/live units.
- (4) Changes in the project have resulted in a reduction in the number of parking spaces required.
- (5) Applicant has submitted a request to make up the difference in parking (14 spaces) through Zoning Parking Credits. Project was not in the Parking Credit Boundary area at the time of approval. Parking calculation does not include future reduction in parking allowances for projects within a quarter mile of a light rail station.

**Cronin, Jeff**

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**From:** Marilyn Buchanan [mdbuchanan@mpowercom.net]  
**Sent:** Thursday, April 08, 2004 3:45 PM  
**To:** Jeff Cronin  
**Subject:** The Raymond Theatre Project - Design Commission 4/12/04

Jeff:

There were two areas of concern that was brought to our attention at the Design Commission on March 15<sup>th</sup>. As a result of those concerns we have decided to:

1. We will remove the pool from the interior of the Atrium space.
2. The retail spaces on the Raymond Avenue and Holly Street elevations will be level with the sidewalks. There will be NO step down.

We will await the discussion of the Design Commission on Monday, April 12<sup>th</sup>, relating to any other design issues for the historical façade of the Raymond Theatre and the new building located adjacent to the theatre.

Please let me know if you need me to do anything else.

Marilyn Buchanan

4/8/2004



**STAFF REPORT**



**MARCH 15, 2004**

## STAFF REPORT

**TO:** Design Commission  
**FROM:** Richard J. Bruckner, Director, Planning & Development Department  
**SUBJECT:** **Application for Concept Design Approval** PLN 2004-00002  
121-129 North Raymond Avenue (Council District 3)  
**DATE:** March 15, 2004

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### RECOMMENDATION:

The staff recommends that the Commission:

#### Environmental Determination and Land-use Entitlements

1. Acknowledge that on January 7, 2002 the City Council certified a revised final environmental impact report (revised FEIR) with findings of fact and a statement of overriding considerations for the Raymond Theater Reuse and Mixed-Use Project.
2. Acknowledge the conclusions of the environmental consultants ("Consistency Finding, Raymond Theater Reuse and Mixed-Use Development Project," March 8, 2004, Cotton/Bridges/Associates and "Raymond Theater Reuse Consistency Finding," March 8, 2004, San Buenaventura Research Associates, **ATTACHMENT A**) that the current project is consistent with the certified EIR.

#### Findings for Compliance with the Tree Protection Ordinance

1. Acknowledge that none of the trees on the site qualifies as a protected native, specimen, or landmark tree.

#### Findings for Concept Design Approval

1. Acknowledge that the **memorandum** from Historic Resources Group (ATTACHMENT B) documents the rehabilitation/restoration of the Raymond Theater building and analyzes its compliance with the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings.
2. Find that the proposed **rehabilitation and restoration of the exterior of the Raymond Theater building** is consistent with the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings;
3. Find that the design of the **adjacent new construction**—if modified to comply with the recommended conditions of approval—is consistent with the Citywide Design Principles in the General Plan, the Design Guidelines for the Central District Specific Plan, the Purposes of Design Review in the municipal code, the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings (new construction adjacent to a historic resource); and
4. Based on these findings, **approve** the application for concept design for the rehabilitation/restoration of the theater and the adjacent new construction with the following conditions and recommendation:

Conditions of Approval.

#### **East Holly Street and North Raymond Elevations**

- a) The proportions and window framing of the **roof-top monitors** shall be studied further, and this study shall include the possibility of introducing a canopy or similar sun-shading device at the sixth-floor terraces to reduce the scale of the tall window. *[Central District guidelines, BD 8.1 Express roofs in a visually interesting manner that complements the composition of the building and the surrounding area; sculpted roof forms are encouraged.]*

- b) To add more transparency to the building walls, and to improve the overall proportion of solid-to-void, some of the **window openings** shall be enlarged vertically or reconfigured on the primary elevations (including, possibly, the corner tower). *[source: City-wide Design Principles, Pasadena Design Qualities, "integrated planning," "functional and visual integration."]* *Central District Guidelines, BD 2.3 Employ strong building forms such as towers to demarcate important gateways, intersections, and street corners; strong corner massing can function as the visual anchor for a block.]*
- c) The windows on the face of the recessed **hyphen**, connecting the new building to the Raymond Theater, shall be redesigned to relate more closely to the windows in the new building. *[source: BD 1.3 Establish a harmonious transition between newer and older buildings.]*
- d) To strengthen the compatibility of the new design with retail stores in Old Pasadena, the **storefronts** shall have a substantial base. *[Secretary of the Interior's Standards for Rehabilitation #9, "New work...shall be compatible with the massing, size, scale and architectural features to protect the historic integrity of the property and its environment."]*

**Electric Alley**

- e) Responding to the characteristic change in buildings in Old Pasadena between formal street-facing elevations and secondary walls, the **alley elevation** shall be redesigned to express more of the utilitarian industrial/warehouse aesthetic of the alley walkways. *["Old Pasadena's alleys have...an ambiance that is distinctly different from the district's streets." Streetscapes and Alley Walkways Plan, p. 2]*
- f) Large **blind openings at ground level** shall be treated with features such as glazing, recesses, ornamental grillework, simulated doors, and other features that typify alleys in Old Pasadena and that are inviting to pedestrians. *["New elements...must be...compatible with the existing features...and enhance the historic context." "creat[e] significant pedestrian-generating activities..." "Alley walkways should be capitalized upon as they are improved to become more functional...to become more inviting and accommodating to pedestrians." "Alley walkways should become exciting pedestrian spaces..." Streetscapes and Alley Walkways Plan, pp. 2, 4. BD 3.6 Avoid uninterrupted blank wall surfaces along all building facades; Human Scale: A building should contribute to a more pleasant and humane living environment. K8-6437BD 7.4 Give greater attention to detail at the street level of a building to satisfy the pedestrian; emphasize details that modulate the light and provide evidence of artistry and craft.]*
- g) To impart more individuality and visual interest to the buildings on the alley, the **balconies and windows** on the two buildings shall vary in their design. *[source: BD 1.3 Establish a harmonious transition between newer and older buildings.]*
- i. To diminish the mass and scale of the new building along the alley, the **top floor** shall be stepped back equal to (or greater than) the setback on the top floor of the Raymond elevation. *[source: Secretary of the Interior's Standards for Rehabilitation #9, "New work...shall be compatible with the massing, size, scale and architectural features to protect the historic integrity of the property and its environment."]*
- j. The Commission shall conduct **final design review**;
- k. Before filing an application for final design review, the Commission shall conduct at least one advisory, **50% design review** to evaluate the progression of the design and the materials and detailing of the project. Among the items that may be considered during 50% review are:
  - A final resolution of any inconsistencies between the **plans and elevations** and **unit plans** for of the interior floors to coordinate exterior window/door openings with interior spaces.
  - the **materials** and finishes (e.g., plaster cement; GFRC panels; storefront framing and doors; glazing, the brick corners, edge caps, angles and color ranges) and the possibility of introducing **metal cladding** on more portions of the new building (e.g., spandrels, elevator tower, gabled

rooftop projections) beyond a small area of the ground floor facing the alley.

