Appendix E-2

Built Environment Inventory and Evaluation Report

(DRAFT)

Built Environment Inventory and Evaluation Report

Delaney Square Residential Project, City of Azusa, California

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Intended Use: This report is intended for the Client's and its representatives' exclusive use. Based on the results of Dudek's investigation, it contains professional conclusions and recommendations concerning the potential for project-related impacts to cultural resources. It should not be considered to constitute project clearance with regard to the treatment of cultural resources or permission to proceed with the Project described in lieu of review by the appropriate reviewing or permitting agency. This report should be submitted to the appropriate federal, state, and local review agencies for their comments prior to the commencement of the Project.

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Executive Summary

Taylor Morrison retained Dudek to prepare a Built Environment Inventory and Evaluation Report for the proposed Delaney Square Residential Project (Project) in Los Angeles County, California. The Project is located on a corner lot bound by East Mauna Loa Avenue to the south, North Calera Avenue to the east, single-family homes to the west, and the Azusa Park Apartments to the north, in Azuza, California (Figure 1, Project Location). The Project proposes to demolish the existing W.R. Powell Elementary School (built in 1957) and construct a complex of 128 residential units consisting of a combination of two-story single-family detached cluster homes and two-story attached triplexes and duplexes.

This report documents Dudek's efforts to identify and evaluate built environment resources consistent with the requirements of the California Environmental Quality Act (CEQA). These efforts included a records search of the California Historical Resources Information System (CHRIS), the development of an Area of Potential Impacts (API), an intensive-level survey of the API for built resources of historic age (45 years of age or older); building development and archival research, the creation of an appropriate historic context, and recordation and evaluation of historic-era properties located in the API under National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and City of Azusa Register of Historic Landmarks designation criteria.

Dudek's archival research and field survey identified one historic-age resource within the API (Figure 2, Built Environment Area of Potential Impacts). The W.R. Powell Elementary School property, built in 1957, was not previously recorded. Dudek completed Department of Parks and Recreation (DPR) forms and an evaluation of the school addressed 1035 East Mauna Loa Avenue (Assessor's Parcel Number [APN] 8628-004-900). Dudek found the W.R. Powell Elementary School not eligible for the NRHP, CRHR, and the Azusa Register of Historic Landmarks.

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ACHP	Advisory Council on Historic Preservation
API	Area of Potential Impacts
APN	Assessor's Parcel Number
c.	circa
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
County	Los Angeles County
CRHR	California Register of Historical Resources
DBH	diameter at breast height
DPR	Department of Parks and Recreation
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
OHP	Office of Historic Preservation
PRC	Public Resources Code
Project	Delaney Square Project
SHPO	State Historic Preservation Officer

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1 Introduction

This Built Environment Inventory and Evaluation Report documents the identification and evaluation of built environment cultural resources within or adjacent to the proposed Delaney Square Project (Project) that may require additional analysis for compliance under the California Environmental Quality Act (CEQA). This report includes the following components: (1) an introduction including project location, description, the regulatory context, and the Area of Potential Impacts (API); (2) background research, which includes a focused records search review of previously recorded built environment resources included in the California Historical Resources Information System (CHRIS) from the South Central Coastal Information Center (SCCIC), a review of historical maps and aerial photographs; and the field methodology and the intensive-level survey of the API; (3) the development of an applicable historic contexts; (4) an evaluation of significance for the property within the API; and (5) findings and conclusions.

1.1 Project Location

The Project is in Azusa, Los Angeles County, California (Figure 1, Project Location). The Project area consists of the Accessor's Parcel Number (APN): 8628-004-900.

1.2 Project Description

1.2.1 Project Summary

The Delaney Square Residential Project (Project) site, which totals approximately 9.77 acres, is located in the city of Azusa (City) within Los Angeles County, approximately 18 miles northeast of downtown Los Angeles. The Project site, located at 1035 East Mauna Loa Avenue on the eastern edge of the City, encompasses one parcel (Assessor Parcel Number [APN] 8628-004-900). The site is currently developed with a school, surface parking, and hardscape and landscaping, including trees. While the site has historically been used for school purposes, all buildings on site are currently vacant. In order to accommodate the Project, the existing buildings and surface parking lot would be demolished and single-family homes and townhomes would be constructed.

Regional access to the Project site is provided by the eastbound/westbound Foothill Freeway (Interstate [I-] 210) to the south, with the Citrus Avenue freeway access ramps located approximately 1,600 feet southeast of the Project site and the South Grand Avenue freeway access ramps located approximately 0.81 miles southeast of the Project site. The I-210 freeway connects the San Gabriel Valley to the Crescenta and San Fernando Valleys to the north/northwest and Pomona Valley to the east. In addition, the I-210 freeway connects to the San Gabriel River Freeway (I-605) located approximately 4 miles west of the Project site. Direct access to the Project site is currently provided via East Mauna Loa Avenue to the south and North Calera Avenue to the east.

The nearest Los Angeles County Metropolitan Transportation Authority (Metro) A Line (formerly L/Gold Line) Azusa Pacific University / Citrus College (APU/Citrus) Station is located approximately 0.72 miles north of the Project site, near the intersection of North Citrus Avenue and West Foothill Boulevard. The nearest bus routes include Foothill Transit Bus Lines 281, 488, 284, and 188.

The Project would construct a combination of 65 two-story single-family detached cluster homes and 63 two-story attached townhomes for a total of 128 dwelling units. The new residences would have a maximum height of 29 feet 10 inches, as two stories. In total, the proposed residential density on site would be approximately 13.1 dwellings units per acre (du/ac). All residential units would be for-sale units. On site, residential amenities would include private and common open space, parking, a tot lot, barbeque area, shaded gathering space, and a butterfly garden. The Project site would be accessible from East Mauna Loa Avenue and a new driveway on North Calera Avenue with internal circulation provided by internal streets, driveways, and alleyways. The Project would include a total of 326 parking spaces, including 256 covered parking spaces for residents and 70 uncovered parking spaces for guests.

The property line for the Project site is located within street along North Calera Avenue and East Mauna Loa Avenue and includes sidewalks and street trees. Minor off-site improvements (i.e. utility connections) are proposed, which involve City easements over the Project boundary. Aside from the utility connections, there are no additional proposed off-site improvements.

1.2.2 Project Characteristics

The Project includes the demolition of existing on-site structures, surface parking lots, and landscaping to enable development of new residential units and amenities, new landscaping, and minor off-site improvements in the adjacent sidewalk and roadways (i.e. utility connections). Further details of the Project's components are provided below.

1.2.2.1 Residential Development

The Project would consist of 128 market-rate units, including 65 two-story single-family detached cluster homes and 63 two-story attached townhomes. The single-family detached unit mix would consist of 48 three-bedroom dwelling units and 17 four-bedroom dwelling units. The townhome unit mix would consist of 17 two-bedroom units and 46 three-bedroom units. The single-family detached homes would be oriented along the southern, eastern, and western frontages, and the townhomes would be oriented along the northern boundary and situated within the interior of the lot. The townhomes would be attached in 17 attached triplexes and six attached duplexes.

Amenities

Various residential amenities would be provided throughout the Project including private and common open space, parking, a tot lot, barbeque area, shaded gathering space, and a butterfly garden. Most outdoor amenities would be located in the central paseo, including a nature playground, picnic area, hop rocks, and tire swing, in addition to the aforementioned amenities.

1.2.2.2 Design Features

The Project's design would consist of four architectural styles (Spanish Colonial, Traditional, Craftsman, and Western Ranch) with color palettes predominantly featuring neutral earthtones of brown, gray, beige, and off-white. Building materials would include stucco, fiberglass doors, concrete flat tiles, vinyl windows, and wood accent siding and fascia.

1.2.2.3 Landscaping, Walls, and Fences

Landscaped areas on the Project site would feature a combination of landscape planters with root barriers/root barrier panels along with free-standing trees, shrubs, and ground covers. New plant materials would consist of climate adapted and/or medium-to-very-low water use species in compliance with Chapter 78, Article VI, Division 7, Landscaping and Irrigation Standards, of the City's Municipal Code. The Project anticipates planting 204 landscaping trees throughout the Project site. The tree palette would include Strawberry Tree, Western Redbud, Mediterranean Cypress, Blue Ice Yellowwood, Skyrocket Juniper, Crape Myrtle, Saratoga Hybrid Laurel, Little Gem Dwarf Southern Magnolia, Indian Hawthorn, Yellow Bells, Fruitless Olive, Coast Live Oak, St. Mary Southern Magnolia, Columbia London Plane Tree, and African Sumac. Examples of proposed shrubs and groundcover include variegated smooth agave, pink cloud pink muhly grass, iceberg rose, desert carpet bank catclaw, pigeon point coyote brush, and creeping juniper, among others.

Tree Plan

As detailed in the Arborist Report, provided as Appendix B of the Draft EIR, there are 38 trees with a diameter at breast height (DBH) of six inches or greater on or adjacent to the Project site. The Project proposes to remove all 25 on-site trees, none of which meet the definition of a "Heritage tree" or "City tree". The removal of these trees would be subject to City's Tree Preservation Ordinance, outlined in Sections 62-191 through 62-201 of the Azusa Municipal Code. According to the ordinance, if trees with a DBH of six inches or greater are removed, the Director of Public Works determines the appropriate size, quantity, and planting locations for replacement trees. At a minimum, three replacement trees must be planted for every one tree removed (i.e. minimum of 75 trees). As stated above, the Project would exceed this minimum requirement with an anticipated 204 tree plantings.

The 13 off-site trees have branches that overhang the property line from the neighboring properties, which would be encroached upon during construction activities. In accordance with City requirements, all regulated trees that are not removed would be protected in a manner consistent with the standards outlined in the City's Tree Preservation Ordinance.

Open Space and Private Open Space

According to Table 4-3 of the City's Development Code (Section 88.42.140 Multi-Family and Small Lot Single-Family Projects), projects containing 31 or more units are required to provide a minimum of 2,000 square feet of common open space, for projects with 31 or more units, and 150 square feet of private open space per dwelling unit. The open space proposed on site includes both community and private open space. There are landscaped areas that would be managed privately (i.e., private open space) and landscaped areas that would be managed by the homeowner's association (HOA) (i.e., common open space, paseo, and site perimeter). The Project would provide 15,100 square feet of common area open space (inclusive of a central paseo, tot lot, barbeque area, shaded gathering space, and a butterfly garden) and 36,916 square feet of private residential open space in the form of yards for a total of 52,016 square feet of residential open space, which meets Table 4-3 and Section 88.42.140(F) of the Development Code. Table 1, below, details the Project's open space.

Table 1. Open Space Summary

.Open Space Type	Table 2.Calculation	Table 3.Open Space (SF)
Open Space Required		
Common Open Space	2,000 SF	2,000
Private Open Space	150 SF per unit	19,200[1]
Open Space Provided		
Common Open Space	—	15,100
Private Open Space	—	36,916
	1. Total Open Space Provided	**52,016**

Source: Development Code Section 88.42.120 (Multi-Family and Small Lot Single-Family Projects).
Notes: SF = square feet; — = not applicable
[1] 150 SF per unit x 128 dwelling units = 19,200 SF.

