

## Project Field Memorandum: Imperial Hardware Lofts Façade Rehabilitation

**Project:** Imperial Hardware Lofts Adaptive Reuse Design Assessment, 3750 Main Street,  
Riverside CA 92501

Document issue 29 April 2015 **Transom window Addendum, 14 August 2018**

Historical Structure Evaluation / Assessment Report for the Record with Recommendations:

Historical analysis, Evaluations of character-defining features with recommendations for significance, Review of Conformance with the City of Riverside's Downtown Specific Plan, Design Review of the proposed Addition and Rehabilitation project.

**Subject:** Site reviews; Archive reviews; Design Development concept reviews of the proposed development of the structure on site and the site context.

**Summary:** Clarifications for transom window material replacements are the focus of this Addendum. Our 29 April 2015 Assessment Report has been excerpted to reference especially applicable or relevant Sections, with added clarifications in red-highlighted text.

Previous historical surveys and studies (Milford Wayne Donaldson, January 2001, and Page & Turnbull, December 2009) have been referenced in the preparation of this Assessment. References to their findings with comments are included within this Assessment.

Please refer to Section 1 of this Historical Memorandum for the Record for further details including criteria used in evaluating significance.

Colorized post card image, dated estimate of 1935. Used for reconstruction of the original storefront mullion pattern. Noted that the original ground level storefront was subsequently removed and was not extant.



Following is a Design Development project stage analysis of significant character-defining architectural and historical cultural resource features present. It should be kept in mind that the schematic and preliminary nature of the design as of the date of this Assessment Report precludes an exact definition of final details for construction and finishes. Detail sheets at the forthcoming Construction Document phases will become instrumental to indicate the incorporation of the recommendations conveyed within this Assessment Report. These sheets will provide a more complete description and understanding of how the Rehabilitation-definition project goals are able to be implemented in the final construction.

It is noted that the transom storefront windows are an element where further clarification in the Construction Document phase is now able to be made.

A summary history and observations from research and at the site includes a listing of significant character-defining attributes with implementation recommendations. Review of previous historical assessments and the City of Riverside Downtown Specific Plan (November 2002) are incorporated within this document by reference.

## 1 REGULATORY DATA EXCERPTS

Summary of Applicable Sections of the Federal Secretary of the Interiors' Standards for Rehabilitation, California Environmental Quality Act, Public Resources Code, and Title 20 of the City of Riverside Municipal Code

### ▪ 1.4 Summary of City of Riverside Municipal Code Chapter 20.25

#### **Section 20.25.030 Administrative Certificates of Appropriateness.**

The Historic Preservation Officer may administratively approve, approve with conditions, refer to the Board, or deny a Certificate of Appropriateness as follows:

A. For all Cultural Resources, including Landmarks (designated and eligible):

1. The in-kind replacement of historically-correct architectural features or building elements, including windows, doors, exterior siding, roofs, porches, cornices, balustrades, stairs, and the like, that are deteriorated, damaged beyond restoration, or previously removed. Storefront transom windows are proposed to be replaced, in-kind, with aluminum windows that match exactly the field-verified dimensions of the existing windows.

#### **Section 20.25.050 Principles and Standards of Site Development and Design Review.**

The Board and Historic Preservation Officer shall make findings of the following standards when

applicable to approving or denying a Certificate of Appropriateness.

C. The colors, textures, materials, fenestration, decorative features, details, height, scale, massing and methods of construction proposed are consistent with the period and/or compatible with adjacent Cultural Resources;  
Storefront and transom windows will match and be compatible/ consistent with the period and adjacent resources.

E. The proposed change does not destroy or adversely affect an important architectural, historical, cultural or archaeological feature or features; Storefront transom window replacement does not adversely affect the architectural resource; one-third of the original wood-framed transoms have been previously removed.

G. The Principles of the Secretary of the Interior's Standards for the Treatment of Historic Properties. (Ord. 7108 §1, 2010; Ord. 6263 §1 (part), 1996)

## ▪ **1.7** Summary of Recommended Project Approach

### **1.7.1** Excerpts from the Public Resources Code:

In the Public Resources Code (PRC section 15064.5) two definitions are made that would apply to the proposed project:

*"The significance of an historical resource is materially impaired when a project:  
Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;*

And,

*Generally, 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.*

**It is Recommended that** the proposed adaptive reuse and rehabilitation project would not cause a substantial adverse change in the historical significance of the resource or environment, and conforms with this Standard of care. The proposed development of the Imperial Hardware Building does not materially alter in an adverse manner the physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources, as there are extremely limited character-defining features present within the interior. The rehabilitation project approach recommended for the exterior west façade of the Imperial Hardware Building is conforming with the standard of care specified in the Public

Resource Code and Secretary of the Interior's Standards as referenced.

