**AGENDA ITEM: 4-B** 



# STAFF REPORT SAN CLEMENTE ZONING ADMINISTRATOR

Meeting Date: December 6, 2018

**PLANNER:** Jonathan Lightfoot, Assistant Planner

**SUBJECT:** Minor Cultural Heritage Permit 18-526, a request to consider

the installation of garage doors into the exterior walls of the front elevation of the historic Goldschmidt House, which is on both the

local historic register and the National Historic Register.

**LOCATION:** 243 Avenida La Cuesta

**ZONING/GENERAL** Residential Low Zoning district and Special Residential Overlay

**PLAN**: 2 (RL-2)

# **PROJECT SUMMARY:**

 The two-story single family residence was designed by Architect Paul R. Williams for Aldai Goldschmidt in 1928. The property is a designated Landmark and was listed on the local register of historic properties in 1996 and included on the National Register of Historic Places in 2004. Additional details are available in Attachment 3.

- The subject property has a recorded Historic Property Preservation Agreement (HPPA) with the City from 1997. This Mills Act contract provides tax abatement in return for a contractual commitment to preserve and maintain the property.
- The residence is 4,800 square-feet according to the National Register listing and sits on a large 28,396 square-foot lot. The lot is surrounded by other single family residences. The vacant lot to the west (239 Ave. La Cuesta) received entitlements for development and plans have been submitted for a building permit.

Figure 1 - Existing Site Conditions



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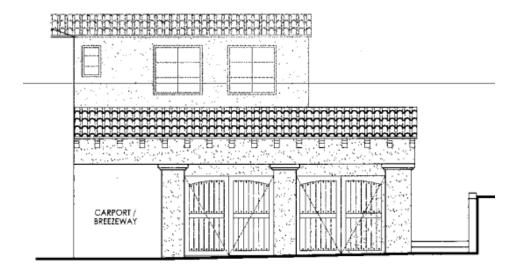


Figure 2 – Proposed Garage Doors

- The applicant proposes to create two new openings into the recessed stucco niches on the front elevation and install two garage doors as seen in Figure 2 above.
- The space was formerly used as a garage. Based on historic aerial photographs, the space was presumed to have had access from the breezeway and from a dirt drive way on the west side yard. The side access was removed and is no longer available due to development of the neighboring parcel at 239 Ave. La Cuesta. Similarly, the breezeway is too narrow for access by most modern vehicles. The proposed garage doors provide a new street-facing, direct access into the former garage (which is currently used as a study).
- Zoning Ordinance Table 17.16.100 (B) requires Zoning Administrator approval of a Minor Cultural Heritage Permit (MCHP) to allow minor alterations to a historic property. New openings for doors and windows on historic properties are not eligible for staff waivers of the required MCHP.
- Staff requested a third-party review by an architectural historian from GPA Consulting to evaluate consistency with the Secretary of the Interior's Standards (SIS) for the Rehabilitation of Historic Resources. The consultant supports the proposal as detailed in Attachment 4.
- Because the project involves only the addition of garage doors, which was reviewed
  by the consultant for consistency with SIS including an analysis of location and
  materials, the City Planner determined that additional review by the Design Review
  Subcommittee (which also serves as the Cultural Heritage Subcommittee) was not
  necessary.
- The project meets required findings for approval because:
  - The project improves the residence's conformity with the Zoning Ordinance by providing covered parking as required within Section 17.64.050.

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 The project restores the historic use of the space as a garage by installing new garage doors that are consistent with the SIS for the Rehabilitation of Historic Resources.

- The new garage doors are compatible with the historic and architectural character of the property. The doors are made of wood, which matches the material of the existing windows and doors. The doors also have the appearance of swinging garage doors, which would have been typical for the period. Therefore, the addition of new garage openings and doors on the building's south elevation will not impact the historic character of the property.
- The proposed alterations are reversible. If the garage openings and doors were removed at a later date, the essential form and integrity of the property would be unimpaired.
- The project is Categorically Exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15331 (Class 31: Historical Resource Restoration/Rehabilitation) because the property's historic use as a single-family residence is being maintained, and the specific use of the garage is being restored. The proposed work is consistent with the SIS guidelines as detailed in Attachment 4.
- Public comments have not been received on this item.