Walls and Fences

The Project would construct various walls and fences throughout the site. One 3-foot-tall monument wall featuring the Project's name, "Delaney Square, a Taylor Morrison Community" is proposed on the left side of each entrance into the Project site. Overall, the Project is proposed with entrances to residences on both along North Calera Avenue and East Mauna Loa Avenue. Walls and fences are generally provided to separate the Project from adjacent uses and section off proposed open space. As such, in order to separate the Project site from the surrounding residences, a 5-foot 6-inch-tall tan colored vinyl fence is proposed along the Project site's northern and western boundaries. Additionally, this vinyl fence is featured as the boundary of each private open space for the single-family residences. A 5-foot 6-inch-tall slump block wall with white slurry finish and decorative brick cap is proposed on the edge of some proposed residences, including along the East Mauna Loa Avenue entrance and particularly along the edge of buildings proposed with an enhanced elevation (e.g., the eastern edge of the southwestern cluster of single-family residences, the northern edge of the cluster of single-family residences south of the Calera Avenue entrance, and the southern edge of the cluster of single-family residences at the southeastern corner of the Project site). In addition, a 3-foot 6-inch-tall vinyl patio fence with a vinyl gate is proposed at the entrance of each of the townhome residences.

1.2.2.4 Vehicle Parking

The Project would include on-site parking for guests and residents, including covered (i.e. garage) and non-covered spaces. The Project would provide a total of 326 parking spaces, including standard and standard accessible spaces.

As shown in Table 2, per the Development Code, the Project is required to provide a minimum of 299 required spaces total, including 43 spaces required for guest parking. The Project is proposing 326 dedicated parking spaces (inclusive guest parking), thereby meeting and exceeding the required number of parking spaces per the City's Development Code.

Table 2. Required Parking Spaces by Use

Use	Land Use	Size (Units)	Metric	Spaces Required
Residential	Single-family detached	65 DU	2 spaces per unit (<4 bedrooms)	130
	Townhome	63 DU	2 spaces per unit (2-4 bedroom units)	126
	Guest Parking	128 DU	1 space per 3 units	43
			Total Units	**128 DU**
			Parking Spaces Required	**299 spaces**
			Parking Spaces Provided	**326 spaces**

Source: Development Code Section 88.36.050 (Number of Parking Spaces Required); Kevin L. Crook Architect, Inc. 2025
Notes: DU = dwelling units

1.2.2.5 Circulation Plan

The Project would support vehicular and pedestrian circulation throughout the Project site and the surrounding area. Primary vehicular access to the Project site would be provided via two driveways: one on East Mauna Loa Avenue and a new access point on North Calera Avenue. Internal circulation within the Project site would be provided by new internal streets, driveways, and alleyways.

The Project site would be accessible to pedestrians from sidewalks along East Mauna Loa Avenue and North Calera Avenue. Sidewalks and pedestrian walkways are generally present throughout the Project site along internal roadways, featuring landscaping with drought-tolerant plantings, and up to proposed dwellings. The Project would also include a central paseo with a pathway for pedestrian connectivity. In addition, pedestrians would have access to the northern townhomes along the northern boundary of the site via sidewalks.

1.2.2.6 Utilities and Infrastructure

The Project would require upgrades to utility infrastructure within the Project site. All on-site infrastructure would be constructed in accordance with City standards and applicable building codes. The Project site is currently served by existing water, sewer, storm drain, electrical, and natural gas infrastructure as the site supports existing uses. The existing overhead power transmission lines (including the high voltage overhead power lines along North Calera Avenue and East Mauna Loa Avenue) and transformer units would be undergrounded. Minor off-site improvements are proposed (i.e. utility connections), which involve City easements over the Project boundary, and include the installation of a private water main to connect to a water lateral and existing water main. Water meters would be installed on site to monitor water flow. In addition, a private fire hydrant and fire water line would be installed and connected to the proposed water main. Sewer connections would be available via the installation of a private 8-inch vitrified clay pipe sewer main with a lateral connection to the existing sewer main.

1.2.3 Project Construction

Approximately 30,037 square feet of existing building and 14,000 square feet of surface parking/asphalt areas are proposed for demolition. The Project would require approximately 4,600 cubic yards of cut and 4,600 cubic yards of fill, resulting in a ‘balanced’ grading that would not require any import or export of soils.

Demolition, grading, utility trenching, and roadway circulation would be constructed in one phase. The residential building component of the Project would be constructed in six construction phases. As determined in consultation with the Project Applicant, it is currently anticipated that development would start in November 2026 and would last approximately 36 months, ending in November 2029. The November 2026 start date represents the earliest possible start date. The Draft EIR assumes an overlap of the paving and architectural coating phases, which is possible depending on market conditions and provides a more conservative analysis of short-term air quality, greenhouse gas, noise, and transportation impacts. Construction activities would include demolition, grading, building construction, paving, and application of architectural coating (see Table 3, below).

Table 3. Construction Phases and Duration

Construction Phases	Duration	Start and End Dates
Demolition	5 months	11/4/2026 – 3/25/2027
Grading	2 months	5/17/2027 – 7/14/2027
Onsite Utilities (Trenching)	9 months	7/15/2027 – 4/25/2028
Paving	1 month	4/26/2028 – 5/31/2028
Building Construction	16 months	6/8/2028 – 11/6/2029
Application of Architectural Coating*	Occurs periodically at the end of phases	7/13/2028 – 11/8/2029

1.3 Regulatory Setting

While the Project as currently planned is subject only to state and local regulatory conditions, federal regulations are also provided here for reference should they be relevant in the future. The following sections provide a brief overview of the federal and state regulatory framework that historic properties and historical resources are identified and evaluated.

1.3.1 Federal

National Historic Preservation Act (54 USC § 300101 et seq., including Section 106 of the NHPA, 54 USC § 306108)

The National Historic Preservation Act (NHPA) established the National Register of Historic Places (NRHP) and the Advisory Council on Historic Preservation (ACHP). Under the NHPA, significant cultural resources are referred to as historic properties, which include any prehistoric or historic district, site, building, structure, or object included in, or determined eligible for inclusion in, the NRHP. Historic properties that are designated by the Secretary of the Interior to be National Historic Landmarks are nationally significant historic places that possess exceptional value or quality in illustrating or interpreting the heritage of the United States. A property is considered historically significant if it meets one of the NRHP criteria and retains sufficient historic integrity to convey its significance.

Implementing Regulations for Section 106 of the NHPA (36 CFR Part 800)

Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. The Section 106 process consists of four principal steps: 1) initiation of the Section 106 process, which includes identifying and initiating consultation with Native American tribes, local governments, and other interested parties; 2) identification of historic properties; 3) assessment of adverse effects; and 4) delineation of stipulations to resolve adverse effects in an agreement document.

Section 106 affords the ACHP and the State Historic Preservation Officer (SHPO), as well as other consulting parties, a reasonable opportunity to comment on any project that would adversely affect historic properties. The ACHP is an independent administering agency that develops procedures at the federal level to protect cultural resources included in, or eligible for inclusion in, the NRHP. The SHPOs administer the national historic preservation program at the state level, in addition to reviewing NRHP nominations, maintaining data on historic properties, and consulting with federal agencies during the Section 106 review.

The NRHP criteria for evaluation (36 CFR Section 60.4) considers the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that:

A. are associated with events that have made a significant contribution to the broad patterns of our history; or
B. are associated with the lives of persons significant in our past; or
C. embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
D. have yielded or may be likely to yield, information important in prehistory or history.

To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity. Integrity is the ability of a property to convey its significance. Because the concept of integrity is based on significance, the assessment of a property's integrity can only proceed after its significance has been fully established. In addition to meeting at least one of the significance criteria discussed above, the assessment of integrity requires consideration under the following seven aspects or qualities: location, design, materials, workmanship, setting, feeling, and association. To retain integrity, a property will always possess several, and generally most, of these aspects (NPS 1995:44).

Certain properties are not typically considered for listing in the NRHP: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties achieving significance within the past 50 years. These properties may be eligible for listing in the NRHP if the property meets one of the four criteria listed above and if the property also meets the appropriate Criteria Consideration for the property.

National Environmental Policy Act, as amended (42 USC § 4321 et seq.)

The National Environmental Policy Act (NEPA), as amended, establishes the federal government's policy for protecting important historic, cultural, and natural aspects of our national heritage during the planning for federal

projects. All federal or federally assisted projects requiring action pursuant to Section 102 of NEPA must take into account the effects of those projects on cultural resources. In considering whether an action may "significantly affect the quality of the human environment," NEPA requires federal agencies to consider the degree to which their actions may affect districts, sites, highways, structures, or objects listed in or eligible for listing in the NRHP.[1] While NEPA and NHPA have independent statutory obligations, integrating their processes can streamline environmental reviews and ensure that cultural resources are adequately considered during federal project planning. When Section 106 of the NHPA and NEPA are integrated, project impacts that cause adverse effects under Section 106 are described in the NEPA document.

1.3.2 State

California Environmental Quality Act (PRC § 21083.2) and CEQA Guidelines (14 CCR § 15064.5)

CEQA requires that the lead agency consider the impacts of a project on historical resources. PRC Section 21084.1 defines historical resources as those listed, or eligible for listing, in the CRHR, or those officially designated or recognized as historically significant by a local government pursuant to a local county or city ordinance or jurisdiction, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. Historical resources also include "historic properties" in California that are listed, or determined eligible for listing, in the NRHP and CRHR. The CEQA Guidelines provide specific guidance for determining the significance of impacts on historical resources. As described in in Section 15064.5(b) of the CEQA Guidelines, a "project with an effect 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."

- A "substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (Section 15064.5[b][1]).
- 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 (Section 15064.5[b][2][A]); or
  - Demolishes or materially alters in an adverse manner those physical characteristics that account for it inclusion in a local register of historical resources pursuant to section 5020.1[k] of the Public Resources Code or its identification in an 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

[1] For projects implemented prior to April 11, 2025, the CEQ advises that federal agencies "should consider voluntarily relying on its rescinded regulations at 40 CFR parts 1500-1508 to complete ongoing NEPA reviews or to defend against challenges to reviews completed while those regulations were in effect." For projects that are approved and implemented after April 11, 2025, the CEQ advises that "federal agencies must revise or establish their NEPA implementing procedures (or establish such procedures if they do not yet have any) to expedite permitting approvals and for consistency with NEPA as amended by the Fiscal Responsibility Act of 2023, including the deadlines established in NEPA" (Council on Environmental Quality, "Memorandum for Heads of Federal Departments and Agencies." February 19, 2025, 1-2).

preponderance of the evidence that the resource is not historically or culturally significant (Section 15064.5[b][2][B]); or

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historic significance and that justify its inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA (Section 15064.5[b][2][B]).

The CEQA Guidelines also provide guidance on minimizing or avoiding significant adverse impacts on historical resources as outlined in the following provisions of Section 15064.5(b)(3)-(5).

- 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 (Section 15064.5[b][3]).
- A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures (Section 15064.5[b][4]).
- When a project will affect state-owned historical resources, as described in Public Resources Code Section 5024, and the lead agency is a state agency, the lead agency shall consult with the State Historic Preservation Officer as provided in Public Resources Code Section 5024.5. Consultation should be coordinated in a timely fashion with the preparation of the environmental documents (Section 15064.5[b][5]).

California Register of Historical Resources (PRC § 5024.1 and 14 CCR § 4850)

PRC Section 5024.1 establishes the CRHR, which lists all significant resources in California that are considered to be historical resources. In California, the term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code Section 5020.1[j]). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (California Public Resources Code Section 5024.1[a]). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP. As such, a resource is considered historically significant if it meets at least one of the following criteria outlined under PRC Section 5024.1(c):

2. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
3. Is associated with the lives of persons important in our past.

4. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
5. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one of the significance criteria described in PRC Section 5024.1(c), a resource must also possess sufficient integrity to qualify for listing in the CRHR. Integrity as defined in 14 California Code of Regulations (CCR) Section 4852(c) as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" as evaluated with regard to the resource's retention of location, design, setting, materials, workmanship, feeling, and association. Historical resources that lack sufficient integrity to meet the criteria for listing in the NRHP may still be eligible for listing in the CRHR if they have the potential to yield significant scientific, historical information, specific data. The CRHR's special considerations for certain property types are limited to moved buildings, structures or objects; historical resources achieving significance within the past 50 years; and reconstructed buildings.

The CRHR includes not only listed prehistoric and historic cultural resources but also resources that are identified through local historical resource surveys or designated under local ordinances provided the survey and ordinance meet the criteria in 14 CCR Section 4852(e) and (f).

1.3.3 Local Regulations

City of Azusa Register of Historic Landmarks

The City of Azusa's Historic Preservation Ordinance (Chapter 55, Azusa Municipal Code Sec. 55-41.) establishes the following criteria for listing in the Azusa Register of Historic Landmarks:

Designation criteria for historic landmarks, historic districts, potential historic landmarks and potential historic districts. Criteria and standards for the designation of historic landmarks, historic districts, potential historic landmarks and potential historic districts shall include one or more of the following, as applicable:

1) It is identified with persons or events significant in local, regional, state or national history.

2) It is representative of the work of a notable builder, designer, architect or artist.

3) It is at least 50 years old.

4) It is less than 50 years old, however it is of exceptional importance in one or more of the criteria set forth in this section.

5) It contributes to the significance of a historic area, being a geographically definable area possessing a concentration of not less than 50 percent of historic or architecturally related grouping of properties that contribute to each other and are unified aesthetically by physical layout or development.

6) It embodies one or more distinctive characteristics of style, type, period design, materials, detail, or craftsmanship.

7) It has a unique location or physical characteristics or represents an established and familiar visual feature of neighborhood, community, or the city.

8) It incorporates elements that help to preserve and protect a historic place or area of historic interest in the city.

9) It has yielded, or may be likely to yield information important in prehistory or history.

City of Azusa General Plan

The City of Azusa adopted its General Plan in 2004. The General Plan is a long-range planning document that serves as a roadmap for the City's goals and policies for the next 20 years. The General Plan's *Chapter 3 – The Built Environment* states the city's historic preservation goals as it relates to the Project as follows *(City of Azusa 2004: 3-47, 3-102)*:

Urban Form Goals and Policies

- Goal 1 – Protect the historic and significant built and natural resources in the city.

Historic/Cultural Resources Goals and Policies

- Goal 3 - Preserve and protect places, buildings, and objects that embody the city's social, commercial, architectural, and agricultural history.

1.4 Area of Potential Impacts

The API is the study area delineated to assess potential impacts from the construction and operation of the Project on both archaeological and historic built environment resources, presented in Figure 2, Built Environment Area of Potential Impacts. The API for built environment resources encompasses the geographic area or areas within which the Project may directly or indirectly cause a substantial adverse change in the significance of a known or unknown historical resource. A substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource is materially impaired (14 CCR Section 15064.5[b][1]). Under CEQA, material impairment of a historical resource is considered a significant impact (or effect), which can be direct, indirect, or cumulative.[2]

A direct or primary effect on a historical resource is one that is caused by the Project and occurs at the same time and place (14 CCR Section 15358[a][1]). Examples of direct effects that are caused by, and immediately related to, the Project include, but are not limited to, demolition, destruction, relocation, and alteration of a historical resource as a result of ground disturbance and other construction activities. Direct effects, however, are not limited to physical effects and, in certain circumstances, can be visual, vibratory, auditory, or atmospheric in nature if the effect is immediate and it results in the material impairment of the significance of a historical resource. Visual intrusions within the viewshed of a historical resource, for example, could result in the material impairment of the resource's integrity of setting if an unencumbered view of the surrounding area or a specific area is a characteristic

[2] As used in the CEQA Guidelines and 14 CCR Section 15358, the terms "effects" and "impacts" are synonymous in this report.

that contributes to the significance of the resource. Similarly, operational noise that exceeds the ambient level of a sensitive noise receptor can cause material impairment to a historical resource that derives part or all its significance from an inherently quiet auditory setting.[3] Finally, atmospheric intrusions, such as those caused by the introduction of high levels of fugitive dust emissions or chemical pollutants, can result in adverse effects that directly and physically affect biological landscape features that have been identified as historical resources for the purposes of CEQA. Overall, while direct effects clearly include physical effects, they may also include other types of effects that are visual, vibratory, auditory, or atmospheric in nature if the effect is caused by and occurs at the same time and place as the Project and there is no other intervening cause between the activities or components of the Project and the historical resource.

By contrast, an indirect or secondary effect is a reasonably foreseeable effect caused by the Project that occurs later in time or is farther removed in distance. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems (14 CCR Section 15358[a][2]). Because these types of effects are not immediately related to the Project, they are considered secondary effects.

Cumulative impacts refer to two or more individual effects that, when considered together, are considerable or compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the Project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (14 CCR Section 15355[a]-[b]). The API for cumulative impacts, if any exist, would include the API for direct effects, indirect effects, or both because in order for a cumulative impact to exist, a historical resource must first be directly or indirectly affected by the Project.

1.4.1 Area of Potential Impacts for Built Environment Properties

Delineation of the API considered the proposed Project activities in conjunction with historic era-built resources that are 45 years of age or older (those built in or prior to 1980) that may sustain impacts due to the construction or operation of the Project.[4] Additional considerations used to justify the delineation of the API include the following:

The horizontal limits of the API considered areas of direct physical effect. Because of the geographically constrained nature of the Project activities, the API is horizontally defined to the Project area, which encompasses one previously

[3] Construction noise that exceeds the ambient level of a sensitive noise receptor is not analyzed because it is considered a temporary impact that would not have an adverse effect on historical resources because it would not cause physical damage and would not permanently alter or diminish the integrity of such resources. Temporary construction noise would not result in a substantial adverse change in the significance of a historical resource and, therefore, would not cause a significant impact under CEQA.

[4] While the 50-year threshold is generally used for listing resources in the National Register of Historic Places (NRHP) and the California Register of Historical resources (CRHR), the California Office of Historic Preservation's (OHP) Instructions for Recording Historical Resources recommends recording "any physical evidence of human activities over 45 years . . . for the purposes of inclusion in the OHP's filing system." It also allows for the "documentation of resources less than 45 years . . . if those resources have been formally evaluated, regardless of the outcome of the evaluation." Further, the guidance notes that the 45-year threshold recognizes that there is commonly a 5-year lag between resource identification and the date that planning decisions are made, and thus it explicitly encourages the collection of data about resources that may become eligible for the NRHP or CRHR within that planning period. More restrictive criteria must be met before the resources included in OHP's filing system are listed, found eligible for listing, or otherwise determined to be important in connection with federal, state, and local legal statuses and registration programs (OHP 1995: 2).

unevaluated historic-age property at 1035 East Mauna Loa Avenue (APN 8628-004-900). The property includes the former W.R. Powell Elementary School (1957), composed of six buildings and three structures. Because of the geographically constrained nature of the project activities, the API is horizontally confined to the delineation presented in Figure 2, Built Environment Area of Potential Impacts.

While all the buildings and structures in the Project area would be demolished as part of the Project, the new design would have similar massing and dimensions as surrounding residential properties and compatible use. Additionally, most of the adjacent properties are rear-facing towards the Project area. Although surrounding properties consist of age-eligible single-family residential developments to the west, south, and east, there would be no potential to impact the existing setting for these properties as the Project consists of residential use that is compatible in use, scale, and character to the surrounding neighborhood. No other historic age properties were identified directly surrounding the Project area. As the Project activities would not diminish the physical characteristics or viewshed setting that could contribute to the potential historical or architectural significance of surrounding properties, no additional surrounding properties were included in the API. Additional considerations used to justify the delineation of the API include the following:

- The SCCIC records search (see section 2.1 CHRIS Record Search) did not identify any previously recorded cultural resources within the Project API, though it did identify six cultural resources within a one-mile radius of the Project API (Table 4). All six resources are characterized as historic-era built environment resources and include two canals (P-19-002777 and P-19-003802), one leach pit (P-19-004901), one commercial building (P-19-180677), one single-family property (P-19-188221), and one transmission line (P-19-188983). Despite this, the closest of the six cultural resources within the one-mile radius, the canal/ditch (P-19-003802), is 0.75-mile northwest of the Project API. Because of the distance from the resources to the proposed Project, there is no potential for the proposed Project to impact these resources.
- Finally, because there are no reasonably foreseeable Project activities that would occur later in time or that would be farther removed in distance that could indirectly affect historical resources, the API contains no geographic areas under consideration for indirect effects.

2 Literature Review, Background Research, and Methods

This section provides the results of the CHRIS records search at the SCCIC, a summary of archival research methods and additional records reviews, a narrative description of historic aerial photographs of the subject property and surrounding area. The consultation with interested parties will be initiated once the CEQA process is initiated by the lead agency.

2.1 CHRIS Records Search

Dudek archaeologist Brenda Rogers conducted a records search of the CHRIS on July 15, 2025, at the SCCIC located on the campus of the California State University, Fullerton. The records search encompassed the entire Project area and a one-mile search radius. The purpose of the records search is to identify any previously recorded cultural resources that may be located in or adjacent to the Project area, and to identify previous studies in the Project vicinity. In addition to a review of previously prepared site records and reports, the records search also included a review of historical maps of the Project area, ethnographies, the NRHP, the CRHR, and the lists of California State Historical Landmarks, California Points of Historical Interest, and Archaeological Determinations of Eligibility. The sections below analyze the results of SCCIC records search with an emphasis on historic built environment resources. For the full results of the records search including archaeological resource studies and resources and all California Department of Parks and Recreation (DPR) 523 site forms see Dudek's 2025 *Archeological Resources Inventory Letter Report for the Delaney Square Residential Project, City of Azusa, Los Angeles County, California*.

2.1.1 Previously Conducted Cultural Resource Studies

The SCCIC records search indicates that 21 previous cultural resources studies have been conducted within a one-mile radius of the Project area. None of these studies intersect with the Project area.

2.1.2 Previously Recorded Built Environment Resources

The SCCIC records search did not identify any cultural resources within the Project area, though it did identify six cultural resources within a one-mile radius of the Project area (Table 4). All six resources are characterized as historic-era cultural resources and include two canals, one leach pit, one commercial building, one single-family property, and one transmission line.

Table 4. Previously Recorded Built Environment Resources within the One-Mile Search Buffer

Primary Number	Description	Recording Events	NRHP/ CRHR Status	Proximity to the API
P-19-002777	Canal/ditch and pipe	1999 (Alexandrowicz, J.S.)	Not evaluated	Outside; ~0.85 mile north
P-19-003802	Canal/ditch	1968 (Clark, Alfred, Cal State Polytechnic College, Pomona)	Not evaluated	Outside; ~0.75 mile northwest
P-19-004901	Leach pit/Cistern	2015 (Strudwick)	Not eligible	Outside; ~1 mile north
P-19-180677	Commercial Building	None	Eligible	Outside; ~0.85 mile northeast
P-19-188221	Single-family property	1996 (Jones & Stokes Associates)	Eligible	Outside; ~1.05 mile northwest
P-19-188983	Transmission Line	1999 (KEA Environmental)	Eligible	Outside; ~1 mile southwest

2.2 Additional Records Reviewed

The following section provides an overview of sources Dudek reviewed as part of preparing this report. Sources obtained provide additional information regarding the potential of built environment resources located within the API. This information was used to understand the history of the area and how the landscape has changed and developed over time.

