

2 May 2016

LR Development Group, LLC
Attn: Mr. Loren Riehl
400 Continental Blvd., 6th Floor
El Segundo, California 90245

RE: 71 Palomar Avenue (APN 052-162-007)
Update to Archaeological Resource Inventory, Significance Evaluation, and Design Review

Dear Mr. Riehl:

LR Development Group (LRD) has proposed to build a multifamily residential project at 71 Palomar Avenue in the City of San Luis Obispo. The project includes rehabilitating the historic Sandford House, a property included on the City's Master List of Historic Resources, repositioning the building on the existing lot, and adaptive reuse of the building. In October 2015, Applied EarthWorks, Inc. (Æ) prepared an Archaeological Resource Inventory, Significance Evaluation, and Design Review for the proposed development (Jenks et al. 2015). We found that the proposed treatment of the historic building is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (SOI Standards) and therefore complies with the City's Historic Preservation Ordinance (the Ordinance) and Historic Preservation Program Guidelines.

Based on these findings, the City Community Development Department prepared a Mitigated Negative Declaration of Environmental Impact (MND) for the project. Subsequently, on March 28, 2016, the City's Cultural Heritage Committee (CHC) reviewed the proposed project and MND. The CHC continued the project to a future date, and directed LRD to reduce the extent to which the Sandford House is repositioned on the lot, provide greater spacing between the historic home and proposed new construction, reduce the scale and massing of the new construction, and give greater consideration to the way in which the new construction highlights the historic elements of the subject property (Cohen 2016). As a result, LRD has redesigned the project with these goals in mind.

At your request, Æ has evaluated the revised design for redevelopment of the subject property. This letter describes the proposed project changes and evaluates them for consistency with the SOI Standards and the City Ordinance and Guidelines. The letter supplements our original evaluation report (Jenks et al. 2015) and does not repeat portions of that report which remain applicable, such as the archaeological findings, historic context statement, significance evaluation, and summary of applicable requirements. Unless specifically mentioned herein, all other unchanged portions of that report are hereby reaffirmed.

Description of Revised Project

To reduce the massing and scale of the project, the revised proposal reduces the number of apartment units from 41 to 33 units. The newly constructed apartment buildings would each be two stories, and will include 16 two bedroom, 12 three bedroom, and five studio units. All 63 proposed parking spaces will be entirely tucked-under the north side of the complex. The new building to the west of the Sandford House has been reduced from three stories to two stories and smaller structures have been substituted for the larger structures proposed originally.



The historic Sandford House would be repositioned approximately 33 feet east and 16 feet south of its current location, a substantially reduced distance in response to CHC direction. The open space around the building has been increased so it is now 49 feet from Luneta Drive, 46 feet from the structures to the west, and 52 feet from the structures to the north. The historic orientation will remain intact, facing Palomar Avenue from the crest of a small slope, though the overall property height will be lowered slightly across the slope. As previously described (Jenks et al. 2015), the two-story residence will be rehabilitated following the City Guidelines and SOI Standards. As with the original proposal, non-historic rear additions to the Sandford House will be removed and the residence, which currently serves as multifamily student housing, will become amenity space (leasing, computer/conference rooms, fitness room, etc.) for residents and management.

We note that our original report refers to the relocation of the Sandford House; however, this should more accurately be considered a repositioning or resiting of the building on the property, since Section 14.01.020 of the Ordinance defines relocation as the “removal of a resource from its original site and its reestablishment in essentially the same form, appearance and architectural detailing at another location.” This is further understood to mean removal of a building or structure from the property where it was originally built and placement on another property elsewhere in the City or outside the City (the “receiver site”). Since the current project does not propose to remove the Sandford House from the site, it should be understood as a change in siting on the original property rather than a relocation. Thus, Section 14.01.110 of the Ordinance does not apply.

Consistency of the Revised Project with City Historic Preservation Program Guidelines and Secretary of Interior’s Standards

As described in our original report (Jenks et al. 2015), the project proposes to rehabilitate the Sandford House in a manner consistent with the City Guidelines and the SOI Standards. The proposed project includes demolition of two non-original additions that were installed after the period of significance; however, the project would retain, rehabilitate, and reuse more than 75 percent of the original framework, roof, and exterior bearing walls and cladding of the building.

The project will retain and repair the architectural features that define the character, form, scale, and appearance of the Sandford House, as described in our original report. Any necessary repairs or replacements will use materials similar in size, shape, quality, and appearance; the project will not introduce new or conflicting architectural elements to the building exterior. The only change to the house will be the elimination of the twin chimneys at the rear (west) elevation, which are already largely invisible from the street. A compatible patio off of the north elevation will be placed on grade and screened on the east Palomar Avenue elevation by a row of hedges.

New construction will occur on the parcel that will change the context and setting of the parcel itself. In this case, however, the original historical landscape and setting have been materially altered by prior development of the surrounding area, including subdivision of the original 15 acre parcel and construction of new roads, infrastructure, and surrounding residential neighborhoods that ended the property’s relative isolation. As a result, the integrity of the historic landscape and setting have been substantially diminished by prior development. Given the broad change in its environment and context, the historic character of the subject property is expressed today in the prominence of the Sandford House within the parcel. While the proposed project calls for the repositioning and slight reduction in elevation of the residence, it will remain on site and in a prominent position on the parcel, serving as the architectural anchor of the site.



In response to CHC direction, the architectural design of the new structures has been completely revised to reduce its massing and scale and avoid detracting from the Sandford House while drawing from architectural elements that would have been present during its period of significance. The proposed new construction will highlight but not mimic the historic elements of the Sandford House; nonetheless, the new construction will remain sufficiently modern and differentiated from the historic building to allow clear distinction between the historic and modern built environment. Subdued neutral colors and lower heights will minimize contrast, while the rhythm of the facades and multi-light windows will still highlight the historic elements of the house.

The proposed repositioning of the Sandford House will allow the historic residence to maintain a prominent position on the parcel. Responding to CHC direction, the distance between the new construction and historic residence has been increased and the proposed new construction will assume a secondary position; siting of the new buildings somewhat suggests that they are on their own parcels on all sides of the historic building. A transitional hierarchy that the architects have sought to create can be viewed in the Palomar Avenue site elevation, moving from the long block of lower apartments to the north towards the Sandford House and residential single-family homes to the south, as demonstrated in the plans enclosed herewith. Other new apartment buildings behind (to the west of) the Sandford House will be only two stories and significantly shorter than the Sandford House itself. The elevated nature of the site and screening by trees and the Sandford House itself will further reduce visual intrusions.

Conclusions and Recommendation

Based on historical research, the Sandford House at 71 Palomar Avenue is significant as a good example of the Colonial Revival architectural style and is appropriately listed on the City Master List of Historic Resources. The proposed project will reposition the Sandford House within the parcel and will construct a new multiple-story apartment building on the site. Æ's analysis finds that the proposed project is consistent with the City Ordinance, Historic Preservation Program Guidelines, and the Secretary of Interior's Standards for Rehabilitation. In our original report (Jenks et al. 2015) we offered six specific recommendations to guide rehabilitation and adaptive reuse of the Master List building as well as the construction of the new residential units. Those six recommendations remain unchanged and are incorporated here by reference.

Thank you for the opportunity to work on this interesting and challenging project. Please contact us if you have any further questions.

Sincerely,

Barry Price, M.A., R.P.A.
Managing Principal
Applied EarthWorks, Inc.