

Letter of South Pasadena's Litigation Attorney Attempting to Nominate More Properties in the Path of the 710 Freeway

The direct participation of the City's litigation attorney in the nomination process for historical significance evidences South Pasadena's attempt to use historic preservation laws as a strategy to create historic districts with questionable justification. It appears the purpose of these nominations for historical significance are not driven by a sincere concern for historic preservation. Instead the historic preservation laws have been used as an attempt to block the Freeway or escalate the cost of mitigation that the Freeway becomes too costly.

In its support of South Pasadena's efforts, the National Trust for Historic Preservation has lent its name and credibility to "institutional NIMBYism."

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ADMITTED IN CALIFORNIA

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DISTRICT OF COLUMBIA

23 January 1997

ROGER B. MOORE

ADMITTED IN CALIFORNIA

Carol D. Shull, Keeper
National Register of Historic Places National Park Service
U.S. Department of the Interior Washington, DC 20013-7127

Re: Route 710, Los Angeles; H32(2280)

Dear Ms. Shull:

This letter is written in behalf of the City of South Pasadena, which has been provided a copy of the January 8, 1997 letter to you from Thomas J. Ptak of the Federal Highway Administration. The City of South Pasadena of course stands by its documented position that the Gillette Crescent Neighborhood remains eligible for listing in the National Register, and that your office should determine them so eligible. The City of South Pasadena will be providing directly to your office a reply to the position stated by the Federal Highway Administration.

At this time, however, permit us to observe that in a few respects Mr. Ptak's documentary submission of the existing record appears incomplete. While he submitted the 11 September 1996 letter from California SHPO Widell to the FHWA California Division Administrator, Mr. Ptak did not submit the SHPO initial report to FHWA dated 10 May 1996; the 27 September 1996 memorandum of SHPO Widell to the California State Historical Resources Commission, which Ms. Widell had issued in light of apparent misinterpretations of her 11 September 1996 letter; the Advisory Council on Historic Preservation's initial report to FHWA dated 22 April 1996; and the Advisory Council's subsequent report dated 30 September 1996. To ensure that you have all these reports, which continue to question and refute FHWA's presentation of Caltrans' faulty conclusions, a copy of each is enclosed here.

Please contact this office if you have any need for additional information from South Pasadena. In the meantime, the City remains grateful for your efforts to ensure that the historical resources threatened by the Route 710 project are properly assessed and protected.

Respectfully,

(signed) Tony Rossmann

cc: Thomas J. Ptak, FHWA
Jeannine Gregory, South Pasadena City Clerk

Department of Interior Determination:
**Nominated Districts "Not Eligible" for National
Register of Historic Places**

"The architecture in the Gillette Crescent neighborhood represents rather workman-like illustrations of the common design traditions of the period. Modest in scale, the buildings have no particular architectural distinction and appear to reflect common contractor-built designs, which were likely replicated throughout the southern California/Pasadena region. The integrity of the "district" is marred by a number of modern apartment complexes, the reconfiguration of certain lots from their historic pattern, and minor alterations to a considerable number of individual homes. The current documentation fails to satisfactorily justify architectural significance of this neighborhood..."

In other words, this is a typical subdivision of the City of South Pasadena that the City has allowed to be marred by construction of modern apartment buildings. If the historic significance of the district was so outstanding, why did the City Council of South Pasadena authorize inconsistent land development prior to the siting of the 710 Freeway route? The likely answer is that the "district" was never considered significant until it the 710 Freeway route was determined. Then suddenly, every house and every subdivision of South Pasadena was advanced as "precious" and "historic." While there are some noteworthy houses and neighborhoods in South Pasadena, the same can be said for all the other cities in South California. South Pasadena is not the only place where noted architects worked or historic individuals lived. And as the Keeper of the Register of Historic Places notes, some places in South Pasadena are mundane and typical subdivisions just like any other city in Southern California.

United States Department of the Interior

NATIONAL PARK SERVICE

P.O. Box 37127

Washington, D.C. 20013-7127

REPLY REFER TO:

2280

To: Thomas J. Ptak, Associate Administrator for Program Development
Federal Highway Administration
400 Seventh St., SW
Washington, DC 20590

The Director of the National Park Service wishes to inform you of our determination pursuant to the National Historic Preservation Act, as amended, and Executive Order 11593 in response to your request for a determination of eligibility for inclusion in the National Register of Historic Places. Our determination appears on the enclosed material.

As you know, your request for our professional judgment constitutes a part of the Federal planning process. We urge that this information be integrated into the National Environmental Policy Act analysis and the analysis required under section 4(f) of the Department of Transportation Act, if this is a transportation project, to bring about the best possible program decisions.

