Cultural Heritage Board Memorandum REVISED

CITY OF RIVERSIDE

Community & Economic Development Department **Planning Division**
3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | RiversideCA.gov

CULTURAL HERITAGE BOARD MEETING DATE: JUNE 18, 2025
AGENDA ITEM NO.: 4

PROPOSED PROJECT

Case Numbers	**DP-2025-00269**(Certificate of Appropriateness)
Request	To consider a Certificate of Appropriateness to demolish an existing fire damaged residential office structure.
Applicant	Belen Bobadilla on behalf the Riverside County Office of Education
Project Location	4472 Orange Street, situated on the east side of Orange Street, between Fourteenth Street and Prospect Avenue
APN	219-023-028
Ward	1
Neighborhood	Downtown
Historic District	Prospect Place Historic District
Historic Designation	District Contributor; Structure of Merit #313
Staff Planner	Scott Watson, Historic Preservation Officer 951-826-5507 swatson@riversideca.gov

RECOMMENDATIONS

Staff recommends that the Cultural Heritage Board:

1. **DETERMINE** whether the proposed request meets the Principles and Standards of Site Development and Design findings, provided in Section 20.25.050.A of the Riverside Municipal Code.

If the Cultural Heritage Board determines the request meets the required Principles and Standards of Site Development and Design:

1. **DETERMINE** that the project is exempt from the California Environmental Quality Act (CEQA) review pursuant to Sections 15061(b)(3) (General Rule) and 15301 (Existing Facilities); and

2. **APPROVE** Planning Case DP-2025-00269 (Certificate of Appropriateness), based on the facts for findings outlined and summarized in the staff report, and subject to the recommended conditions of approval (Exhibit 1).

BACKGROUND

4472 Orange Street

The subject property is approximately 6,534 square feet and was developed with a single-story Late-Victoria Cottage style family residence, with Neo-Classical elements, in 1908. The single-family residence was listed as a contributor to the Prospect Place Historic District and as a result also designated as Structure of Merit #313.

Character-defining features of the structure include: a rectangular ground plan with a raised foundation; a moderately-pitched, asphalt shingle topped bellcast hipped roof with wide boxed eaves, outlookers, and a bellcast hipped roof dormer; narrow wood lap board siding; an internally set red brick chimney; an asymmetrical façade; a partial-width recessed porch with a doric column topped half-wall; two canted bays, one on the west (façade) elevation and one on the south elevation; and wood double-hung window with wood trim, some with a diamond pattern divided lite. An ADA ramp with a lap-board half-wall has been added to the north elevation as part of the adaptive reuse of the structure discussed below.

In 1986, an application, by Thompson & Colegate Attorneys at Law was submitted, to rezone the parcels at 4462, 4472, and 4480 Orange Street from Residential - 3 (Multi-Family Residential) to the Restricted Office Zone. The proposal included the demolition of the residence at 4480 Orange Street and adaptive reuse of the residence at 4472 Orange Street into a professional office. As part of the rezoning, a Parking Overlay Zone was also added to the parcels at 4462 (already vacant) and 4480 Orange Street. The proposal was recommended for approval by the Planning Commission on July 3, 1986, and approved by City Council on January 27, 1987. Due to the timing of the application submittal, the project did not require CHB approval; however, a comment letter was provided to the Planning Commission by staff to the CHB, Alan Curl.

The Prospect Place Historic District

Concurrent to the rezone request and prompted by commercial development in the area south of Fourteen Street, specifically the expansion of the Press Enterprise complex at the southeast corner of Orange Grove Avenue and Fourteen Street, the Cultural Heritage Board (CHB) designated the area roughly bounded by Main Street on the west, Orange Grove Avenue on the east, Prospect Avenue on the south and just north of Fifteen Street as the Prospect Place Historic District (PPHD). Following a series of informational meetings, CHB held a Public Hearing on October 15, 1986, and approved the PPHD nomination. During this time Structure of Merit criteria included Criterion E – Its relationship to other preservation designations recognized by the City of Riverside if it is complementary to the integrity of that designation, and it was standard practice of CHB to automatically designate all the contributors to a historic district as Structures of Merit. No additional evaluation for individual significance were completed. In current practice, properties are evaluated and designated individually as Structures of Merit, and not collectively. When a historic district is designated, the properties are solely listed as

contributors or non-contributors, as is consistent with State and Federal Guidelines, and best practices in other jurisdictions.

