



August 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), Orange County, California. The subject property is identified as a contributor to the Old Towne Orange Historic District listed in the National Register of Historic Properties (National Register) 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 (CDFs) related 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 site visits to the property on December 14, 2020 and July 21, 2021, to identify significant CDFs of the building and the surrounding historic district. Sapphos Environmental, Inc. also completed background research to inform a timeline of the subject property's development and use history.

Based on 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), Orange County, California. The subject property is identified as a contributor to the Old Towne Orange Historic District listed in the National Register of Historic Places (National Register) in 1997. Properties listed in the National Register are automatically listed in the California Register of Historical Resources (California Register), 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 Secretary of the Interior's *Standards for the Treatment of Historic Properties (Standards)*, an evaluation of the property was completed to identify the character-defining features (CDFs) 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 CDFs. Ms. Kasey Conley and Ms. Carrie Chasteen meet the Secretary of the Interior's *Professional Qualification Standards* in the fields of Architectural History and History. Site visits were completed on December 14, 2020 and July 21, 2021, 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 National Register and/or California Register will be automatically listed in the Historic Register. The Historic Register will include all contributors to National Register- and/or California Register-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.

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

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 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 California Register 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

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 CDFs 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

² City of Orange. Adopted 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=>

- Front porches transition between the public sidewalk and private space of the house South Glassell Street, ca. 1920 Plaza Park, 2005
- 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* 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 California Register 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 California Register, 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

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 California Register; 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 California Register, 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 in 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 for Rehabilitation* 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 for Rehabilitation* 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.*

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

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.*
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 quickly grew during the 1880s population boom in Southern California, and it was officially incorporated in 1888. This early boom in population led 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 led 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.

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=>

The subject property has been used for various industrial and commercial businesses over time. The earliest recorded business at the property was Orange County 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 through 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.¹⁰ Country Roads Antiques closed in 2021 and the building is currently vacant.

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, removal of the original primary and eastern façade pediments, cover/removal of brick cornice, the alteration/infill of the 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

The subject property is a rectangular 1-story vernacular commercial building constructed circa 1916. The building exterior (Attachment 2, *Property Photograph Log*) is clad in stucco over brick with a flat roof. Based on a 1925 photograph and building scarring, a brick cornice was located along the parapet of the building with pediments along the primary and eastern façades. These pediments and cornice appear to have been removed by 1970 based on additional historic photographs (Figure 1,

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.

1925 Historic Photograph; Figure 2, 1970 Historic Photograph). The primary façade faces W. Chapman Avenue and has four large wood display windows which are slightly recessed creating narrow sills along the bottom. Pilasters with brick capitols are located between each opening along the primary and eastern façades. The display windows are large, fixed single-pane windows with a band of four divided transoms above. Some latches and chains on the transom windows are visible from the interior of the space. The primary entrance is at-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. Based on the material/style of the current entrance door and interior alterations, the entrance door and fixed window/bulkhead to the west do not appear to be original and was further recessed into the building at an unknown date (Figure 1, *Entrance Alteration*).



Figure 1. Entrance Alteration (interior view)
SOURCE: Sapphos Environmental, Inc., 2021

The eastern façade is divided into eight openings (referenced as opening Nos. 6, 7, 8, 9, 10A–C, and 11). The four northern openings have the same display windows found on the primary façade. Based on historic photographs from 1925, the northern-most display window (No. 6) appears to be original. The historic photograph from 1925 also shows that the opening south of this window (No. 7) originally had a wood four-divided light with a higher sill, similar to the windows found on the rear of the building, and these two windows remained until at least 1970 (Figure 2, 1925 *Historic Photograph*; Figure 3, 1970 *Historic Photograph*).



