

April 20, 2021
Project No. 2589-001
Design Review for the Proposed Project Located at
204 W. Chapman Avenue, Orange, CA 92866

MEMORANDUM FOR THE RECORD

2.6 2589-001.M02

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FROM: Sapphos Environmental, Inc.
(Ms. Kasey Conley)

SUBJECT: Design Review for the Proposed Project Located at 204
W. Chapman Avenue, Orange, CA 92866

ATTACHMENT: 1. Location Map
2. Property Photograph Log

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EXECUTIVE SUMMARY

This Memorandum for the Record (MFR) recounts the design review completed for the property located at 204 W. Chapman Avenue (Assessor Parcel Number [APN] 390-663-17), City of Orange (city), County of Orange, California. The subject property is identified as a contributor to the Old Towne Orange Historic District listed in the National Register of Historic Properties (NRHP) in 1997. Therefore, the property is a historical resource pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15064.5(a). Sapphos Environmental, Inc. (Ms. Kasey Conley and Ms. Carrie Chasteen) was retained by the property owner to complete a review of the design of the proposed rehabilitation of the historic building. In order to ensure the proposed project does not create a substantial adverse change in the significance of the known historical resource pursuant to Section 15064.5(b) of the CEQA Guidelines, the proposed project seeks to comply with the Secretary of the Interior's *Standards for the Treatment of Historic Properties* (Standards). Projects that comply with the Standards are considered mitigated to below the level of significance and are therefore eligible for a Class 31 Categorical Exemption under CEQA. This MFR identifies a brief history of the building and its significant character-defining features significant to its contributing status. Methods included inspecting building permits from the City of Orange (City), completing online research using archives and newspaper repositories, and completing a site visit to the property on December 14, 2020, to identify significant character-defining features of the building and the surrounding historic district. Sapphos Environmental, Inc. also completed preliminary background research to inform a timeline of the subject property's development and use history.

Based upon a review of the proposed project, the proposed project complies with the Standards, potential impacts to the historical resource are considered mitigated to a level of less than significant (Section 15064.5(b)(3) of the CEQA Guidelines), and the proposed project is eligible for a Class 31 Exemption.

INTRODUCTION

This Memorandum for the Record (MFR) recounts the design review completed for the proposed project located at 204 W. Chapman Avenue (Assessor Parcel Number [APN] 390-663-17), City of Orange (city), County of Orange, California. The subject property is identified as a contributor to the Old Towne Orange Historic District listed in the National Register of Historic Places (NRHP) in 1997. Properties listed in the NRHP are automatically listed in the California Register of Historical Resources (CRHR), and the City of Orange (City) Register of Historic Resources. Therefore, the property is a historical resource pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15064.5(a). In order to inform the design of the proposed project and its compliance with the Standards, an evaluation of the property was completed to identify the character-defining features of the building which are significant to its contributing status as part of the historic district. Sapphos Environmental, Inc. (Ms. Kasey Conley and Ms. Carrie Chasteen) was retained by the property owner to complete the evaluation of the property and compile a list of exterior, interior, and site character-defining features. Ms. Kasey Conley and Ms. Carrie Chasteen meet the Secretary of the Interior's *Professional Qualification Standards* in the field of Architectural History and History. A site visit was completed on December 14, 2020, where the condition of the building and the site was ascertained. Additionally, research was conducted to compile a brief history of the subject property and surrounding area.

REGULATORY FRAMEWORK

City of Orange

The City's General Plan contains a Cultural Resources and Historic Preservation Element which identifies the issues, goals, and policies of preservation within the City. The Cultural Resources and Historic Preservation Element established the Orange Register of Historic Resources under the following guidelines:¹

The City will create a Local Register of Historic Resources (Historic Register) which will serve as a local register of historical resources under CEQA. The criteria for listing in the Historic Register will be the same as for listing in the CRHR, as such criteria may be updated from time to time by the State of California. To be listed in the Historic Register, a property or district must demonstrate eligibility under one or more of four basic significance criteria, be representative of at least one theme identified in the Historic Context Statement and retain substantial integrity.

Upon establishing the Historic Register, all previously evaluated resources that have been designated or officially determined eligible for listing in the NRHP and/or CRHR will be automatically listed in the Historic Register. The Historic Register will include all contributors to NRHP- and/or CRHR-listed historic districts, as well as individual resources listed on the Historic Register and contributors to listed local historic districts. Notwithstanding the foregoing, "historical resource" for the purposes of CEQA means "historic district" in the case of a contributor to an historic district.

The City will expand upon existing procedures for designation of local resources to expressly include separate or individual resources, structures, objects, sites, as well as districts and

¹ City of Orange. March 2010. Orange General Plan, Cultural Resources and Historic Preservation. Available at: <https://www.cityoforange.org/391/General-Plan>

archaeological resources. Resources identified as potentially eligible in the Orange Inventory may be listed in the Historic Register if they meet the criteria noted above. Specifically, the City intends to pursue Historic Register listing for the three Eichler Tracts as historic districts and the approximately 60 potential individually eligible resources identified in the reconnaissance survey accompanying the General Plan update.

The City will also expand upon the existing procedure for designation of local historic districts. The procedure for designation of such districts should be interactive with property owners, should encourage participation in the listing process, and should include at least one mailing to property owners of record inviting them to public workshops to discuss proposed Historic Register listing.

