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memorandum

date November 10, 2017

to Long Beach Development Services, Planning Bureau

cc

from Environmental Science Associates (ESA)

subject Historical Resources CEQA Impacts Analysis for the Broadway Block Project, Long Beach, California

Environmental Science Associates (ESA) has been retained by the City of Long Beach, California (client) to conduct a Historical Resources CEQA Impacts Analysis (addendum) for the proposed project (project) located at 240 Long Beach Boulevard in the City of Long Beach, California (project site), assessor parcel numbers (APNs) 7281-017-905, 7281-017-906, 7281-017-915, 7281-017-903, 7281-017-902, and 7281-017-918. The project site includes two large open parking areas flanking the Acres of Books building (building), which has been previously identified as eligible for the California Register of Historical Resources (California Register or CR) and listed as a City of Long Beach Landmark and is considered a historical resource pursuant to CEQA. In 2009, PCR Services Inc. (PCR) completed a Historic Resources Assessment report (report) confirming the significance of the building and identifying its character defining features.

This addendum was prepared to assess the potential impacts of the proposed Broadway Block project on historical resources in the project vicinity and provide the City with preservation recommendations to ensure compliance with the California Environmental Quality Act (CEQA). The addendum was prepared by ESA's architectural historians, including Margarita C. Jerabek, Ph.D., Director of Historic Resources and Christian Taylor, M.H.P., Senior Architectural Historian, whose qualifications meet and exceed the Secretary of the Interior's Professional Qualification Standards in history and architectural history. Professional qualifications are provided in Attachment A.

On September 29, 2017, an intensive pedestrian survey of the project site was conducted. Photographs documenting the views of the building and surrounding area are included in Attachment B. A plan review of the proposed Broadway Block project was conducted to determine whether or not the project would result in potentially significant impacts to the historical resources on the project site and in the immediate vicinity, in compliance with CEQA. The proposed project plans were prepared by Rob Wellington Quigley, FAIA,

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Architecture and Planning on August 31, 2017. A copy of the reviewed project plans is provided in Attachment C.

Project Description

The proposed project seeks to develop a mixed-use commercial project at southeast corner at the intersection of 3rd Street and Long Beach Boulevard in the City of Long Beach. The Subject Property is currently improved with a commercial building that is now vacant and most recently was the location of Bertrand Smith's Acres of Books book store. The project seeks to retain the Streamline Moderne architectural design and historical appearance of the existing building by retaining many of its character-defining features and materials. The project would remove the rear portion of the building, replacing it with new construction mimicking the original scale and massing of the extant building, using new materials (CMU with brick accents). The new rear portion of the building will be used as a pedestal to support additional portions of the new construction. The project would deconstruct the front portion of the building, while retaining the primary (west) façade in place. Materials from the deconstructed portion of the building would be stored off site until the building is reconstructed following the construction of a subterranean parking lot. The primary (west) elevation would be restored to its 1936 appearance when the property was occupied by the Glenn E. Thomas Company used car dealership (**Figure 1**). This will result in the removal of the existing storefront windows and entrance installed in 1960, replacing them with a new storefront that would consist of clear butt glazed glass, a new glass door and a new concrete curb.



Broadway Block Project – 150712.09

Figure 1
Glenn E. Thomas Car Dealership, c. 1936

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Additional new construction consists of a tower at the north end of the project site, standing 22-stories in height, including 199,782 square feet of residential space and 10,579 square feet of commercial space. At the south end of the project site, a mid-rise structure standing approximately eight-stories tall, will include 216,299 square feet of residential space and 12,628 square feet of retail space. The project will add 582 parking spaces through the construction of above grade and subterranean parking lots.

Resources in the Project Vicinity

The Downtown Plan Environmental Impact Report (EIR) provides a listing of historical and potentially historical resources in the downtown area. Review of these lists revealed six historical or potentially historical resources in the immediate vicinity with a view of the project site. The California Historic Resources Inventory (HRI) was consulted, identifying four additional historic resources in the vicinity with views of the project site. The United States Post Office building located adjacent to the project site at 300 Long Beach Boulevard is listed in the National Register of Historic Places (National Register or NR). The Campbell Apartments located east of the project site at 132 Linden Avenue has been identified as eligible for the National Register. The resources identified with views of the project site are listed below in Table 1.

