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January 19, 2021

Community Development Department City of Orange 300 East Chapman Avenue Orange, CA 92866

Attention: Robert Garcia <u>rgarcia@cityoforange.org</u> re: Historic Resources Assessment of 363 S. Main St., Orange

To the Community Development Department:

As an architect and historian, I would like to state my concerns about the Historic Resources Assessment of 363 Main St., Orange, prepared by LSA (July 2020.) This report is insufficient for making planning decisions about this office building.

The report's conclusions that "the City may reach a finding of *No Impact* regarding historic-period built environment resources. No mitigation measures are recommended for historic-period built environment resources" (p. 24) are not proven by its evidence.

This report contains many historical inaccuracies, leading to its misleading conclusion about the building's significance. I would recommend that the city have a peer review performed by an independent expert selected by the city from a list of qualified and certified architectural historical professionals.

I reach this conclusion as a historian. I have published twenty books on twentieth century architectural history. Many of these books are on Modern architecture, especially in Southern California. I am also a resident of Orange County, and serve as a Commissioner on the California State Historical Resources Commission, though I am writing as an independent professional and not on behalf of the Commission. My resume is attached.

I will not itemize each mistaken element in the report; that would be the job for the peer review. But I will draw your attention to a few of the building's key characteristics that were inaccurately assessed.

- I. The report misidentifies 363 S. Main St. as "International Style" (p. 10) and assesses it based on a misinterpretation of that style.
 - A. Though similar to the International Style, Southern California's Midcentury Modernism is a distinct entity with particular relevance to the climate,

culture, and city planning of our region. These factors were not assessed in determining its actual significance.

- In comparing 363 S. Main to buildings by European Modernists Ludwig Mies van der Rohe and Walter Gropius, the report overlooks more relevant comparisons to the work of American Modernists such as Minoru Yamasaki and Edward Durell Stone, both of whom used ornamental sunscreens related to the one at the 363 S. Main building.
- B. This flawed comparison to the International Style leads the report to mistakenly compare it unfavorably to buildings on S. Main St. south of LaVeta. Those buildings are 10-12 stories (not two) and appear to be built at least 10-20 years later. The report gives no dates for those buildings, nor any analysis to support the claim that they are "better" examples of the International Style.
 - Instead of these irrelevant comparisons, 363 S. Main should have been assessed in comparison with numerous professional commercial office buildings of similar size and style. Examples of this building type can be found throughout the City of Orange and Orange County. The report did not undertake the necessary research that would be expected in an accurate and thorough assessment.

II. 363 S. Main St. is an excellent example of Southern California Midcentury Modern architecture. It retains its integrity.

- A. The important character defining features that make this building significant as a Midcentury Modern building are either misinterpreted or overlooked in the report.
 - Where the report states that the "mosaic tiles, terrazzo floors, and perforated metal screen are decorative elements not typical of the style" (p. 23) it is entirely mistaken. These are each characteristic features of Midcentury Modern architecture evident throughout Southern California.
 - a) The report incorrectly identifies the metal sunscreen on the facade of the building as a "perforated" metal screen (ie, holes pierced in a solid sheet.) It appears, rather, to be a constructed 3-D metal honeycomb. An inaccurate description of a key element like this calls into question the thoroughness of the report.
 - b) The abstract ceramic tile artwork in the entry breezeway are incorrectly identified. Such ceramic tile artwork is a key and characteristic element of Midcentury Modern design; one widelyknown example (ignored in the report) is the similarly tiled underground walkways by Charles Kratka at Los Angeles International Airport (1961.)
 - 2. An accurate description of 363 S. Main would note specific elements of its Midcentury Modern style: the fine detailing of the metal screening, the vertical I-beam columns framing the screening, the sophisticated proportioning of the facade elements and its recessed glass wall, the interior atrium and its floating stairs, the terrazzo flooring, and the well-handled asymmetry of the southern bay for car access, responding directly to Southern California's car culture in this era. All of these are

key defining characteristics of Midcentury Modern architecture that were overlooked in the report.