Built Environment Resource Directory

The California Office of Historic Preservation (OHP) maintains the Built Environment Resource Directory (BERD), an inventory of built environment cultural resources that are processed through OHP's office. A July 29, 2025 search of the BERD for Los Angeles County showed that the subject property was not included.

Calisphere

Calisphere provides access to 2,000 collections contributed by more than 300 cultural heritage organizations in California, including universities, libraries, archives, museums, and historical societies. Dudek searched for the subject property's address and other keywords on Calisphere on July 29, 2025. This search uncovered results related to the property's architect, Kistner, Wright & Wright, which included three photos of multistory buildings. However, it did not identify any historic photographs or any additional materials pertaining to the subject property.

Online Archive of California

The Online Archive of California (OAC) provides free public access to detailed descriptions of primary resource collections maintained by more than 300 contributing institutions including libraries, special collections, archives, historical societies, and museums throughout California and collections maintained by the 10 University of

California campuses. Dudek searched for historical tenants and address associated with the subject property on OAC on July 30, 2025, and did not identify any relevant materials specifically related to the property. Dudek also searched for the architect, Kistner, Wright & Wright which resulted in seven collections, all of which appear unrelated to the subject property, however, the architect's biographical background information was used in the historic context section of this report.

Los Angeles County Assessor

Dudek obtained assessor data from the Los Angeles County Assessor's Portal for the subject property on July 30, 2025. This assessor data provided limited information, including square footage, parcel map data, and tract numbers.

City of Azusa Building Permits

Dudek submitted a public records request for building permits associated with 1035 East Mauna Loa Avenue on September 10, 2025 (Reference No: PRA:2025-231). The City responded to the public records request on September 18, 2025, emailing Dudek a response that Planning and Building do not have information pertaining to the original building permit of the school. Dudek received original as-built architectural plans from the Client, Taylor Morrison, on September 18, 2025.

Historic Aerials

A review of historic aerial photographs was conducted as part of the archival research effort for the proposed project. The aerial photographs provided a general idea of growth in the neighborhoods and on the subject property (NETR 2025a; UCSB 2025).

Historical Map

Historic topographic maps were examined to determine the growth in the area and how the property developed over time (NETR 2025b).

Historical Newspapers

Dudek reviewed historical newspapers from the California Digital Newspaper Collection and Newspapers.com covering the City of Industry and the surrounding area to understand the development of the city and the subject property. These documents were used in the preparation of Section 3, Historic Context, and Section 4, Results of Identification and Evaluation Efforts.

2.3 Interested Party Correspondence

On February 24, 2026, Dudek Architectural Historian Andrea Dumovich Heywood sent an outreach letter and figure depicting the Project area to Azusa Historical Society and Glendora Historical Society and Museum. The letter provided a brief description of the proposed Project and requested information about historic and cultural

components in or near the Project area. To date, no responses have been received. Copies of the interested party correspondence have been submitted in conjunction with this Project and all responses are in Appendix A.

2.4 Field Survey

Dudek Architectural Historian Andrea Dumovich Heywood, MHC, conducted an intensive survey of the Project study area on July 28, 2025. She returned to the subject property for additional documentation on September 10, 2025. Ms. Heywood meets the Secretary of the Interior's Professional Qualifications Standards for architectural history. The survey entailed walking around the exteriors of each building within the subject property, documenting each with notes and photographs, specifically noting character-defining features, spatial relationships, observed alterations, and examining any historic landscape features on the property

3 Historic Context

This context is provided to ascertain what significant themes are present. Dudek provides this context to better understand the context of any of the identified previously recorded or newly documented resources in the API. This context provides an overview of the historic themes and the building types that were documented as part of this study.

3.1 Historic Development of Azusa

City of Azusa is located within the County of Los Angeles, situated against the base of the San Gabriel Mountains to the north. Present-day Azusa was part of Rancho Azusa de Dalton, a 4,431-acre Mexican land grant given in 1841 by Governor Juan Alvarado to Luis Arenas. In addition to Azusa, present-day cities located on the former land grant include Irwindale, Arcadia, Monrovia, and Baldwin Park. The land comprising Azusa, however, was not considered valuable due to an abundance of rocks and sand, which made farming and cattle grazing difficult (Petersen 2016; City of Irwindale 2025).

The County of Los Angeles was established on February 18, 1850, one of 27 counties established in the months prior to California acquiring official statehood in the United States two years after the Mexican American War. Settlement of the Los Angeles region continued in the early American Period. Many of the ranchos in the area now known as Los Angeles County remained intact after the United States took possession of California; however, a severe drought in the 1860s resulted in many of the ranchos being sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944: 3–6). Nonetheless, ranching retained its importance, and by the late 1860s, Los Angeles County was one of the top dairy production centers in the country (Dumke 1944: 14–15). In the 1870s, the county was divided into townships comprised of subdivided ranchos, and by 1876, the county reportedly had a population of 30,000 people (Dumke 1944: 7).

Los Angeles County maintained its role as a regional business center and the development of citriculture in the late 1800s and early 1900s further strengthened this status. These factors, combined with the expansion of port facilities and railroads throughout the county, contributed to the impact of the real estate boom of the 1880s in which many southern California towns were founded (Pitt 2024; Dumke 1944: 41-43).

By 1887, Jonathan S. Slauson established the town of Azusa and on December 29, 1898 Azusa incorporated. Azusa Valley became the first public school for the local community and in 1891, Citrus, the first Union High School, was located at the corner of Citrus next to Broadway. By 1899, Azusa's population consisted of 865 inhabitants (City of Azusa 2025).

Government leaders recognized the need for water to sustain the growing population in the County of Los Angeles. Irish immigrant William Mulholland personified the City of Los Angeles's efforts for a stable water supply (Survey LA 2016: 2). By 1913, the City of Los Angeles had purchased large tracts of land in the Owens Valley, and Mulholland planned and completed the construction of the 240-mile Los Angeles Aqueduct that brought the valley's water to the city. Access to water resulted in a population boom in the region; in the city of Los Angeles, for example, the population rose from 170,298 residents in 1900 to 936,455 by 1920 (Pitt 2024; Los Angeles Almanac 2020).

Increased population led to more available workers, which helped spur regional agricultural growth. Between 1900 into the 1940s, Azusa's growth relied on its citrus and agricultural industry. The middle class shifted to mostly Anglo-

Americans and the lower classes transitioned to mostly minority groups. Numerous American-born Hispanics worked in the citrus fields and packing structures. A Mexican barrio area developed in Azusa during this time (Hayes 2003: 4.5-4).

The decline of the citrus industry and the impact of World War II, including the arrival of Aerojet in 1944, led to the end of Azusa's citrus markets (Hayes 2003: 4.5-4). After World War II's conclusion in 1945, California experienced a massive wave of migration and building boom. In Los Angeles County, the rise in wartime employment in aircraft factories and shipyards during World War II, as well as statewide post-war immigration/emigration patterns, increased the county's population from 2,208,492 residents in 1930 to 4,151,687 residents by 1950 (Los Angeles Almanac 2020).

The postwar decades saw much of the county transformed from ranches and farms into residential subdivisions surrounding commercial and industrial centers. Previous agricultural success and the booming oil and aerospace industries were key factors in the county's growth in the twentieth century (Pitt 2024; Los Angeles Almanac 2020; Survey LA 2016: 2). In response to the rise in population, developers built tract homes, and multi-family residences on former agricultural properties in Los Angeles County throughout the 1940s and 1950s (Pitt 2024). Throughout the post-World War II period, residential styles reflected a range of regional styles that often combined Regional Modernism with elements of the Ranch style. Inspired by new construction materials and techniques refined during the war, many architects focused on producing low-cost mass-produced designs. Prefabricated housing systems, also known as manufactured homes or modular homes, were introduced to the market during the post-war period (Survey LA 2021: 91-92).

With the advent of the state and federal highway systems during the 1950s and 1960s, automobiles allowed travelers to take themselves to places that were only previously accessible by railroads. The highway system encouraged tourism that propelled the county's economy and spurred growth in the area. Freeway systems replaced former Route 66, bringing new populations to Azusa who sought affordable homes and community (Hayes 2003: 4.5-4). This automobile-oriented growth is reflected in the much of Azusa's present-day built environment that includes sprawling post-World War II suburbs characterized by concentrations of single-family residences with distinctive planning features such as street alignments, setbacks, curbs, sidewalks, and landscaping (Caltrans 2011: 17-18; Survey LA 2021: 153).

By 1965, Azusa Pacific (College) University was established, bringing academia to the city (Hayes 2003: 4.5-4). The Los Angeles County region continued to grow, as its population reached 6,038,771 residents by 1960 and later increased to 8,863,164 residents by 1990 as the county continued to expand during the last half of the twentieth century and into the twenty-first century (Los Angeles Almanac 2020). As of 2020, the City of Azusa had 50,000 residents (United States Census Bureau 2025).

3.2 Development of Public Education in Azusa

In 1888, Azusa City School District (ACSD) is first noted in the *Los Angeles Tribune* (Los Angeles Tribune 1888:4). Azusa Valley became the first public school to serve the local Azusa community, and in 1891, Citrus opened as the first Union High School (City of Azusa 2025). By July 1, 1900, ACSD formally organized as its population reached 5,250 (LAT 1924: 15).

By 1948, ACSD received $164,593 in state funding to address the "tremendous influx of people" into Azusa (Monrovia News-Post 1948: 2). Most of the funding was allocated towards aiding strained classrooms with new construction to accommodate for population increase. A flyer that appears to be dated from c.1950s for Azusa states that the city had five existing elementary schools at that time, with two additional schools being planned, along with future Azusa High School expansions (City of Azusa c.1950s).

Today, AUSD has approximately 7,000 enrolled students who attend one of the following Azusa Unified schools: Dalton Elementary School, Hodge Elementary School, Lee Elementary School, Longfellow School, Magnolia Elementary School, Valleydale Elementary School, Murray Elementary School, Paramount Elementary School, Gladstone Middle School, Azusa High School, and Sierra High School (AUSD 2025).