Storefront transom window replacement does not create an adverse change to the architectural resource; the physical properties of the existing wood framing are standard square-section profiled material that will be matched in profile, material dimension, daylight opening dimension, and appearance in the replacement aluminum design. The location of the transom windows, above the marquee, act to remove them from close physical examination. The consistency of the transom windows as a part of the storefront system below the marquee act to unify the façade treatment and maintenance expectations.

### **1.7.2 Excerpts from the Secretary of the Interior's Standards with Recommendations:**

In the preamble to the 1992 edition of the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (37 CFR 68) there is stated a guiding principal:

*"The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility."*

A current online definition of rehabilitation provided by the National Park Service is recommended to apply to the Imperial Hardware Building Lofts project:

*"When repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular period of time is not appropriate, Rehabilitation may be considered as a treatment. Prior to undertaking work, a documentation plan for Rehabilitation should be developed."*

It is Recommended that a Rehabilitation approach is considered to be the proper definition for the Imperial Hardware Lofts Adaptive Reuse project. The proposed alterations to the property preserve the primary character-defining feature, specifically the west Main Street façade. Alterations and additions are planned for a new use above- the residential uses proposed- and within the ground floor spaces of the structure, specifically retail/commercial.

Storefront transom window replacement is included within the referenced retail/commercial ground floor spaces.

### **1.7.3 A Recommended Adaptive Reuse Project Approach:**

From The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings:

*Alterations / Additions to Historic Buildings*

Historical Architectural Assessment Report:  
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*Some exterior and interior alterations to the historic building are generally needed to assure its continued use, but it is most important that such alterations do not radically change, obscure, or destroy character-defining spaces, materials, features or finishes.*

It is Recommended that the proposed Adaptive Reuse project approach complies with maintaining the overall historical character of the existing façade structure and site. The design provides a compatible new use for the Imperial Hardware Building as a continued use for ground floor retail spaces, incorporating new residential spaces above the first floor level.

Storefront transom window replacement does not adversely affect or radically change the architectural resource;

The following sections document the details qualifying these conclusions.

## 2.1.7 Architectural Style Recommendations:

### Excerpted:

As stated elsewhere within this Assessment, the period of significance date is recommended to be 1935. As the existing storefront construction at the ground floor level represents a later modification, a contemporary interpretation is proposed that will inform the proposed design of the new structure's historically referential storefront. It is recommended to maintain the bay spacing and architectonic rhythm of the Imperial Hardware Building's façade original fenestration design. Such an approach has been successfully implemented in the schematic façade design of the proposed addition. Remaining original construction of the 1935 storefront are the transom windows, above an altered storefront at grade. The later ground floor level storefront construction is not significant.

Storefront transom windows are not a component part of the Art-Deco styled façade definition.

Similarly, the suspended marquee has been altered from its original appearance. As conservation investigation proceeds in the Construction Document development, decisions of what construction corrections are necessary, feasibility of repairs, and which appropriate approach and recommended appearance may be made.

## 2.1.15 Design Standards and Guidelines for Historic Districts:

*15.5 DESIGN STANDARDS AND GUIDELINES FOR HISTORIC STRUCTURES AND HISTORIC DISTRICTS 15.5.1 Secretary of the Interior's Standards for Rehabilitation The Secretary of the Interior's Standards for Rehabilitation are ten basic principles created to help preserve the distinctive character of an historic building and its site, while allowing for reasonable change to meet new needs. These Standards are the basic principles from which these Design Guidelines were developed.*

(Page 15-15)

The proposed project appears to comply with these goals, specifically *The Secretary of the Interior's Standards for Rehabilitation*, summary underlined above. The proposed project preserves the primary significant elements of the Imperial Hardware Building façade and its distinctive character, while allowing a change to meet reasonable new needs.