## RECOMMENDATION

Staff recommends that the Zoning Administrator:

- Determine the project is Categorically Exempt from the requirements of the CEQA pursuant to CEQA Guidelines Section 15331 (Class 31: Historical Resource Restoration/Rehabilitation); and
- 2. Adopt Resolution ZA 18-047, approving Minor Cultural Heritage Permit 18-526, Goldschmidt Garage Doors, subject to attached conditions of approval.

#### Attachments:

- Resolution ZA 18-047
   Exhibit A Conditions of Approval
- 2. Location Map
- 3. DPR Form for 243 Ave. La Cuesta
- 4. Evaluation for Consistency with the Secretary of the Interior's Standards
- 5. Photos

Plans (under separate cover)

# **ATTACHMENT 1**

#### **RESOLUTION NO. ZA 18-047**

A RESOLUTION OF THE ZONING ADMINISTRATOR OF THE CITY OF SAN CLEMENTE, CALIFORNIA, APPROVING MINOR CULTURAL HERITAGE PERMIT 18-526, GOLDSCHMIDT HOUSE GARAGE DOORS, TO INSTALL TWO NEW GARAGE DOORS WITHIN NEW OPENINGS ON THE FRONT ELEVATION OF THE RESIDENCE, LOCATED AT 243 AVENIDA LA CUESTA

WHEREAS, the residence at 243 Avenida La Cuesta, the Goldschmidt House, is listed on the City's Designated Historic Resources List and the National Register of Historic Places as an individual property; and

WHEREAS, on August 23, 2018, an application was submitted by Dena Van Slyke, 209 Avenida Granada, San Clemente, CA 92672, for Minor Cultural Heritage Permit 18-526, and deemed complete on November 6, 2018; a request to install two new garage doors into new openings on the front elevation. The subject site is located at 243 Avenida La Cuesta in the Residential-Low Zoning District and within Special Residential Overlay 2 (RL-2). The site's legal description is Lot 130 of Tract 898, and Assessor's Parcel Number is 057-061-13; and

WHEREAS, the Planning Division has completed an initial environmental assessment of the above matter in accordance with the California Environmental Quality Act (CEQA) and recommends the Zoning Administrator determine the project is Categorically Exempt from CEQA pursuant to State CEQA Guidelines Section 15331 (Class 31: Historical Resource Restoration/Rehabilitation). This is recommended because the project is a rehabilitation project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties as determined through an analysis conducted by an architectural historian; and

WHEREAS, on August 30, 2018, the City's Development Management Team (DMT) reviewed the proposed project and determined it complies with the General Plan, Zoning Ordinance, and other applicable City ordinances and codes. The DMT supports the project; and

WHEREAS, on December 6, 2018, the Zoning Administrator of the City of San Clemente held a duly noticed public hearing on the subject application, considered written and oral comments, and facts and evidence presented by the applicant, City staff, and other interested parties.

NOW, THEREFORE, The Zoning Administrator of the City of San Clemente does hereby resolve as follows:

# Section 1. Incorporation of Recitals.

The Zoning Administrator hereby finds that all of the facts in the Recitals are true and correct and are incorporated and adopted as findings of the Zoning Administrator as

fully set forth in this resolution.

# Section 2. CEQA Findings.

Based upon its review of the entire record, including the Staff Report, any public comments or testimony presented to the Zoning Administrator, and the facts outlined below, the Zoning Administrator hereby finds and determines that the proposed project is Categorically Exempt from CEQA pursuant to State CEQA Guidelines Section 15331 (Class 31: Historical Resource Restoration/Rehabilitation).