- the layout, dimensions, and material of the **control joints** in the plaster.
  - the **window** framing, operation, and recess—including the tall greenhouse windows on the new building and the restored tall windows on the front elevation of the Raymond Theater.
  - the detailing, projection, and proportions of the **overhanging fixed canopies**.
  - **Eye-level perspective drawings** of the **storefronts** and of the partial elevation visible through **Kendall Alley**.
  - **Distant views of both buildings**—concentrating on visible features on the exposed roofs—as viewed from the interior of **Memorial Park**.
  - The location and detailing of the new roof-mounted **skylights** in the ceiling of the atrium in the Raymond Theater (and the extent to which these features are visible from Memorial Park and other pedestrian-level sight lines).
  - The profile and cladding of the **elevator/stair tower** above the hyphen connecting the theater with the new building (and the possibility that the this feature should relate better in form to other roof-top features on the new building).
  - the installation details of the **awnings**, which according to the City's design guidelines should be mounted within piers along ground floor and not overlap onto the face of the piers.
  - The locations for **tenant signage and signage**.
  - The projection of the **balconies on the alley elevation** and any walkway, curbing, bollards, planters, and lighting in the alley (pending final approval from the Fire Department, Public Works Department, and Building Division).
  - Impacts on the exterior architecture of **structural considerations** such as of cutting openings into the existing reinforced concrete wall of the fly lot for windows and underpinning of existing floors for to support subterranean parking, pool, etc.
  - the **gutter/downspout** system and materials.
  - the **ornamental grating** in the second-level openings for the interior parking.
  - any specialty **paving** in five-foot setback on N. Raymond elevation and the paving at the entrance to the Raymond Theater building.
  - The reconstruction of the original **marquee** on the Raymond Theater
  - The proposed location for the **public art** component.
- Recommendation: As an amenity for residents of units in the converted theater, restudy access to light and air for the fifth-floor units (e.g., unit E1, Sheet 7).  
[source: Pasadena Design Qualities, "integrated planning," "functional and visual integration."]

## BACKGROUND

The Raymond Theater mixed-use project combines new construction with conversion of the historic Raymond Theater building into a commercial/residential mixed-use development. The new construction is a six-story building oriented to the corner of Holly and Raymond and connected to the south wall of the theater building. U-shape in plan, it is organized around a small interior courtyard. It opens to the interior of the theater building through lower-level parking and upper-level floors with residential units.

The 0.7-acre site, at the northwest corner of E. Holly Street and N. Raymond Avenue, is in the Central District-11 (CD-11) zoning district and in the Old Pasadena National Register historic district. Across the street from the Senior Center and Memorial Park, it is bordered: on the north by the Armory Center for the Arts (California National Guard; Fitch Haskell, architect; 1933); on the west by Electric Alley (with the one-story Little Church, 1909, and a two-story commercial block on Holly Street (Pierce Hotel, 1924); and on the south by Holly Street and retail/office buildings. The site is flat, with only a minor slope. Primary views of the site are from Holly Street and most of Memorial Park (looking west) and from Raymond Avenue (looking north).

The new construction is proposed on an existing surface parking next to the south wall of the Raymond Theater. Constructed in 1920-1921 and designed by Cyril Bennett (1891-1957), the theater is a 22,574 square foot building constructed of reinforced concrete and hollow-clay tile with a poured concrete and steel-truss roof. The secondary elevations are of patterned concrete framework. The Georgian Revival building, derived from the late eighteenth-century work in England of Robert Adam (1728-1792), is the oldest movie palace in the City. It has a formal temple-like street façade with three center bays—of alternating tall arches and pilasters—flanked by two slightly projecting pavilions. The façade also features a full entablature, a blocking course with balustrade and pediments, a rusticated terra-cotta base, and terra cotta panels and monumental urns.

The new construction is a 76,341 square-foot building with four stories of housing over a two-story podium. The flat-roofed building has a height, massing, and footprint comparable to the Raymond Theater. At the ground floor, on the Holly and Raymond elevations, it has retail spaces that protrude 29 feet into the parking garage. A second level of parking above the ground-floor retail space extends to the outer walls of the building. The two-story base, similar in height to the elevated base of the theater, is framed in a plastered pier-and-spandrel grid set on a plinth of GFRC. The upper floors, clad in brick, are organized as two-or-three bay units modulated by stacked balconies and recessed terraces. At the top floor, in plane with the recessed patio doors, small monitors with pitched roofs and faced with tall greenhouse windows interrupt the flat roofline. A corner tower, angled at 45-degrees for its full height, distinguishes the Holly/Raymond corner. Flanking the corner, the building has brick banding and a slightly recessed top floor, both of which align with the entablature and brickwork of the theater. As the building extends to the west and wraps onto Electric Alley, its massing simplifies; the wall planes are flush with no setback.

Along the alley, a portion of the ground-floor storefront wraps the corner. The remaining bays, behind which is the parking garage, are blank. The window and balcony openings of the new building are repeated as new openings in the existing formed-concrete walls of the 75-foot fly loft of the theater. Access to the parking garage is through portals on Electric Alley and Holly Street.

### **Land-use entitlements.**

In January 2002, the City Council certified an environmental impact report for the Raymond Theater mixed-use project. This entitlement applies to a project with 61 residential units, 28,565 square feet of commercial, retail, and office uses, and new construction on the existing surface parking lot adjacent to the theater. At that time, the Council also adopted findings of fact and a statement of overriding considerations, and it approved four variances: one for height (permitting new construction up to 65 feet, the approximate height of the theater), a second to permit a five-foot setback for the new building on Raymond Avenue (to match the setback of the theater), and two others for parking. Realization of this project substantially changes the interior of the interior auditorium, balcony, stage, lobby, and smoking lounges of the theater.

The project submitted for concept design review has 49 units, 15 fewer than the entitlement issued by the City Council. The amount of retail square footage is also reduced from the original entitlement. Currently, the retail and office uses (excluding approximately 3,600 square feet of live-work space) amount to 11,383 square feet. Additional descriptions about the changes to the project and its entitlements from the City Council are presented in ATTACHMENT A ("Consistency Finding," pp. 6-7).

#### **Concept Design Review.**

Concept design review, as defined in the municipal code, concentrates on massing, orientation, wall modulation, solid-to-void relationships, rooflines, compatibility with surroundings, proportions, and compliance with design guidelines. The recommendation in this report proposes that the Commission conduct final design review after an advisory 50% review to evaluate the progression of the design.

#### **Historic Preservation Review.**

By code (§17.92.030 and 17.92.110), the Design Commission reviews major alterations to historic properties in the Central District and adjacent new construction. The code requires the Commission to apply the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings to these reviews. Design review is limited to the exterior unless there are "interior alterations which materially affect a structure's appearance from the public right of way (§17.92.030) or there is a historic designation of the an interior of "significant public or semi-public interior spaces and features" of a historic monument (§17.52.040). In this case, there are no interior alterations that affect the exterior appearance of the building; the roof-top skylights, the restoration of the front doors and tall windows are exterior features already subject to design review. The interior of the building is not a designated monument.<sup>1</sup>

Apart from the City's design review, Pasadena Heritage holds a preservation easement on the Raymond Theater building. An approval to alter the exterior of the theater is an independent negotiation between Pasadena Heritage and the developer.

#### **Historic Preservation Issues.**

The attached memorandum from Historic Resources Group (ATTACHMENT B) analyzes the entire project, including work to the interior of the theater building, for its compliance with the Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings and with the conditions of approval adopted by the City Council in January 2002. The participation of Historic Resources Group in the planning and future construction of the project is a requirement of the environmental mitigation measures.

The memorandum confirms that several issues remain unresolved at this time. Among these issues are: the treatment of the painted brickwork on the theater (p. 7); the flooring/paving at the main entrance (p. 9); the marquee (pp. 9, 10); and the skylights in the roof (p. 13). The restoration, reconstruction, or rehabilitation of the original marquee remains unknown until the cladding on the existing structure is removed to expose the surviving structure inside it. Additional information on these items will be presented to the Commission during 50% review and final review.