TABLE 1
PREVIOUSLY RECORDED RESOURCES

P-Number	Address	Description	Eligibility	Distance from Project Site
P-19-178955	300 Long Beach Boulevard	United States Post Office	1S	0.03 miles (172 feet) North, Direct View of Project Site
	132 Linden Avenue	Campbell Apartments	3S	0.14 miles (754 feet) Southeast, Indirect View of Project Site
P-19-178942	130-140 Linden Avenue	Lafayette Complex	3S	0.14 miles (718 feet) Southeast, Indirect View of Project Site
P-19-178943	145 Linden Avenue	Broadlind Hotel	3S	0.12 miles (623 feet) Southeast, Indirect View of Project Site
	205 Long Beach Boulevard	Pacific Tower	5S1	0.02 miles (90 feet) West, Direct View of Project Site
	316 Elm Avenue	Art Deco Building	5S1	0.05 miles (275 feet) Northeast, Indirect View of Project Site
	318 Elm Avenue	Bay Hotel	5S1	0.06 miles (305 feet) Northeast, Indirect View of Project Site
	224-230 E. Broadway	American Hotel	5S1	0.06 miles (320 feet) West, Indirect View of Project Site
	234 Elm Avenue	Italianate Apartment Building	5S3	0.04 miles (230 feet) East, Indirect View of Project Site

Notes:

1S: Individual property listed in NR by the keeper. Listed in the CR.

3S: Appears eligible for NR as an individual property through survey evaluation.

5S1: Individual property that is listed or designated locally.

5S3: Appears to be individually eligible for local listing or designation through survey evaluation.

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Acres of Books, 240 Long Beach Boulevard

The building currently located at 240 Long Beach Boulevard was originally constructed in 1924 as a neighborhood market. Known as the Grand Central Market, the building was owned and operated by the Central Market Company. In 1933, The City of Long Beach suffered a devastating earthquake, causing significant damage to buildings throughout the City, including the Grand Central Market. The damage caused by earthquake resulted in the redesign and reconstruction of the building's primary elevation in the Streamline Moderne style, which was popular at the time. The remaining building was also largely reconstructed, the ceiling was raised, and the present concrete Streamline Moderne storefront was installed at a cost of \$5,000.¹ Additional changes to the building included relocation of the windows, removal of the entire front wall and second story of the building, and the installation of new concrete pylons at the front corners. Physical evidence indicates that the existing continuous concrete frame with brick in-fill that presently forms the side and rear elevations of the building was also constructed as part of the earthquake retrofit project to consolidate the structure.

The Streamline Moderne appearance and warehouse construction of the building were created after the earthquake for its new use for the Glenn E. Thomas Company used car dealership, and the existing building retains its primary architectural and structural features from its 1933-1935 period of significance when it was reconstructed for that use. Bertrand Lee Smith's book store, Acres of Books occupied the building beginning in 1960 until 2008. The book store was originally located at 140 Pacific Avenue when Smith established it in 1936. The front windows of the building were altered in 1960 to accommodate the building's new use as a book store for the bookstore (**Figure 2**).²

¹ *Southwest Builder and Contractor*, June 2, 1933, p. 48. City of Long Beach Building Permit, September 5, 1935, no. 3-10302.

² City of Long Beach Building Permits, November 7, 1960.

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Figure 2
Acres of Books, c. 1960

In 1990, the building was designated by the City of Long Beach as a Historical Landmark for its Streamline Moderne style storefront, which represents changes to the City of Long Beach's Downtown caused by the Long Beach Earthquake of 1933. The City also recognized the property as historically and culturally significant for its association with a notable individual, the antiquarian book dealer and benefactor, Bertrand Smith.

In 2009, PCR Services, Inc. (PCR) completed a Historic Resources Assessment report (report), which recommended the building as eligible for the California Register of Historical Resources under Criterion 1 for its historical associations with early 20th century commercial development of downtown Long Beach and the reconstruction efforts throughout the City following the 1933 Long Beach Earthquake (**Figure 3**). The report recommended the property be assigned a California Historical Resource Status (CHRS) Code of 3CS, "appears eligible for the California Register as an individual property through survey evaluation." The report also stated that the building remained eligible for local listing, recommending the property be assigned a California Historical Resource Status (CHRS) Code of 5S1, as an "individual property that is designated or listed locally." Based on the findings in the report, two periods of significance were developed. The first period begins with the date of construction in 1924 and ends with the building's reconstruction in 1935 following the Long Beach earthquake (1933). The second period of significance begins with the occupation of the building by Bertrand Smith and his Acres of Books book store in 1960, and ends in 1965 with the passing of Smith.