This determination does not serve in any manner as a veto to uses of property, with or without Federal participation or assistance. The responsibility for program planning concerning properties eligible for the National Register lies with the agency or block grant recipient after the Advisory Council on Historic Preservation has had an opportunity to comment.

Attachment

E.O. 11593

DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places National Park Service

Project Name: 710 Freeway Gap Closure Project (between 1- 10 and 1-210)

Location: South Pasadena, Los Angeles County **State:** CALIFORNIA

Request submitted by: Thomas J. Ptak, FHWA

Date received: 1/10/97

Additional information received: 2/20/97, 2/21/97

Name of property:	SHPO opinion	Secretary of the Interior's opinion	Criteria
Gillette Crescent Neighborhood	N/A	Not Eligible :	
Valley View Heights Neighborhood	N/A	Not Eligible	

See Comments Attached

(signed) Carol D. Shull
Keep. of the National Register

Date: 2-24-97

PROJECT NAME: 710 Freeway Gap Closure Project
LOCATION: Los Angeles County, California
SUBMITTING AGENCY: FHWA/CAL TRANS

SOUTH PASADENA

The current study looks at two potential historic districts: the Valley View Heights neighborhood located immediately north of the Short Line Villa Tract (Determined Eligible in 1995) and the Gillette Crescent neighborhood located just to the north of that area. CAL TRANS staff studied the areas and determined that eligible districts did not exist in either neighborhood, citing loss of integrity, unremarkable design, and commonplace architectural forms. The city of South Pasadena sponsored its own study of the Gillette Crescent neighborhood. Since the two areas both lie in South Pasadena the context provided in the previous round of determinations still served as the basis for these determinations.

Based on the documentation provided by FHWA (including individual Architectural Inventory/Evaluation forms generated by CAL TRANS and the City of South Pasadena's own consultant, the narrative context overviews, and the previous information submitted as part of the determination of eligibility process) I concur with the FHWA's findings that the Gillette Crescent and Valley View Heights neighborhoods are not eligible for listing in the National Register of Historic Places as historic districts. The proposed -districts- do not represent significant and distinguishable entities within the context of South Pasadena history.

GILLETTE CRESCENT NEIGHBORHOOD

NOT ELIGIBLE

The Gillette Crescent area was first platted in 1922 and was largely built up by the 1930s. The housing is fairly modest in scale with mostly one-story single family homes and a few historic multi-family units (bungalow courts and duplexes). Of the 69 buildings surveyed by CAL TRANS approximately 70% date from the 1920-1930 period and about 50% are Spanish or Mediterranean Revival in style. The architecture is described in the CAL TRANS report as "typical examples of builders' houses of the period which can be seen in uncountable numbers throughout South Pasadena and surrounding communities.- CAL TRANS' study goes on to say that "Although the neighborhood is geographically discrete, its architecture is not distinguishable from similar middle-class 1920s neighborhoods in South Pasadena and surrounding communities.-"

The 1920s represented the third major boom period in South Pasadena's developmental history. This 1920s boom was part of a region-wide boom that saw

approximately 5,300 new subdivisions platted in the Southern California area from 1920 to 1925; 1,434 in 1923 alone. According to CALTRANS' study, the plats making up the expanded Gillette Crescent neighborhood represented about 10-15% of the new subdivisions platted in South Pasadena during the 1920s. In general effect, however, the 1920s-era development "was neither as massive nor as significant in determining the character of the town (S. Pasadena) as the earlier periods."

The City of South Pasadena's study portrays the neighborhood as an architecturally significant collection of Spanish Colonial and California Mediterranean Revival-style residential architecture from the 1920s. The documentation, however, provides no comparative context evaluating this neighborhood with others in South Pasadena and elsewhere in the region. The CAL TRANS report states that "whole neighborhoods and hillsides in the Pasadena area are covered with the white-walled houses and clay tile roofs characteristic of the style (California Mediterranean) Like the earlier Craftsman architecture, the style was picked up by builders, and as the population of the region expanded. whole streets were lined with new bungalows clad in the Mediterranean style, forming a lasting image of Southern California." The current documentation fails to show how the Gillette Crescent houses represent a significant and distinguishable entity within the context of the hundreds of modest builder-designed homes erected in the 1920s in South Pasadena and the surrounding communities.