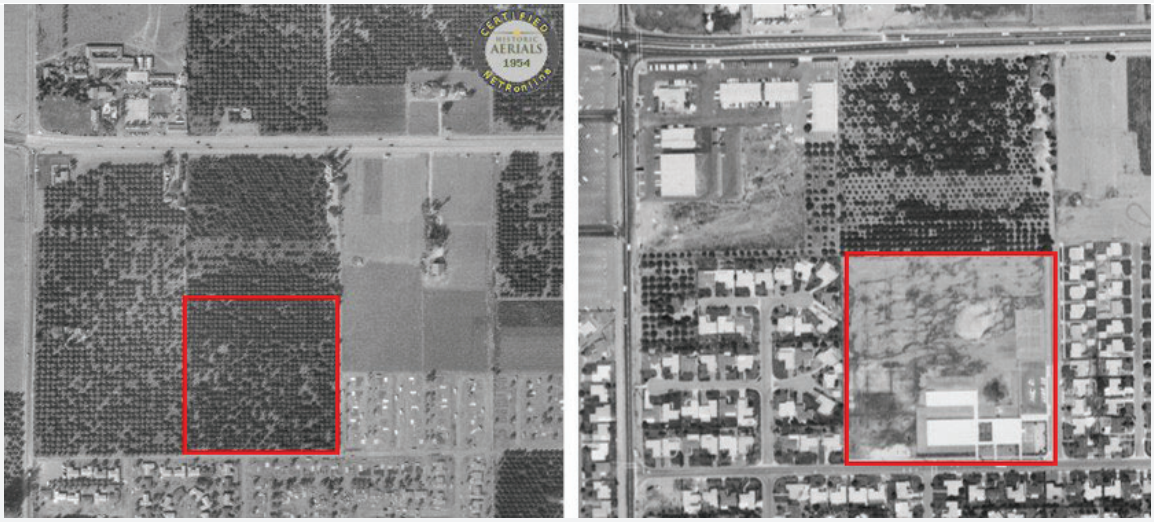
3.3 Development of W.R. Powell Elementary School

According to available historic aerials, the subject property was used for agricultural purposes in the 1940s. By the mid-1950s, housing began to develop adjacent to the site that would later become W.R. Powell Elementary School, while the future school site remained agricultural (Exhibit 1) (NETR 2025a).

On September 16, 1957, the school first opened as part of the Azusa City Schools District (Pasadena Independent 1957: 34). The elementary school was named after Azusa civic leader, citrus rancher, and pioneer agriculturalist, W.R. Powell (LAT 1956: 154; DNPMNP 1956c: 6). In 1957, Jack Maloof served as the school's first principal (Pasadena Independent 1957: 34).

The original school layout from 1957 consisted of Building A and B, which housed the administration building, along with a kindergarten and nine grade-level classrooms (NETR 2025a; Pasadena Independent 1957: 34). By circa 1959, Building C was added to the school campus to house four additional classrooms, completed by architect Kistner, Wright, and Wright, and contactor K.F. Gantner, along with Custom Wood Products (Exhibit 2) (DNP 1958: 7; DNP 1959: 3).

Exhibit 1. 1954 aerial photograph (L) showing the subject property at 1035 East Mauna Loa Avenue as agricultural land; 1960 aerial photograph (R) showing the subject school property with three buildings (outlined in red).

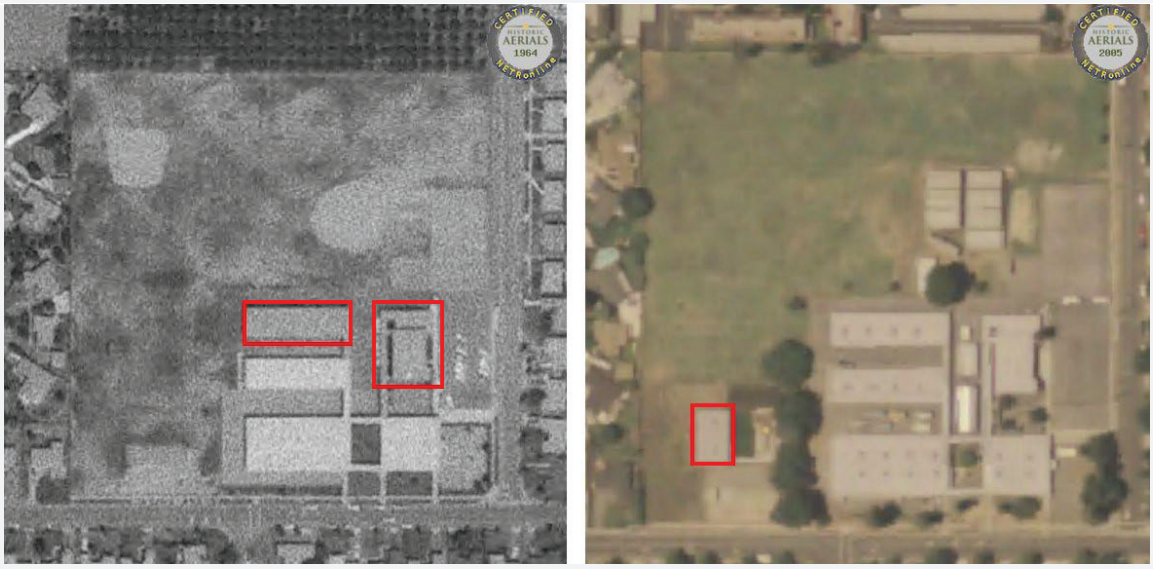


Source: NETR 2025a; UCSB 2025

In circa 1960, the utility structure (Structure 2) was added to the campus. By 1964, former Powell school teacher, Lerald Teter, was promoted to school principal (Progress-Bulletin 1964: 11).

Historic aerials from 1964 also show that the school expanded by that time, adding Classroom Building D and Multipurpose Building E to the north of the existing school buildings in circa 1964 (Exhibit 2). From 1964 to the early 2000s, the school's footprint remained consistent with the exception of what appears to be portable or modular buildings that came and went beginning in the late 1990s. Portable Building 1 was added in 1999. In 2005, Building F was added to the parcel's southwest corner and in circa 2009 the canopy structure (Structure 3) was placed north of Building E (Exhibit 2) (NETR 2025a).

Exhibit 2. 1964 aerial photograph (L) first showing the subject school with two new buildings added (outlined in red); 2005 aerial photograph (R) showing the subject school with a new building added to the west (outlined in red).



Source: NETR 2025

Between 2009 and 2025, the subject school's footprint remained consistent, with the addition of new playground areas added to northeast and southwest in circa 2020 (NETR 2025a).

3.4 Kistner, Wright & Wright Firm Biography

The architectural and engineering firm based in San Diego and Los Angeles known as Kistner, Wright & Wright, was active between circa 1952 to 1973. The firm was founded by the following three architects: Theodore C. Kistner, Henry Lyman Wright, and William Theodore Wright. After Kistner died, the firm closed in 1973 (OAC 2025). Their best known projects include large-scale designs, including two rare Late Moderne style buildings in Westlake, Los Angeles known as the Kidney Center (1955) and the Universal Care Medical & Dental Building (1967), as well as Cerritos College (1961), and the Norwalk Civic Center (1965) which references Mid-Century Modern's Miesian school of design through its architecture (Los Angeles Conservancy 2025a, Los Angeles Conservancy 2025b, Los Angeles Conservancy 2025c).

3.5 Typology: Finger-Plan School Design (1940-1959)

By the 1950s, design ideas for schools that had been considered experimental in the 1930s had come to full maturity and became the national standard, including the finger-plan and the cluster-plan. Similar to the way in which architectural styles go in and out of popularity as do building plans and designs. Post-World War II, school's exhibiting a unified campus design, buildings that accompanied a high degree of indoor and outdoor integration, ample outdoor spaces, and sheltered corridors became characteristics of the functionalist typology. Educational buildings were given a more domestic scale as opposed to the formality and monumentality that characterized earlier eras of school design. Elementary schools remained one-story in height, while middle and high schools went up to two-stories. Finger-plan schools are decentralized and pavilion-like, with "finger-like" wings, arranged on an axis. The plan was frequently utilized because it allowed for more students to fit on a smaller lot and allowed for easy expansion. During the 1940s and 1950s the flinger-plan and the cluster-plan were the most popular school campus designs in the United States (SE 2014).

Characteristics of the Finger-plan design:

- Building plans and site design clearly express their function
- Classrooms "finger-like" wings arranged on an axis
- Buildings that accompanied a high degree of indoor and outdoor integration
- Large outdoor spaces
- Sheltered corridors
- Generous expanses of windows
- Flat roof or broken pediment roof used for lighting and acoustics
- One-story massing for elementary schools; up to two-stories for junior/high schools

3.6 Architectural Style: Mid-Century Modern (1933-1965)

Mid-century Modern style is reflective of International and Bauhaus styles popular in Europe in the early 20th century. This style and its living designers (e.g., Mies Van der Rohe and Gropius) were disrupted by World War II and moved to the United States. During World War II, the United States established itself as a burgeoning manufacturing and industrial leader, with incredible demand for modern buildings to reflect modern products in the mid-20th century. As a result, many industrial buildings are often "decorated boxes"—plain buildings with applied ornament to suit the era and appear more modern without detracting from the importance of the activity *inside* the building. Following WWII, the United States had a focus on forward thinking, which sparked architectural movements like Mid-Century Modern. Practitioners of the style were focused on the most cutting-edge materials and techniques. Architects throughout Southern California implemented the design aesthetics made famous by early Modernists like Richard Neutra and Frank Lloyd Wright, who created a variety of modern architectural forms throughout Southern California. Like other buildings of this era, Mid-century Modern buildings had to be quickly assembled, and use modern materials that could be mass-produced (McAlester 2013; Morgan 2004).

Key character-defining features of the Mid-century Modern style include (McAlester 2013; Morgan 2004; Gebhard and Winter 2003):

- Low, boxy, horizontal proportions;
- Mass-produced materials;
- Flat, smooth sheathing;
- Flat roofed without coping at roof line; flat roofs hidden behind parapets;
- Lack of exterior decoration or abstract geometrical motif;
- Simple windows (metal or wood);
- Industrially plain doors;
- Large window groupings;
- Commonly asymmetrical; and
- Whites, buffs, and pale pastel colors.

4 Results of Identification and Evaluation Efforts

This section provides a physical description and an evaluation of the resource identified in the API under NRHP, CRHR, and local listing criteria to assess the historical significance and integrity of built resources in the API. A physical description of the property and its development history are also provided below. The significance evaluation was prepared by Dudek Architectural Historian Andrea Dumovich Heywood, MHC, who meets the Secretary of the Interior's Professional Qualification Standards for architectural history. A full DPR that includes more detailed information on the property discussed below is available in Appendix B.

4.1 Survey Results

One resource over 45 years of age at the time of survey was recorded and evaluated for historical significance. The W.R. Powell Elementary School, a multicomponent resource with multiple buildings and structures, is summarized below in Table 5. The campus description and evaluation are presented in Section 4.2.

Table 5. W.R. Powell Elementary School Buildings and Structures

Building/Structure	Building Type	Year Built
W.R. Powell Elementary School: 1035 East Mauna Loa Avenue/ (APN) 8628-004-900		
A	Administration and Kindergarten Classroom	1957
B	Classroom	1957
C	Classroom	Circa 1959
D	Classroom	Circa 1964
E	Multipurpose	Circa 1964
F	Classroom	2005
1	Portable	1999
2	Utility Structure	Circa 1960
3	Canopy Structure	Circa 2009

Notes: APN = Assessor's Parcel Number

4.2 Description and Evaluation of Resource in the API

4.2.1 W.R. Powell Elementary School

4.2.1.1 Description

W.R. Powell Elementary School is located on a 9.77 acre parcel, on a corner lot immediately north of East Mauna Loa Avenue and west of North Calera Avenue (Exhibit 3). It sits within a residential area along the eastern edge of the City of Azusa. Powell Elementary contains six permanent educational buildings and one portable building. The

school's Mid-Century Modern Style buildings served educational purposes from its opening in 1957 until the school's closure in 2023.

The educational buildings are located on a large square parcel surrounded by single family residences to the west, east, and south; a multi-family apartment complex is to the north. The school buildings are primarily clustered to the parcel's southeast corner and face East Mauna Loa and North Calera Avenues, to the south and east respectively. Approximately half of the parcel remains as open green space to the north and west of the school buildings. Additional site features include three play areas as well as basketball and handball courts. Narrow front lawn buffers the school, fronting East Mauna Loa Avenue to the south and partially fronting North Calera Avenue to the east.