Alterations to or new construction on sites with listed historic resources shall be subject to City staff and/or Design Review Commission (DRC) review and approval as outlined in Section 17.10.090 (Demolition Review) of the Municipal Code, in the Old Towne Design Standards (updated 1999), in the City's Local CEQA Guidelines (updated 2006), or in other adopted design standards.

Until such time as an Historic Register is established, the City will use the Orange Inventory only to the extent that potential historic resources surveyed, listed in, or eligible for listing in the CRHR have been identified. Once the Historic Register is established, the City will use the Historic Register to identify historic resources for purposes of CEQA, NHPA, and National Environmental Policy Act (NEPA) review of proposed projects. Historic resources listed in the Historic Register shall have a presumption of significance pursuant to CEQA Section 21084.1 and shall be treated as historic resources under CEQA.

Old Towne Orange Historic Preservation Design Standards²

A review of the *Old Towne Orange Historic Preservation Design Standards*, specifically the *Standards for Historic Commercial Buildings*, was reviewed for the proposed project. The *Old Towne Orange Historic Preservation Design Standards* outline the character-defining features of the Old Towne Orange Historic District as:

- Period of significance: 1888–1940
- Rectangular lots with a grid street pattern
- Tree-lined streets with planted parkways
- Concrete sidewalks and walkways
- Fluted concrete streetlights with acorn globes
- Detached residential buildings with similar front and side setbacks
- Small, utilitarian detached accessory buildings at rear of lots
- Primarily gable, hip, or flat roofs, corresponding to the architectural style of the buildings
- Primarily wood or stucco cladding; Some brick or stone cladding, mostly used for decorative accents at porches and foundations
- Front porches transition between the public sidewalk and private space of the house South Glassell Street, ca. 1920 Plaza Park, 2005

² City of Orange. Adopted by Orange City Council December 2018. City of Orange Historic Preservation Design Standards. Accessed January 2021. Available at: <https://www.cityoforange.org/DocumentCenter/View/5928/Historic-Preservation-Design-Standards-for-Old-Towne?bidId=>

- Residential architectural styles include Folk Victorian, Prairie, among others Craftsman, Spanish Colonial Revival, Tudor Revival

Additionally, Glassell Street and Chapman Avenue are considered the “spoke streets” of the Old Towne Orange Historic District, and the *Old Towne Orange Historic Preservation Design Standards* outline guidelines for setting, storefronts, and signage of new construction to ensure compatibility. These guidelines generally state that buildings along Chapman Avenue and Glassell Street shall retain their historic character as large-scale commercial buildings; that the historic storefronts of the buildings shall be retained including windows, entrances, and bulkheads, and historic signage shall be maintained if extant.

Santa Fe Depot Specific Plan³

The design standards outlined in the Santa Fe Depot Specific Plan as they relate to industrial buildings within the Old Towne Historic District were reviewed. The Santa Fe Depot Specific Plan area is located entirely within the local Old Towne Historic District and partially within the National Register Historic District. Since the District’s beginnings in 1986, the City has seen ongoing revitalization of Old Towne. In 1995, in coordination with the Old Towne Preservation Association, the City adopted the Historic Preservation Design Standards for Old Towne Orange (also known as the Old Towne Design Standards).

There has been a gradual revitalization and gentrification of the commercial and residential areas of the Old Towne Historic District, a declining viability of the remaining industrial properties around the Santa Fe Depot, and interest expressed from prospective housing developers seeking infill redevelopment sites in the area. The design standards and guidelines contained in this Specific Plan will work in conjunction with the Old Towne Design Standards and Secretary of the Interior’s *Standards for Rehabilitating Historic Buildings* to preserve and protect the historic integrity of the area while also meeting the demand for new infill development. However, if there is a conflict between the Specific Plan and the Old Towne Design Standards, the Specific Plan shall prevail.

California Register of Historical Resources

The CRHR was established to serve as an authoritative guide to the state’s significant historical and archaeological resources (California Public Resources Code [PRC] Section 5024.1). State law provides that in order for a property to be considered eligible for listing in the CRHR, it must be found by the State Historical Resources Commission to be significant under any of the following four criteria that considers if the resource:

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

³ City of Orange. September 2012. Santa Fe Rail Depot Specific Plan. Accessed January 2021. Available at: <https://www.cityoforange.org/DocumentCenter/View/614/Santa-Fe-Depot-Specific-Plan-Update---Final-PDF>

California Environmental Quality Act (CEQA)

When a proposed project is expected to cause substantial adverse change to a historical resource, the environmental clearance for the project usually requires mitigation measures to reduce negative impacts. Substantial adverse change in the significance of a historical resource means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. Material impairment occurs when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register, or its identification in a historical resources survey, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in the CRHR, as determined by a lead agency for the purposes of CEQA.

The City has adopted *Local CEQA Guidelines* (Guidelines), amended April 11, 2006 to provide the City, and anyone intending to carry out a project, with the requirements of the environmental review process established according to state law, local ordinance, and City practices. The Guidelines contain a section pertaining specifically to historical resources. This section establishes the existing Historic Building Survey (1982 with updates from 1992 and 2005) as a recognized list of historical resources within the City pursuant to PRC 5020.1(k). The section authorizes use of the Secretary of the Interior's *Standards for Rehabilitation*, the *Guidelines for Rehabilitation*, and the Old Towne Design Standards (adopted 1993 and updated in 1997), for design review purposes. It provides thresholds for substantial adverse change and identifies local categorical exemptions and cumulative impacts analysis.