The Class 31 exemption specifically exempts from further CEQA review the rehabilitation of a historic property that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Furthermore, none of the exceptions to the use of the Class 1 categorical exemption identified in State CEQA Guidelines section 15300.2 apply. The project will not result in a cumulative impact from successive projects of the same type in the same place, over time. There are no unusual circumstances surrounding the project that result in a reasonably possibility of a significant effect on the environment. The project will not damage scenic resources, including trees, historic buildings, rock outcroppings, or similar resources. The project does not include any hazardous waste sites. The project will not cause a substantial adverse change in the significance of a historical resource because the proposed alteration has been reviewed by a qualified historic architect and has been determined to be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Thus, the Class 1 exemption applies, and no further environmental review is required.

# Section 3. Minor Cultural Heritage Permit Findings

With respect to Minor Cultural Heritage Permit (MCHP) 18-526, the Zoning Administrator finds as follows:

- A. The architectural treatment of the project complies with the San Clemente General Plan, in that;
  - The proposed garage doors are wood, consistent with the materials standards within the City's Design Guidelines Section II.C.3.d – Building Materials, Color, and Texture; and
  - 2. The proposed garage doors are recessed within two existing blind niches between the three existing stucco-clad square columns on the east end of the front elevation.
- B. The architectural treatment of the project complies with any applicable specific plan and the City's Zoning Ordinance in areas including, but not limited to, height, setback, color, etc., in that:
  - 1. The proposed garage doors will not alter the existing building's footprint or height.

- 2. The proposed doors are compatible with the historic and architectural character of the property. The doors are made of wood material and utilize a swinging door design typical of the time period.
- C. The architectural treatment of the project complies with the architectural guidelines in the City's Design Guidelines, in that;
  - 1. The proposed garage doors are wood, consistent with the other windows and doors of the structure and with the materials standards within the City's Design Guidelines Section II.C.3.d *Building Materials, Color, and Texture*; and
  - 2. The proposed garage doors are recessed within two existing blind niches between the three existing stucco-clad square columns on the east end of the front elevation.
- D. The general appearance of the proposal is in keeping with the character of the neighborhood, in that:
  - 1. All abutting residences provide covered parking and the provision of offstreet covered parking is required by Chapter 17.64 of the Zoning Ordinance.
  - 2. The proposed doors are compatible with the historic and architectural character of the property. The doors are made of wood material and utilize a swinging door design typical of the time period.
- E. The proposal is not detrimental to the orderly and harmonious development of the City, in that:
  - 1. The provision of two covered parking spaces is a Zoning Code requirement, per Section 17.64.050.
  - 2. The proposed alterations do not encroach into any setbacks or above any height limits prescribed by the Zoning Ordinance for the RL-2 Zone.
- F. For resources on the City's Landmarks List, the proposed rehabilitation, restoration, preservation, or reconstruction, including modifications, alterations, or additions, are found to be in conformance with the Secretary of the Interior Standards for the Treatment of Historic Properties and preserve to the extent feasible the character defining features, in that the proposal was reviewed by an architectural historian from GPA Consulting and was determined to be in compliance with Secretary of the Interior's Standards (SIS) for the Treatment of Historic Properties. The project complies with the SIS in that:
  - 1. The property's historic use as a single-family residence is being maintained, and the specific use of the garage is being restored.

- 2. The proposed new garage openings and doors do not obscure, damage, or destroy character-defining features. They will be in the same locations as the existing walls; therefore, the south elevation will retain its overall design and configuration.
- 3. The new garage doors do not create a false sense of historical development nor are they a conjectural feature. They are adequately differentiated as new by their modern operability and by the appearance of seams, which allow the garage doors to roll up. Therefore, they will be distinguishable as non-original upon close inspection.
- 4. The planters that are being removed were added outside of the period of significance and are therefore, not character defining.
- 5. The new garage doors are compatible with the historic and architectural character of the property. They are made from a compatible material, wood, which matches the material of the existing windows and doors. The new doors are also compatible with the building's architectural style. They have the appearance of swinging garage doors, which would have been typical for the period. Therefore, the addition of new garage openings and doors on the building's south elevation will not impact the historic character of the property to the degree it would no longer retain integrity overall.
- 6. The proposed alterations are also reversible; meaning if the garage openings and doors were removed at a later date, the essential form and integrity of the property would be unimpaired.