The six permanent buildings are identified as buildings A through F in this description, as well as shown in Figure 2. Three non-permanent buildings and structures are also identified in Figure 2 and discussed in the description below.

Exhibit 3. W.R. Powell Elementary School, camera facing northwest, showing overview of the campus (September 10, 2025).



Source: Dudek, IMG_0207

Building A: Administration and Kindergarten Building (1957)

Building A is a one-story Mid-Century Modern Style administration and kindergarten classroom building with a square plan, constructed in 1957 (Exhibit 4). Located at the parcel's southeast corner, Building A fronts both East

Mauna Loa and North Calera Avenues, serving as the school's primary street-facing building or "face" of the school, along with Building B which also fronts East Mauna Loa. Administration Building A was originally built to house "offices, nurse's room, teachers' workroom and lounge" (DNPMNP 1956b: 7). The roof displays minimal pitch and primarily reads as a flat roof at the north and south facades, and a gable roof at the east and west facades, clad in white rolled composition roofing material. Wide eaves extend over the roofline at each elevation and stucco fascia wraps around the entire building along with upper metal flashing. Building A is primarily clad in stucco with the exception of what appears to be narrow vertical wood panels at the main entrance on the primary (south) façade. The school's one of two main entrances is situated at East Mauna Loa Avenue, at the southwest corner of Building A, as indicated by the school address along with "Welcome Panthers," and "Preparing the Future," stated along the fascia of the covered walkway between Buildings A and B. Below the covered walkway, a marquee with "Powell School" and "Panthers" is fixed to Building A's southwest corner. Fenestration throughout the building consists of repeating groups of metal framed windows in various sizes and arrangements. All windows appear to be fixed except for the clerestory hopper-style windows. A wide, covered walkway wraps around the entire building, with narrow metal support columns at the east and west facades. The west façade walkway externally connects Building A to Building B to the west and to Building E to the north.

Exhibit 4. South façade view of Building A, showing the school's main entrance under a covered walkway, facing north. (July 28, 2025)



Source: Dudek, IMG_0203

Building B: Classroom Building (1957)

Building B is a one-story Mid-Century Modern Style classroom building with a long and wide rectangular plan, constructed in 1957 (Exhibit 5). Located to the west of Building A, the two buildings are connected by a covered walkway and see-through metal vertical fence to the north and south, with an internal courtyard between the two buildings. The roof displays minimal pitch and primarily reads as a flat roof at the north and south facades, and a

gable roof at the east and west facades, clad in white rolled composition roofing material. Wide eaves extend over the roofline at each elevation and stucco fascia wraps around the entire building along with upper metal flashing. Building B is primarily clad in stucco. Classrooms are located at the north and south facades, where the majority of the fenestration is also located. Fenestration consists of repeating groups of metal framed windows in various sizes and arrangements. All windows appear to be fixed except for the clerestory hopper-style windows. A wide, covered walkway wraps around the entire building, with narrow metal support columns at the east facade. The east façade walkway externally connects Building B to Building A to the east, and to Building C to the north.

Exhibit 5. View of Building B, west and north elevations, facing southeast. (July 28, 2025)



Source: Dudek, IMG_0156

Building C: Classroom Building (Circa 1959)

Building C is a one-story Mid-Century Modern Style classroom building with a long and narrow rectangular plan, constructed in circa 1959 (Exhibit 6). Located to the north of Building B and south of Building D, the roof displays minimal pitch and primarily reads as a flat roof at the north and south facades, and a gable roof at the east and west facades, clad in white rolled composition roofing material. Wide eaves extend over the roofline at the north, south, and east facades, and stucco fascia wraps around the entire building along with upper metal flashing. Building C is primarily clad in stucco. Classrooms are located at the north and south facades, where the majority of the fenestration is also located. Fenestration consists of repeating groups of metal framed windows in various sizes and arrangements. All windows appear to be fixed except for the clerestory hopper-style windows. A wide, covered walkway with narrow metal support columns is located at the east façade, which externally connects Building C to Building B to the north, and to Building D to the south. Children's murals are painted on the east façade, situated below the covered walkway.

Exhibit 6. View of Building C, east and north elevations, facing southwest. (July 28, 2025)



Source: Dudek, IMG_8439

Building D: Classroom Building (Crica 1964)

Building D is a one-story Mid-Century Modern Style classroom building with a rectangular plan, constructed in circa 1964 (Exhibit 7). Located to the north of Building C, the roof displays minimal pitch and primarily reads as a flat roof with the exception of the west where it reads as a gable roof. The roof is clad in white rolled composition roofing material. Wide eaves extend over the roofline, and stucco fascia wraps around the entire building along with upper metal flashing. Building C is primarily clad in stucco. Classrooms are located at the north and south facades, where fenestration is also located, consisting of repeating groups of metal framed windows in various sizes and arrangements. All windows appear to be fixed except for the clerestory hopper-style windows. A wide, covered walkway with narrow metal support columns is located at the east façade, which externally connects Building D to Building C to the south.

Exhibit 7. View of Building D, south and west elevations, facing northeast. (July 28, 2025)



Source: Dudek, IMG_8478

Building E: Multipurpose Building (Circa 1964)

Building E is a combination one-and-two story Mid-Century Modern Style multipurpose building with an irregular-shaped plan, constructed in circa 1964 (Exhibit 8). Its massing is composed of two primary volumes: a two-story rectangular footprint attached to an intersecting smaller one-story rectangular footprint. Building E faces the parking lot along North Calera Avenue to the east, serving as the school's secondary entrance or "face" of the school. The roof of both building volumes displays minimal pitch and primarily reads as a flat roof at the east and west, and a gable roof at the north and south facades, clad in white rolled composition roofing material. A deep gabled canopy extends past the small building volume to the north. Wide eaves extend over the roofline at each elevation and stucco fascia wraps around the entire building along with upper metal flashing. Building E is primarily clad in smooth plaster with brick veneer at the primary (east) façade and minimal brick cladding at the south facade. Fenestration throughout the building consists of repeating groups of metal framed windows in various sizes and arrangements. All windows appear to be fixed except for the clerestory hopper-style windows. The primary (east) façade's fenestration is limited to a few windows on the small volume with additional windows on the small volume's north façade. Similar to Building A, the secondary entrance is denoted with "Welcome" written along the fascia of the extended roof. The primary (east) façade exhibits a mural with panther footprints and face, along with "Powell

Elementary Home of the Panthers" stated across most of the façade. The south façade contains another mural reading "Home of the Proud Panthers." A wide, covered walkway stretches along the west façade and externally connects Building E to Building A to the south.

Exhibit 8. View of Building E, east elevation, facing southwest. (July 28, 2025)



Source: Dudek, IMG_181

Building F: Classroom Building (2005)

Located at the southwest corner of campus, Building F is a one-story institutional classroom building that has a rectangular plan with stucco cladding, and was constructed in 2005 (Exhibit 9).

Exhibit 9. View of Building F, east and north elevations, facing southwest. (July 28, 2025)



Source: Dudek, IMG_181

Non-Permanent and Portable Buildings

The non-permanent buildings consist of one portable building (Building 1 in Figure 2), one utility structure (also referred to as a transformer vault in the 1960 as-built architectural plans) (Structure 2 in Figure 2), and one canopy structure (Structure 3 in Figure 2). All three lack architectural distinction and are utilitarian in design (Exhibits 10 through 12). A concrete platform for a previous building or structure that has since been demolished is to the west of the portable building. Large mature trees are scattered throughout the school campus, consisting of Oak and Redwood trees, among others. A narrow paved parking lot sits along the school's east side, parallel to North Calera Avenue.

Exhibit 10. View of portable building (portable 1 in Figure 2), east and north elevations, facing southwest. (July 28, 2025)



Source: Dudek, IMG_8463

Exhibit 11. View of utility structure (structure 2 on Exhibit 1), east elevation, facing west. (July 28, 2025)



Source: Dudek, IMG_8435

Exhibit 12. View of canopy structure (structure 3 on Exhibit 1), east and south elevations with Building E to the left, facing west. (July 28, 2025)



Source: Dudek, IMG_0183

4.2.1.2 Statement of Significance

NRHP and CRHR Evaluation

The following section provides an evaluation of the W.R. Powell Elementary School under NRHP and CRHR significance criteria and integrity considerations. The subject school was evaluated for local significance immediately following.

NRHP/CRHR Criteria

Under NRHP and CRHR Criteria A/1, the property at 1035 East Mauna Loa Avenue lacks a direct and important association with any event significant in local, state, or national history. W.R. Powell Elementary School was constructed in 1957 and subsequently expanded, during the Post-World War II construction and population boom in Southern California. The federal highway development of the 1950s and 1960s enabled new populations to move to Los Angeles County and Azusa in search of cheaper housing and community. W.R. Powell Elementary School was constructed to serve the adjacent sprawling post-World War II suburbs and single-family residences that were developed around that time and were in need of an elementary school. The subject property represents a school district and statewide trend of post-World War II educational expansion. While this is an important trend both regionally and statewide, the subject property did not play a significant role in this trend, nor did it influence this trend. Therefore, the subject property does not meet NRHP Criterion A and CRHR Criterion 1.

Under NRHP and CRHR Criteria B/2, the W.R. Powell Elementary School at 1035 East Mauna Loa Avenue lacks a significant association with the productive life of any person important in local, state, or national history. Research identified that the school was named after Azusa civic leader, citrus rancher, and pioneer agriculturalist, W.R. Powell. However, research did not uncover additional information regarding W.R. Powell, nor did it reveal any direct connection between W.R. Powell and the work for which he is known and the subject property. Archival research did not identify any significant persons who's productive life is known to be associated with the school. Due to a lack of identified significant associations with any persons important in our past, the property is recommended not eligible under NRHP Criterion B and CRHR Criterion 2.

Under NRHP and CRHR Criterion C/3, the W.R. Powell Elementary School at 1035 East Mauna Loa Avenue represents a modest example of a Mid-Century Modern style elementary school. Architecturally, the school campus buildings do not possess high artistic value as they are typical post-war Mid-Century Modern style campus buildings found throughout Southern California. Kistner, Wright & Wright (active between circa 1952 to 1973) is noted as the school's architect as indicated in 1956 architectural drawings, however, available research compiled to date has not suggested that Kistner, Wright & Wright should be considered a master architectural firm (OAC 2025). They were best known in the Southern California region for completing a number of large-scale projects including two rare Late Moderne style buildings in Westlake, Los Angeles known as the Kidney Center (1955) and the Universal Care Medical & Dental Building (1967), Cerritos College (1961), and the Norwalk Civic Center (1965) which references Mid-Century Modern's Miesian school of design through its architecture. Although research revealed that the school was designed by architectural and engineering firm Kistner, Wright & Wright, the firm likely had several employees and drafts-people and it is not known which architect specifically designed the school. Although constructed by W.T. Wadleigh Construction Company, research did not indicate that W.T. Wadleigh Construction Company is considered a master contractor. W.R. Powell Elementary School also does not appear to be a component of a potential or existing historic district. Overall, the property lacks distinctive design and construction value and therefore does not meet NRHP Criterion C and CRHR Criterion 3.

Under NRHP and CRHR Criteria D/4, the subject property as a historic-era built environment property, is not significant as a source, or likely source, of important historical information, nor does it appear likely to yield important information about historic construction methods, materials, or technologies, or information important in prehistory or history. This technology is well understood through contemporary trade journals and scientific monographs. As such, the property lacks significance under NRHP Criterion D and CRHR Criterion 4.