Secretary of the Interior's Standards for Rehabilitation⁴

The following Standards for Rehabilitation are the criteria used to determine if a rehabilitation project qualifies as a certified rehabilitation. The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation of historic materials and features. To be certified, a rehabilitation project must be determined by the Secretary to be consistent with the historic character of the structure(s) and, where applicable, the district in which it is located. The following Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.

1. *A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.*
2. *The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*

⁴ National Park Service, U.S. Department of the Interior. January 2021. Standards for Rehabilitation. 36 CFR 67.

3. *Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.*
4. *Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.*
5. *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.*
6. *Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.*
7. *Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.*
8. *Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.*
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 such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

PROPERTY HISTORY/CONSTRUCTION HISTORY

The subject property is located in the Old Towne Orange Historic District. In the late 19th century when Rancho Santiago de Santa Ana was subdivided, 4,000 acres of land was given as payment to the lawyer Alfred B. Chapman who represented several parties in the partition. At the center of those 4,000 acres, land was put aside for a public plaza, known today as the Plaza Historic District (Plaza), with Chapman Avenue running east-west and Glassell Street running north-south as the main through streets. The City of Orange (city) quickly grew during the 1880s population boom in Southern California, and it was officially incorporated in 1888. This early boom in population lead to the construction of civic and institutional buildings surrounding the Plaza as well as early residential buildings predominantly in the Queen Anne style. The economic bust of the 1880s lead to a decrease in construction during the last decade of the 19th century, but the prosperity of the citrus and agricultural industry in the early 20th century saw new commercial development in the city radiate from the original Plaza along Chapman Avenue and Glassell Street. This development became the commercial and social hub for the city creating what is known today as the Old Towne Orange Historic District.⁵ The period of significance for the Old Towne Orange Historic District is cited as 1888–1940.

The subject property has been used for various industrial and commercial businesses over time. The

⁵ City of Orange. November 2006. "City of Orange Historic Context Statement." City of Orange General Plan Update. Prepared by: Chattel Architecture, Planning, and Preservation, Inc., Sherman Oaks, CA. Available at: <https://www.cityoforange.org/DocumentCenter/View/8660/City-of-Orange-Historic-Context-Statement?bidId=>

earliest recorded business at the property was Ignition Works in 1919.^{6,7} For a short time, the building was home to O.A. Haley Inc., who sold new and used Graham Brothers trucks.⁸ The Graham Brothers began building trucks in 1916 and the business was eventually acquired by Dodge.⁹ By 1926, a real estate office occupied the space and throughout the 1930s, the building was home to an autobody and paint shop. From the 1940s to the 1980s, the building housed various industrial and commercial businesses including the Nehi Bottling Company, Reliable Sheet Metal and Air Conditioning, Town and Country Patio Shops, and Exclusive Furnishings. In 1993, Country Roads Antiques and Gardens opened in the building and remains in business today.¹⁰

The subject property was constructed circa 1916 on the south side of W. Chapman Avenue one block west of the center of the Plaza. The building is a 1-story vernacular commercial building. Building permits for the original improvement of the property were not available; therefore, the original architect, if any, and builder are unknown. Alterations to the building include textured stucco, the infill of the display windows along the eastern façade, alteration of the primary entrance door, boarding of the windows on the southern façade, addition of the metal roll-up door on the southern façade, addition of the wood mezzanine on the interior of the building, and the replacement of original wood trusses with wood glulam beams.

PROPERTY DESCRIPTION AND INTEGRITY

Site

The subject property is in the Old Towne Orange Historic District one block west of the center of the Plaza Historic District on the southwest corner of W. Chapman Avenue and Olive Street (Attachment 1, *Location Map*). The setting surrounding the property is substantially commercial with 20th-century 1- and 2-story vernacular brick, stucco, and masonry buildings. The subject property faces north to W. Chapman Avenue and is adjacent to the public right-of-way on its northern and eastern façades. The rear of the property is enclosed with non-original fencing. A rear alley (a part of the subject property parcel with an easement which allows ingress and egress to the west adjacent parcel) separates the building from an open parking lot to the south.

Exterior (Attachment 2, *Property Photograph Log*)

The subject property is a rectangular 1-story vernacular commercial building constructed circa 1916. The building is clad in stucco over brick with a flat roof. The primary façade faces W. Chapman Avenue and has four large wood display windows which are slightly recessed creating narrow sills along the bottom which have planter boxes. Pilasters with a brick cornice and architrave are located between each window. The display windows are large, fixed single-pane windows with a band of four divided hopper lights above. Latches and chains on the hopper windows are visible from the interior of the space, yet it is unknown if the windows are still operable. The primary entrance is at-

⁶ Panganiban, Jennifer and Rebecca Dressler. 2002. "The History of Orange and 204 West Chapman." Orange, CA: Chapman University. Excerpt provided by the Orange Public Library History Center, December 2020.

⁷ Sanborn Fire Insurance Maps date this business through at least 1922.

⁸ *Santa Ana Register*, 6 (Santa Ana, CA). 11 March 1925.