Figure 2. 1925 Historic Photograph
SOURCE: *City of Orange Planning Department*



Figure 3. 1970 Historic Photograph
SOURCE: *City of Orange Planning Department*

There is no photographic documentation of the original windows in the remaining six openings (Nos. 8, 9, 10A–C, and 11). Based on interior and exterior building scarring and infill, it appears that the windows in these six openings had multiple style and height interactions over the years with differing brick, block, and mortar infill visible on the interior of the building (Figures 4A–C, *Window Infill/Building Scarring*).



Figure 4A. Window Infill/Building Scarring (interior view)
SOURCE: *Sapphos Environmental, Inc., 2021*



Figure 4B. Window Infill/Building Scarring (interior view)
SOURCE: *Sapphos Environmental, Inc., 2021*



Figure 4C. Window Infill/Building Scarring (interior view)

SOURCE: *Sapphos Environmental, Inc., 2021*

After 1970, at least three additional display windows were added to the eastern façade in openings Nos. 7, 8, and 9, making up the current four display windows. Exterior and interior building scarring suggests three additional display windows in openings Nos. 10A–C were added to the eastern façade and later infilled at an unknown date. A loading bay door, No. 11, is located in the southern-most opening of the façade. The Sanborn Fire Insurance Maps from 1922 to 1950 do not indicate an opening at this location. This bay door was presumably added after 1950 and is not original.

The southern façade includes three wood four-divided light wood casement windows with a higher sill, like that shown in the 1925 historic photograph (Figure 2). A loading bay door is located at the western end of the façade. 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 were both occupied by Country Roads Antiques and Gardens. The buildings are structurally separate.

IDENTIFIED CHARACTER-DEFINING FEATURES

The 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
Single-pane windows topped with band of transom 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 CDFs 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 historic 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 and their aesthetics of large single-pane glass with divided transoms 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 as one story in height or had a second story which was used as office/residential space. The surrounding historic 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 historic district. Additionally, the design of the flat roof is indicative of the vernacular commercial buildings that were quickly being constructed in the area. The building originally had a brick cornice with pediments, yet these were removed/covered between 1925 and 1970. 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 (not materials), indicative of the original commercial/industrial design intent, is the only interior CDF recommended for retention.

DESIGN REVIEW

The review of the proposed project has been divided into four project elements, Windows/Openings, Façade/Roofline, Exterior Space, and Interior Space, for purposes of this analysis.

The proposed project would convert the property into a restaurant including a rear outdoor patio with alterations/additions that seek to comply with the *Standards*.

Element 1: Windows/Openings

Based on research, site visits, historic photographs, building scarring, and infill materials, the display windows along the primary façade (W. Chapman Avenue), the northern-most display window on the eastern façade (Olive Street), the three rear wood windows, and the rear automotive bay door opening are original to the building. The original entrance door on W. Chapman Avenue was altered with new materials and a single fixed-pane window to the west at an unknown date based on a review of the Sanborn Fire Insurance Maps and interior infill materials. The seven remaining openings along the eastern façade south of the northern corner unit have been altered several times over the years with various height and style window opening iterations based on infill material and scarring. Additionally, the automotive bay door at the southern end of the eastern façade is not original as it is not marked on the Sanborn Fire Insurance Map and its addition date is unknown.

The proposed project seeks to retain, repair, or salvage the remaining known historic material on the building as it pertains to window and door openings. The primary entrance door alcove, which is recessed will be retained, and the non-original entrance door and single fixed-pane window will be replaced. The door will be replaced with a single fixed-pane glass door with faux wood surround to match the surrounding existing wood windows as well as a full height single-pane fixed window to the west. The glass door allows for the retention of an interior/exterior connection which would have been present on a retail space when the building was constructed as well as allow for the new door to be discreet. The wood four divided-light transoms above the entrance alcove will be retained/restored and visible from the public right-of-way.