The memorandum also contends that the window openings in the west wall of the fly loft comply with the Secretary's Standards, because the alley-facing wall is not a character-defining feature of the building, and that the new construction is compatible in design with the adjacent historic district as new infill construction.

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<sup>1</sup> *The only designated interiors in Pasadena are features/fixtures designed by the architects Greene & Greene and the first-floor spaces of the Castle Green Hotel.*

Twelve new skylights are proposed for installation in the roof of the existing auditorium of the Raymond Theater (see sheets 7, 8, & 9 in plans and elevations, ATTACHMENT E). These skylights are required by building code to provide light and air for occupancy of the interior spaces that open into the atrium (see longitudinal section on sheet 12, ATTACHMENT E). The building official has determined that this condition satisfies §1202 and §1203 of the building code subject to calculations required for operable area. The number of these skylights and their size, height, profile, and finishes will be presented to the Commission for further review during 50% review and final review.

### Other Design Issues.

As new construction in a historic district, the project—both the rehabilitation and restoration of the 1921 theater and the new building—is required by code to comply with the Secretary of the Interior's Standards. For the new construction, the two most applicable standards are:

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.***
  
10. *New additions and adjacent or **related new construction shall be undertaken in a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.***

The design complies with these Standards by emulating the massing and scale of the theater building. It also references features of the historic building, such as horizontal banding, a raised base, and assembles them in a new composition. The Raymond elevation, for example, the new building is architecturally compatible with the theater building with its distinctive base, middle, and top, its large wall planes surfaced in brick, and its changes in material and wall plane aligned with the entablature of the theater. The large volume of the new building and its exposure on three elevations permits a deviation from the conventional approach of firmly aligning regulating lines—such as cornices and ground-floor storefronts—between the new and the old. (*Central District guidelines, BD 3.4 Use regulating lines to promote contextual harmony, solidify the relationship between new and old buildings, and lead the eye down the street.*) The context in this case is a variety of building storefronts with varying heights.

The recommendations in this report mostly address the alley elevation of the new building. The proposed massing of the west elevation, for example, is incompatible with the existing buildings on the west side of the alley. A distinct step back at the top floor would diminish the combined massing of the new building and the existing 75-foot wall of the fly loft.

The recommendations also propose a redesign of the alley elevation to distinguish it from the formal street-facing elevations. Even though the design guidelines for the Central District promote "common" treatments on all elevations of a building (*UR 5.2 "Create a simple, pleasing composition that uses a common vocabulary of forms, architectural elements, and materials; continue design elements, detailing, and materials around the entire structure"*), a distinction between alley elevations and street elevations characterizes the historic district. The alley elevation would also be more appealing to pedestrians if visually interesting features were applied to the large blank wall surfaces.

Among the unresolved issues at this stage is the proposal to add projecting balconies on the alley elevation. The balconies animate this elevation and are preferable to the alternative of recessed balconies. At this time, however, final approval for the projecting balconies awaits further discussions among the Building Division, the Fire Department, and Public Works Department.

On the street-facing elevations, the most important design issue is the composition of solids-to-voids. Window openings set in large wall planes surfaced in brick are architecturally compatible with the Raymond Theater. This treatment is less compatible, however, with typical buildings in the surrounding historic district. Further studies of the elevations should confirm whether elongating some windows (e.g., at the top-level), adding transoms, regrouping them, or varying the operation would add more visual interest to the new building and greater transparency to the walls.

#### **CONCLUSION.**

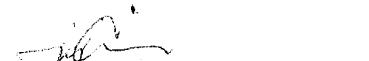
The combined rehabilitation/restoration of the exterior of the Raymond Theater building with the adjacent new construction is the largest project in the Old Pasadena historic district since construction of the One Colorado project in 1991. The complexity and scale of the project require careful review by the Commission through all phases of design development. For this reason, this report proposes that the Commission conduct one or more intermediate reviews of the architectural design before final design to evaluate 17 items that affect the architectural integrity of the project. The Commission also has a role in evaluating final compliance of the project with several of the environmental mitigation measures.

Respectfully submitted,




Richard J. Bruckner  
Director of Planning and Development Department

Written by:

  
Jeff Cronin, Principal Planner

Reviewed by:

  
John Poindexter, Planning Manager

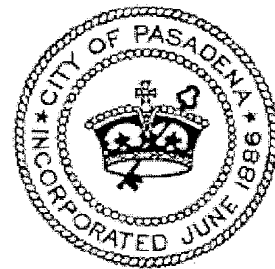
#### **ATTACHMENTS**

- ATTACHMENT A:** ("Consistency Finding, Raymond Theater Reuse and Mixed-Use Development Project," March 8, 2004, Cotton/Bridges/Associates and "Raymond Theater Reuse Consistency Finding," March 8, 2004, San Buenaventura Research Associates
- ATTACHMENT B:** Memorandum from Historic Resources Group, Revised 3-5-2004.
- ATTACHMENT C:** Correspondence from Attorney Frances An, 3-5-2004.
- ATTACHMENT D:** Correspondence from Attorney Craig A. Sherman, 3-9-2004.
- ATTACHMENT E:** Plans and Elevations.



# Consistency Finding

## Raymond Theater Reuse and Mixed-Use Development Project



March 8, 2004

**Lead Agency:**  
City of Pasadena  
Parks and Natural Resources Division  
Public Works and Transportation Department  
100 North Garfield Avenue, Room 212  
Pasadena, CA 91109

Consultant to the City:  
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*A Division of P&D Consultants, Inc.*  
800 E. Colorado Blvd., Suite 270  
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8185.01

**ATTACHMENT A**

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## Summary

This Consistency Finding for the Raymond Theater Reuse and Mixed-Use Development project modification (modified project) has been prepared in response to changes to the conceptual design previously approved by the City of Pasadena City Council for the Raymond Theater Reuse and Mixed-Use Development project (original project) on January 7, 2002. On January 7, 2002, the City Council certified a Revised Final Environmental Impact Report (Revised FEIR) and an Addendum (Addendum) to the Revised FEIR for the original project. Since approval of the original project, the applicant has revised the conceptual design and has filed a Design Review application with the City of Pasadena Planning and Development to permit the modifications. This Consistency Finding has been prepared to examine the environmental effects of the modified project relative to the effects associated with original project, as documented in the Revised FEIR and Addendum (State Clearinghouse No. 1999091008).

## Changes to the Project

The project modifications generally consist of a reduction in the number of residential units, a reduction in the amount of commercial space, elimination of previously planned commercial space from the Raymond Theater building, and modifications to the theater auditorium space and ceiling to allow light and air penetration into the space for the benefit of interior apartment units. According to the applicant, the modified project responds to market demand for larger, urban-style apartment units and live/work apartment units in close proximity to the Memorial Park Gold Line station. The auditorium ceiling modifications are required to achieve the requirements of Title 14, Section 12.390 of the Pasadena Municipal Code, which establishes standards for natural light and ventilation. The proposed modified project involves reuse of the Raymond Theater building and construction of a new adjacent building to include 49 residential apartments, 11,383 square feet of commercial space, and 116 parking spaces. The original project, as approved and analyzed in the Addendum and the Revised FEIR, allows for 61 residential apartments, 28,565 square feet of commercial space, and 157 parking spaces.

## Purpose of and Authority for this Document

The City has accepted the application for the modified project, and the Planning and Development Department has determined that subsequent environmental review is required pursuant to the California Environmental Quality Act (CEQA). The City has undertaken this review to determine whether a new Negative Declaration or Environmental Impact Report, or other form of documentation, is required for the modified project.