The City's study also attempts to portray the neighborhood as part of the continuing evolution of speculative development stimulated by the expansion of suburban railroad and streetcar systems. The CAL TRANS study successfully argues, however, that by the 1920s rail connections were much less of an influential element driving residential development than the sheer post-War demand for new housing. While clear links can be shown between pre-World War I developments like the Short Line Villa Tract and the establishment of new rail line connections, these connections are much less evident in the 1920s, where there appears to have been a mad rush to develop any remaining open undeveloped land. Where South Pasadena's earlier nineteenth and twentieth century developments had established a distinctive urban pattern through their reliance on proximity to the newly established rail lines, the 1920s developments show no such pattern or connections.

The City's study also proposed that the distinctive hillside setting of the Gillette Crescent neighborhood represented a significant aspect of period urban planning and design. CAL TRANS, however, counters their argument by analyzing the origins of hillside development and comparing the South Pasadena work to other contemporary and innovative developments in the southern California region. The study reveals that the Gillette Crescent project 1) was not the work of first rate or innovative architects, 2) did not use particularly innovative methods or architecturally significant forms, and 3) shows no direct evidence that the selection of the hillside location was a significant design consideration.

The architecture in the Gillette Crescent neighborhood represents rather workman-like illustrations of the common design traditions of the period. Modest in scale, the buildings have no particular architectural distinction and appear to reflect common contractor-built designs, which were likely replicated throughout the southern California/Pasadena region. The integrity of the district is marred by a number of modern apartment complexes, the reconfiguration of certain lots from their historic pattern, and minor alterations to a considerable number of individual homes. The current documentation fails to satisfactorily justify the architectural significance of this neighborhood as a distinguishable entity within the context of South Pasadena.

VALLEY VIEW HEIGHTS NEIGHBORHOOD

NOT ELIGIBLE

The Valley View Heights neighborhood shares characteristics of both the Gillette Crescent and the Short Line Villa Tract neighborhoods. While the development history of the Valley View area somewhat parallels that of the Short Line Villa Tract, the visual character of the area is dominated by modest, small-scale residences reflecting the common contractor-built forms similar to those found in Gillette Crescent and throughout other parts of South Pasadena.

Like the Short Line Villa Tract, Valley View Heights was first platted in 1906 as a prospective streetcar suburb served by the same station stop on Henry Huntington's new Short Line Electric Railroad. Unlike the Short Line Villa Tract, however, the development of individual lots within the Valley View plat was far slower. Although the two areas were platted just 6 months apart, Valley View Heights contained only 5 houses by 1910, while approximately 20 new homes had been erected in the Short Line Villa Tract. By 1914 only about fifteen homes were located in Valley View, while the Short Line tract had almost 40 residences. The developers of the Valley View Heights tract erected a substantial hotel building in the heart of the neighborhood in 1909, perhaps in hope of stimulating development, similar to the efforts of Huntington's Hotel Wentworth in the more exclusive Oak Knoll development further to the north in South Pasadena. The hotel was razed in the 1920s, however, and the lots subsequently redeveloped.

Thus, from the perspective of reflecting the significant characteristics of typical pre-World War I streetcar suburban development, the Valley View Heights neighborhood represents a rather poor example. This is particularly true when compared with the number and integrity of historic resources in the nearby Short Line Villa Tract previously determined eligible by the Keeper. The extent, scale, and condition of the prewar housing in the Short Line Villa Tract dominates the character of that neighborhood allowing it to strongly convey the significant characteristics of the period. The modest examples of prewar Craftsman residential design in the Valley View Heights neighborhood on the other hand fail to convey a cohesive sense of community, time and place.

The Valley View Heights neighborhood had its largest single concentration of development activity during the 1920s boom period; twenty four extant buildings remain from that ten year span. The result is a district whose character relies on its collection of 1920s-era architecture. This presents the same problems of contextual evaluation seen in the Gillette Crescent neighborhood. In order to establish significance it is necessary to justify the eligibility of the district within the context of the pervasive elements of the 1920s boom era development. The architecture in the neighborhood represents rather workman-like illustrations of the common design traditions of the period. Modest in scale, the buildings have no particular architectural distinction and appear to reflect common contractor-built designs, which were replicated throughout the southern California/Pasadena region. In addition, the integrity of the "district" is marred by a number of modern buildings and alterations to a considerable number of individual homes. (The CAL TRANS evaluation of the district identified 39 potentially contributing resources and 36 noncontributing properties. If the period of significance is taken up to 1945, as was done in the Short Line district, the numbers are approximately 45 contributing and 30 noncontributing.) The current documentation fails to justify the architectural or historical significance of this neighborhood as a distinguishable entity within the context of South Pasadena.

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