<u>Section 4.</u> Zoning Administrator Approval.

Based on the foregoing recitals and findings, and the written and oral comments, facts, and evidence presented, the City of San Clemente Zoning Administrator approves Minor Cultural Heritage Permit 18-526, Goldschmidt House Garage Doors, subject to the Conditions of Approval set forth in Exhibit A.

PASSED AND ADOPTED at a regular meeting of the City of San Clemente Zoning Administrator on December 6, 2018.

Cecilia Gallardo-Daly, Zoning Administrator

# CONDITIONS OF APPROVAL MINOR CULTURAL HERITAGE PERMIT 18-526

1.	The applicant shall defend, indemnify, and hold harmless the City of San Clemente and its officers, employees, and agents from and against any claim, action, proceeding, fines, damages, expenses, and attorneys' fees, against the City, its officers, employees, or agents to attack, set aside, void, or annul any approval or condition of approval of the City concerning this project, including but not limited to any approval or condition of approval of the City Council, Planning Commission, or City Planner. Applicant shall pay all costs, The City shall promptly notify the applicant of any claim, action, or proceeding concerning the project and the City shall cooperate fully in the defense of the matter. The City reserves the right, at its own option, to choose its own attorney to represent the City, its officers, employees, and agents in the defense of the matter. If the applicant fails to so defend the matter, the City shall have the right, at its own option, to do so and, if it does, the applicant shall promptly pay the City's full cost of the defense.  (PIng.)
2.	Use and development of this property shall be in substantial conformance with the approved plans, material boards and other applicable information submitted with this application, and with these conditions of approval. (Plng.)
3.	Thirty (30) days after project approval, the owner or designee shall submit written consent to all of these imposed conditions of approval to the Community Development Director or designee. [Citation – City Attorney Legal Directive/City Council Approval June 1, 2010] (Plng.)
4.	The applicant shall comply with all applicable provisions of the San Clemente Municipal Code, adopted ordinances, and state laws. (Plng.)(Eng.)(Bldg.)
5.	Prior to the issuance of building permits, the owner or designee shall include within the first four pages of the working drawings a list of all conditions of approval imposed by the final approval for the project. [Citation – City Quality Assurance Program] (Plng.) (Bldg.)
6.	The new carriage style wooden garage doors shall be recessed behind the original

square columns so that the columns remain the predominant feature and the niche

■■ (Plng.)\_\_\_\_

All Conditions of Approval are standard, unless indicated as follows:

Denotes a modified standard Condition of Approval.

characteristic of the elevation is maintained.

■■ Denotes a project specific Condition of Approval

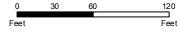
# **ATTACHMENT 2**





Project: MCHP 18-526

Address: 243 Avenida La Cuesta





# State of California -- The Resources Agency DEPARTMENT OF PARKS AND RECREATION

# CONTINUATION SHEET

Primary # HRI# Trinomial

# **ATTACHMENT 3**

Page 1 of 3 Resource Name or #: 243 AVENIDA LA CUESTA

Recorded by: Historic Resources Group Date: 9/20/2006 ☐ Continuation ☑ Update

PROPERTY NAME Casa Tres Vistas

HISTORIC NAME Goldschmidt House

PROPERTY ADDRESS 243 Avenida La Cuesta

ASSESSOR PARCEL NUMBER 057-061-13

PROPERTY TYPE Single-family residential

OTHER DESCRIPTION

**DATE OF CONSTRUCTION** 1928 (F) Building Permit

INTEGRITY No substantial changes post-1988 Historical Photo Log prepared by the City of San

Clemente.