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Figure 3
Acres of Books, 2009

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Character-Defining Features of 240 Long Beach Boulevard, APN: 7281-017-910

The following list of character defining features is a summary of the visual character of the exterior of the building located at 240 Long Beach Boulevard. According to the National Park Service, “character refers to all those visual aspects and physical features that comprise the appearance of every historic building. Character-defining elements include the overall shape of the building, its materials, craftsmanship, decorative details, interior spaces and features, as well as the various aspects of its site and environment. The purpose [is to] identify those features or elements that give the building its visual character and that should be taken into account in order to preserve them to the maximum extent possible.”³ A Character-Defining Features analysis should be an inventory of character-defining features, classified as significant, contributing, and non-contributing. These terms are generally interchangeable with primary, secondary and tertiary character-defining features, which are also commonly, used descriptors.

Significant character-defining features are by definition the most important and should be considered for retention in order to preserve and protect the eligibility of the Building as an eligible historic resource. In this case, significant features and spaces are those directly related to the building’s architectural significance as an example of Streamline Moderne style architecture as well as features directly related to the building’s association with the post-earth quake reconstruction of Downtown Long Beach. Alteration or removal of these features should be avoided. Contributing character-defining features add to the character of a historic property and should be retained to the greatest extent feasible and rehabilitated as appropriate; however, more flexibility is given to these features as alterations to some contributing features may not adversely impact the Building’s potential eligibility as a historic resource. Contributing features are those which date from the period of significance but are not directly tied to the building’s eligibility as a historic resource. Finally, the greatest flexibility is afforded to non-contributing features; their complete removal does not usually adversely impact the significance of the Building. A detailed analysis of the exterior elevations, interior spaces, and character-defining features was included in the previous report prepared by PCR in 2009. The report identified the features listed below, which have retained substantial integrity. However, the condition of the brick masonry (bricks and mortar) is poor, particularly on the south elevation where it is substantially deteriorated.

- Rectangular Massing and Footprint
- Building Plan and Relationship of Interior Spaces
- Streamline Moderne Façade (West Elevation)
- Concrete Framing
- Exterior Masonry Cladding on North, South, and East Elevations
- Low-Pitched Hipped Roof with Skylights and Parapet
- Steel Trusses
- Concrete Buttresses
- Wooden Catwalk
- Concrete Floor
- Rear Industrial Windows

³ Lee H. Nelson, “Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character,” National Register Preservation Brief 17, U.S. Department of Interior, National Park Service, 1982. <https://www.nps.gov/tps/how-to-preserve/briefs/17-architectural-character.htm>.

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(Later alterations include: rear roll down garage door and altered opening, infilled windows on the south elevation, side entrance on the north elevation is replaced, 1960s storefront is boarded and deteriorated)

CEQA Analysis

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at PRC Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical resources. Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

The CEQA Guidelines recognize that historical resources include: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register; (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.⁴ The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired."⁵ According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.
- D. In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic

⁴ Title 14 California Code of Regulations Section 15064.5

⁵ CEQA Guidelines Section 15064.5(b)(1)

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Buildings (Standards) is considered to have mitigated its impacts to historical resources to a less-than-significant level.⁶

Analysis of Project Impacts

Direct Impacts

A resource listed in, or determined to be eligible for listing in the California Register of Historical Resources is considered a historical resource under CEQA. As discussed above, the property is recommended eligible for the California Register for its historical associations with early 20th century commercial development of downtown Long Beach and the reconstruction efforts following the 1933 Long Beach Earthquake. Additionally, the property is a designated Historic Landmark in the City of Long Beach.

The proposed project would result in the removal or alteration of the building's character-defining features resulting in direct impacts affecting its eligibility as a historical resource. The project seeks to remove the rear portion of the building (approximately 170 x 50 feet), including portions of its hipped roof, parapet, and skylights. While the project will retain and reuse the front portion of the building, nearby construction of new structures to the north and south, as well as the construction of a subterranean parking lot, will require the building's disassembly, removal and reconstruction while the remaining Streamline Moderne façade would be retained in place.