III. The historical urban context of this type and style of building was not sufficiently addressed.

- The history of roads, highways, and commercial strips is now recognized to be as important as the history of center cities (such as Orange's Old Towne.) This relevant historical context is absent from the report, and therefore the contextual significance of this building is missing.
 - a) This was an era when the region built a wide range of creative and influential designs that served a growing population (especially in Orange County); Modern design as represented in this building reflected a widespread optimism about modern life in growing suburban areas like Orange. The broad appeal and spread of this phenomenon are demonstrated by Orange's Eichler residential tracts. This building is a comparable and well-designed example of a Modern commercial building.
 - (1) It should be noted that the Eichler tracts have been recognized only relatively recently as historic and valuable assets to the community. For years they were largely overlooked as insignificant. Commercial buildings of the same era such as 363 S. Main are now being recognized as equally significant and valuable to the community.
 - b) While the report has an extended discussion of the Orange Plaza's history (p. 6), it does not contain any mention of the commercial strip history of Main St. That would have been more relevant to assessing this building. The report should have surveyed and listed other comparable buildings so that an accurate assessment could be made. Without that evidence, the claim that the building is not a significant contributor to a potential district is unsupported.
 - c) In contrast to the report's claim (p. 22), this small commercial building definitely does convey the building boom of the 1960s which the report sets as its standard.

In conclusion, this report contains substantial inaccuracies, missing data, and misinterpretations which call its conclusions seriously into question. A thorough report would, in my opinion, confirm the significance of this building as an excellent and intact example of Southern California Midcentury Modern design.

Sincerely,

Alan Hess

RESUME OF ALAN HESS, ARCHITECT

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WORK	1981- 1986-2012	Alan Hess, Architect Architecture critic, San Jose Mercury-News
EDUCATION	1975-78	M.Arch. I, School of Architecture and Urban Planning, University of California, Los Angeles
	1970-74	B.A., Principia College, Elsah, IL
DESIGN	Jamm's Coffee Shop exhibit, Petersen Automotive Museum, Los Angeles County Museum of Natural History; principal contributor to interpretive exhibits Gordon Onslow-Ford guesthouse, Marin County, CA	
TEACHING	1989-91 1986-90	Instructor, University of California, Los Angeles Lecturer, Southern California Institute of Architecture
PUBLIC SERVICE	Commissioner, California State Historical Resources Commission 2018-2022 Board of Directors, Palm Springs Modernism Week Chairman, Board of Directors, Preserve Orange County Board of Directors, DesignOnScreen Foundation Juror, George Matsumoto Design Awards 2020 Juror, DocomomoUS Design Awards 2020 Juror, AIA Wester Regional Design Awards 2017	
PRESERVATION	 Consultant, restoration of Stanley Burke's Restaurant (1958) Consultant, Survey LA, Los Angeles Planning Department Consultant, Architectural Survey, City of Palm Springs Design Guidelines, Heatherstone Community, Mountain View, CA Qualified for National Register of Historic Places/Historic Cultural Monument: CBS Television City (Pereira & Luckman, 1952), Los Angeles, CA Norm's Coffee Shop (Armet & Davis, 1957), Los Angeles, CA Johnie's Coffee Shop (Armet & Davis, 1955), Los Angeles, CA 	

	 Stuart Pharmaceutical Factory (Edward Durell Stone 1958), Pasadena, CA Bullock's Pasadena Department Store (Wurdeman & Becket 1947) McDonald's Drive-In (Stanley C. Meston 1953), Downey, CA Valley Ho Hotel (Edward Varney, 1957), Scottsdale, AZ Expert testimony on behalf of landmark designations for Century Plaza Hotel, Los Angeles (Minoru Yamasaki, 1966); Bob's Big Boy, Burbank (Wayne McAllister, 1949); Wichstand, Los Angeles (Armet & Davis, 1957), Columbia Savings, Los Angeles (1964), Stanford Hospital (Edward Durell Stone, 1959), National Theater, Westwood (1969) and other mid-century modern structures
FELLOWSHIPS	Fellow, National Arts Journalism Program, Columbia University School of Journalism, 1997-98
GRANTS	Clarence Stein Foundation grant, research on Irvine, CA, 2018 Graham Foundation for Advanced Studies in the Fine Arts, research on Brazilian landscape architect Roberto Burle Marx, 1990
AWARDS	President's Award, Los Angeles Conservancy 2015 Docomomo/US Survey Award of Excellence: Curating the City: Modern Architecture in L.A. Website (with Los Angeles Conservancy) 2014 Honor Award, National Trust for Historic Preservation 1997 President's Award, California Preservation Foundation
LICENSE	Licensed architect, California # C 15747

PUBLICATIONS

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