**SIGNIFICANCE** This one-story single family residence was built for Adlai Goldschmidt in 1928. The

Goldschmidts were Los Angeles distillers and winemakers. In 1906, they became half owners of some 10,500 acres of former ranch lands in the Capistrano Valley.

(See Continuation Sheet).

STATUS CODE 1S

STATUS Listed in the National Register as an individual property. The property also appears

eligible at the local level both individually and as a contributor to a potential historic

district. It is recommended for retention on the Historic Structures List.

Project City of San Clemente Historic Resources Survey Update

Prepared for City of San Clemente

910 Calle Negicio, Suite 100 San Clemente, CA 92673

Prepared by Historic Resources Group

1728 Whitley Avenue Hollywood, CA 90028

# State of California -- The Resources Agency DEPARTMENT OF PARKS AND RECREATION

# **CONTINUATION SHEET**

Primary # HRI# Trinomial

Page 2 of 3 Resource Name or #: 243 AVENIDA LA CUESTA

Date: 9/20/2006 Recorded by: Historic Resources Group SIGNIFICANCE (continued). When the property was later divided, the Goldschmidts retained the coastal grazing lands that would later be acquired by a syndicate headed by Hamilton Cotton and developed as San Clemente. The Goldschmidt Residence was designed by Los Angeles architect Paul R. Williams. Williams has designed a number of residences for the Goldschmidt family over the years, including homes for brothers Max and Herman in the Holmby Hills and Hancock Park neighborhoods of Los Angeles. Williams was one of Los Angeles' premier architects from the 1920s to the 1950s, and undoubtedly the most successful black architect of his day. He is responsible for some of that city's most recognizable landmarks, including the Beverly Hills Hotel and the Theme Building at Los Angeles International Airport. He is perhaps best known as the "architect to the stars," designing elegant Period-style mansion for the Hollywood elite, including Frank Sinatra, Cary Grant, and Lucille Ball. The Goldschmidt House was listed in the National Register of Historic Places in 2004. It appears eligible at the local level under Criterion A for its association with the Ole Hanson/Spanish Village by the Sea period of development (1925-1936), and under Criterion C for its association with prominent architect Paul R. Williams and as a unique and elaborate interpretation of the Spanish Colonial Revival style in San Clemente.

# State of California -- The Resources Agency DEPARTMENT OF PARKS AND RECREATION

# **CONTINUATION SHEET**

Primary # HRI# Trinomial

Page 3 of 3 Resource Name or #:

243 AVENIDA LA CUESTA

**Recorded by:** Historic Resources Group

Date: 9/20/2006

☐ Update

# **Photographs of the Subject Property:**











**Date:** October 10, 2018

For: City of San Clemente Planning Department From: Emily Rinaldi, Associate Architectural Historian Subject: Goldschmidt House, 243 Avenida La Cuesta

The owner of 243 Avenida La Cuesta, also known as the Goldschmidt House, is proposing the addition of garage doors into existing blind niches on the former garage at the east end of the building's south elevation. The Goldschmidt House is a single-family residence located within the City of San Clemente (City) on Avenida La Cuesta between Patero Del Oro and Calle Bella Loma. The building was constructed in 1928 and designed by architect Paul R. Williams in the Spanish Colonial Revival style. It is designated by the City as a local landmark as well as listed in the National Register of Historic Places and California Register of Historic Resources under Criterion C/3 as an excellent example of a work by a master architect.

Properties on the City's Designated Historic Resources or Landmarks List require a Minor Cultural Heritage Permit (MCHP) for all minor exterior alterations or modifications. Applications for a MCHP are reviewed City Planning staff for compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) with final approval determined by the Zoning Administrator. The Standards are a series of best practices issued by the National Park Service for maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations to historic properties. The Standards are accompanied by Guidelines for four types of treatments for historical resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The Standards for Rehabilitation are used by the City in their review of proposed alterations to buildings designated as local landmarks.