Although the Streamline Moderne façade would be retained, there is a high probability that it may be substantially impaired through compromise of its structural integrity during construction, including disassembly and removal of the concrete and brick structural system and its reconstruction, as well as excavation during construction, that would potentially threaten the structural stability, materials and features of the Streamline Moderne façade. Disassembly, removal and reconstruction of the building will also result in loss of the original brick masonry materials and concrete structure, which is directly related to the building's significant association with the reconstruction of Long Beach following the earthquake in 1933. While the project seeks to reuse the existing brick on the north and south elevations, removal of the concrete structural system, including interior concrete buttresses, would result in a direct impact affecting the building's eligibility because the concrete structure cannot be salvaged and reused. Additionally, there is a high probability some of the brick would be damaged during disassembly and would not be suitable for reuse; and a large part of the brick on the south elevation is in poor condition and may not be suitable for reuse. Thus, the project would result in substantial loss of the original brick material, loss of the entire concrete structure, and would only reconstruct the front portion of the building; and while the Streamline Moderne façade would be retained, disassembly, excavation and construction impacts would potentially impair its structural stability, materials and features.

Furthermore, the building is identified as a local landmark for its association with Bertrand Smith, a locally significant person. The storefront and signage related to Acres of Books reflects the building's association with Smith. Although the project will restore the building's Streamline Moderne west façade which dates from the building's post-earthquake 1933-1935 reconstruction, it will remove the storefront and Acres of Books signage on the west, north, and south elevations. These features are identified as character defining features in the 2009 PCR report and directly relate to the building's significant association with Bertrand Smith. The removal of the Acres

⁶ CEQA Guidelines Section 15064.5(b)(3)

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of Books storefront and signage would result in a direct impact adversely affect the building's eligibility for its association with Bertrand Smith.

While the proposed project would retain and preserve the building's Streamline Moderne primary west façade, the combined effect of the storefront removal, disassembly and reconstruction of the remaining building and the resulting loss of original building materials, and removal of the rear portion of the building would materially impair character-defining features that convey the property's historical significance, therefore resulting in a substantial adverse change to the property. The proposed project would result in a potentially significant unavoidable impact to a historic resource under CEQA. Mitigation measures are recommended below to reduce potential impacts, however, after project completion potential impacts would remain significant and unavoidable because the building would be largely disassembled and reconstructed leaving only the Streamline Moderne façade in place, and the building would be essentially rebuilt with a new storefront, the rear of the building would be replaced with new construction, and the north side elevation would be altered for the new use.

Indirect Impacts

The new construction proposed by the project would alter the setting of adjacent historic resources. However, the setting has already been altered by infill commercial and residential development. Located south of the project site, there are two modern parking structures and commercial buildings. Furthermore, new commercial buildings have been constructed to the west and northwest of the project site. A view-shed analysis of the project site's visibility from the nearby historic resources was conducted to determine if the project would result in any significant indirect impacts to historic resources. The project seeks to add a 22 story tower at the northwest corner of the property, while additional new construction on the site will be limited to approximately eight-stories in height. Currently, the tallest building in the immediate vicinity is the Pacific Tower located directly adjacent to the project site to the southwest at 205 Long Beach Boulevard, standing approximately 12-stories tall. Therefore, the new tower proposed by the project would introduce a new scale of architecture to the area, resulting in an indirect impact to adjacent resources. However, the impact would be less than significant because the new construction does not obscure any of the primary views of the adjacent resources. The primary elevation of the adjacent Pacific Tower faces south, while the new construction on the project site would be located to the east. The primary elevation of the adjacent United States Post Office faces west, while the new construction in the project site would be to the south. Additional historic resources in the immediate area are smaller multi-family residential and commercial mixed use buildings. These buildings were constructed in a dense urban environment and were not intended to be seen from great distances. The new construction proposed by the project would not result in a significant impact effecting the eligibility of these resources.

Secretary of the Interior's Standards Reviews

As mentioned above, under CEQA, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing, Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the Historical Resource.⁷ It is important to note, new construction adjacent to a historical resource is considered "related new construction" and numbers nine (9) and ten (10) of the Standards apply to this

⁷ California Environmental Quality Act, 15064.5 (3).