An appealed CHB's approval of the PPHD nomination was filed by property owner and applicant for the rezoning at 4472 Orange Street, Thompson & Colegate, as the adaptive reuse, demolition, and rezoning project was already in process when the Historic District was designated. Following a few years of discussion at City Council and the Land Use Committee, City Council denied the appeal and upheld the PPHD designation on January 17, 1989. At that time, Council included in the motion to reconsider the designation in three years as there was some discussion regarding possible impacts to a potential expansion of the Riverside Community College.

In 1992, a status report and recommendation on the PPHD was provided to the City Council. Of the alternatives considered in the report, staff recommended the PPHD be retained and zoned for single-family residential but allow for the adaptive reuse of the structures to non-residential uses with the granting of a Conditional Use Permit. On September 22, 1922, City Council accepted staff recommendation and retained the PPHD.

With the adoption of the Downtown Specific Plan in 2002, the area of the PPHD, including the property was rezoned as Downtown Specific Plan – Residential District (DSP-RD).

Rezoning and Designation Timeline

The following outlines the timeline of key events for the property including rezoning and historic designation:

- 1/15/86 - PPHD Discussions begin
- January - October 1986 – CHB Reviews and Considers PPHD Designation
- 6/4/86 - Rezoning Application Submitted
- 7/3/86 - Planning Commission Recommends Rezoning Approval
- 8/25/86 - PPHD Public Information Session
- 10/15/86 - PPHD Designated
- 10/30/86 - Letter of Appeal Filed
- 1986 – 1989 – Appeal reviewed by CC and Land Use Committee
- 1/17/89 - CC Upholds Designation
- 9/22/92 - CC Retains PPHD
- 11/2002 - DSP adopted & PPHD rezoned DSP-RD

PROJECT DESCRIPTION

In December 2023, the building at 4472 Orange Street caught fire and sustained damage. The applicant, Riverside County Office of Education, is requesting the demolition of the structure due to the significant fire damage and usability of the structure. The applicant contracted with Insight Forensics to complete a Structural

Damage Evaluation Report. The report prepared by Blake Landers, Licensed Civil Engineer and General Contractor, found that:

> More than 50% of the floor system and 60% of the roof system framing exhibited cross-sectional charring or excessive sapping/glazing appearance and were compromised by exposure to heat/fire. Based on the areas damage in the roof system, the entirety of the roof would require replacement either due to fire damage or implementation of current standards for building. Similarly, the floor framing, including the car decking and beam lines supporting the repetitive joist of the floor framing has been damaged and would require removal of all of the framed systems above the damaged areas.

The report concluded that "Based on the extent of structural damage, limited salvageability of the remaining structure and impact of the building code update/upgrade requirements on reuse, it is expected that the subject building will be required to be demolished entirely and reconstructed from the ground up to ensure safety, functionality/code compliance."

A Historic Resources Assessment was also prepared by Casey Tibbet of LSA to determine continued eligibility of the structure. The report recommended the repeal of the Structure of Merit Designation, the identification of the property at 4472 Orange Street as a non-contributor to the PPHD, and the northern boundary of the district be shifted to remove 4472 and 4480 Orange Street from the district. A full evaluation, including historical research is included in the assessment.

It was standard practice of CHB in the 1980s to designate all contributors to historic districts as Structures of Merit. As no criteria analysis was ever completed for the subject property, the assessment by Tibbet includes the following Structure of Merit criteria analysis:

> ***City Structure of Merit Criterion 1: Has a unique location, embodies a singular physical characteristic, or contains a view or vista representing an established and familiar visual feature within a neighborhood, community or area.***
>
> This property is located in the downtown area of Riverside, in an area where there are many similar buildings. There is nothing unique about its physical characteristics, location, or view. It is not significant under this criterion.
>
> ***City Structure of Merit Criterion 2: Is an example of a type of building which was once common but is now rare in its neighborhood, community or area.***
> The building types associated with this property are single-family residence (1908–1987) and residential office (1987–2024). Both are exceedingly common property types in Riverside. It is not significant under this criterion.
>
> ***City Structure of Merit Criterion 3: Is connected with a business or use which was once common but is now rare.***

The property was not associated with a business historically. It is not significant under this criterion.