The display windows along W. Chapman Avenue will be retained in place. The wood transom and display window surrounds will be repaired where possible and replaced in kind where deterioration is too great. The display windows along W. Chapman Avenue are significant to the building, retaining its characterization as an early-20th-century commercial space and their retention helps preserve the building's characterization as such. The proposed project would replace the glass in the single fixed-pane display windows along W. Chapman Avenue and at the northern corner of Olive Street to create operable awning style units.¹¹ The window openings themselves, along with the remaining historic material, will be retained/repared where possible or replaced in kind where too deteriorated. The aesthetic of single fixed-pane 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. The transom windows above the display windows will be retained/repared were possible and replaced in kind where deterioration is too great. The transom windows which are still operable will remain operable with interior latched and chains extant, and those that are inoperable will remain inoperable.

The windows and openings south of the northern corner unit on Olive Street have seen multiple

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. This interior space will be used as storage and an interior shade/curtain will block exterior visibility into the space.

iterations overtime. The proposed project would install four divided light accordion-style windows with a sill difference of 18 inches between the original northern corner display window and the proposed windows in the five openings south of the corner unit. The current display windows along this façade are not original to the building and were added sometime after 1970, thus the materials are not historic fabric of the building. The addition of the four divided light accordion-style windows is more in line with the wood four divided light casement window which historically appeared south of the northern corner unit.¹² Historically the openings along this façade contained some sort of fenestration pattern, and re-opening the bays along Olive Street with a type more in-line with the historic fenestration and a sill 18-inches higher to differentiate it from the display windows allows recognition of the historic façade as “utilitarian” while allowing for the creation of a new use with minimal alteration.

Additionally, the automotive bay door at the southern end of the eastern façade is not original to the building. The proposed project will salvage one wood four divided light casement window from the southern façade (the other two to remain in place) and relocate it to the southern-most bay. The salvaging of the window and the placement of it on the Olive Street façade retains the historic material of the building while acknowledging the potential historic window fenestration of this façade based on evident scarring. The bay between the salvaged window and the proposed accordion windows will be left infilled to differentiate the old from the new and separate the various fenestration patterns on the façade.

The remaining two wood four divided light casement windows in the southern façade will remain in place. The central window opening (the window being repurposed to the eastern façade) will be converted to a modular roll-up door, with matching lintel height to the existing windows and thin mullions to make the design discreet with an historic appearance, for interior pedestrian connection to the rear patio. Additionally, the automotive bay door at the western end of the façade will be infilled with a thin wood partition wall, slightly recessed from the southern elevation, and removable. This alteration allows for the addition of a pedestrian door with egress to the back of house so no additional opening into the building occurs while also acknowledging the automotive opening that was originally there. The wood partition wall is reversable and since the metal roll-up door is not original, no historic material will be removed. The changes to this non-primary façade are minor and located on a non-street-facing façade, making their impact minimal.

Therefore, the repair/replacement in kind of current windows, the minimal alteration of the display windows for operability, the addition of four divided light accordion-style windows on the eastern façade, salvaging of the wood window from the southern façade to the eastern façade, the addition of a modular roll-up door on the southern façade, and the reversable infill of the automobile bay door on the southern façade complies with the *Standards*.

Element 2: Façade/Roofline

The proposed project seeks to make minimal alterations to the façade/roofline of the building. Based on a 1925 historic photograph, the subject property originally had pediments along the primary and eastern façade parapet with a brick cornice. The building was also most likely originally clad in finally textured stucco. National Park Service Technical Preservation Brief No. 22, *The Preservation and Repair of Historic Plaster* (Brief No. 22) states that small-scale commercial buildings during the 19th and early 20th century were commonly clad in this material as it was inexpensive, gave the

¹² Due to lack of photographic evidence, it is unclear whether the wood casement windows appeared all the way down Olive Street.

building a more expensive look, and offered wind, rain, and some fire protection.¹³ Additionally, Brief No. 22 states that into the early 20th century, stucco was commonly given a smooth, troweled finish, yet sand aggregate was very common.¹⁴ With this information, and the historic photographs revealing a modest Spanish Colonial Revival aesthetic to the building, the original stucco presumably had a mild sand textured finish, making the proposed finish and color compatible with the original and the period of significance.