Per the CEQA Guidelines (California Code of Regulations Section 15162), a new Negative Declaration or Environmental Impact Report (EIR) should be prepared when: (1) changes are proposed in the project which would require important revisions to previous documentation, (2) changes occur with regard to the circumstances under which the project is undertaken, which require important revisions in the previous documentation, or (3) new information of substantial importance becomes available which was not known and could not have been known at the time of the previous documentation. In general, a new EIR or Negative Declaration is required if any of these factors would result in a new significant effect, or provide information on new mitigation measures or alternatives which would mitigate a significant effect if included in the proposed project, and which are not proposed to be implemented.

## Conclusion

The City has determined that the proposed modification to the Raymond Theater Reuse and Mixed-Use Development project will result in similar types and levels of impacts as those documented in the previous Revised FEIR and Addendum, as the modified project design is similar in nature and scope to the original project initially approved in 2002.

The changes will not result in any substantial change with respect to land use and planning, cultural resources, transportation and circulation, and construction impacts. Implementation of the modified project, as addressed in this Consistency Finding, does not raise any important new issue about the project's significant effects on the environment. No substantial change in the circumstances under which the project will be undertaken has occurred that would require revisions to the previous documentation, and no new information has come to light relating to environmental effects or mitigation measures that would change the conclusions of the Revised Final EIR and Addendum. Therefore, the modified project does not require the preparation of a new Negative Declaration or EIR.

# Introduction

This Consistency Finding for the modified Raymond Theater Reuse and Mixed-Use Development project (modified project) has been prepared in response to proposed changes to a project previously approved by the City of Pasadena City Council for the Raymond Theater Reuse and Mixed-Use Development project (original project) on January 7, 2002. On January 7, 2002, the City Council certified a Revised Final Environmental Impact Report (Revised FEIR) and an Addendum (Addendum) to the Revised FEIR for the original project. Since approval of the original project, the applicant has revised the conceptual design and has filed a Design Review application with the City of Pasadena Planning and Development to permit the modifications. This Consistency Finding has been prepared to examine the environmental effects of the modified project relative to the effects associated with original project, as documented in the Revised FEIR and Addendum (State Clearinghouse No. 1999091008). The purpose of this Consistency Finding is to determine whether the modified project involves substantial change to the original project reviewed in the Addendum and Revised FEIR in order to establish whether or not a new Negative Declaration or EIR must be prepared for the new project, as required by the CEQA Guidelines, Section 15162.

This finding document describes the modified project, considers its environmental effects and mitigation measures, and provides additional information relevant to this project.

Under the California Environmental Quality Act (Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (California Administrative Code, Section 15162), no subsequent environmental review shall be prepared for a project for which a Negative Declaration or EIR has been adopted unless the lead agency determines one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration adopted, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous Negative Declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous Negative Declaration;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project but the project proponents decline to adopt the mitigation measure or alternative; or

- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous Negative Declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If no new Negative Declaration or EIR is required, supplementary environmental information need not be circulated for public review, but may be considered by the Lead Agency together with the previous Negative Declaration or EIR in making its decision on the proposed project.

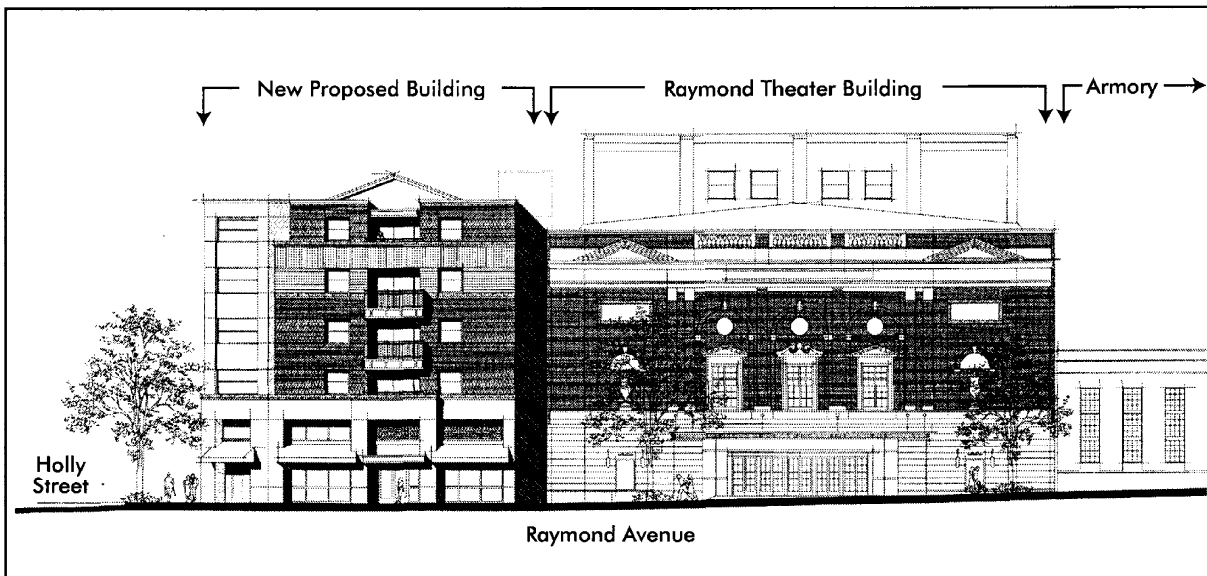
## Project Description

As identified in the Addendum and Revised FEIR, the project applicant has received approval for the adaptive reuse of the Historic Raymond Theater building and construction of an adjacent mixed-use commercial/residential building. Parking for both buildings will be provided beneath the theater and new building and as above-ground structured parking in the new building. The approved reuse of the Raymond Theater building provides for apartment units within the theater fly loft area and stage area, office and commercial uses within the theater foyer and balcony, and commercial uses within the theater auditorium space. The new building will contain apartment units and ground-floor retail commercial space. A total of 61 residential apartments (1- and 2-bedroom units), 28,565 square feet of commercial space, and 157 on-site parking spaces were approved by the City Council. The conditions of project approval require the applicant to retain and restore the façade of the Raymond Theater.

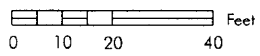
The project applicant now proposes a similar reuse and mixed-use development project that consists of 49 residential apartments, 11,383 square feet of commercial uses, and 116 parking spaces. The modified project, like the original project examined in the Addendum and the Revised FEIR, provides for restoration of the front façade of the theater building to its original 1921 appearance, as shown in Figure 1. However, both the original and modified project will result in changes to all other building façades and substantial alterations to the theater's interior. Changes in the development program are shown in Table 1. This table includes planned improvements for the original Raymond Theater Reuse and Mixed-Use Development project, as approved, and the modified project.

As Table 1 indicates, the number of residential units will decrease by 12, the total square footage of commercial use will decrease by approximately 60%, and parking will decrease by 41 stalls. No parking is planned within the Raymond Theater building, and the volume of the main auditorium space, minus the balcony, is proposed to remain open from floor to ceiling and used as an atrium with a lap pool. Detailed project characteristics are as follows.

Figure 1



Source: Togawa & Smith, Inc., February 3, 2004



City of Pasadena

Figure 1  
Raymond Avenue Elevation



**Table 1  
Comparison of Original Project and Modified Project**

Original Project	Modified Project
<i>Scope of Use</i>	
61 residential units	49 residential units
28,565 sq. ft. of commercial use	11,383 sq. ft. of commercial use
<i>Layout</i>	
Within theater building, residential units located only within the fly loft and stage area. Commercial uses located within the auditorium and balcony. No parking within theater, but parking to be provided beneath theater building.	Within theater building, residential units located within the fly loft, stage area, and the balcony. Commercial uses located within lobby. Lap pool and atrium within auditorium. No parking within theater, but parking to be provided beneath theater building.
Within new adjacent building, ground-floor retail and 4 floors of residential apartments.	Within new adjacent building, ground-floor retail and 4 floors of residential apartments.
Link new building to theater by a common underground parking area.	Link new building to theater by a common underground parking area.
157 parking spaces provided below grade and portions of the second floor of the adjacent building.	116 parking spaces provided below grade and portions of the second floor of the adjacent building.

