



September 22, 2020

City of Pasadena Planning Commission
Attn: Tess Molinar
Hale Building
175 N. Garfield Ave., 2nd Floor
Pasadena, CA 91101

Re: Proposed Amendment to the Historic Preservation Ordinance

Dear Members of the Planning Commission:

We very much appreciate Staff's considerable work on improving the Historic Preservation Ordinance as directed by City Council in response to community concerns. This is an excellent opportunity to improve, strengthen and clarify Pasadena's ordinance, and Pasadena Heritage supports this effort wholeheartedly.

While we support most of the recommended amendments presented by Staff, we do have some questions and recommendations to further strengthen certain provisions. Our detailed comments are as follows:

1. Category 2 Review – Strongly Support

In the past, the ability of the City to delay, but not deny, approval of a COA has led to the demolition of historic buildings or the destruction of important historic fabric after the waiting period. This change is a critical improvement and we applaud it. Furthermore, the application of a COA requirement for contributing properties in eligible but undesignated landmark districts offers important protection to eligible resources.

2. Process to Evaluate Properties – Strongly Support

This amendment creates a process for evaluating potential historic resources and will help by determining eligibility early in the process of a sale or project proposal. We suggest changing the triggering age of a building to 40 years rather than 45 years so as to be sure more recent buildings are evaluated as they approach the typical 50-year mark. The Los Angeles Conservancy launched an advocacy initiative, "The '70s Turn 50", in early 2020. Eligible resources from the 70s are between 40 and 50 years old, and are under threat because of a lack of understanding and appreciation. For example there is currently a project before the Design Commission that would remove the entire travertine exterior of Edward Durell Stone's 1974 Bank Americard building in the Central District and replace it with GFRC. We need thorough evaluations of '70s resources in order to ensure their protection. We also support the provision that evaluations would be appealable to or able to be called up by the HPC.

Question – There are occasionally circumstances whereby a building has such exceptional significance that it might be considered “historic” and should require a review even if younger than 40 years. In the past, Pasadena Heritage nominated both Bullock’s Pasadena and the Stuart Pharmaceutical Company building to the National Register before they had reached 50 years and both were accepted. Can language be added to allow for such exceptional circumstances?

Question – Can a person or entity that is not the building owner request such an evaluation? The language as written refers only to a property owner.

3. Major & Minor Projects – Strongly Support Proposed Amendments

Recategorizing of several kinds of projects as major projects will address some of the most egregious cases we’ve witnessed where destructive changes are made to historic buildings. In general we support the recommendations with the following requested changes:

Project (Major)

b. This description refers to changes to the “street-facing or primary elevation” of an historic resource. We urge this description to include the street-facing or primary façade and other facades, or portions thereof, that are visible from the public right of way. To leave a house or building with only its front façade intact while the rest of the exterior and interior are virtually demolished is in preservation vernacular a “facadectomy or facadomy”. If the goal of historic preservation policy is to preserve as much historic fabric as possible while allowing for appropriate change, the wholesale removal of exterior fabric and interiors is unacceptable. We recommend that 70% of existing historic exterior fabric and all character-defining features on the front-facing elevation and other elevations that are visible from the public right of way be preserved or, if truly impossible, replicated.

g. The same point made above applies to item g., which refers directly to exterior cladding.

Project (Minor)

e. Question -- This item describes “any undertaking not requiring a permit” that materially alters character-defining features. How will staff know that this work is proposed if a permit is not required, and therefore, how can staff review and correct it before the work is undertaken or the public reports it?

HPC – Garages

We feel comfortable that the staff can adequately review most garages, as long as a staff decision about a garage can be called up or appealed to the HPC in a case where a demolition or major change to a garage does have a potential significant impact or is highly visible from the public right of way. Is that the case?

4. Exemptions from COA

This concept is rather confusing, and we cannot express support without more fully understanding the consequences of this change.

5. Findings for Demolition – Support

6. Rescission or Amendments to Landmark Districts – Support

7. Appeals and Calls for Review in Landmark District Conservation Plans – Support

8. Incentives for Preserving Historic Resources – Support

9. Minimum Maintenance Requirements – Support

We recommend adding language about landscape maintenance and removal of plant materials that are directly causing detrimental effects to an historic resources (trees undermining foundations, ivy destroying mortar on brick facades, sprinklers spraying on structure or foundation, etc.).

10. Penalties for Violations – Support

We further recommend that the time to bring a project into compliance be 6 months rather than 12 months.

We ask for clarification on the “potential monetary fines” item and urge that specific fines, as large as possible under law, be clearly stated and regularly levied to discourage violations of the ordinance.

11. Review Authority for Replacement Building Permits – Support

12. Views from Private Streets – Support

We note again that we urge the requirement of a COA for all changes to all facades of an historic resource visible from the public right of way.

13. Design Review Findings – Strongly Support

14. Designation for Greene & Greene – Strongly Support

We further urge that provision be made for the City to begin gathering (we imagine on a voluntary basis) an inventory of interior fixtures designed by the Greens for reference. It is all but impossible to regulate the preservation of interior elements and fixtures if there is no record of what is existing.

15. Criteria for Designation – Support

This appears to be a clarification of the existing language which is a good thing.

The additional recommendations are acceptable to us as presented.

Additional Consideration: We have prevailing concerns about historic interiors and interior architectural features. In several recent projects across the City, we have seen interiors gutted and priceless features removed. In our comments we suggested an historic interior designation for publicly accessible buildings or works of Craftsman master architects. That suggestion has not been considered in these recommendations, but we are suggesting another alternative to help protect interiors. Providing additional incentives for Historic Monument designation would encourage owners of properties with exceptional interior

features to apply for or agree to this designation - calling out only those interior features that are truly extraordinary (a Batchelder fireplace, a Wallace Neff staircase, fine built-ins in a dining room, etc.). We must do more to protect interiors and features in addition to those of Greene & Greene.

We thank you for considering our viewpoint on this important issue. Pasadena prides itself as a historic city and a leader in historic preservation. Our architectural heritage is one of our greatest shared assets. We believe we should have a Historic Preservation Ordinance reflective of the quality of our resources and commitment of the community to protecting them. We look forward to hearing your input on these proposed changes, and encourage you to further strengthen and modernize the Ordinance.

Sincerely,



Susan N. Mossman
Executive Director



Andrew Salimian
Preservation Director