City Structure of Merit Criterion 4: Has yielded or may be likely to yield, information important in history or prehistory.

The building does not date to the prehistoric period. It was constructed in 1908 using common methods and materials for that time. It was then remodeled for use as an office in 1987. It is unlikely that it would yield any information important to history or information that cannot be found in other buildings of a similar vintage. It is not significant under this criterion.

City Structure of Merit Criterion 5: Represents an improvement or Cultural Resource that no longer exhibits the high degree of integrity sufficient for landmark designation, yet still retains necessary integrity under one or more of the landmark criteria to convey cultural resource significance as a structure or resource of merit.

This property does not retain enough integrity to meet any of the Landmark or the Structure of Merit criteria. As part of its conversion to an office, the setting and spatial relationships that conveyed the property's association with early residential development in Riverside and the PPHD were radically altered and severely compromised. Additionally, as previously noted the building does not meet the Landmark designation criteria because no historically important people are associated with the former residence, and it is not the work of a master architect or builder. The building has sustained alterations including construction of an ADA-compliant ramp on the north elevation and removal of nearly half of the windows including the façade windows. A fire destroyed the interior and damaged the roof and exterior walls. This is not a rare resource as there are many examples of Neoclassical cottages in the city, including in the PPHD and the nearby Mile Square neighborhood. It is not significant under this criterion.

The historical assessment also reviewed the historic district criteria and the property within the context of the district.

Historic District Criterion 6: Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning.

As one of Riverside's oldest truly residential neighborhoods, the PPHD represents an important era of Riverside's settlement and growth. The small lots, 15- to 20-foot setbacks between houses, narrow driveways, and, in most locations, landscaped parkways between the street and sidewalk contribute to the urban character of the neighborhood. Conversion of the 4472 Orange Street residence to an office with related parking radically changed the spatial relationships that conveyed the property's association with the early 20th century neighborhood. The building is now accessed by a 25-foot-wide driveway and is surrounded by parking on three sides. The closest residence is more than 70 feet to the south. In addition, the landscaped parkway was removed, and the front setback was reduced to

facilitate street widening. All of these things are inconsistent with the remainder of the neighborhood. The property at 4472 Orange Street is no longer representative of the small-lot, residential pattern of development and does not provide appropriate historic context or association for the PPHD. It is not a contributor to the district under this criterion.

Historic District Criterion 7: Conveys a sense of historic and architectural cohesiveness through its design, setting, materials, workmanship, or association.

The PPHD is not significant for its architecture per se, but it does convey a sense of cohesiveness through the subdivision design, its setting, and the materials found throughout. The subdivision is laid out with small lots, consistent front and side setbacks, and a grid street pattern (with the exception of Prospect Avenue). The right-of-way width is approximately 40 feet, including landscaped parkways that are mostly located between the curbs and sidewalks. This is not the case for 4472 Orange Street. At this location, the street has been widened to approximately 50 feet and the parkway has been shifted between the sidewalk and front yard, which essentially causes it to disappear as there is no distinction between it and the yard area. Although the front setback was reduced by the street widening, the side setbacks were enlarged significantly to accommodate the wide driveway and parking areas. This was facilitated by removal of the residence adjacent to the south at 4480 Orange Street.

The PPHD setting is a small-lot, urban neighborhood surrounded by non-residential uses on larger properties. Nearby non-residential properties include Riverside Community College to the south and west and a car wash, bank, law offices, the Press Enterprise facility, and the office at 4472 Orange Street to the north and east. Each of these occupies a large property with on-site or adjacent parking. Although the building at 4472 Orange Street is residential in appearance, its immediate setting, like other non-residential uses in the area, consists of a wide street and a large parking lot with a wide driveway. This is inconsistent with the PPHD setting.

Throughout the PPHD, wood is the dominant material found on the buildings. It is used for siding, window frames, doors, and accents. The same is true for the building at 4472 Orange Street and in this way, it does relate more to the PPHD than to the other non-residential uses in the area. However, this relationship is outweighed by the changes to the design and setting. The combination of the tree-filled parking lot and the large setbacks from other buildings gives this property an expansiveness that historically it never had. There is a sense that it was part of a multi-acre property perhaps surrounded by citrus groves. Because of this, the property does not convey the appropriate historic context or association. It is essentially creating a false sense of history and, therefore, does not contribute to the significance of the PPHD under this criterion.

