



LSA ASSOCIATES, INC.  
1500 IOWA AVENUE, SUITE 200  
RIVERSIDE, CALIFORNIA 92507

951.781.9310 TEL  
951.781.4277 FAX

BERKELEY  
CARLSBAD  
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## MEMORANDUM

**DATE:** September 7, 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 Number WSH1601)

LSA Associates, Inc. (LSA), under contract to Western States Housing, LLC, recently prepared a historical resources impacts assessment 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 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 has revised the proposed project. This memorandum provides a brief analysis of the revised project with regard to compliance with the SOIS and compatibility with the Old Towne Historic District.

### Revised Plans

Revised plans dated September 5, 2016 propose six new buildings, greater preservation of the School, underground parking, and amenities (Attachment A). The amenities include a swimming pool and patio area, a volleyball court, a basketball court, and a bicycle storage area. The proposed new buildings consist of two one-story buildings north and south of the School, three three-story buildings along Lemon Street, and one 5½-story building in the northwest corner of the property adjacent to Lemon Street. The arrangement of buildings allows a much wider view of the east elevation of the

School and courtyard from Lemon Street than previously proposed. This is enhanced by transparent fencing around portions of the basketball court and pool area. In addition, the reduction and arrangement of buildings, in conjunction with sections of deeper setbacks along Lemon Street, allows for improved spatial relationships and a less dense feeling.

**School Building.** The plans for the existing school building have been revised to incorporate preservation of more character-defining features. The proposed dormers on the west side of the building have been removed allowing for the preservation/restoration of the original ceilings. In addition, all of the existing windows and exterior doors will be retained and repaired if necessary and most, if not all, of the original classroom walls will be preserved. The architect has also indicated that the original wood floors will be retained and many of the chalkboard supports will also be preserved and incorporated into the design of the proposed units.

On the east side of the School the configuration of the landscaped area and walkways will be retained. The meandering path and historic display that were previously proposed have been removed and a note on the plans indicates that the historic display may be installed adjacent to the right-of-way. The handicapped accessible ramp at the primary entrance is still proposed and the bicycle storage area now extends further east than the School building. These appear to be the only obvious modern alterations on this side of the building.

**Density and Spatial Relationships.** The previous project plans 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 does 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 are 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.

### **Old Towne Historic District**

As stated in the July 2016 report, 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 along this segment of North Lemon Street. However, even with the considerable improvements to the design, it is worth noting that the density is higher and the setbacks are smaller than those of the properties in the District. Overall the project represents an incremental encroachment of high-density development in an area that has historically been characterized by small single- and multi-family homes.

### **Conclusion**

LSA supports these changes which enhance the preservation of the School and improve the project from a historical resources point of view. 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 on 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; and
3. **Salvage of Historic Materials.** To the extent feasible, any salvageable historic materials that will be removed in connection with the project (i.e., 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, onsite 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 dated September 5, 2016