⁹ Parkhurst, Terry. November 2020. "Graham Brothers Trucks and Graham-Paige Motors" All Par. Accessed December 2020. Available at: <https://www.allpar.com/threads/graham-brothers-trucks-and-graham-paige-motors.229473/>

¹⁰ Panganiban, Jennifer and Rebecca Dressler. 2002. "The History of Orange and 204 West Chapman." Orange, CA: Chapman University. Excerpt provided by the Orange Public Library History Center, December 2020.

grade and is deeply recessed into the building. The entrance door is a multi-light wood door with a fixed transom above. There is a large, single-pane window to the west of the entrance. The 1922 Sanborn Fire Insurance Maps show that the building was used by three separate businesses with what appears to be an interior partition walls down the center of the building. Based on this information and on material/style of the current door, the entrance door and fixed window/bulkhead to the west do not appear to be original and were added later making one central entrance when the interior partitions were removed and a singular business, potentially the Nehi Bottling Company, took over the building.

The eastern façade has four of the same display windows found on the primary façade. Building scarring suggests three additional windows were infilled at the southern end of this façade at an unknown date. A loading bay door is also located at the southern end. The Sanborn Fire Insurance Maps from 1922 to 1950 do not indicate an opening at the southern end of the eastern façade, and this bay door was presumably added after 1950 and is not original.

On the southern façade there are three additional windows at the eastern end that are boarded and an additional loading bay door at the western end. This loading bay door retains a wood sliding entrance door, which may be original to the building. The loading bay door has also been altered with a metal roll-up security door. The roof has four skylights, which are original to the construction of the building based on Sanborn Fire Insurance Maps.

Interior

The interior of the building is a large open space with concrete floors, open rafter ceilings with wood glulam beams, and an open wood mezzanine which wraps around the interior of the building on the western, southern, and eastern façades. The mezzanine is accessed by a wood staircase in the southwest corner of the building. The staircase faces south towards the loading bay door. Most of the mezzanine is open to the remainder of the building with a wood safety railing. The eastern side of the mezzanine is not accessible. Based on material and construction of the mezzanine around the roof beams and the staircase being sited so close to the rear loading bay door, it does not appear to be original to the construction of the building in circa 1916. There is an opening in the western wall allowing access between the subject property and the adjoining building which are both occupied by Country Roads Antiques and Gardens. The buildings are structurally separate.

IDENTIFIED CHARACTER-DEFINING FEATURES

The character-defining features (CDFs) of the subject property and site were ranked with the following identifiers:

Most Significant: CDF is significant to the design of the building and its contributing status to the district; alterations should be avoided.

Significant: CDF is significant to the design of the building and its contributing status to the district; compatible alterations of these features are acceptable.

Common and Not Significant: CDF is common in design and found in most buildings of this type; alterations are acceptable.

Not Historic; Not Significant: CDF was added after the period of significance and is not significant to the design of the building; alterations are acceptable.

Altered: CDF was altered after the period of significance and is no longer significant to the design of the building; alterations are acceptable.

Character-Defining Features: *Site*

Feature	Ranking
Adjacent to public right-of-way	MS
Rear open space	C
Rear fencing	NHNS
KEY: MS = Most Significant; S = Significant; C = Common and Not Significant; NHNS = Not Historic; Not Significant; A = Altered	

Character-Defining Features: *Exterior*

Feature	Ranking
Display windows along northern and eastern façades	MS
Fixed single-pane windows topped with band of hopper windows	MS
Primary entrance on Chapman Avenue	MS
Rectangular footprint	S
One story in height	S
Flat roof	S
Skylights	C
Loading bay doors	C
Planter Boxes	NHNS
Entrance door	NHNS; A
Stucco	NHNS; A
KEY: MS = Most Significant; S = Significant; C = Common and Not Significant; NHNS = Not Historic; Not Significant; A = Altered	

Character-Defining Features: *Interior*

Feature	Ranking
Open rafter ceilings	S
Concrete floors	C
Wood glulam beams	NHNS; A
Wood mezzanine	NHNS
KEY: MS = Most Significant; S = Significant; C = Common and Not Significant; NHNS = Not Historic; Not Significant; A = Altered	

Based on this research, Sapphos Environmental, Inc. recommends that the design of the proposed project incorporate the character-defining features of the property listed as *Most Significant* and *Significant* into the design with none to minimal alteration of the features. The retention of the building adjacent to the public right-of-way is significant to the district and development of the area during the early 20th century. Additionally, the location of the display windows along W. Chapman Avenue and Olive Street are significant to the building's ability to convey itself as a commercial building from the early 20th century. As W. Chapman Avenue was the main east-west street through the historic district, the entrance of the building facing W. Chapman Avenue is also significant to its design. Significant exterior features also include the flat roof and its 1-story height. During this period,

most commercial buildings were constructed 1 story in height or had a second story which was used as office/residential space. The surrounding district conveys this type of development pattern and the original 1-story height of the building is significant in maintaining the integrity of feeling and setting of the district. Additionally, the design of the flat roof is indicative of the vernacular commercial buildings that were quickly being constructed in the area. The sightline of the flat roof should be retained, although the roofing material specifically is not historic and not significant. Furthermore, as the interior space was constructed with no real design intent and has been altered throughout the years, the open ceilings and interior wood-truss roof form, indicative of the original commercial/industrial design intent, is the only interior character-defining feature recommended for retention.

