



City of Orange
Community Development
300 East Chapman Avenue
Orange, CA 92866
Attention: Mr. Robert Garcia

Monday, January 18, 2020

By email: rgarcia@cityoforange.org

Re. Notice of Intent to Adopt Mitigated Negative Declaration (No. 1872-20)
for 363 S. Main Street

Dear Mr. Garcia,

Please consider our public comments for the record regarding the Mitigated Negative Declaration as it affects 363 S. Main Street or the Main Street Medical Office Building (AKA Orange Medical Office Building).

Preserve Orange County is a membership-based non-profit with a mission to promote the conservation of the architectural and cultural heritage of Orange County. We engage with cities, property owners and residents across boundaries because in our view the protection of the historic built environment of the region in which we work, play and live is in the public interest. We raise awareness among all stakeholders of the benefits of historic resources, of the environmental review process that is there to protect them, and of the best practices for restoring and adapting historic buildings to modern use.

Among our board members, we have four preservation professionals who meet or exceed the Professional Qualifications for the Secretary of the Interior's Standards for History, Historic Architecture and Architectural History (36CFR Part 61). It is our considered, professional opinion that the Historic Resources Assessment prepared by LSA Associates, Inc. (July 2020) and on which the determination of a Mitigated Negative Declaration rests, is seriously flawed and is leading the City to apply the wrong standard of environmental review for this building.

To begin, the report's historic overview (p. 4-7) makes reference to the shift in development in the post-World War II period from downtown Orange and the Plaza district to the suburbs but completely omits a discussion of the commercial district, namely of S. Main Street, that grew on the outskirts. In fact, the extent of the historic context provided for 363 S. Main is that it was once an orange grove. (p. 6, paragraph 4) The overt focus on the impact of suburbanization on the Plaza district belies a lack of understanding and research about the project area.

The analysis of the architectural significance of the building at 363 S. Main is the weakest part of the report and the most deleterious for the building. The building is correctly described as having elements of the International style but the contention that "mosaic tiles, terrazzo floors, and perforated metal screen are decorative elements not typical of the style" (p. 23 paragraph 2) is simply not true and can only be drawn from a very narrow reading of Modernism in Southern California in the mid-twentieth century. Placing the building in the context of the European Bauhaus misses several decades of influential regional architecture. (p.12)

When the designer/engineer, Floyd Weaver, was conceiving his plans for 363 S. Main, Modern architects and designers in Southern California such as Millard Sheets (Home Savings and Loans buildings) and Welton Becket and Associates (Parker Center, Los Angeles, 1955), were using mosaic tiles in their work. Terrazzo floors were a common feature of Modern architecture applied residentially and commercially in the period. The use of industrial material such as metal in a decorative screen was not unusual and could be seen employed in different ways as sun screens (*brise soleils*) to shield interiors exposed by the large window panels such as those we see on the main elevation of 363 S. Main. The Humanities building on the campus of California State University Long Beach (State Architect, 1965) is an example of the type in a vertical orientation. (fig. 1.0)



Figure 1.0 McIntosh Humanities Building, California State University Long Beach, CA, 1965 by State Office of Architecture and Construction. Note the metal screen attached to the building's main elevation. Photograph by Sarah Locke/LA Conservancy

Finally, the report fails to make a convincing case that the building does not retain integrity of design and materials. On the contrary the building at 363 S. Main is a virtual time capsule. The building retains all of its character-defining features such as its rectangular composition, flat roof, large-scale glazing, atrium, and suspended stair case, in addition to the mosaic tile and metal *brise soleil*. Moreover, the alterations listed (p. 23 paragraph 2) such as the ADA ramp and the awnings are not only reversible, but do not constitute alterations to the main features that would disqualify this building as representing its era.

The building is not the work of a master architect or a pure example of the International style but nor does it have to be in order to be considered a historic resource. The building is a highly intact example of post-World War II commercial Modernism, and more than embodies the distinctive characteristics of the postwar commercial architecture property type. That a publicly accessible commercial type over 50 years

old retains its features is exceptional and expressive of a past historical era. For these reasons, 363 S. Main appears eligible for the California Register of Historical Resources under Criterion 3 as it “embodies the distinctive characteristics of a [postwar commercial vernacular] property type.”

We therefore urge the City of Orange to contract with a federally-qualified preservation consultant to conduct a peer review of the LSA assessment for 363 S. Main. We recommend that the City select a firm with knowledge of commercial buildings from the period of significance in Southern California.

By doing the hard work of designating the three Eichler Tracts as local historic districts, and developing award-winning design guidelines for their protection, the City of Orange has a demonstrable understanding of the Modern period in Orange County and the value to the City and its residents of preserving it. We strongly encourage the City to pause to consider that 363 S. Main is part of this architectural heritage.

Thank you for the opportunity to provide public comment.

Sincerely,

A handwritten signature in cursive script that reads "Krista Nicholds". The signature is written in dark ink on a light-colored background.

Krista Nicholds
Executive Director