Although the pediments were removed, and the brick cornice was removed/covered prior to 1970, some of the original brick cornice remains on the southern façade. The proposed project will expose/repair the remaining historic brick cornice on the southern façade to honor the original building design.

Seismic tie-back bracing of the building requires small square plates to run along the parapet of all façades, with a row of one on the northern and southern façades and a row of two on the eastern façade due to the height of the parapet. These plates will be painted the same color finish as the exterior walls to allow them to be more discreet. National Trust Technical Preservation Brief No. 41 *The Seismic Rehabilitation of Historic Buildings* (Brief No. 44) states that it is acceptable for reinforcement features to be visible if they are designed to blend in with the building.¹⁵ The painting of the anchor plates will allow the parapet to be braced for continued longevity while being discreet along the roofline of the building.

Along the primary and eastern façades, exterior light fixtures will be added between each window opening below the brick capitols of the pilasters. Additional lighting will be included just below the parapet for illumination of the “Finney’s Craft House” sign above the primary entrance on W. Chapman Avenue and above the second window unit south on the Olive Street façade. Although it is unclear if exterior lighting historically existed on the building, the proposed lighting is compatible with the surrounding historic district. Most, if not all, of the surrounding buildings have a variety of lightly fixtures along their primary façades. The Old Towne Orange Historic Preservation Design Standards simply state that exterior lighting should be compatible with the architectural style of the building, which is vernacular, meaning the proposed fixtures meet the design standards.

Element 3: Exterior Space

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 historic district’s period of significance and is an appropriate material for new fencing. Additionally, since the fence is not attached to the historic building, it will not alter or remove any historic materials and is reversible.

¹³ National Park Service, U.S. Department of the Interior. “Technical Preservation Brief No. 22, The Preservation and Repair of Historic Stucco.” Accessed August 2021. Available at: <https://www.nps.gov/tps/how-to-preserve/briefs/22-stucco.htm#background>

¹⁴ National Park Service, U.S. Department of the Interior. “Technical Preservation Brief No. 22, The Preservation and Repair of Historic Stucco.” Accessed August 2021. Available at: <https://www.nps.gov/tps/how-to-preserve/briefs/22-stucco.htm#background>

¹⁵ National Park Service, U.S. Department of the Interior. “Technical Preservation Brief No. 41, The Seismic Rehabilitation of Historic Buildings.” Accessed August 2021. Available at: <https://www.nps.gov/tps/how-to-preserve/briefs/41-seismic-rehabilitation.htm>

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

Element 4: Interior Space

The CDF of the interior of the building that was found to be significant was the open, exposed 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 reversible, 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 result in a minor change to this feature in light of the building as a whole.