GPA Consulting (GPA) was retained by the City to review the proposed alterations to the Goldschmidt House and analyze the project for compliance with the Standards for Rehabilitation. GPA's analysis, recommendations, and conclusions are discussed below.

#### **Description of Former Garage**

When the Goldschmidt House was constructed in 1928, the first floor of the east end of the building was used as a garage. This portion of the building is semi-attached as it is separated on the first floor by a square opening that leads to a carport or breezeway, but the building's second story cantilevers out over the western portion of the garage roof. The south elevation features three simple square columns clad in stucco. Between the columns are two blind niches comprised of featureless stucco-clad walls slightly setback from the three columns. Concrete planters were later added in front of the blind niches at an unknown date. The north elevation originally featured garage openings, which were accessed via a semi-circular drive that wrapped around the building to the north. In the 1960s, this northern driveway was relandscaped into a lawn and garden area and the garage was converted into a playroom. The



former garage is currently used as an office. Based upon the photographs provided, GPA could not confirm whether the original garage openings and doors remained on the north elevation.

#### **Character-Defining Features**

Character-defining features are the architectural components that contribute to a building's sense of time and place. The character-defining features of buildings can be generally grouped into three categories: the overall visual character of a building, the exterior materials and craftsmanship, and the interior spaces, features, and finishes. The relative importance of character-defining features depends on the level of craftsmanship, visibility, and integrity. In addition, some character-defining features are more important than others in conveying the significance of the building. Primary character-defining features are considered the most important elements contributing to the significance of the building, while secondary features are considered less important.

The Goldschmidt House is architecturally significant as an excellent example of the work of Paul R. Williams. As such those distinctive features, spaces, and materials that are key to conveying its original design are character-defining. The period of significance is 1928, the year the building was constructed.

## **Project Description**

The project proposes restoring the original use of the garage by adding two new garage openings and doors into the existing blind niches at the east end of the building's south elevation. The three existing columns will be retained, and the historic walls and non-original planters between the columns will be demolished to create the new openings. Two new garage doors will be inserted into the openings. These doors will be wood roll-up doors with the appearance of double swinging doors. New concrete and tile to match the paving of the existing driveway will also be installed in front of the new openings.

## **Standards Analysis**

The following is analysis of the proposed project's compliance with the Standards:

Standard 1. A property will 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.

The proposed project complies with Standard 1. The property's historic use as a single-family residence is being maintained, and the specific use of the garage is being restored.

Standard 2. The historic character of a property will be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property will be avoided.

The proposed project complies with Standard 2. The proposed new garage openings and doors do not obscure, damage, or destroy character-defining features. They will be in the same locations as the existing walls; therefore, the south elevation will retain its overall design and configuration. The existing walls and planters within the blind niches will be removed; however, neither of these



features are key to conveying the property's original design and so are considered less important or non-character-defining features.

Standard 3. Each property will 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, will not be undertaken.

The proposed project complies with Standard 3. The new garage doors do not create a false sense of historical development nor are they a conjectural feature. They are adequately differentiated as new by their modern operability and by the appearance of seams, which allow the garage doors to roll up. Therefore, they will be distinguishable as non-original upon close inspection.

Standard 4. Most properties change over time; those changes that have acquired historic significance in their own right will be retained and preserved.

The proposed project complies with Standard 4. No changes to the property that have acquired historic significance in their own right are being removed. The period of significance is 1928, the date of construction. Only those features and materials that date from 1928 are character defining. The planters that are being removed were added outside of the period of significance and are therefore, not character defining. They are common and utilitarian in their design and construction and have not acquired significance in their own right.

Standard 5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

The proposed project complies with Standard 5. No distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize the property will be removed. The walls being demolished are not distinctive or character-defining features of the property. They do not exhibit unique construction techniques nor are they examples of craftsmanship. The stucco cladding is a common, utilitarian material and therefore, is also not distinctive.