**Theater Building:** The modified project proposes changes to the design of the original project to convert the stage/fly loft area and balcony to 21 apartment units (loft flat, townhouse, work/live, and work/live plus loft); remove the character-defining ramps in the lobby to accommodate a single, 6,190-square-foot commercial space, as well as the residential lobby and building entrance foyer; and construct an atrium, leveled to the same height as the lobby floor and open from floor to ceiling, with a decorative lap pool and changing rooms in the main portion of the auditorium. Figure 2 shows the cross-section of the Raymond Theater building.

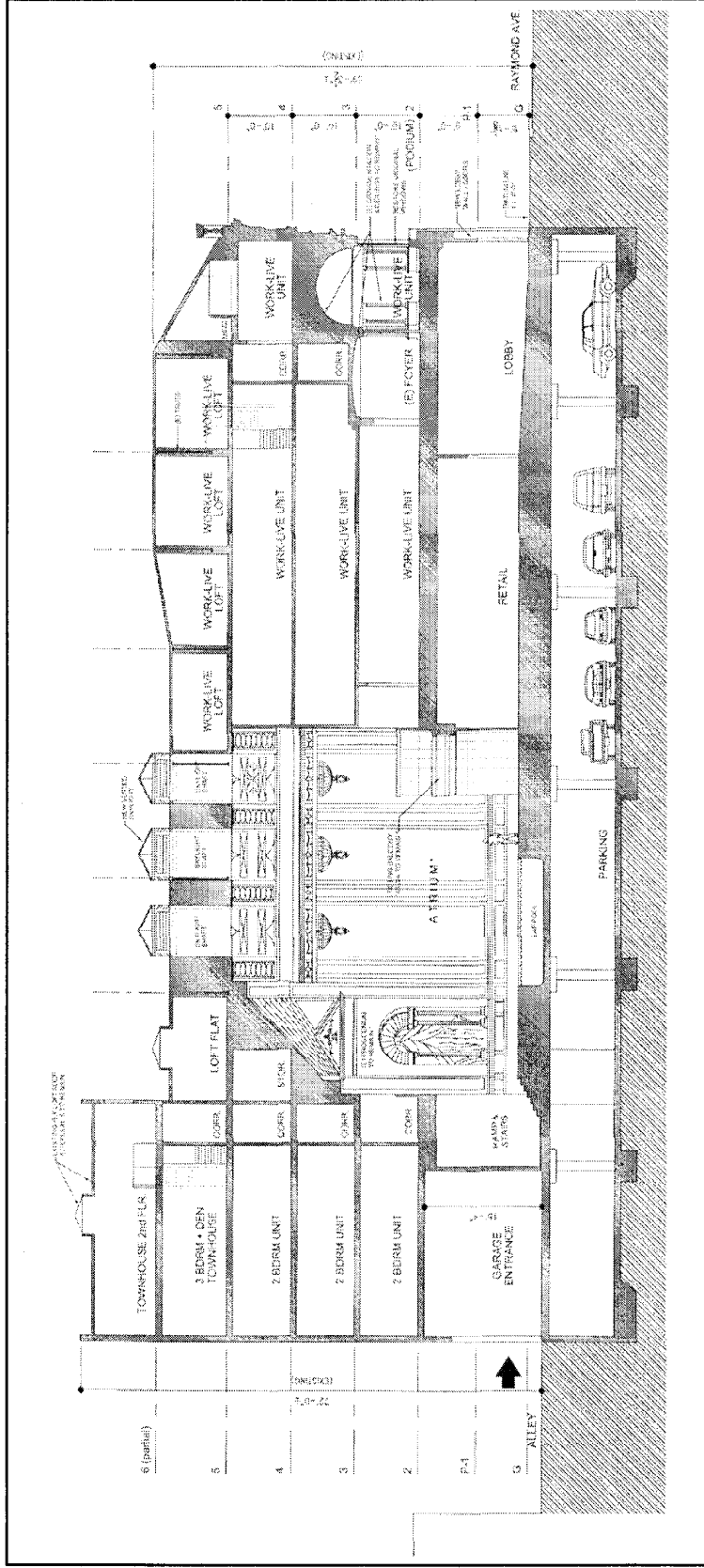
Six of the apartments will be located within the interior of the theater building, in the balcony area, and therefore, without exterior walls that open to the outside. Pasadena Municipal Code Title 14, Section 12.390 requires that all guest rooms, dormitories, and habitable rooms within a dwelling unit be provided with natural light by means of exterior glazed openings and natural ventilation by means of openable exterior openings. These exterior openings shall open directly onto a street or public alley or a yard or court located on the same lot as the building, or required windows may open into a roofed porch (Municipal Code Title 14, Section 12.400). To provide natural light to these interior units in accordance with the City's Municipal Code, skylights are planned in the auditorium ceiling (see Figure 3) to shed natural light onto the atrium. Balconies will overlook the atrium within each unit to ensure light exposure per Municipal Code requirements.

This development approach will require the cutting of holes into the auditorium ceiling, as shown in Figure 3, for the skylights. This is a new project feature not included in the original project.

**Adjacent Building:** The original project and the modified project provide for a new five-story building south of the Raymond Theater, on an existing parking lot. The new building includes one level of underground parking and one and one-half levels of above-ground parking, with the

lowest level connected to the parking beneath the Raymond Theater. The amount of commercial space