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project. Therefore, the project was also assessed for conformance to Standards nine and ten regarding “related new construction” constructed adjacent or in the vicinity of other historical resources.

Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

Since its construction, the property has functioned as a grocery store, a used car dealership, a furniture store, a restaurant, and, most recently, a bookstore. Under the proposed project, the property will continue to be used for commercial purposes. The project includes changes to the property’s distinctive materials, features, spaces, and spatial relationships, affecting its integrity and eligibility. The project will remove the eastern half of the existing building, while deconstructing the western portion and preserving the primary (west) façade in place. Once construction of the adjacent residential tower and associated subterranean parking are completed, the western portion of the building will be reconstructed using the salvaged masonry materials and existing roof structure, including the original truss components. These alterations would remove all remaining portions of the property’s character-defining concrete framing added after the 1933 earthquake. Further, the changes would remove portions the building’s low-pitched hipped roof, parapet, steel trusses, concrete buttresses, Acres of Books storefront and signage, and concrete floor. The removal of the eastern half of the existing building would result in the loss of the property’s rear industrial windows, rear skylights, brick parapet, and alter the property’s footprint, massing, and existing spatial relationships. Additional alterations include the removal of historic masonry along the north and south elevations to accommodate new window openings, new steel framing, and internal seismic reinforcement of the reconstructed masonry structure. The proposed project would require substantial change to the building and remove or alter character defining features that contribute to the building’s significance. Therefore, the project does not comply with Standard 1.

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

Under the proposed project, many of the historic character-defining features of the property will be retained and preserved. The property would be rehabilitated and adaptively reused. Specifically, the project would rehabilitate and reuse the first 70 feet of the primary west portion of the existing building and restore the property’s existing Streamline Moderne style façade on Long Beach Boulevard. An open floor plan is proposed to preserve and maximize the building’s existing clear span structural system. However, the proposed project also removes distinctive materials (e.g., glass, brick), alters numerous character-defining features (e.g., rectangular massing and footprint, rear industrial windows, concrete framing infilled with brick, low-pitched hipped roof with skylights and parapet, steel trusses, catwalk, Acres of Books storefront and signage, and concrete floor. The proposed project does not fully comply with Standard 2 because the project would remove or alter character defining features that contribute to the building’s significance.

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 elements from other historic properties, will not be undertaken.

The Project recognizes the distinctive historic and architectural character of the building, including the single-story scale and massing along the street front, low-pitched hipped roof, and Streamline Moderne materials and details. No conjectural features would be added and changes that create a false sense of historical development

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would be avoided. The newly constructed eastern portion of the building is differentiated from the reconstructed western portion and historic facade by the use of modern materials (CMU block, with red brick accents) and design elements and would not create a false sense of historical development. Therefore, the Project conforms to Standard 3.

Standard 4: Changes to a property that have acquired historic significance in their own right will be retained and preserved.

The property acquired its historic significance between 1924 and 1935 for its association with the commercial development of downtown Long Beach and reconstruction efforts after the 1933 Long Beach earthquake. During this period, the most substantial change was the construction of the concrete Streamline Moderne style facade and the concrete frame with brick in-fill structure, after the property sustained damage during the 1933 Long Beach Earthquake. The building's Streamline Moderne facade and its concrete and brick structure are associated with the post-earthquake reconstruction of Long Beach and has therefore acquired historic significance in its own right. While the Streamline Moderne style facade and a majority of the building's masonry would be retained under the proposed project, the building's character defining concrete structure would be lost. As stated in the 2009 PCR report, The building acquired additional historic significance between 1960 and 1965 for its association with the locally significant antiquarian book dealer Bertrand Smith and his book store, Acres of Books. During this period, the current storefront and Acres of Books signage was added. Due to their association with Bertrand Smith, these features have acquired historic significance. The 2009 PCR report identified these elements of the building as character defining features. The project proposes to remove the current store front windows and entry along the building's west elevation. The project also proposes to remove the signage associated with Smith's book store, Acres of Books. Therefore, the project would result in the removal of character defining features that have acquired additional significance and would not fully conform with Standard 4.