Standard 6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features will be substantiated by documentary, physical, or pictorial evidence.

The proposed project complies with Standard 5. No repair or replacement of deteriorated or missing historic features have been proposed.

Standard 7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used. The surface cleaning of structures, if appropriate, will be undertaken using the gentlest means possible.

The proposed project complies with Standard 7. No harsh chemical or physical treatments have been proposed. Should the need for chemical or physical treatments arise, the City staff should review the proposed methods to ensure that they are gentle and safe and in accordance with the Standards for treating the potentially affected materials.



Standard 8. Significant archeological resources affected by a project will be protected and preserved. If such resources must be disturbed, mitigation measures will be undertaken.

The proposed project complies with Standard 8. There is no evidence to suggest that any archeological resources will be found at the property. Additionally, the project does not include any major ground-disturbing activity. If any archeological resources are discovered during construction, work must be stopped until a qualified archeologist investigates the situation and determines the best means for protection and preservation.

Standard 9. New additions, exterior alterations, or related new construction will not destroy historic materials that characterize the property. The new work will be differentiated from the old and will be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

The project complies with Standard 9. As described above, the proposed work will not destroy historic features or materials that characterize the property. The new garage doors are compatible with the historic and architectural character of the property. They are made from a compatible material, wood, which matches the material of the existing windows and doors. The new doors are also compatible with the building's architectural style. They have the appearance of swinging garage doors, which would have been typical for the period. Therefore, the addition of new garage openings and doors on the building's south elevation will not impact the historic character of the property to the degree it would no longer retain integrity overall.

Standard 10. New additions and adjacent or related new construction will 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.

The project complies with Standard 10. No additions to the historic building or related new construction have been proposed. The proposed alterations are also reversible; meaning if the garage openings and doors were removed at a later date, the essential form and integrity of the property would be unimpaired.

#### **Recommendations**

GPA encourages the consideration of the following recommendations to ensure the proposed project is consistent with best practices in historic preservation:

• City Planning staff should keep a copy of the permit set, including both existing conditions drawings and proposed drawings, in the City's historic property file as a method of documenting changes for future research.