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

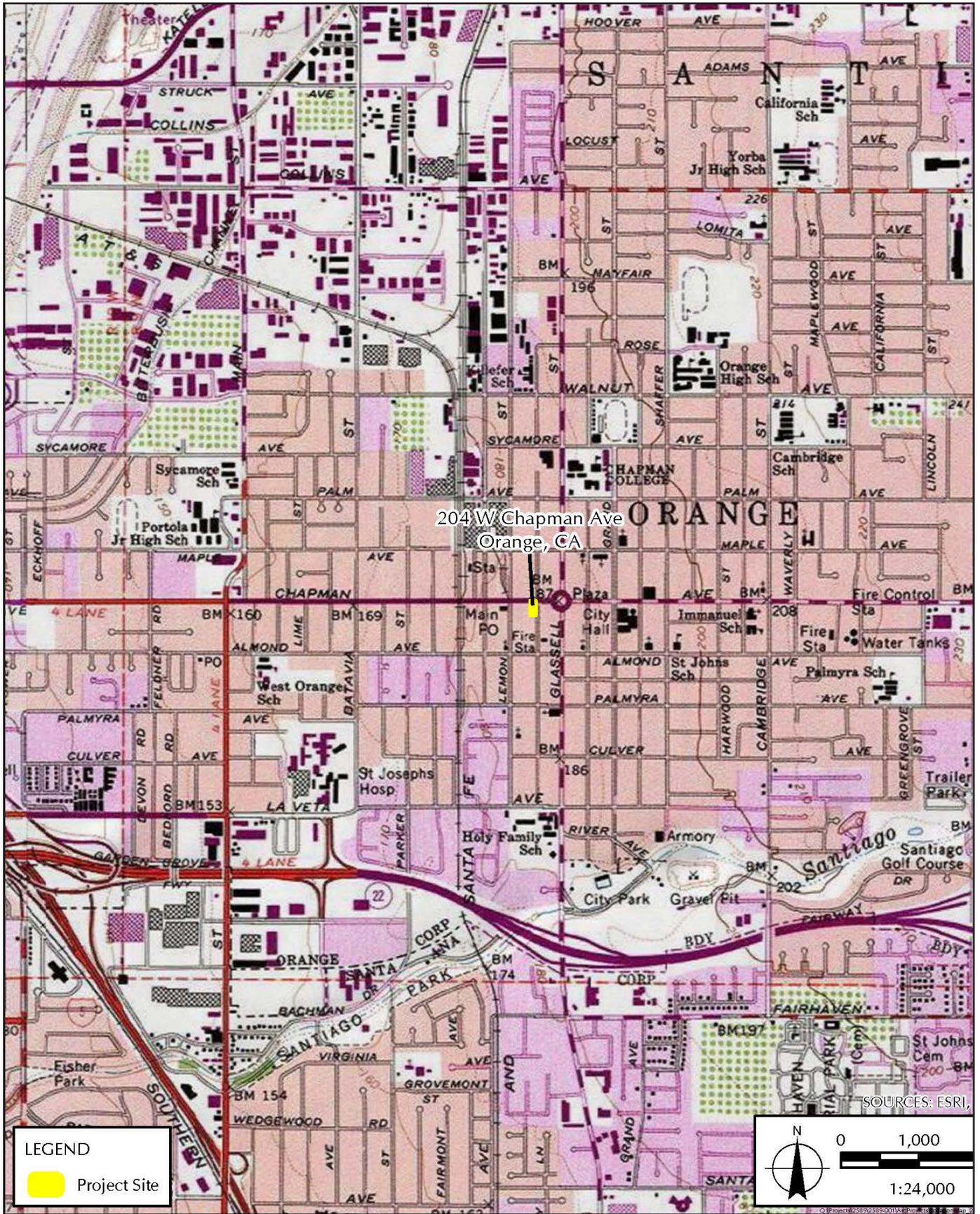
The proposed project offers minimal alterations to the historic building, retaining most of the CDFs identified as *Most Significant* and *Significant*. The changes to the building allow for a new use with minimal alteration to significant features while also retaining the character of the building as a 20th-century commercial space with connection to the streetscape through the large single fixed-pane display windows along the primary façade as well as an automotive use with the retention of the automobile opening on the southern façade and the acknowledgement of a more utilitarian eastern façade. The distinctive features of the windows are retained, and no false sense of history is being created by the addition of un-substantiated CDFs. Most historic material on the building will be retained/repared where possible or replaced in kind where deterioration is too great. Design features of the proposed project that do alter CDFs 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*. The design of the proposed project is discreet and compatible with the surrounding historic district. 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 Depot 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 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);
August 6, 2021