City of Azusa Criteria

1. It is identified with persons or events significant in local, regional, state or national history.

Research identified that W.R Powell Elementary School was named after Azusa civic leader, citrus rancher, and pioneer agriculturalist, W.R. Powell. However, research did not uncover additional information regarding W.R. Powell, nor did it reveal any direct connection between W.R. Powell and the work for which he is known and the subject property. Archival research did not identify any associations with any significant persons involved in the efforts to develop the school. As such, the property does not meet local criteria 1.

2. It is representative of the work of a notable builder, designer, architect or artist.

Kistner, Wright & Wright (active between circa 1952 to 1973) is noted as the school's architect as indicated in 1956 architectural drawings, however, available research compiled to date has not suggested that Kistner, Wright

& Wright should be considered a master architectural firm (OAC 2025). Work that is more representative of Kistner, Wright & Wright's designs include a number of large-scale projects including two rare Late Moderne style buildings in Westlake, Los Angeles known as the Kidney Center (1955) and the Universal Care Medical & Dental Building (1967), Cerritos College (1961), and the Norwalk Civic Center (1965) which references Mid-Century Modern's Miesian school of design through its architecture. Although constructed by W.T. Wadleigh Construction Company, research did not indicate that W.T. Wadleigh Construction Company was a master contractor. As such, the property does not meet local criteria 2.

3. It is at least 50 years old.

W.R. Powell Elementary school was constructed in 1957, and therefore is over 50 years old. As such, the property meets local criteria 3.

4. It is less than 50 years old, however it is of exceptional importance in one or more of the criteria set forth in this section.

W.R. Powell Elementary school is not less than 50 years old. As such, the property does not meet local criteria 4.

5. It contributes to the significance of a historic area, being a geographically definable area possessing a concentration of not less than 50 percent of historic or architecturally related grouping of properties that contribute to each other and are unified aesthetically by physical layout or development.

W.R. Powell Elementary School also does not appear to be a component of a potential or existing historic district. As such, the property does not meet local criteria 5.

6. It embodies one or more distinctive characteristics of style, type, period design, materials, detail, or craftsmanship.

Architecturally, the school campus buildings do not possess high artistic value or contain distinctive characteristics or craftsmanship, as they are typical post-war Mid-Century Modern style campus buildings found throughout Southern California. As such, the property does not meet local criteria 6.

7. It has a unique location or physical characteristics or represents an established and familiar visual feature of neighborhood, community, or the city.

W.R. Powell Elementary School does not have a unique location or physical characteristics or represents an established and familiar visual feature of neighborhood, community, or the city. As such, the property does not meet local criteria 7.

8. It incorporates elements that help to preserve and protect a historic place or area of historic interest in the city.

W.R. Powell Elementary School does not incorporate elements that help to preserve and protect a historic place or area of historic interest in the city. As such, the property does not meet local criteria 8.

9. It has yielded, or may be likely to yield information important in prehistory or history.

The subject property has not yielded and does not appear likely to yield information important in prehistory or history. As such, the property does not meet local criteria 9.

Integrity

Because the historic integrity of a property is based on associative significance under applicable criteria, the assessment of a property's integrity can only proceed after its significance has been fully established. When appropriate, the assessment of integrity requires consideration under the seven aspects or qualities. To retain integrity, a property will always possess several, and generally most, aspects of integrity. Determining which aspects are most important requires an understanding of why, where, and when the property is significant. Although the school meets the City of Azuza Local Criteria 3 for being over 50 years of age, meeting this Criteria alone does not qualify the property for listing in the City of Azuza Register of Landmarks. It was not found to meet any other City Criteria. Additionally, the subject property (W.R. Powell Elementary School) evaluated was not found to have associative significance under any of the Criteria for listing in the NRHP or CRHR, therefore, analysis of historic integrity of the subject property is inconsequential.

Conclusion

The W.R. Powell Elementary School does not meet any NRHP, CRHR, or City of Azusa Register of Historic Landmarks, eligibility criteria individually or as a contributing element to any known or potential historic district.

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5 Findings and Conclusions

The subject property was evaluated in consideration of NRHP, CRHR, and City of Azusa criteria and integrity requirements. As a result of the evaluation, W.R. Powell Elementary School (1035 East Mauna Loa Avenue) is recommended ineligible for inclusion in the NRHP, CRHR, and City of Azusa Register of Historic Landmarks. The subject elementary school was found to lack significance under Criteria A/1, B/2, C/3, and D/4, and criteria 1-2, 4-9 in City of Azusa local criteria. Because the subject elementary school lacks significance in all criteria, an integrity assessment was not required. In summary, it does not appear to be eligible for inclusion in the NRHP, CRHR, or City of Azusa Register of Historic Landmarks, either individually or as a contributing element to any known or a potential historic district and it does not qualify as a historical resource under CEQA.

Dudek evaluated the resources in the API in accordance with Section 15064.5 (a)(2)-(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code and found that the one property within the API is not considered a historical resource for the purposes of CEQA. The recommended Status Code for the W.R. Powell Elementary School is 6Z. A summary of the findings is provided below in Table 6.

Table 6. Built Environment Evaluation Summary for Properties in Area of Potential Impacts

Building/Structure	Address/APN	Year Built	Primary Number*	NRHP/ CRHR Eligibility	Assigned California Historical Resource Status code
W.R. Powell Elementary School	1035 East Mauna Loa Avenue/8628-004-900	1957	None	Not Eligible	6Z

Notes: APN = Assessor's Parcel Number; API = Area of Potential Impacts; ca. = circa; NRHP = National Register of Historic Places; CRHR = California Register of Historical Resources; 6Z=Found ineligible for NR, CR, or local designation through survey evaluation

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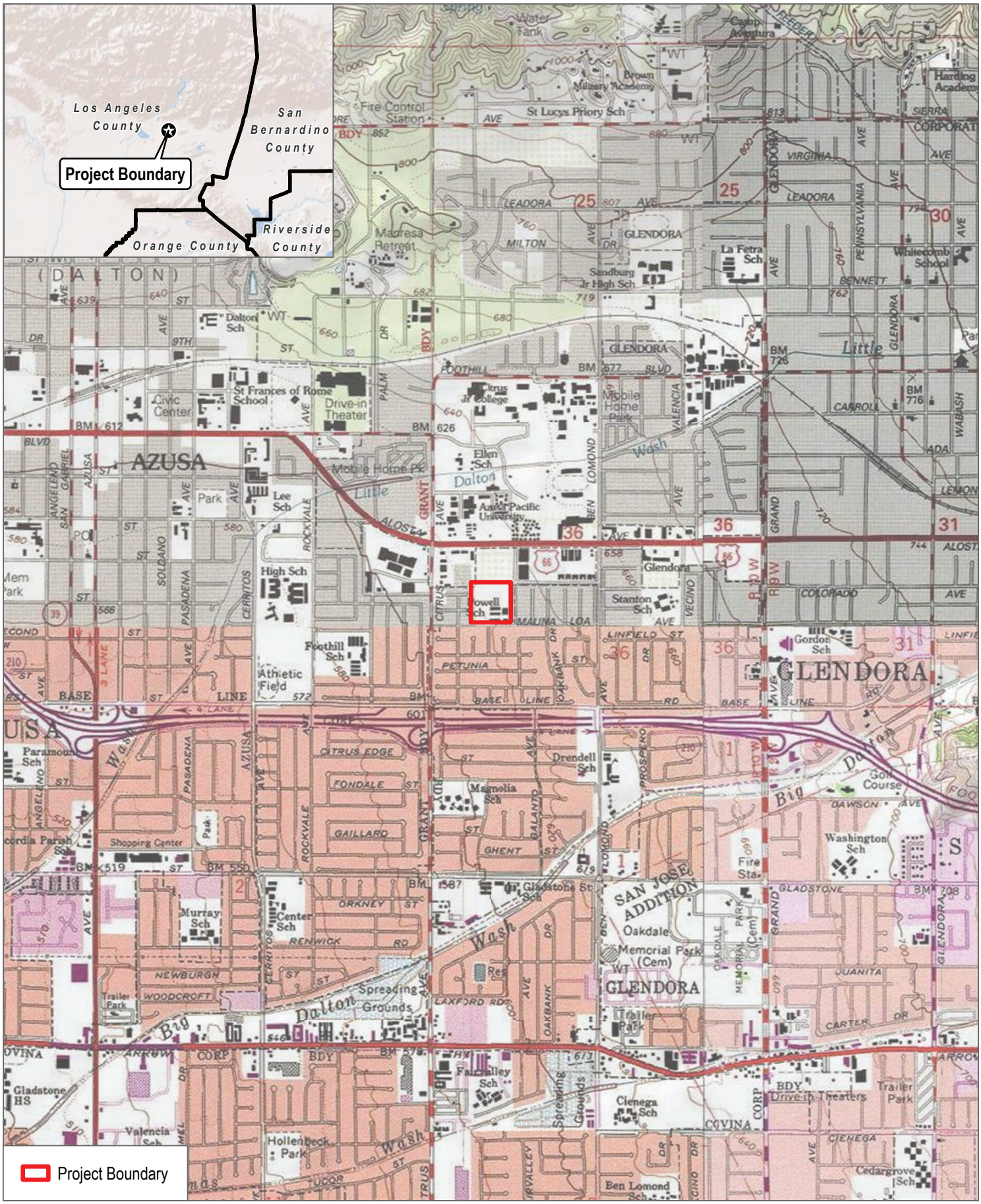
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SOURCE: USGS 7.5' Series
Azusa Quadrangle - Township 1N Range 10W Section 36

DUDEK

0 1,000 2,000 Feet

FIGURE 1
Project Location
Delany Square Residential Project

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SOURCE: Open Streets; Maxar 2024

DUDEK

0 80 160 Feet

FIGURE 2

Built Environment Area of Potential Impacts

Delany Square Residential Project

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Appendix A

Interested Party Correspondence

From:	Andrea Dumovich Heywood
To:	"Usc333.dmr@gmail.com"
Cc:	Brandon Whalen-Castellanos; Katie Haley
Subject:	City of Azusa Delaney Square Project
Date:	Tuesday, February 24, 2026 4:48:00 PM
Attachments:	image001.png image002.png image003.png image004.png Interested Party Letter_AHS.pdf

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To Whom it May Concern,

I am reaching out today on behalf of Dudek and Taylor Morrison to provide you with some information about the City of Azusa Delaney Square Project. As part of the cultural resources study for the proposed project, Dudek is consulting all regional historical organizations to determine if there are any known historic or cultural resources that may be within the proposed project area. Please see the attached letter and map for more information about the nature and location of the project, and please feel free to contact me should you have questions or information regarding cultural or historical resources in this area.

Thank you,
Andrea Dumovich Heywood

Andrea Dumovich Heywood (she/her)
Architectural Historian
DUDEK

O: 949 373 8311 **C:** 949 641 7152
dudek.com

DUDEK
225 SOUTH LAKE AVENUE
SUITE M210
PASADENA, CALIFORNIA 91101
T 626.204.9800

Azusa Historical Society
P.O. Box 972
Los Angeles, CA 90078

February 24, 2026

Subject: Delaney Square Project

To Whom it May Concern,

Dudek has been retained by Taylor Morrison on behalf of the City of Azusa to complete the California Environmental Quality Act (CEQA) documentation and supporting technical studies, including a Built Environment Inventory and Evaluation Report for the Delaney Square Project (Proposed Project). The intent of the Proposed Project to construct approximately 128 market-rate residential units, comprised of 63 two-story attached townhomes, 65 two-story single-family detached cluster homes, and a variety community amenities. The Proposed Project site which is 9.77 acres is located at the former W.R. Powell Elementary School (1035 East Mauna Loa Avenue, Azusa, CA 91702), constructed in circa 1964 in Azusa, California (see Figure 1 enclosed).