Figure 2



Source: Togawa & Smith, inc., February 3, 2004

Figure 2  
 Cross-Section of Proposed Reuse  
 of the Raymond Theater

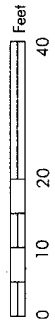
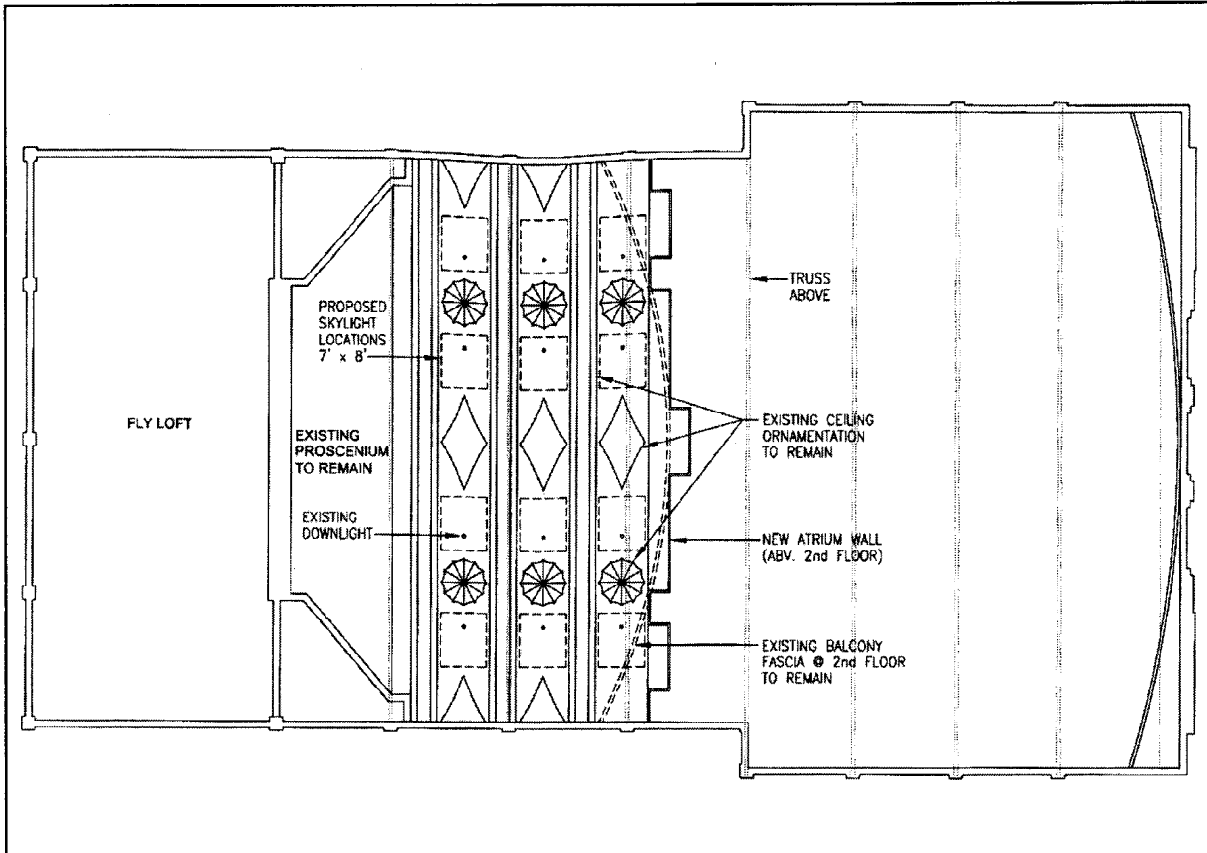


Figure 3



Source: Togawa & Smith, Inc., February 3, 2004

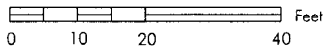


Figure 3  
Raymond Theater Atrium Ceiling Detail

within the new structure has increased from the original project by 2,384 square feet to 5,193 square feet in the modified project. Residential units will continue to be provided on the second through fifth floors.

**Parking Facilities, Access, and Loading Areas:** The original project included 157 on-site parking spaces, including 39 tandem spaces. The modified project provides 116 spaces, including 34 tandem spaces. As part of its action on January 7, 2002, the City Council approved a variance to allow tandem parking to serve commercial uses and a variance request to allow for a higher percentage of compact parking spaces than permitted by zoning regulations. Both the original and modified project provide parking access into the theater building from Electric Drive. The modified project proposes parking access from Holly Street at the southeast corner of the development (into the new building).

Both projects provide one loading space in the Raymond Theater building (on the first floor within the parking area).

**Construction:** Once construction activity begins, the project developer anticipates that construction of the modified project, like the original project, can be completed within a 12-month period.

## Changes with Regard to Circumstances under which the Project was Undertaken

No substantial changes with regard to the circumstances under which the project was undertaken have been identified. However, the Metropolitan Transportation Authority (MTA) Gold Line light-rail system (Gold Line) is now complete. The Gold Line was considered in the Addendum and Revised FEIR. The Gold Line provides direct service between Sierra Madre and Downtown Los Angeles at Union Station, where it connects to other MTA transit lines.

## Environmental Impact Analysis

The Addendum and the Revised FEIR analyzed four environmental issue areas included in the Initial Study Environmental Checklist. Three of these issue areas — land use and planning, transportation/circulation, and construction impacts — were identified as potentially significant adverse impacts which, as a result of mitigation measures included as part of the proposed project or required by the City or other agency, can be avoided or substantially lessened. The Addendum and the Revised FEIR indicated that even with implementation of mitigation measures, impacts to cultural resources are significant and unavoidable.

### Land Use and Planning

The modified project proposes the same land uses as those approved for the original project, although at lesser intensity of use. As concluded in the Addendum and Revised FEIR, the project is compatible with surrounding land uses and implements General Plan land use policies (pages 7 and 44-45, respectively). Like the original project, the modified project facilitates use of the Gold Line Light Rail system by placing residences and job sites within walking distance to the Old Town Gold Line station (General Plan Land Use Element Policy 1.3 - Transit-Oriented and Pedestrian-Oriented Development). Like the original project, the modified project is

consistent with the land use policies specific to the Central District. It creates 47 new residential and live/work units and 11,383 square feet of new nonresidential development. Respectively, these numbers represent 0.92% of the new housing units (based on a cap of 5,095 units) and 0.18% of new nonresidential development (cap of 6.2 million square feet) planned for the Central District. No new impact results.

Renovation of the front façade of the Raymond Theater to its original appearance is included as part of the proposed project and the original project. In keeping with General Plan Land Use Element Objective 5 - Character and Scale of Pasadena, the design plans for the modified project are subject to Pasadena Design Commission review to determine whether any design enhancements or modifications are required to fully implement this objective.

Both the original project and the modified project irretrievably alter the character, function, and overall integrity of the theater by changing the use to residential units and retail space. These uses fail to achieve complementary historic resource preservation objectives of the Pasadena General Plan Land Use Element Objective 6 - Historic Preservation and are not consistent with General Plan Land Use Element Policy 6.3 - Adaptive Reuse. However, like the original project, the modified project will be required to incorporate the following mitigation measures which, as concluded in the Addendum and Revised FEIR (pages 8 and 50, respectively), will reduce impact with respect to adaptive reuse to a less than significant level.

LU-1. Detailed design aspects of the project shall be reviewed by the City's Design Commission, which will have the responsibility of ensuring that final project design plans respond to and are consistent with applicable criteria contained in the Civic Center Specific Plan and the Pasadena Downtown Urban Design Guidelines. The applicant shall submit draft plans to the Design Commission for consideration, and any revisions directed by the Commission shall be incorporated into final design plans to be presented to planning staff for final approval. No building permits shall be issued until final design plans have been approved and findings made that the project conforms to the Civic Center Specific Plan and the Pasadena Downtown Urban Design Guidelines.

LU-2. All design and construction of the project shall comply with final design plans.

LU-3. All additions or changes to the project in the future shall be subject to the requirements of mitigation measures LU-1 and LU-2 above.

Conditions under the modified project are the same as those considered in the Addendum and the Revised FEIR, and impacts will be less than significant after mitigation.

## Cultural Resources

Both the original and modified projects introduce new building elements into the Old Pasadena National Register Historic District that potentially contrast in scale or character with the historic district. The modified project, like the original project, introduces new building elements into the setting for the Civic Center National Register Historic District, and such elements may be out of scale or character with the historic district. Similar to the original project, the modified project proposes restoration of the theater's Raymond Avenue elevation to its 1921 appearance, a potentially beneficial environmental impact. Both the modified project and the original project eliminate the adjacent parking lot. However, as discussed on page 64 of the Revised FEIR,



compliance with the Secretary of the Interior's Standards will reduce these impacts. Therefore, the following mitigation measures are required to implement the project:

- CR-1. Prior to the issuance of building permits and as part of the application for design approval, the applicant shall submit plans and elevations, together with other supporting documentation, detailing the rehabilitation and restoration of the Raymond Theater. This information shall include product specifications, materials samples, large-scale drawings, and similar items illustrating all aspects of the rehabilitation work to the historic portions of the building. Such plans will include documentation indicating how the integrity of these features will be protected during the construction phase of the project. The Zoning Administrator and the Design Commission will review and approve this documentation. The City shall withhold building permits for the project until the Zoning Administrator and Design Commission complete their review of this information.
- CR-2. All restoration work shall be performed in accordance with the *Secretary of the Interior's Standards for Rehabilitation*. Restoration of the original (or early) painted finish on the brick facing the east façade should be considered as part of the rehabilitation.
- CR-3. The applicant shall hire a qualified professional, experienced in historic preservation and the conservation of historic materials, to participate in the design of the rehabilitation and restoration of the Raymond Theater. This professional shall also monitor all construction activities affecting the historic exterior and interior features of the Raymond Theater that are required to be preserved or restored. The designated professional shall have the authority to halt construction work in the event of potential damage to such elements, and to work with the City on appropriate remediation.
- CR-4. Prior to the issuance of any building permit, the applicant shall produce a documentation survey of the property in accordance with the Historic American Building Survey (HABS) standards. This documentation shall include archival quality photographs of exterior features, elevations, and significant interior features of the Raymond Theater. Scaled, "as-built" site plan and floor plans shall also be produced. A historic documentation report shall be included in the documentation package. The documentation package will be archived at an appropriate location determined by the City of Pasadena.
- CR-5. The applicant shall hire a historian meeting the professional qualifications of the National Park Service to assemble photographic, archival-recorded histories, and other materials on the theater's history. The City shall solicit proposals for locating materials in the most appropriate location, which may include the Pasadena Public Library. A report summarizing and documenting the materials shall be completed prior to the issuance of building permits.
- CR-6. The design of the new building shall be reviewed by responsible City decision-making bodies for compliance with the *Secretary of Interior's Standards for the Treatment of Historic Properties*, as well as the *Civic Center Specific Plan* and the *Downtown Pasadena Urban Design Guidelines*.
- CR-7. Alterations to the secondary facades of the Raymond Theater shall be reviewed by responsible City decision-making bodies for compliance with the *Secretary of*

*Interior's Standards for the Treatment of Historic Properties, as well as the Downtown Pasadena Urban Design Guidelines.*

Nevertheless, substantial alteration of the theater auditorium and construction of a new residential complex results in the loss of approximately three-fourths of the building's historic fabric, some of its exterior, and the majority of the its interior character-defining features. The modified project introduces additional alterations to the interior, namely alterations to the ceiling of the theater auditorium space to accommodate skylights (previous Figure 3). While the treatment of the skylights will be performed to mimic ceiling patterns and integrate into the overall design, the integrity of the ceiling will be disrupted.

The Secretary of the Interior's Standards proscribe that alterations and modifications of use of historic properties should minimize changes to character-defining features, materials, spaces, and distinctive features. As concluded in the Addendum and Revised FEIR (pages 10-11 and 66, respectively), the original project will result in unavoidable, significant effects on a historic resource. The modified project will similarly result in unavoidable significant effects.

The project applicant provided the City with a memorandum drafted by Historic Resources Group, LLC dated March 5, 2004, addressing the manner by which the applicant proposes to comply with the mitigation measures adopted in connection with the certified Addendum and Revised FEIR. San Buenaventura Research Associates (SBRA), a historic resources consulting firm under contract to the City of Pasadena, has reviewed this memorandum, as well as the original project and the modified project, and has determined that the proposed mitigation plan complies with the intent of the adopted mitigation measures. When applied to the proposed changes to the project, this plan will serve to minimize nonreversible alterations to character-defining features, materials, spaces, and the distinctive features of the historic property, and will provide for the documentation of historic features, and on-site monitoring during construction. The mitigation listed above and incorporated into prior environmental documentation will apply to modified project.

Therefore, SBRA has concluded that while the impacts of the modified project will continue to be significant and adverse, these impacts are not new and are not substantially increased in severity when compared to the impacts addressed in the Addendum and Revised FEIR. Further, SBRA has concluded that the adoption of additional mitigation measures will not serve to substantially reduce these impacts. No additional mitigation is available or required to further reduce these unavoidable impacts.

Conditions under the modified project are the same as those considered in the Addendum and the Revised Final EIR, and impacts are significant and unavoidable.

## **Transportation and Circulation**

The analysis of the original project in the Addendum and Revised FEIR indicated that the project will not result in a significant impact on the local or regional road systems, on public transit, pedestrian travel, or parking (pages 1384, respectively). The original project was estimated to generate 930 daily vehicle trips, with 43 occurring in the A.M. peak hour and 90 occurring in the P.M. peak hour. Based on the assumptions and methodology used for the March, 2000 traffic study in the Addendum and the Revised FEIR, the modified project is estimated to generate 788 daily vehicle trips, with 25 A.M. and 60 P.M. peak-hour trips. This represents a reduction in vehicle trips relative to the original project. Traffic impacts associated

with the modified project are the less than those considered in the Addendum and the Revised FEIR, and no additional or revised mitigation is required.

## Construction Impacts

The applicant indicates that the construction time frame for the modified project, like the original project, is approximately 12 months. Like the original project, excavation of an underground parking garage is required for the modified project. Construction activity associated with the modified project, like the original project, will generate intermittent high noise levels, add truck and construction equipment traffic to streets in the area, disrupt pedestrian activity on Raymond Avenue and Holly Street, produce dust from grading and pollutant emissions from construction equipment, and result in "dirty" stormwater runoff. The modified project will not result in any new or different construction activity impacts. Mitigation measures included in the Addendum and Revised FEIR to reduce impacts to a less than significant will apply to the modified project.

The Revised FEIR and Addendum indicate that construction activities have the potential to affect the historic integrity of historic elements to be retained, e.g. the front façade (pages 14-15 and 88, respectively). The Revised FEIR and Addendum include mitigation measures listed below to reduce the impact to a less than significant level. The modified project will involve similar construction activities on the Raymond Theater, with the exception that the ceiling will be cut for construction of the skylights. Mitigation measure C-2 below, which applied to the original project, adequately addresses impacts associated with the modified project.

- C-1. A telephone number and a name of a contact person for both the applicant and the City for registering comments or complaints shall be posted in a clearly visible manner along the perimeter of the site.
- C-2. The applicant shall submit final design plans and construction plans to the City's Zoning Administrator for approval prior to beginning any work on the Raymond Theater. These plans show how the applicant and/or the applicant's contractors intend to ensure that the historical integrity of the Raymond Theater will be protected during construction.
- C-3. All construction staging areas shall be located at least 500 feet from residences and/or other noise sensitive uses.
- C-4. Muffled construction equipment shall be used. All construction equipment shall be properly tuned.
- C-5. All construction vehicles over 6,000 pounds shall use designated truck routes and then the most direct route to and from the site.
- C-6. A flagperson shall be employed to direct traffic when construction vehicles access the project site and staging area(s).
- C-7. Deliveries of construction materials, hauling of exported soil, and other construction activities requiring access to the site by large vehicles shall be scheduled during off-peak hours to the extent possible.

- C-8. A solid fence no less than eight feet in height, or other dust-control feature acceptable to the City Building Official, shall be provided around appropriate portions of the site perimeter.
- C-9. A covered pedestrian walkway adjacent to structures being worked on shall be provided along the site boundary.
- C-10. If any sidewalk is blocked during construction, alternate routes for pedestrians shall be clearly marked with signs approved by the City.
- C-11. The ARTS bus stop shall be temporarily relocated to a location specified by City Transportation staff, who will consult as necessary with the Pasadena Blue Line Metro Construction Authority and Los Angeles County Metropolitan Transportation Authority. The developer shall fund the cost of such relocation.
- C-12. If project construction coincides with construction of the Los Angeles to Pasadena Blue Line in the immediate vicinity (planned for October 2000 to July 2003), the City will require the developer to provide a construction management plan that minimizes potential conflict.