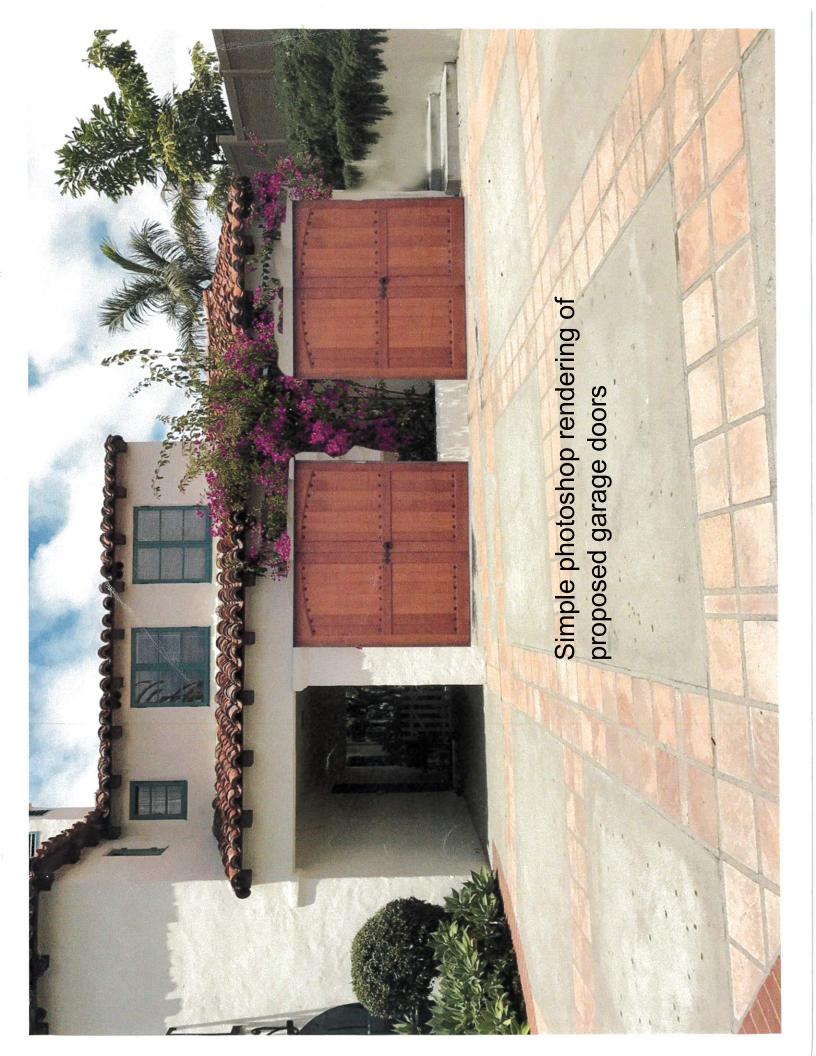
#### **Conclusions**

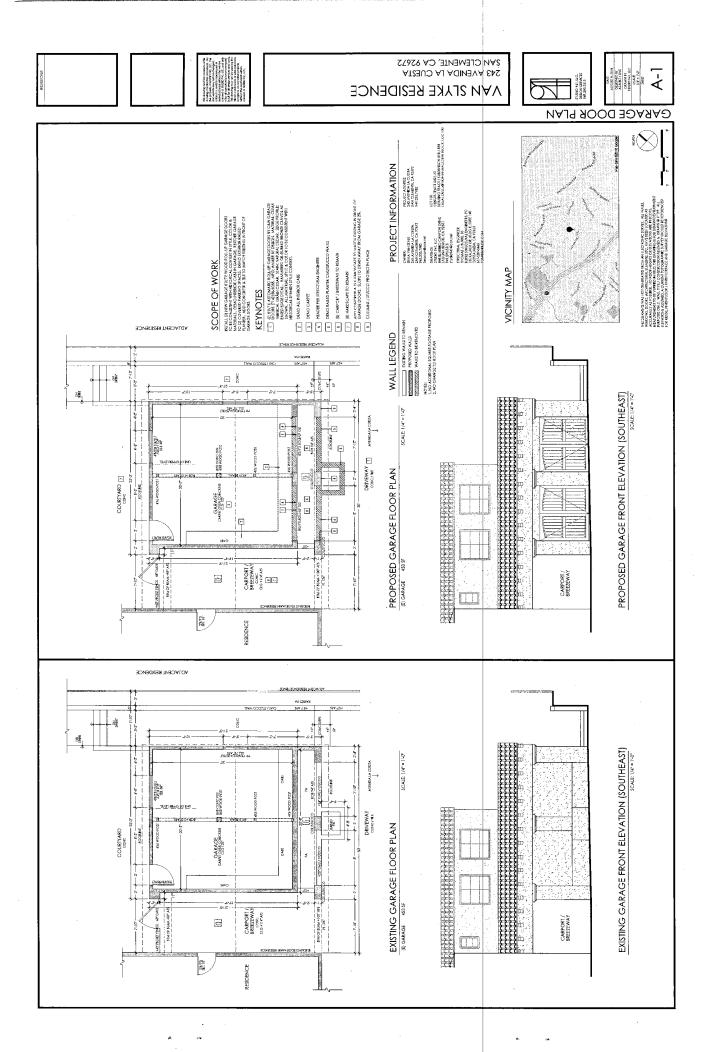
Based on the review of the current plans, the project complies with the Standards for Rehabilitation. Thank you for your consideration of this memo. I am happy to answer any questions you may have. You can reach me at (310) 792-2690 or by e-mail at emily@apaconsulting-us.com.











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