DESIGN REVIEW

Site

The rear (southern) space will be rehabilitated into an outdoor patio and seating area. The patio will include a freestanding wood trellis addition that will not be attached to the historic building, is reversible, and is discreet in design. The current non-historic chain link, metal, and wood fence enclosing the rear of the parcel will be removed and replaced with a wood fence. According to the Old Towne Orange Historic Preservation Design Standards, wood fencing was frequently used during the district's period of significance and is an appropriate material for new fencing. The removal of the non-historic fencing and replacement with compatible fencing also accomplishes Rehabilitation Item #5 of the Mills Act Rehabilitation Plan. Additionally, since the fence is not attached to the historic building, it will not alter or remove any historic materials and is reversible.

There will be no alteration of the footprint of the building from being adjacent to the public right-of-way along Chapman Avenue and Olive Street and therefore the project retains the most significant character-defining feature of the site.

Exterior

Alterations to the exterior of the building are minimal and preserve most of the historic materials of the resource. Three character-defining features of the exterior of the building were identified as *Most Significant*: location of display windows along Chapman Avenue and Olive Street, fixed-pane display windows with hoppers above, and primary entrance on Chapman Avenue. The non-historic planter boxes will be removed and the wood casing on the display and hopper windows will be repaired, accomplishing Rehabilitation Items #2 and #6 of the Mills Act Rehabilitation Plan. No window openings along Chapman Avenue or Olive Street will be removed or altered and three infilled original windows along Olive Street will be restored, accomplishing a portion of Rehabilitation Item #1 of the Mills Act Rehabilitation Plan. The hoppers above the display windows will be retained and restored where warranted. The hopper windows, although once operable, will be fixed yet the extant original chains and latches will be decoratively retained to convey the history of their operability. The proposed project would replace the existing fixed-pane display windows along Chapman Avenue and at the northern corner of Olive Street, the area most visible from the historic district, with single-pane push-up units.¹¹ The window openings will be retained and not altered. The aesthetic of single-pane fixed display windows along the primary façade will be maintained yet the operability of the windows will allow for indoor/outdoor connection of the dining space.

¹¹ The window at the western end of the primary façade will remain in-operable as it is located in the kitchen of the interior.

The windows, including the three south of the corner unit and three infilled windows (six total), and the loading bay door along Olive Street will be replaced with accordion four-fold glazing units. In order to harmonize the appearance of the new four-light window systems, the mullions of the hopper windows will align with the breaks in the accordion windows. The extension of the mullions will give the windows a modular system appearance. Modular window systems became popular in the 1940s and are compatible with the period of significance of the district. The Standards for Rehabilitation state that although it first recommends retaining historic windows as is, alterations that are in keeping with the period of significance are also appropriate. Furthermore, modular window systems can be found throughout the district, including 127 S. Olive Street among others, making these alterations compatible within the district setting. Although the modular window system will be newly introduced to the building, the window openings will be retained, and fixed-pane windows can be reinstalled at a future date rendering the alteration reversible. Additionally, as the loading bay door is not original to the construction of the building or the period of significance for the district, its alteration from a door to a window is less than significant and does not impact the integrity of the building.

The primary entrance of the building will remain along Chapman Avenue and the size of the opening will generally not be altered and will be retained on the eastern side of the entrance alcove. The current non-historic door will be replaced with a single-light door, compatible with the building and the surrounding district. Additionally, the non-original fixed light window and bulkhead to the west of the entrance door will be removed and replaced with a full-height fixed window which is modest in design and aesthetic and compatible with entrance alcoves found throughout the district. According to the Santa Fe Depot Specific Plan, entrance doors on industrial buildings throughout the district were simple and discreet in design, making the new door compatible. The non-historic awning will also be removed, allowing the original divided light hopper windows above to become visible and restoring the historic appearance of this feature.

On the southern façade of the building, a non-operable wood sliding door located to the west of the loading bay door which dates from the period of significance will be retained as a visual feature and a pedestrian door, leading to the back of house, will be added to the opening located here, with the size of the opening retained. Along the façade, there are three wood cased windows which are blocked/boarded up. The proposed project will restore two of the windows and alter the central window to a modular roll-up door, with thin mullions to make the design discreet. The changes to this non-primary façade are minor and located on a non-street-facing façade, making their impact minimal.

The proposed project will also retain the current slope, parapet, and sightline from the public right-of-way of the roof. The historic skylights, although a common feature in early-20th-century industrial buildings, will be retained and restored. The proposed project will place mechanical equipment on the roof, but the equipment will be located so that it is not visible from the public right-of-way and maintains the current flat roof sightline of the building. Additionally, the new HVAC system placed on the roof accomplishes Rehabilitation Item #8 of the Mills Act Rehabilitation Plan.

The current textured stucco exterior cladding will be removed and replaced with a smooth stucco finish.¹² The current textured stucco is an alteration from after the period of significance and per the Old Towne Orange Historic Preservation Design Standards, smooth stucco is appropriate for buildings within the district. It is assumed removal of the textured stucco will destroy the original cladding material, if present, and smooth textured stucco is an appropriate cladding material for this

¹² Specifications on the removal process will be supplied by the architect.

type of building. The removal of the textured stucco also accomplishes Rehabilitation Item #3 of the Mills Act Rehabilitation Plan.

Interior

The character-defining feature of the interior of the building that was found to be significant was the open rafter ceilings. The proposed project will enclose a portion of the western end of the interior for kitchen space which will include a drop ceiling. This space will not be public facing and the open volume of the dining room, which will highlight the original interior roof form, will be maintained. Additionally, the drop ceiling in the kitchen will be reversable, and no historic material will be removed or altered. Over its lifespan, the building has historically housed multiple businesses at once making the use of interior partitions and sections a common feature of its history. Although one display window at the western end will be enclosed within the kitchen space, currently none of the windows are visible from the interior, and the proposed project will change this.