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

While the project will result in the restoration of the building's Streamline Moderne front facade, it will also result in the removal of additional materials and features that characterize its significance. The project will remove the rear portion of the extant building and deconstruct the remaining front portion of the building. This will result in the removal of the building's concrete structural framing, which is a character defining feature related to its significance as a representation of the reconstruction efforts after the Long Beach earthquake. Furthermore, the project would remove the storefront and signage associated with the Acres of Books book store. These features are characteristic of the building's association with locally significant Bertrand Smith. Therefore, the project will not conform to Standard 5.

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, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

Deteriorated and missing historic features will be repaired rather than replaced. The property's Streamline Moderne style facade and steel trusses will be repaired in accordance with the Secretary of the Interiors Standard's for Rehabilitation. Where materials cannot be repaired, they will be replaced by salvaged materials

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from the rear portion of the building that is being removed. If salvaged historic materials are unavailable for the replacement of a distinctive feature, it is recommended that 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 will comply with Standard 6.

Standard 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The project does not propose the use of any chemical treatments may cause damage to historic materials. Physical treatments during the restoration of the building's primary façade have not been specified in the project plans. The project does not comply with Standard 7.

Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

Archaeological Resources were not considered as part of this study and the potential to encounter archaeological or Native American resources during the course of the Project is considered remote. The Project would conform to Standard 8.

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

The proposed project includes new construction on the north and south sides of the extant historic building, as well as a subterranean parking lot below the building. The project proposes to disassemble and store the historic building, in order to better protect its historic materials from damage during construction. This will result in the removal of historic materials that characterize the property, specifically the concrete structural system associated with the building's reconstruction after the Long Beach earthquake, and removal and replacement of the rear portion of the building with new construction, and would not comply with Standard 9.

Furthermore, the new construction is significantly larger than the historic building on the subject property and other historic buildings in the immediate area. The project attempts to reduce the effects of the new tower's height by providing separation between the building and the new construction and stepping down the scale of the tower to one-story on the side adjacent to the historic building's north elevation. At the building's south elevation, the new construction steps down from approximately eight-stories along Broadway to five-stories adjacent to the building. However, the stepping down of the new construction's massing and separation between the new buildings and historic building are not enough to offset the effects of the proposed 22-story tower to the north and the new eight-story building to the south. While the contemporary design of the new construction and the use of modern materials, such as metal, glass, and concrete differentiate the new construction from the old building, the project is not compatible in scale and massing with historic resources on the property or its surrounding environment and does not comply with Standard 9.

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10. New additions and adjacent or related new construction shall 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.

Under the proposed project, the related new construction is to be built on vacant lots to the north and south of the building and would be separated from the historic building by a corridor. If these new buildings were removed in the future, the historic building would remain in place. However, the project also proposes to remove rear portion of the historic building and replace it with new construction, while retaining the front portion of the building and restoring the west (primary) façade. Over the course of the project, the retained portion of the building would be disassembled and stored offsite, while the west façade would be preserved in place. The stored portions of the building will then be reconstructed at a later point in the project. This would result in the demolition of the building's concrete structure, which contributes to its significance. Furthermore, the project seeks to remove the original storefront and signage related to the Acres of Books, which also contribute to its significance. Therefore, the project would only retain the building's west façade, salvaged masonry, and roof trusses. The building would retain its scale and massing at the street front but will have lost key aspects that reflect its significance. If the new construction were removed, the building would not remain unimpaired. Therefore, the proposed project does not comply with Standard 10.

Conclusion and Recommendations

The proposed project would result in a potentially significant direct impact by material alteration of some of the property's character-defining features (e.g., changes to the rectangular massing and footprint, removal of the rear industrial windows, concrete framing, and Acres of Books signage and storefront). As discussed above, the Project would conform with Standards 3, 6, and 8 but it would not conform with Standards 1, 2, 4, 5, 7, 9, or 10. Upon Project completion, the building would no longer convey its significance associated with the reconstruction of Downtown Long Beach following the earthquake in 1933 or its associations with locally significant person, Bertrand Smith and would no longer be eligible for the California Register or local listing. The following mitigation measures are recommended to reduce the level of potential impacts caused by the project.