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## **2.1.17 Design Guidelines for Commercial Rehabilitations:**

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### *15.7 DESIGN GUIDELINES FOR REHABILITATION OF HISTORIC COMMERCIAL BUILDINGS*

*15.7.1 Site Design Character Defining Statement The design of the site of an historic structure is an essential part of its character. This design includes the streetscape in which the site is set, the planting strip along the street, the way a structure sits on its lot in relation to other structures and the street, and landscaping elements. While many of the historic structures in the Downtown Specific Plan area may have lost some of these characteristics over time, certain common characteristics remain which help to define the character of these historic areas and the structures within them. Historically, commercial areas in the Downtown Specific Plan area were characterized by a consistent setback usually aligned against the sidewalk. Parking was located either to the rear of buildings or was provided on street. Preservation of this regular street pattern is essential to maintaining the historic, pedestrian-friendly character of Riverside's historic commercial areas.*

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### *GENERAL DESIGN STANDARDS AND GUIDELINES 15-22 ANATOMY OF A WINDOW 15.7.2 Openings Character Defining Statement*

*The pattern of windows, doors, and other openings on the facades of an historic structure strongly define the character of the structure's design. Changing these elements in an inappropriate manner has a strong negative impact on the historic character of the structure. These openings define character through their shape, size, construction, arrangement on the facade, materials, and profile. Maintaining historic windows and doors often makes good economic sense, as they typically had a much longer life span than modern replacement windows. If you are thinking about replacing your historic windows or doors, please consult Rehab Riverside Right for suggestions on simple, inexpensive repairs which might extend their useful life. For instance, replacing single panes with double glazing or by adding storm windows or doors, you can increase energy efficiency while still preserving both the historic character of a structure and saving money! **Storefront transom window replacement does not alter the opening shape, size, and proportion nor does it adversely affect the architectural resource. The windows have been coordinated with the pilaster locations and the spacing of vertical mutins now conform with the arrangement shown on the historical colored post card.***

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## **2.1.20 General Design Standards and Guidelines:**

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*15.8.3 Materials and Details Materials commonly used on facades of historic commercial structures in Riverside included brick, stucco, and masonry. Architectural details were usually embellishments added to the solid plane of the facade or parapet details rising from it. Echoing these traditions in the design of new construction will help to preserve the distinctive character of Riverside's downtown commercial areas. Guidelines (1) Building materials should be similar, or at least appear similar, to those used historically. **Storefront transom window replacement does not alter the opening shape, size, and proportion nor does it adversely affect the architectural resource; they will appear similar to the dimensions and proportions of the original windows.***

*(2) Generally, architectural details should be arranged to emphasize the horizontal features of facades. (3)*



*Architectural details should echo, but should not exactly mimic, details found on historic facades. (4) The colors of permanent finish materials should be similar to these used historically. (5) The use of architectural detail to break up the visual mass of outsized buildings is encouraged. 15.8.4 Openings, Storefronts, and Entries The character of historic commercial blockfronts is largely defined by the storefronts, entryways, windows and doors designed to create street level interest for pedestrians and passersby. While a historic commercial blockfront might be composed of a Mission Revival structure, a Moderne structure, and several Italianate structures, all of these structures would have presented a similar face to the sidewalk, with large expanses of glass storefront windows, welcoming well-marked entryways, and largely regular, horizontally massed windows. Most historic commercial structures employ this basic architectural vocabulary to create a welcoming retail experience for passersby, and express their architectural style through details and materials. It is essential to the character of historic commercial districts, therefore, that new structures utilize this common vocabulary to ensure that the character of the area is not lost.*

(Page 15-29) **Storefront transom window replacement does not alter the opening shape, size, and proportions and they “echo” the original sizes and openings appropriately.**

*15 GENERAL DESIGN STANDARDS AND GUIDELINES 15-30 Strong corner emphasis Guidelines (1) On the ground floor of new commercial structures, a majority of the primary architectural facade should echo traditional retail storefronts. (2) The ground floor of the primary architectural facade should be composed primarily of transparent elements. (3) Recessed entryways are strongly encouraged for primary entrances on the ground floor level. (4) Primary entryways should be clearly marked through the use of important defining architectural elements, such as transoms, awnings, lintels, or surrounds. (5) New ground-level facades should echo through their use of architectural detail and articulation the widths of existing historic storefront bays in the area. (6) Upper story windows should be regularly spaced and horizontally massed on the primary architectural facade. (7) On structures occupying corner lots, corner entryways with strong architectural emphasis are encouraged.*

(Page 15-30)

The proposed project appears to comply with these goals. Underlining used for emphasis.

An emphasis of the southwest building corner is made by employing a tower element and related expression in volume. A strong architectural emphasis here proposed is terminated by an open space area with architectural features provided at the rooftop level. The art Deco style pilasters and cornice line are referenced in the proposed design. Vertical stepping is present in the pilaster elements, which are being interpretively referenced and continued in the design of the proposed façade.