The proposed project will also remove the wood mezzanine that wraps around the western, southern, and eastern walls of the interior space. Research found this mezzanine to not be original to the construction of the building and a common feature found in industrial spaces of the period. The removal of this feature will not alter the building's ability to contribute to the historic district.

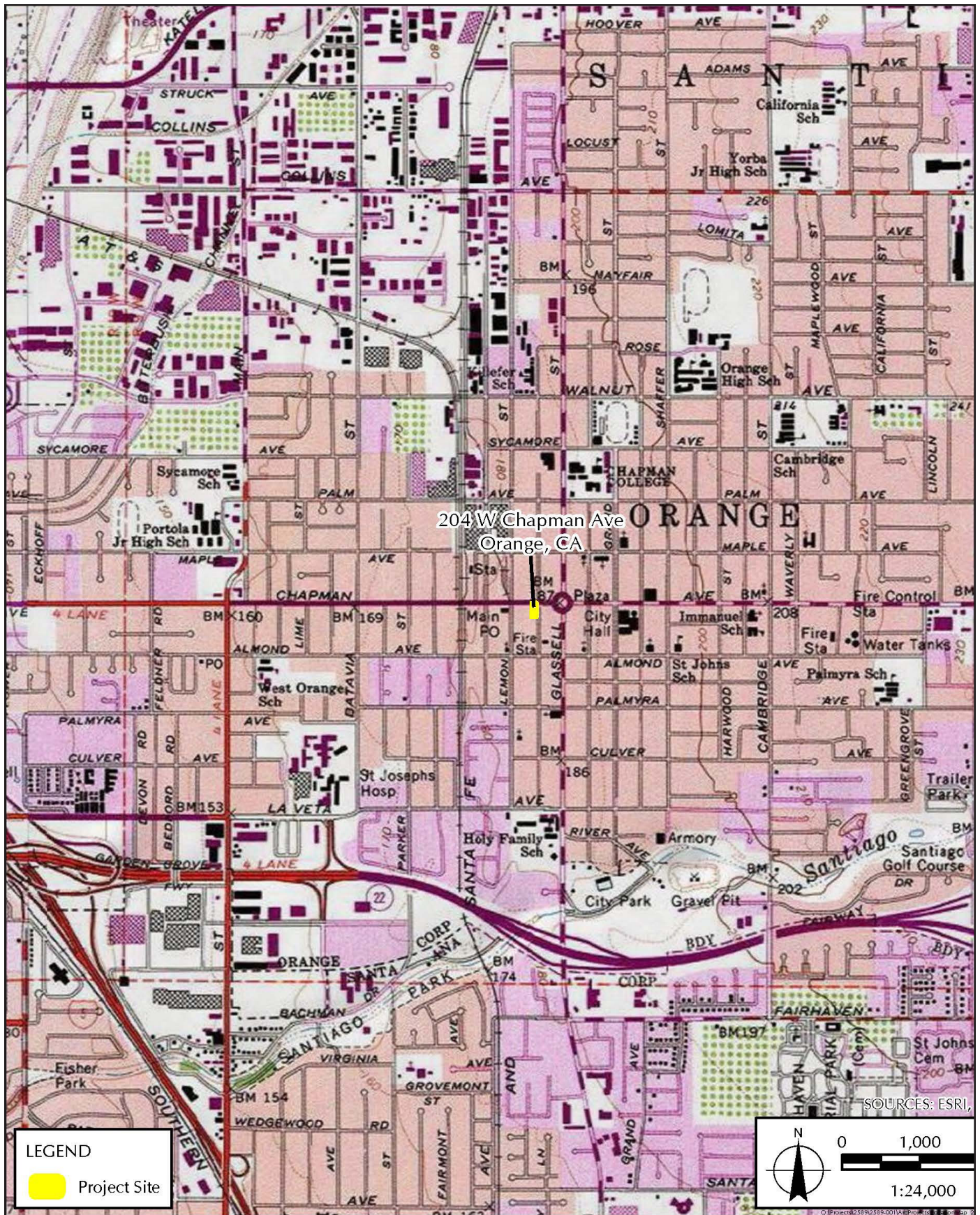
CONCLUSION

The proposed project offers minimal alterations to the historic building, retaining most of the character-defining features identified as *Most Significant* and *Significant*. Design features of the proposed project that do alter character-defining features of the space do so in a way that is reversible and does not alter/remove the historic fabric of the building. Reversibility is the hallmark of a preservation-friendly project as defined in the Standards. Additionally, the proposed project will accomplish six of the Rehabilitation Items identified in the Mills Act Rehabilitation Plan (as noted above). Based on this review, the proposed project is in compliance with the:

- Standards for Rehabilitation:
 - Standards Nos. 1–7 and 9
- Old Towne Orange Historic Preservation Design Standards:
 - Setting Standard Nos. 1, 1a, 2, 2a, 3b, 5a–d, 6, and 12
 - Storefront Standard Nos. 1, 1a, 1b, and 2
- Santa Fe Deport Specific Plan:
 - Façade/roof treatment with the retention of the roofline and parapet construction
 - Window treatment with the retention of window location and material and aesthetically compatible operability
 - Door/entry treatment with the design of a district compatible entrance door
 - Materials treatment with the rehabilitation of original exterior cladding and retention of structural beams showcasing construction type

Therefore, the proposed project complies with the Standards, potential impacts to the historical resource are considered mitigated to a level of less than significant (Section 15064.5(b)(3) of the CEQA Guidelines), and the proposed project is eligible for a Class 31 Exemption.