# Consistency Finding

The above analysis indicates that the modified project will not raise any important new issue regarding the project's significant effect on the environment. No new mitigation measures beyond those required of the original project and identified in the Addendum and the Revised FEIR will be required for the modified project.

Therefore, the City hereby finds that the environmental impacts associated with the modified project are similar to or less than those considered in the Addendum and the Revised FEIR for the original project. The mitigation measures included in the Addendum and Revised FEIR to reduce project impacts to a less than significant level are valid for the modified project. No new mitigation measures have been identified that would substantially reduce potentially significant environmental impacts. In making this consistency finding, the City has reviewed the modified project, the Addendum, and the Revised FEIR and has determined that:

- 1) The modified design of the Raymond Theater Reuse and Mixed-Used Development project does not propose substantial changes to the Raymond Theater Reuse and Mixed-Use Development project, approved by the Pasadena City Council on January 7, 2002, which will require major revisions of the Addendum dated December 6, 2001 or the Revised FEIR dated November, 2000, both of which were certified by the City Council on January 7, 2002.
- 2) The modified project will not occur under any substantial change in the circumstances under which the project will be undertaken which will require major revisions of the Addendum or Revised FEIR.
- 3) No new information of substantial importance shows that:
  - (a) The modified project will have one or more significant effects not discussed in the previous Addendum and Revised FEIR;
  - (b) The modified project will have substantially more severe significant effects than those previously examined;
  - (c) The mitigation measures previously found to be feasible would now be infeasible and would substantially reduce one or more significant effects but are rejected by the project proponents; or
  - (d) Mitigation measures considerably different from those analyzed in the previous Addendum and Revised FEIR that would substantially reduce one or more significant effects are rejected by the project proponents.

As provided for in the California Code of Regulations Section 15162 (CEQA Guidelines), no subsequent Negative Declaration or EIR shall be prepared for a project for which an EIR has been adopted unless any of the above findings cannot be made. Environmental impacts associated with the modified project are consistent with those considered for the original project, and the Addendum and Revised FEIR prepared for that project are valid for the modified project.

## References

City of Pasadena Municipal Code Title 14 Building and Construction, Chapter 12 Housing Code, Sections 390 Natural Light and Ventilation and 400 Origin of Light and Ventilation. <http://www.ci.pasadena.ca.us/cityclerk/municode.asp>.

*Revised Final Environmental Impact Report, Raymond Theater Reuse and Mixed-Use Development, Volumes I and II.* State Clearinghouse No. 1999091008. City of Pasadena. November 2000.

*Addendum to the Revised Final Environmental Impact Report, Raymond Theater Reuse and Mixed-Use Development Project.* City of Pasadena. December 6, 2001.

Raymond Theater Concept Design plans. Togawa & Smith Architects. February 3, 2004.

Raymond Theater Reuse Consistency Finding. San Buenaventura Research Associates, March 8, 2004.

Raymond Theatre Development Concept Design Historic Preservation Issues. Historic Resources Group. March 5, 2004.

To: Jeff Cronin, City of Pasadena  
From: Mitch Stone, San Buenaventura Research Associates  
Date: 8 March 2004  
Re: **Raymond Theater Reuse Consistency Finding**

SBRA has been asked to determine if the proposed changes to the description for the Raymond Theater Reuse and Mixed Development Project are consistent with the historic resources-related mitigation measures adopted in connection with the Revised FEIR and Addendum for this project certified by the Pasadena City Council on January 7, 2002. The impacts of this project on historic resources were determined at that time to be significant, adverse and unavoidable. These mitigation measures are:

- CR-1. Prior to the issuance of building permits and as part of the application for design approval, the applicant shall submit plans and elevations, together with other supporting documentation, detailing the rehabilitation and restoration of the Raymond Theater. This information shall include product specifications, materials samples, large-scale drawings, and similar items illustrating all aspects of the rehabilitation work to the historic portions of the building. Such plans will include documentation indicating how the integrity of these features will be protected during the construction phase of the project. The Zoning Administrator and the Design Commission will review and approve this documentation. The City shall withhold building permits for the project until the Zoning Administrator and Design Commission complete their review of this information.
- CR-2. All restoration work shall be performed in accordance with the *Secretary of the Interior's Standards for Rehabilitation*. Restoration of the original (or early) painted finish on the brick facing the east façade should be considered as part of the rehabilitation.
- CR-3. The applicant shall hire a qualified professional, experienced in historic preservation and the conservation of historic materials, to participate in the design of the rehabilitation and restoration of the Raymond Theater. This professional shall also monitor all construction activities affecting the historic exterior and interior features of the Raymond Theater that are required to be preserved or restored. The designated professional shall have the authority to halt construction work in the event of potential damage to such elements, and to work with the City on appropriate remediation.
- CR-4. Prior to the issuance of any building permit, the applicant shall produce a documentation survey of the property in accordance with the Historic American Building Survey (HABS) standards. This documentation shall include archival quality photographs of exterior features, elevations, and significant interior features of the Raymond Theater. Scaled, "as-built" site plan and floor plans shall also be produced. A historic documentation report shall be included in the documentation package. The documentation package will be archived at an appropriate location determined by the City of Pasadena.
- CR-5. The applicant shall hire a historian meeting the professional qualifications of the National Park Service to assemble photographic, archival-recorded histories, and other materials on the theater's history. The City shall solicit proposals for locating materials in the most appropriate location, which may include the Pasadena Public Library. A report summarizing and documenting the materials shall be completed prior to the issuance of building permits.
- CR-6. The design of the new building shall be reviewed by responsible City decision-making bodies for compliance with the *Secretary of Interior's Standards for the Treatment of Historic Properties*, as well as the Civic Center Specific Plan and the Downtown Pasadena Urban Design Guidelines.
- CR-7. Alterations to the secondary facades of the Raymond Theater shall be reviewed by responsible City decision-making bodies for compliance with the *Secretary of Interior's*

*Standards for the Treatment of Historic Properties*, as well as the Downtown Pasadena Urban Design Guidelines.

The project as originally proposed would result in the substantial alteration of the theater auditorium and in the loss of approximately three-fourths of the building's historic fabric, some of its exterior, and the majority of its interior character-defining features, resulting in an unavoidable, significant impact on a historic resource. The applicant now proposes to reduce the number of residential units and the amount of commercial square footage within the project; to eliminate previously planned commercial space within the building, and to modify the auditorium space and ceiling to allow light and air penetration into the space for the benefit of interior apartment units.

These modifications would result in additional alterations to the interior, in particular alterations to the ceiling of the auditorium space to accommodate the skylights, thereby reducing the design integrity of the auditorium further than was originally anticipated. Other minor proposed design changes to the project description include the addition of a pool within the atrium area and the relocation of the demising wall between the atrium and retail spaces and the residential units occupying the area above and below the theater balcony.

The project proponent has provided to the city a memorandum drafted by Historic Resources Group, LLC dated March 5, 2004, addressing the manner by which the applicant proposes to comply with the mitigation measures adopted in connection with the certified FEIR. SBRA has reviewed this memorandum as well as the previously approved project and the proposed changes to the project description, and has determined that the proposed mitigation plan complies with the intent of the adopted mitigation measures. When applied to the proposed changes to the project, this plan will serve to minimize nonreversible alterations to character-defining features, materials, spaces, and the distinctive features of the historic property, and will provide for the documentation of historic features, and on-site monitoring during construction.

We therefore conclude that while the impacts of the proposed project continue to be significant and adverse, that these impacts are not new, and that they are not substantially increased in severity when compared to the impacts addressed in the certified FEIR. Further, SBRA concludes that the adoption of additional mitigation measures would not serve to substantially reduce these impacts.