8. Southern façade loading bay door, 204 W. Chapman Avenue (view northwest);
August 6, 2021



9. Southern façade boarded windows, 204 W. Chapman Avenue (view northwest);
July 21, 2021



10. Interior of 204 W. Chapman Avenue (view northeast);
July 21, 2021



11. Interior of 204 W. Chapman Avenue (view northeast);
July 21, 2021



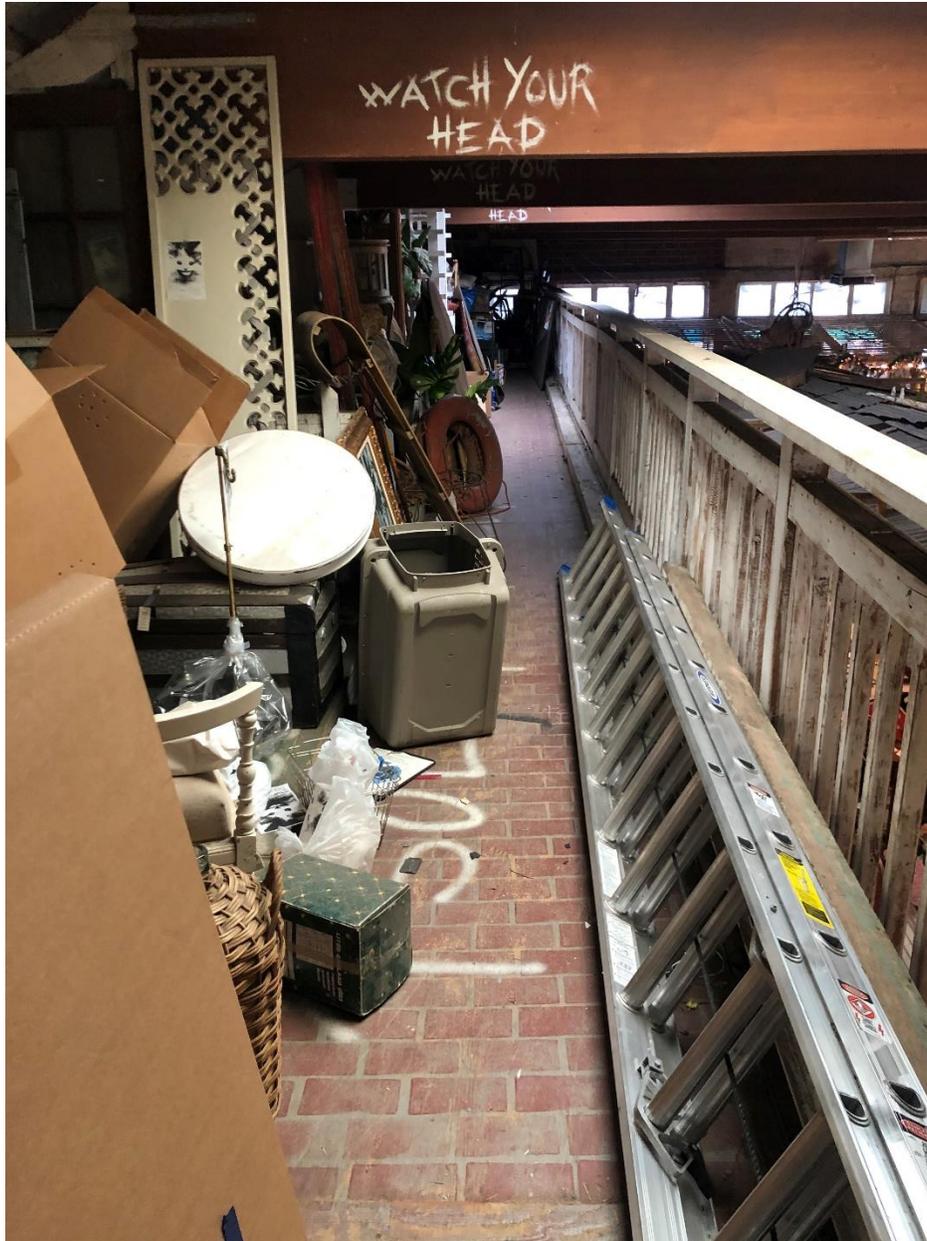
12. View from interior mezzanine / Open rafter ceiling and wood glulam beams,
204 W. Chapman Avenue (view northeast);
December 14, 2020



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



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



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