If there are any questions regarding the contents of this MFR or additional information is required, please contact Ms. Conley at (626) 683-3547, extension 135, or email at kconley@sapphosenvironmental.com.



ATTACHMENT 1 Location Map

ATTACHMENT 2
PROPERTY PHOTOGRAPH LOG



1. 204 W. Chapman Avenue (view southwest);
December 14, 2020



2. Primary Façade, 204 W. Chapman Avenue (view south);
December 14, 2020



3. Display Windows on Primary Façade, 204 W. Chapman Avenue (view southeast);
December 14, 2020



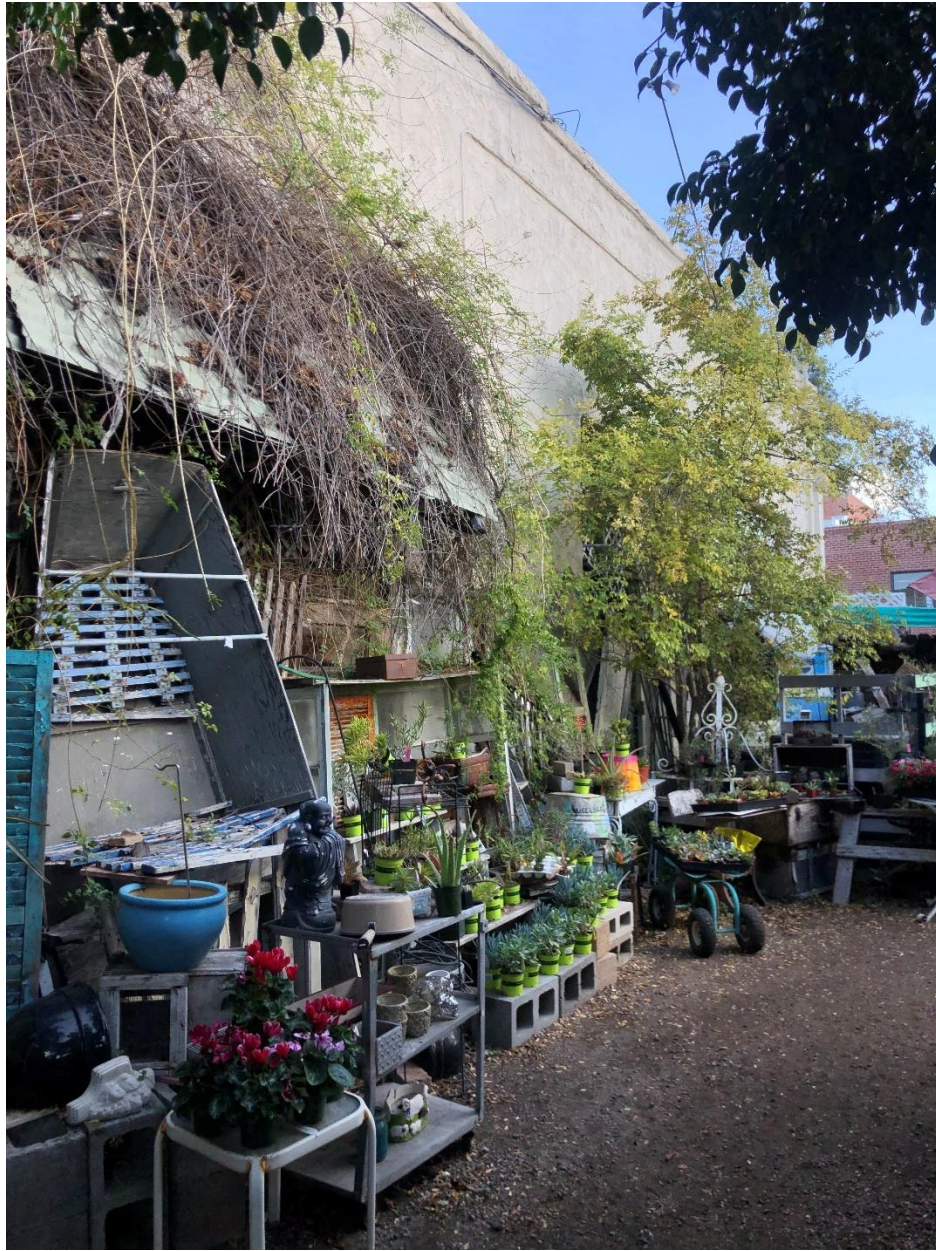
4. Primary Entrance, 204 W. Chapman Avenue (view southwest);
December 14, 2020