In summary, alteration to the contexts of the site, including but not limited to the removal of the parkway, the widening of the street, the reduction of the setback, and the separation of the property from the other properties of the district have diminished its

ability to provide appropriate historic context or value to the PPHD; therefore, as asserted in the assessment by Tibbet, this property should be considered a non-contributor to the historic district and thus removed as it is on the edge of the district.

PROJECT ANALYSIS

FACTS FOR FINDINGS

Pursuant to Chapter 20.25.050 of Title 20 (Cultural Resources) of the Riverside Municipal Code (RMC), the Cultural Heritage Board and Historic Preservation Officer must make applicable findings of specific Principles and Standards when approving or denying a Certificate of Appropriateness. For proposed projects involving individually significant Cultural Resources (i.e. City Landmarks, Structures of Merit, eligible Landmarks, etc.), the project should demonstrate:

Chapter 20.25.050.A – Principles and Standards of Site Development and Design Review for Individually Significant Resources
Consistency or compatibility with the architectural period and the character-defining elements of the historic building, such as colors, textures, materials, fenestration, decorative features, details, height, scale, massing, and method of construction.
Facts: This finding is not directly applicable, as the project proposes removal of the existing structure and does not include any new construction or additions for which architectural compatibility would typically be evaluated.
The proposed project does not destroy or pose a substantial adverse change to an important architectural, historical, cultural or archaeological feature or features of the Cultural Resource.
Facts: The property at 4472 Orange Street is currently designated as a Structure of Merit. This designation was applied under a former practice in which all contributors to historic districts received automatic designation, without individual evaluation. The recent Historic Resource Assessment prepared by Tibbet suggests that the property does not meet the criteria for individual designation as a Structure of Merit. If this assessment is accepted, and the property is determined to lack individual significance, its removal may not constitute a substantial adverse change to an important cultural resource. However, as the current designation remains in effect, removal of the structure could also be interpreted as a potential impact to a designated historical resource. The significance of the impact ultimately depends on whether the existing designation is affirmed or the conclusions of the updated evaluation are accepted.

Chapter 20.25.050.A – Principles and Standards of Site Development and Design Review for Individually Significant Resources
Compatibility with context considering the following factors: grading; site development; orientation of buildings; off-street parking; landscaping; signs; street furniture; public areas; relationship of the project to its surroundings.
Facts: The subject property's immediate context has undergone substantial alteration over time, primarily due to surrounding site redevelopment and the introduction of surface parking areas in the mid 1980's. These changes have resulted in an auto-oriented environment with minimal physical or visual connection between the building and nearby structures, significantly diminishing the original spatial and landscape relationships the property once had. Given this altered context, the existing building's compatibility with its surroundings has been substantially reduced. While the building itself retains architectural elements that reflect its original design and orientation, the broader environmental changes have compromised its ability to contribute meaningfully to the site's historic context. Consequently, the proposed removal of the structure may be seen as consistent with the evolved site conditions and could facilitate a more cohesive redevelopment that better aligns with current use patterns. It is recognized that some may view the building's architectural presence as a valuable link to the past, and its removal could be seen as a loss to the remaining contextual fabric.
Consistency with the principles of the Secretary of the Interior's Standards for the Treatment of Historic Properties.
Facts: This finding is not applicable as the project involves only the removal of the structures from the project site and does not involve any new structures or any addition to existing structures where consistency with the Secretary of the Interior' s Standards is a consideration.
As applicable, consistency with other federal, state, and/or local guidelines.
Facts: No additional federal, state, and/or local guidelines apply to this project.