Recommended Mitigation Measures

Mitigation Measure 1- Retention and Reuse. The City will encourage the on-going maintenance and appropriate adaptive reuse of existing landmarks as historic resources. A project has been developed with intent to adaptively reuse the building in accordance with the Secretary of the Interior's Standards for Rehabilitation (Standards). To ensure the project meets the Standards, the applicant shall retain a preservation consultant who meets the Secretary of the Interior's professional qualification standards in history, architectural history, historic architecture or architecture and a licensed historic engineer with at least 10 years of experience in historic preservation to complete the following tasks:

- A historic engineer shall review the project plans, providing recommendations regarding changes including structural bracing and protection of the Streamline Moderne façade during construction and removal, storage and reassembly of salvaged building materials necessary to ensure the project complies with the Standards and provide a letter summarizing the review findings to the City of Long Beach's Planning Bureau.
- Prepare a rehabilitation plan for the proposed renovation and adaptive reuse of the historic building (240 Long Beach Boulevard, Acres of Books). The rehabilitation plan shall be prepared by a historic

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preservation consultant and historic engineer and shall address treatment of historic materials to be retained to reduce potential project impacts. The rehabilitation plan shall identify significant character-defining features and include appropriate recommendations for the treatment and reuse of these features. Any maintenance, repair, stabilization, rehabilitation, preservation, conservation, or reconstruction work on the building shall be undertaken in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Properties. Unsound, decayed, or toxic materials (e.g. asbestos, lead paint, etc.) need not be included in the salvage and rehabilitation process; however, deteriorated character-defining materials such as the brick masonry shall be replaced in kind in accordance with the Standards.

- The historic preservation consultant and the historic engineer shall visually inspect the disassembly and reconstruction of the subject building at regular intervals to prevent or minimize potential damage to historic fabric and monitor project compliance with the Standards. The preservation consultant and historic engineer shall document the construction monitoring process in digital photography as well as monitoring logs, and a final monitoring report to be submitted to the City's Planning Bureau.

Mitigation Measure 2-Recordation. A recordation document prepared in accordance with Historic American Building Survey (HABS) Level III requirements shall be completed for the historic building (240 Long Beach Boulevard, Acres of Books). The recordation document shall be prepared by a qualified architectural historian or historic preservation professional who satisfies the Secretary of the Interior's Professional Qualification Standards for Architectural History pursuant to 36 CFR 61. This document shall include a historical narrative on the architectural and historical importance of the building and its contributions to the history of Long Beach, construction history, and record the existing appearance of the buildings in professional large format photographs. The buildings' exteriors, representative interior spaces, character-defining features, as well as the property setting and contextual views shall be documented. All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation (HABS standards). Copies of the completed report shall be distributed to the South Central Coastal Information Center (SCCIC) at the California State University, Fullerton and the City of Long Beach Public Library. A HABS report for the building was prepared by PCR in 2010. The HABS was submitted to the National Park Service for transmittal to the Library of Congress and archival copies were submitted to the City of Long Beach Development Services Department and the Long Beach Public Library, satisfying the mitigation recommendations suggested here and in the previous evaluation prepared by PCR in 2009.⁸

Mitigation Measure 3- Interpretive Program. Interpretation about the significant history of the Acres of Books building shall be placed within a publically accessible location within or nearby the historic building. The interpretation shall use the recommendations from Mitigation Measures MM-1 (Retention) and MM-2 (Recordation) to interpret the history of the Acres of Books building and its historical associations with the reconstruction of Long Beach following the earthquake in 1933 and the historical contributions made locally by Bertrand Smith. Historical photographs, aerials, and newspapers shall compliment the interpretive exhibit to visually demonstrate the activities that took place at the building. A qualified architectural historian or historic preservation professional shall provide oversight to the design and installation of an interpretive program.

⁸ "Art Exchange Building," Written Historical and Descriptive Data, Historic American Buildings Survey, National Park Service, U.S. Department of the Interior, 2010.

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Level of Significance after Mitigation

After implementation and completion of the recommended mitigation measure discussed above, the potential impacts of the proposed project on the historical resource located as 240 Long Beach Boulevard would remain significant and unavoidable because the building would no longer retain important character defining features that make it eligible for state and local listing. The mitigation measures outlined above are important to assure that information that contributes to building's significant association with the history of Long Beach is retained for future generations.

LIST OF ATTACHMENTS

Attachment A: Professional Qualifications

Attachment B: Additional Photographs

Attachment C: Project Plans

Attachment A

Professional Qualifications

Attachment B

Additional Photographs

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Attachment C

Project Plans

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