5. Eastern Façade, 204 W. Chapman Avenue (view northwest);
December 14, 2020



6. Southern Façade, 204 W. Chapman Avenue (view northwest);
December 14, 2020



7. Southern Façade, 204 W. Chapman Avenue (view northeast);
December 14, 2020



8. Southern façade loading bay door, 204 W. Chapman Avenue (view northwest);
December 14, 2020



9. Southern façade boarded windows, 204 W. Chapman Avenue (view northeast);
December 14, 2020



10. Rear open space, 204 W. Chapman Avenue (view south);
December 14, 2020



11. Rear open space, 204 W. Chapman Avenue (view east);
December 14, 2020



12. Interior of 204 W. Chapman Avenue (view northeast);
December 14, 2020



13. Interior of 204 W. Chapman Avenue (view south);
December 14, 2020



14. Interior of 204 W. Chapman Avenue (view north);
December 14, 2020



15. View from interior mezzanine / Open rafter ceiling and wood glulam beams,
204 W. Chapman Avenue (view northeast);
December 14, 2020



16. View from interior mezzanine / Interior of primary facade wall and ceiling,
204 W. Chapman Avenue (view northeast);
December 14, 2020



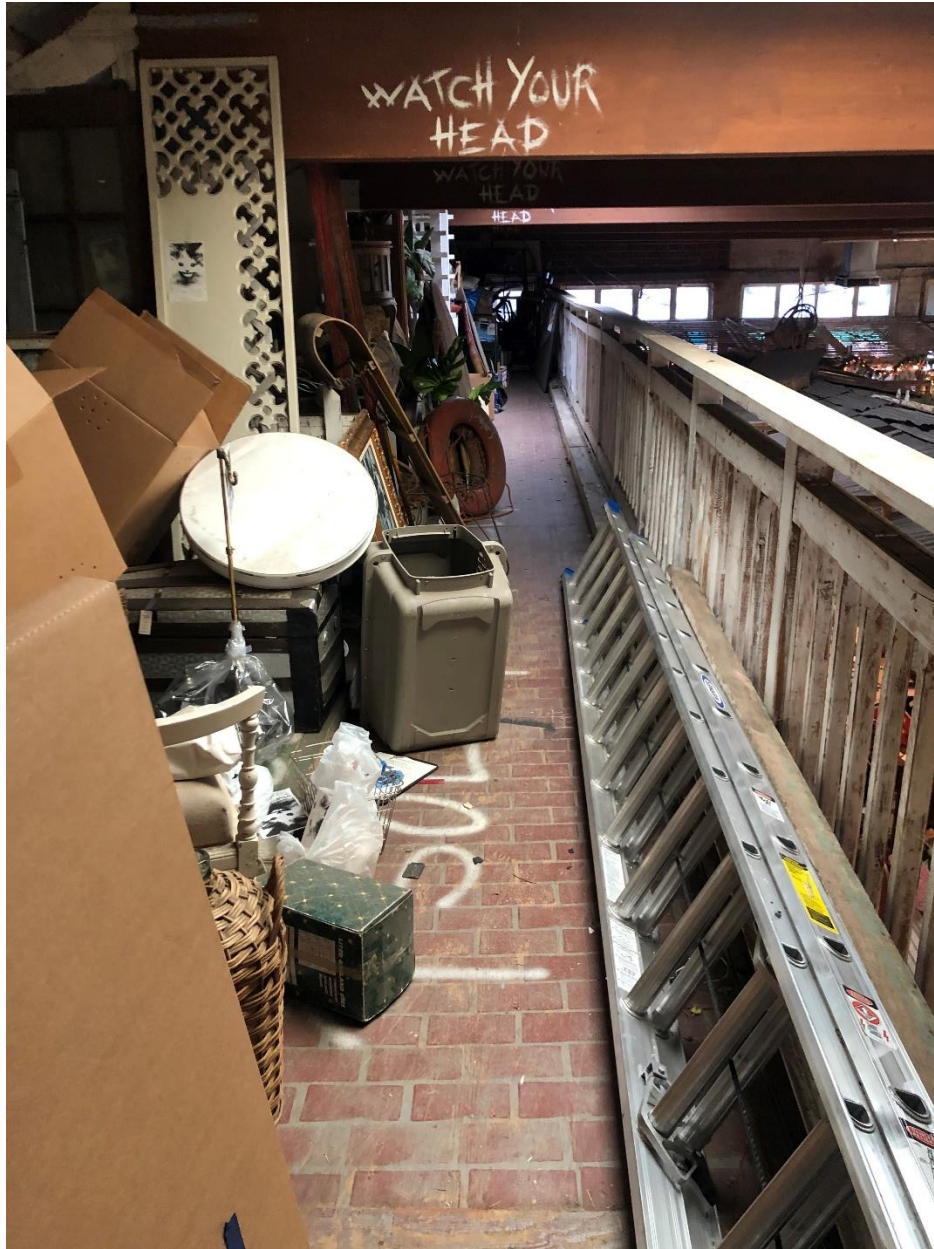
17. Interior skylight (1 of 4), 204 W. Chapman Avenue (view north);
December 14, 2020



18. View of mezzanine railing cut into roof supports,
204 W. Chapman Avenue (view southwest);
December 14, 2020



19. Interior mezzanine staircase in southwest corner,
204 W. Chapman Avenue (view northwest);
December 14, 2020



20. Interior mezzanine along western side of the building,
204 W. Chapman Avenue (view north);
December 14, 2020



21. Rear loading bay door adjacent to mezzanine staircase,
204 W. Chapman Avenue (view south);
December 14, 2020



22. View of mezzanine enclosed at southern end from the ground floor,
204 W. Chapman Avenue (view south);
December 14, 2020



23. Lower ceiling height at southern end of building below mezzanine,
204 W. Chapman Avenue (view west);
December 14, 2020