Ground floor storefront windows are proposed to be transparent. The tripartite bay spacing of the original façade is maintained, and further referenced in the proposed addition above.

**Storefront transom window replacement does not alter the opening shape, size, and proportion nor does it adversely affect the architectural resource.**

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### 3 PRIOR DOCUMENTATIONS

#### Summary of previous Historical Assessments and recommendations for defined Period of Significance

Historical Architectural Assessment Report:  
Imperial Hardware Lofts Adaptive Reuse Design Assessment, Riverside CA

Historical Assessment Report, Issue date 24 March 2015

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### **3.1.1 Summary of Recommendations from Prior Assessments:**

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In development of this Historical Assessment Report, the former Imperial Hardware Building has previously been evaluated for its cultural historical landmark significance by several reviewers whose work is referenced and incorporated within this Report.

The Imperial Hardware Building was evaluated on behalf of the City of Riverside in a historic resource survey completed in 2001 by Architect Milford Wayne Donaldson, in response to a proposed project that would require the complete demolition of the existing structure on site. A feasibility study analysis for a hypothetical re-use project of the Imperial Hardware Building was prepared by Architects Page & Turnbull in 2009.

Excerpts from their reports are referenced with comment in this Report as follows:

*"The Imperial Hardware Building has been significantly altered since its first construction as two separate buildings in ca. 1900 and ca. 1920. The original brick façades were replaced in 1935, after a fire, with an Art Deco design. The interior of the building had been gutted, and few character-defining features remain. Other than the 1935 façade and windows, the only significant extant features are the tin ceilings and (damaged) wood floor."*

*"However, because of the good condition of the Art Deco façade, Architect Milford Wayne Donaldson, EALA recommends that any new development on the site of the Imperial Hardware Building incorporate the existing structure into the new work."*

Donaldson Historic Resources Survey, January 2001, Page 22.

The Report also concurs with Donaldson's Survey that the Art Deco façade is a significant, character -defining feature for which a Conservation approach in repair and rehabilitation is recommended. It is the project intent to incorporate the existing façade structure within the new work. **Storefront transom window replacement with a similar opening in shape, size, and proportion does not adversely affect the architectural resource; it retains integrity of the storefront system where the transom windows have been removed in roughly a third of the openings.**

*"...there is an opportunity to adaptively reuse the Imperial Hardware Building for retail/ commercial uses proposed in the master plan. Retail and office uses would comply with the Secretary of the Interior's Standards for the Treatments for Historic Properties. The storefronts could easily be restored to the 1935 period to match the preserved Art Deco façade. The tin ceilings of the extant structures should also be retained."*

*"The design of any new addition should be a contemporary interpretation of Art Deco design and should be clearly differentiated from the historic façade."*

Donaldson Historic Resources Survey, January 2001, Pages 22-23.

Donaldson's Survey document predated the Riverside Downtown Specific Plan. It should be



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noted that the provision of a residential component rather than the office uses above the ground floor as considered results in a substantial difference in the proposed project, in both design and volume. Donaldson figured in his schematic design intent sketches a one or a two-story addition to the existing commercial structure design that would be retained and reused as strictly a commercial retail/ office program. This is not the proposed adaptive-reuse program or the means in feasibly accomplishing the façade rehabilitation.

These two design parti concepts were identical to the theoretical designs as developed by architects Page & Turnbull in their 2009 Adaptive Reuse Study. Their first scheme, a two-story addition, was determined to not be in compliance with the Standards, due to lack of compatibility with the overall existing scale and massing. This would affect the property's integrity. Page & Turnbull's Scheme 2 includes no new additions, construction, or exterior alterations.

*"As currently designed, Scheme 2 would be in compliance with the Secretary of the Interior's Standards for Rehabilitation."*

Page & Turnbull, December 2009, Page 13.

*"The character-defining features of 3750 Main Street include:*

- *1935 (-era) Art Deco façade;*
- *Interior Staircases (newel post);*
- *Elevator and elevator shafts;*
- *Second floor wood windows;*
- *Steel windows located in rear;*
- *Tin ceiling on the first floor, and*
- *Existing brick structural system"*

Page & Turnbull, December 2009, Page 8.

This Assessment Report considers the exterior façade to be the primary character-defining feature recommended to be preserved. The second floor wood windows sizes and trim at the west primary façade and the first floor tin ceiling and crown trim are the only "essential" interior features considered to be repairable in part for maintaining integrity.