For proposed projects involving contributors or contributing feature within Historic Districts and Neighborhood Conservations Areas, the proposed project should demonstrate:

Chapter 20.25.050.B – Principles and Standards of Site Development and Design Review for Historic Districts and Neighborhood Conservation Areas
Compatibility with the height, scale, or massing of the contributor (or contributing feature) the Cultural Resource.
Facts: This finding is not applicable as the project involves the removal of the structure that has been found to be a non-contributor to the PPHD and does not involve any new structures or any addition to existing structures where compatibility with the height, scale, or massing of the historic district is necessary.
Compatibility with colors, textures, materials, decorative features of the contributor (or contributing feature) to the Cultural Resources.
Facts: This finding is not applicable as the project involves the removal of the structure that has been found to be a non-contributor to the PPHD and does not involve any new structures or any addition to existing structures where compatibility with the height, scale, or massing of the historic district is necessary.
The proposed change does not destroy or pose a substantial adverse change to an important architectural, historical, cultural or archaeological feature or features within boundary of the Cultural Resource.
Facts: The recent Historic Resources Assessment by Tibbet recommends that the subject property be considered a non-contributor to the Prospect Place Historic District. This recommendation is based on alterations to the site including widening of the street, reduced setbacks, removal of parkways, and a general disconnection from the historic district's original character. If the property is accepted as a non-contributor, its removal would not be expected to significantly impact important architectural, historical, cultural, or archaeological features within the district. However, as the property is currently listed as a contributor to PPHD, its removal may also be interpreted as an adverse change to the district's fabric and significance. The significance of the impact ultimately depends on whether the existing designation is affirmed or the conclusions of the updated evaluation are accepted.

Chapter 20.25.050.B – Principles and Standards of Site Development and Design Review for Historic Districts and Neighborhood Conservation Areas
Compatibility with the context of the Cultural Resource regarding grading, site development, orientation of buildings, landscaping, signs, or public areas.
Facts: The subject property is located at the edge of the Prospect Place Historic District boundary and is visually, physically, and spatially disconnected from the majority of the district. According to the Historic Resource Assessment, the structure appears more as a remnant grove house than an integrated element of a cohesive historic neighborhood. The assessment finds the property to be a non-contributor to the district. If this finding is accepted, removal of the structure would not significantly alter the ratio of contributing resources within the district or affect the district's overall context. However, as the property remains currently designated as a contributor its removal could also be interpreted as a loss that affects the district's contextual integrity. The determination of impacts to the context depends on the weight given to the current designation versus the findings of the updated assessment.
Consistency with the Citywide Residential Historic District Design Guidelines, approved guidelines for each Historic District, and/or any other applicable Design Guidelines;
Facts: This finding is not applicable as the project involves the removal of the structure that has been found to be a non-contributor to the PPHD and does not involve any new structures or any addition to existing structures where the Citywide Residential Historic District Design Guidelines apply.
Consistency with the principles of the Secretary of the Interior's Standards for the Treatment of Historic Properties.
Facts: This finding is not applicable as the project involves only the removal of the structures from the project site and does not involve any new structures or any addition to existing structures where consistency with the Secretary of the Interior' s Standards is a consideration.

AUTHORIZATION AND COMPLIANCE SUMMARY

Regulatory Codes	Consistent	Inconsistent
Historic Preservation Code Consistency (Title 20) Based on the findings, the project can be found consistent with Title 20 of the Riverside Municipal Code. Although the subject property was previously listed as a contributor to the Prospect Place Historic District (PPHD) and therefore, automatically designated as a Structure of Merit, a recent Historic Resource Assessment has determined that the property does not meet the criteria for individual designation. Due to prior alterations and changes to its setting, the structure also no longer contributes significantly to the historic context of the district. Accordingly, the proposed demolition of the structure can be seen as resulting in no substantial adverse impact on the character or integrity of the PPHD. However, as the property remains currently designated as a contributor and Structure of Merit, its removal could also be interpreted as a loss to a Cultural Resources. The determination of Consistency with Title 20 depends on whether the existing designation is affirmed or the conclusions of the updated evaluation are accepted.	☑	☐

There are reasonable arguments in support of both retaining and removing the structure. Factors include that building has sustained significant fire damage, and a recent Historic Resource Assessment concluded that it does not meet the criteria for individual designation and no longer contributes meaningfully to the historic district. Alternatively, the structure remains formally designated as both a Structure of Merit and a contributor to the Prospect Place Historic District, rehabilitation, including the retention of any remaining exterior materials, to preserve its presence within the district. The determination relies on whether the Cultural Heritage Board concurs with the findings and conclusions of the submitted evaluation reports.

