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MEMORANDUM

DATE: October 21, 2016

To: Leason Pomeroy, LP3 Architecture
Doug DeCines, DeCines Properties, Inc.

FROM: Casey Tibbet, M.A., Senior Cultural Resources Manager/Architectural Historian

SUBJECT: Killefer Square Specific Plan, City of Orange, California (LSA Project No. WSH1601)

LSA, under contract to Western States Housing, LLC, prepared a historical resources impacts assessment in July 2016 and an addendum in September 2016 for the Killefer Square Specific Plan (Specific Plan). The Specific Plan is a proposed adaptive reuse development plan for the Lydia D. Killefer Elementary School (School), which is listed in the National Register of Historic Places (National Register) and located at 541 North Lemon Street in the City and County of Orange. The property is currently developed with the main school building, two modern classroom buildings, a shed, and parking. The Specific Plan calls for adaptive reuse of the main school building and removal of all other buildings and parking to facilitate a multiple-family residential project with underground parking and various amenities.

BACKGROUND

In July 2016, LSA prepared an impacts assessment for the proposed project using the *Secretary of the Interior's Standards for the Treatment of Historic Properties, Rehabilitation (SOIS)*. That report determined that the proposed project was not in compliance with the SOIS and would result in substantial adverse changes to the significance of the School. Although the project would preserve/restore most of the School's exterior features, the proposed alterations to the interior of the school and surrounding grounds (addition of nine new one-, two-, and three-story buildings) would considerably diminish its ability to convey its history as a school and would, therefore, impair its historic significance. In addition, the project was incompatible in scale and massing with the one-story residences across North Lemon Street in the Old Towne Historic District.

In response to LSA's findings and recommendations, as well as input from City staff, the community, and the City's Design Review Committee (DRC), Western States Housing, LLC revised the proposed project and, in September 2016, LSA analyzed the revisions in terms of compliance with the SOIS and compatibility with the Old Towne Historic District. That analysis, which was completed as an



addendum to the July 2016 report, concluded that the revised site plan did a much better job of maintaining the campus feel of the School and the important spatial relationships of the courtyard/play area, as well as the visual connection with the surrounding neighborhood that the School once served. In addition, more character-defining features were proposed to be preserved and, if the proposed buildings were ever removed, there would be very little material damage and the property would look very similar to its current appearance.

REVISED PLANS (OCTOBER 2016)

After meeting with the DRC in early October 2016, Western States Housing, LLC has again revised the proposed site plan. The current version of the proposed plan increases the number of buildings, but reduces the height of the tallest building and the number of units. The proposed buildings range from two to five stories; however, the fifth story has been stepped back to reduce the visual impact from Lemon Street. In addition, the plan increases the landscaped setback from the Lemon Street property line from 8 feet to 20 feet and provides a landscaped courtyard between the tallest buildings adjacent to Lemon Street. The conceptual elevations show an art wall and open wrought iron fencing along Lemon Street. The driveway and the ball court have switched places, but the width of the view corridor appears to be the same as previously proposed. All of this improves the spatial relationship and creates a less dense feeling.

No changes to the previously proposed work to the School building are indicated.

Density and Spatial Relationships

The original project plans in the July 2016 report were not in compliance with SOIS 1, 2, 9, and 10. The common thread in each of these is preservation of spatial relationships. The revised site plan from September 2016 did a much better job of maintaining the campus feel of the School and the important spatial relationships of the courtyard/play area, as well as the visual connection with the surrounding neighborhood that the School once served. In addition, more character-defining features were proposed to be preserved and, if the proposed buildings were ever removed, there would be very little material damage and the property would look very similar to its current appearance. The current plans (October 2016) do an even better job of reducing the density and maintaining the important spatial relationships.

OLD TOWNE HISTORIC DISTRICT

As stated in both the July 2016 report and the September 2016 addendum, the project is not within the Old Towne Historic District and would not impair the historic significance of this large District or the few contributing properties across North Lemon Street from the project area. The current plans, with the larger setback along Lemon Street and the stepped back building design, represent improvement in terms of the project's visual compatibility with the adjacent District. As noted in the previous report and addendum, the project represents an incremental encroachment of high-



density development in an area that has historically been characterized by small single-family and multifamily homes, but will not impair the historic significance of the District.

CONCLUSION

LSA supports the changes in the current conceptual plans because they continue to provide for preservation of the School and improve the project from a historical resources standpoint. To ensure that the project is in compliance with the SOIS and there is no substantial adverse change to the historic property, the following mitigation measures are recommended:

1. **Historic American Buildings Survey (HABS) Level I Documentation.** The School should be documented to Level I of the HABS by a professional who meets the Secretary of the Interior's Professional Qualification Standards for Historian, Architectural Historian, or Historical Architect. This documentation consists of the following:

- a. A full set of as-built measured drawings that adhere to HABS guidelines. Generally, this includes a site plan, floor plans, elevations, building sections, and details. The plans should clearly identify the locations and dimensions of any openings that are proposed for removal so that these openings could conceivably be reconstructed in the future. The drawings should be produced from accurate measurements and recorded with ink on a translucent material such as Mylar at a size of either 19 × 14 inches or 24 × 36 inches.

If historic as-built drawings are found depicting all or part of the School, these may be used to satisfy part of this requirement, with supplemental drawings prepared for areas and features not depicted in historic drawings.

- b. Large format (4 × 5-inch negatives or larger) black-and-white photographs of all exterior elevations, context views, character-defining features, and significant interior spaces. Views must be perspective-corrected and fully captioned. Prints must be made on polyester-based "safety film" and processed per HABS standards. If digitally produced prints are made, they must be of equivalent quality to the traditional photographic contact print and be a true representation of the negative including the borders. Digital contact prints can be made from TIFFs by scanning the film and printing it on 100 percent cotton, acid-free matte paper using pigment or carbon inks on an inkjet printer. The paper/printer/ink combination used for the digital prints must have a permanency rating of 150 years or greater by an independent rating organization. Please refer to the updated 2015 HABS guidelines available online at <http://www.nps.gov/hdp/standards/habsguidelines.htm> if further clarification is needed.
- c. Written data that include a narrative history and description of the property. The data provided in this report can be used to fulfill part of this requirement. The written data should be printed on archival bond paper.

One archival copy (with negatives) should be submitted to the HABS program for inclusion in the Library of Congress. Non-archival copies of the documentation (such as a digital copy that is laser printed and comb bound, with a CD containing high-resolution electronic files) should be provided to the City of Orange Community Development Department, the Orange



Public Library and the Orange County Archives. Successful completion of this mitigation measure is predicated on acceptance of the documentation package by the City of Orange Community Development Department.

2. **Requirements for Building Repairs and Treatment.** The following shall be incorporated into the general notes on the working drawings:
 - a. 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 where possible, materials. Replacement of missing features shall be substantiated by documentary and physical evidence.
 - b. Chemical or physical treatments, if appropriate, shall be undertaken using the gentlest means possible. Treatments that cause damage to historic materials shall not be used.
3. **Salvage of Historic Materials.** To the extent feasible, any salvageable historic materials that will be removed in connection with the project (e.g., wood-framed windows, doors that date from the period of significance, historic-period bell, and bell hardware in bell tower) should be reused on the site wherever possible. Any historic materials that will not be reused on site should be stored and preserved in a secure, on-site location for potential re-installation in the future. For the purposes of this mitigation measure, “salvageable historic materials” is defined as any building material or decorative feature that dates from the period of significance (1931–1944) and is in good condition.

Attachment A: Revised plans from October 2016