Storefront transom windows were not considered in our Assessment Report as a character-defining feature of this architectural resource.

Repair and reincorporation of features such as interior stair newel posts, steel fixed and casement windows, and the tin ceiling panels and trim details are pending development of final Construction Documents. The second floor windows were found not to be feasible to retain, and are proposed to be replaced with a similar wood material of the exact size, dimension, and detail appearance.

Feasible repairs and the development of specifications and detailing will be a necessary part of the construction documents development to support the recommended rehabilitation program.

## 4 EXISTING CONDITIONS/ ARCHITECTURAL SUMMARY

### Existing Architectural Summary with Evaluation of historical resources

#### ▪ 4.1 Summary of Existing Exterior Architectural Elements:

Original construction conditions of Imperial Hardware Building have been modified inside and out over multiple phases of construction alterations and additions. Deferred maintenance that has occurred both before and beyond the defined period of significance has created some conditions that have led to marginal performance of this vernacular commercial building envelope. In some instances, these have been extensive modifications, such as wholesale replacement of original storefront windows and most exterior doors that have affected the character of the original design.

Still, the façade walls and building volume has generally maintained the overall appearance of the original construction, while exhibiting numerous modifications as well as obvious later alterations. It may be considered that the nature of a vernacular commercial structure is that it supports such modifications without compromising its overall character. **Storefront transom window replacement does not alter the opening shape, size, and proportion nor does it adversely affect the architectural resource.**

*“The significance of an historical resource is materially impaired when a project:  
Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources”*

The present conditions with a lack of significance or conditions suggesting integrity is lacking at all interior spaces. The exterior west façade maintains its integrity successfully and is the element recommended to be incorporated in the project design.

#### 4.5.1 Conclusion:

Summarizing;

##### 4.5.1.1.>

There is a history of ongoing development and remodeling of the Imperial Hardware Building. This affects the entirety of the interior spaces, where there are limited character-defining features that remain. These are summarized in Section 6. At the exterior the lower, grade level exterior storefront doors and windows, and all of the exterior entrance doors are replaced and non-original from the 1935 construction. These are considered reversible actions, and these later modifications are recommended to be removed and replaced with compatibly designed elements. **Storefront transom window replacement is included in this recommendation for a**

compatible design replacement.

#### **4.5.2 Current description of deteriorated and/or incompatible features:**

Following are a list of incompatible and/or deteriorated features present at the exterior façade that have a potential impact on some of the character-defining elements of the building:

- Exterior flashing trim at the canopy/marquee, and rain gutters that have been displaced, broken, damaged, or are missing.
- Standard flush, painted hollow-metal doors at a great majority of the openings.
- Penetrations of façade by added conduits and electrical equipment.
- Deteriorated original or later replaced brick masonry wall elements, especially at the south and west, primarily at the west façade.
- Deteriorated wood double hung and casement windows.
- Non-conforming infill replacements of windows with painted plywood panels.

Storefront transom windows are part of this non-conforming window replacement point.

#### **4.6 Conclusions and Recommendations:**

It is clear that there are many features in this Imperial Hardware Building that have suffered from combinations of factors. Multiple stages of infrastructural upgrades made over time have created an additive quality to most interior spaces and exterior surfaces. Some of these alterations are no longer functional or functioning as intended. While some corrections of poorly performing features are achievable from an improved maintenance plan, many examples of required improvements are indicative of an overall infeasibility of a rehabilitation approach.

Replication of previously removed original storefront transom windows are part of this conclusion/ recommendation.

## **5 ASSESSMENT OF SIGNIFICANCE**

### **Summary of Primary Conveyance of Significance, referencing CEQA Criteria and previous Historical Assessments Evaluation of historical resources**

#### **5.1 Summary of Recommendations for Significance and Prior Assessments**

There have been two assessments by architects and historians within fourteen years of the date of this Report. Following is a summary of their comments in consideration of Assessments for Significance:

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### **5.1.2** Page & Turnbull's December 2009 Reuse Study Summary:

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From the Technical Report: "This Assessment Report considers the exterior façade to be the primary character-defining feature recommended to be preserved. The second floor wood windows sizes and trim at the west primary façade and the first floor tin ceiling and crown trim are the only "essential" interior features considered to be repairable in part for maintaining integrity."

Storefront transom windows are not included in this 2009 Assessment.