ENVIRONMENTAL REVIEW

If the Cultural Heritage Board concurs with the findings of the Historic Resource Report by Tibbet:

- The building at 4472 Orange Street has been found is ineligible for individual designation based on new information, it does not qualify as a "historic resource" as defined by the California Environmental Quality Act (CEQA). Therefore, potential impacts to the residence itself through demolition are not subject to CEQA analysis.
- The property has also been found as non-contributor, the removal of this property through demolition has no affect or impact on the district; therefore, its removal cannot be considered a significant impact under CEQA.

- Therefore, there project can been found to be exempt from the provisions of the California Environmental Quality Act (CEQA), pursuant Sections 15061(b)(3) (General Rule) and 15301 (Existing Facilities).

PUBLIC NOTICE AND COMMENTS

Public notices were mailed to property owners within 300-feet of the site and a Notice of Demolition was posted on site at least 30-days prior to the Cultural Heritage Board meeting. As of the writing this report, Staff received 140 public comment letters in opposition to the proposed project. The letters do not provide any substantial information that is not addressed in the staff report and primarily expresses opposition.

APPEAL INFORMATION

Actions by the CHB, including any environmental findings, may be appealed to City Council within ten calendar days after the decision. Appeal filing and processing information may be obtained from the Planning Division by calling 951-826-5371.

STRATEGIC PLAN

This item contributes to the Envision Riverside 2025 City Council Strategic Priority 5 – High Preforming Government (Goal 5.3 – Enhance communication and collaboration with community members to improve transparency, build public trust, and encourage shared decision-making).

This item aligns with the following Cross-Cutting Threads:

1. *Community Trust*: The application for a Certificate of Appropriateness is being reviewed at a public meeting of the CHB and notices were sent to property owners within a 300-foot radius of the property and posted on at the property, providing an opportunity to comment on the project.
2. *Equity*: The application for a Certificate of Appropriateness will be discussed at a CHB meeting which is available to all residents and can be viewed both in person and virtually.
3. *Fiscal Responsibility*: The application for a Certificate of Appropriateness has no impact on City General Funds.
4. *Innovation*: The application for a Certificate of Appropriateness makes use of new information and approaches to research.
5. *Sustainability and Resiliency*: The proposed will all for future reuse of the project site.

EXHIBITS LIST

1. Staff Recommended Conditions of Approval
2. Aerial Photo/Location
3. Prospect Place Historic District Map
4. Project Plans (Plot Plan, Floor Plans, Elevation)
5. Structural Damage Report by Insight Forensics
6. Historic Resource Assessment by Casey Tibbet, LSA
7. Interior Photos
8. Site Photos

9. Prospect Place Historic District Designation, 1986-1989
10. Letter from Alan Curl regarding rezoning
11. Prospect Place Historic District Designation Reconsideration, 1992
12. Public Comment

Prepared by: Scott Watson, Historic Preservation Officer
Approved by: Maribeth Tinio, City Planner

CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT PLANNING DIVISION

EXHIBIT 1 –CONDITIONS OF APPROVAL

PLANNING CASE: DP-2025-00269 **MEETING DATE:** June 18, 2025

CASE SPECIFIC CONDITIONS

1. Within one-year of approval of a Certificate of Appropriateness, the applicant shall submit an application to dedesignate the subject property and modify the project Prospect Place Historic District Boundary to removing 4472 and 4480 Orange Street.

GENERAL CONDITIONS

2. There is a one-year time limit in which to secure the necessary building permits required by this Certificate of Appropriateness. If unable to obtain necessary permits, a time extension request letter stating the reasons for the extension of time shall be submitted to the Planning Division. HP staff may administratively extend the term of a Certificate of Appropriateness for one year, no more than twice.

   PLEASE BE ADVISED THAT THE APPLICANT WILL NOT BE NOTIFIED BY THE PLANNING DIVISION ABOUT THE PENDING EXPIRATION OF THE CERTIFICATE OF APPROPRIATENESS.

3. The project must be completed in accordance with the Cultural Heritage Board's (CHB) Certificate of Appropriateness approval, including all conditions listed. Any subsequent changes to the project must be approved by the CHB or HP staff.

4. This approval for the Certificate of Appropriateness is for design concept only and does not indicate the project has been thoroughly checked for compliance with all requirements of law. As such, it is not a substitute for the formal building permit plan check process, and other changes may be required during the plan check process.

5. Granting this Certificate of Appropriateness shall in no way exclude or excuse compliance with all other applicable rules and regulations in effect at the time this permit is exercised.