## **6** CHARACTER-DEFINING FEATURES

### Coordinated recommendations of Character-Defining elements of Design, Materiality, and Cultural Resources Present

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#### ▪ **6.1** Historical assessment and listing of character defining features:

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##### **6.1.1** Introduction

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Character-defining elements of the individual Buildings were evaluated broadly in the Page & Turnbull Reuse Study, written in support of a proposed project that would retain the entirety of the complex. These include:

*"The character-defining features of 3750 Main Street include:*

- *1935 Art Deco façade;*
- *Interior Staircases;*
- *Elevator and elevator shafts;*
- *Second floor wood windows;*
- *Steel windows located in rear;*
- *Tin ceiling on the first floor, and*
- *Existing brick structural system"*

Page & Turnbull, December 2009, Page 8.

Storefront transom windows are not included in this 2009 Assessment.

This Assessment Report considers the exterior façade to be the primary character-defining feature recommended to be preserved. The second floor wood windows at the west primary façade and the first floor tin ceiling and crown trim are the only "essential" interior features considered to be repairable for maintaining integrity.

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##### **6.1.2** Historical Assessment Summary statement:

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As the preponderance of historical significance associated with this site is in regard to CEQA Criteria (C), the character-defining features tend to represent physical features of the structure. Individual elements such as the west main entrance façade details and massing volumes are a specific character-defining feature as well as a conglomeration of multiple details.

### **6.1.3 Recommended Character-Defining Features, Exterior:**

#### **6.1.3.1.>**

Wood windows with associated muntins; casement and double hung recessed arch detail, west Main Street façade.

These windows are at the second floor and do not include the storefront transom windows.

### **6.1.4 Character-Defining Features, Interior:**

#### **6.1.4.2.>**

Wood windows and associated wood casing trim elements, west Main Street façade.

These windows are at the second floor and are not the storefront transom windows.

## **7 CONCLUSIONS & RECOMMENDED APPROACHES**

### **Concluding Recommendations for a compatible design of proposed modifications to the Imperial Hardware Building, including alterations of structure for adaptive reuse:**

#### **7.1 Summary of a recommended adaptive-reuse project approach:**

##### **7.1.1 Historical Assessment and Character-Defining features Summary:**

As stated throughout this Memo, and particularly in Section 4.1:

The Imperial Hardware Building structure has a history of ongoing changes, additions, and subtractions.

Following are summaries for a recommended, compatible approach. These are in general conformance with the guidelines of the Secretary of the Interior's Standards and therefore in accord with mitigating project impacts under the CEQA. Per the Standards language, a project should be performed in a "*reasonable manner, taking into consideration economic and technical feasibility.*"

##### **7.2.1 Recommendations for reuse of rehabilitated character-defining features:**

The character-defining features of the Imperial Hardware Building are recommended in general to be retained *in situ*, and remain as part of the adaptively-reused rehabilitation design on site. As previously referenced, adopting a project approach that is deemed compatible with the Secretary of the Interior's Standards under the Rehabilitation Guidelines definitions will be



found conforming to CEQA requirements. These Rehabilitation standards are the most widely adopted historical project approach. They are the most accepting of project parameters that includes new, compatibly-designed construction differentiated from the original, while meeting contemporary needs. Historic-era construction can be modified as a part of a rehabilitation documentation plan allowing for “...alterations or additions to the property (that) are planned for a new or continued use....” (Reference Section 1.1.4.)

Storefront transom windows are included in this recommendation for a new, compatibly-designed construction. The differentiation is for the materiality of finished aluminum in lieu of rehabilitated and reconstructed wood framing. It is noted that there were three bays of the original storefront windows that were removed and replaced with louvered panels. These openings have been replicated to match the original design as seen in the colorized post card.

### ▪ **7.3** Summary of recommendations for a compatible project approach:

The Report also concurs with Donaldson's Survey that the Art Deco façade is a significant, character -defining feature for which a Conservation approach in repair and rehabilitation is recommended. It is the project intent to incorporate the existing façade structure within the new work.

Storefront transom windows are included in this recommendation for a new, compatibly-designed construction. The differentiation is for the materiality of finished aluminum in lieu of rehabilitated and reconstructed wood framing.

### **7.3.1** Recommendations for a compatible design, Character-Defining Features:

**Excerpt:**

**7.3.1.6.>**

New construction should conform materially to the Secretary of the Interior's Standards nos. 9 and 10 regarding additions to historical or historically-eligible structures:

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

Storefront transom windows are included in this recommendation for a new, compatibly-designed construction. The differentiation is for the materiality of finished aluminum in lieu of rehabilitated and reconstructed wood framing.

End of Historical Assessment Report

Transom window Addendum, 14 August 2018

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