As part of our study, we are consulting all regional historical organizations to determine if there are any known historic or cultural resources that may be affected by the Proposed Project. Your efforts in this process will provide invaluable information for the proper identification and treatment of such resources. If you have any information regarding known cultural resources in the Proposed Project area, please feel free to contact me via phone or email (listed below). All comments, emails, or letters received will be included in the reports generated by this study. Thank you for your time regarding our request.

Sincerely,

Andrea Dumovich Heywood

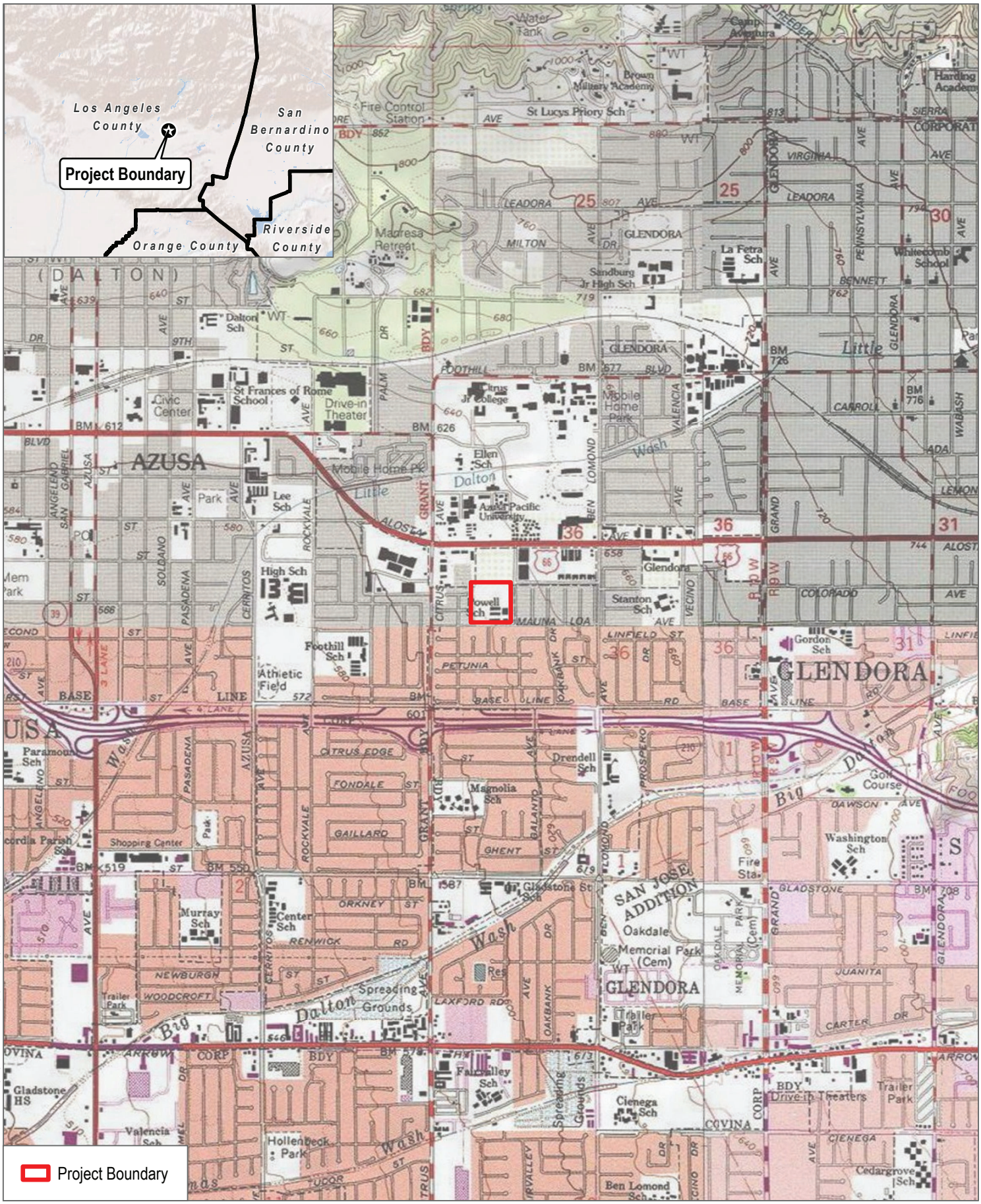
_____

Andrea Dumovich Heywood

Architectural Historian

949.373.8311 // adumovichheywood@dudek.com

Att.: *Figure 1, Regional Location and Local Vicinity*
cc: *Brandon Whalen-Castellanos, AICP, Dudek, and Katie Haley, MA, Dudek*



SOURCE: USGS 7.5' Series
Azusa Quadrangle - Township 1N Range 10W Section 36

DUDEK

0 1,000 2,000 Feet

FIGURE 1
Project Location
Delany Square Residential Project

From:	Andrea Dumovich Heywood
To:	"mail@glendorahistoricalsociety.org"
Cc:	Brandon Whalen-Castellanos; Katie Haley
Subject:	City of Azusa Delaney Square Project
Date:	Tuesday, February 24, 2026 4:48:00 PM
Attachments:	image001.png image002.png image003.png image004.png Interested Party Letter_GHSM.pdf

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Thank you,
Andrea Dumovich Heywood

Andrea Dumovich Heywood (she/her)
Architectural Historian
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O: 949 373 8311 **C:** 949 641 7152
dudek.com

DUDEK
225 SOUTH LAKE AVENUE
SUITE M210
PASADENA, CALIFORNIA 91101
T 626.204.9800

Glendora Historical Society and Museum
314 N. Glendora Avenue
Glendora, CA 91740

February 24, 2026

Subject: Delaney Square Project

To Whom it May Concern,

Dudek has been retained by Taylor Morrison on behalf of the City of Azusa to complete the California Environmental Quality Act (CEQA) documentation and supporting technical studies, including a Built Environment Inventory and Evaluation Report for the Delaney Square Project (Proposed Project). The intent of the Proposed Project to construct approximately 128 market-rate residential units, comprised of 63 two-story attached townhomes, 65 two-story single-family detached cluster homes, and a variety community amenities. The Proposed Project site which is 9.77 acres is located at the former W.R. Powell Elementary School (1035 East Mauna Loa Avenue, Azusa, CA 91702), constructed in circa 1964 in Azusa, California (see Figure 1 enclosed).

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Sincerely,

Andrea Dumovich Heywood

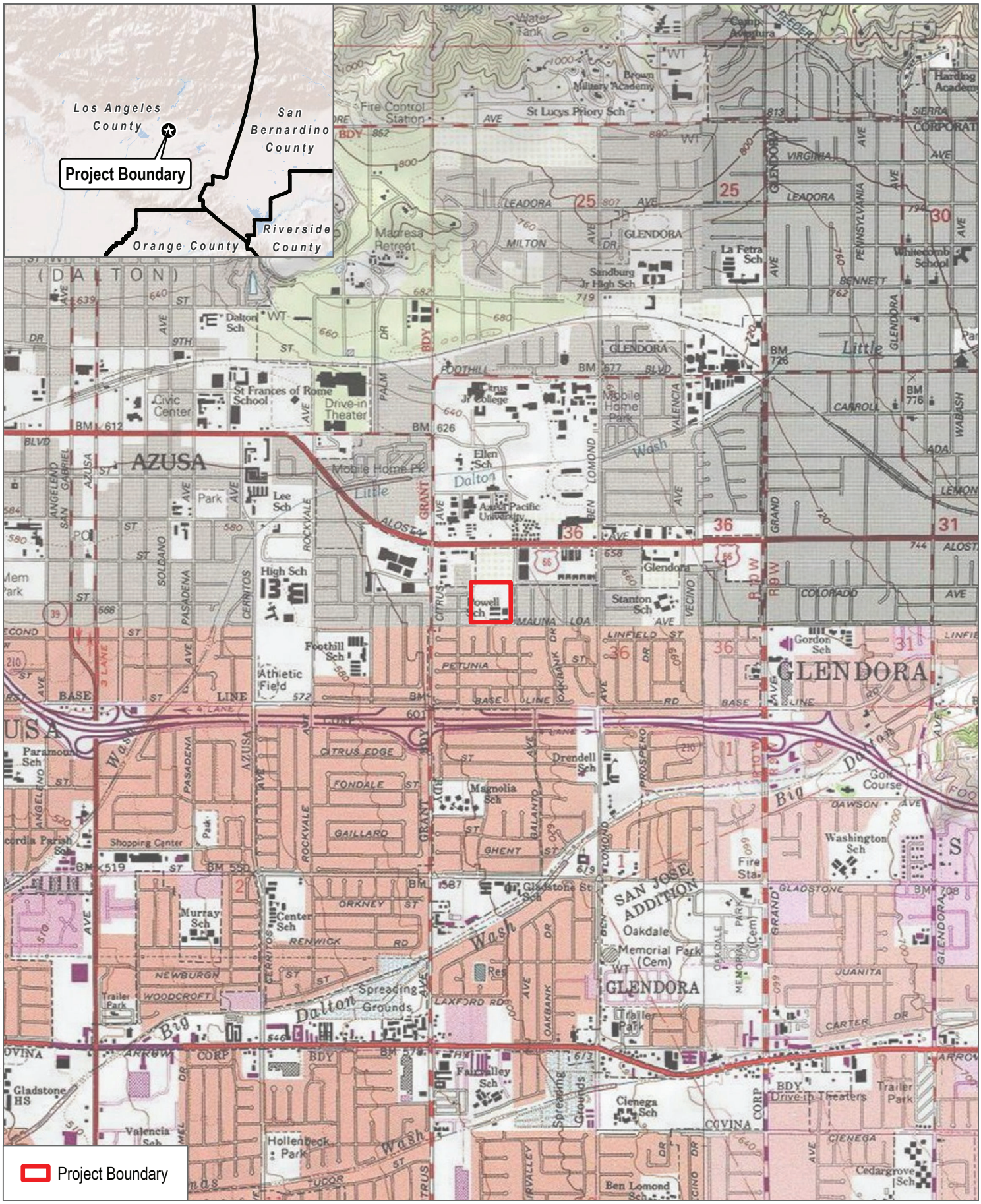
_____

Andrea Dumovich Heywood

Architectural Historian

949.373.8311 // adumovichheywood@dudek.com

Att.: *Figure 1, Regional Location and Local Vicinity*
cc: *Brandon Whalen-Castellanos, AICP, Dudek, and Katie Haley, MA, Dudek*



SOURCE: USGS 7.5' Series
Azusa Quadrangle - Township 1N Range 10W Section 36

DUDEK

0 1,000 2,000 Feet

FIGURE 1
Project Location
Delany Square Residential Project

Appendix B
DPR Forms

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code Reviewer Date

***Resource Name or #:** (Assigned by recorder) W.R. Powell Elementary School

P1. Other Identifier: 1035 East Mauna Loa Avenue

*__P2. Location:__ ☐ **Not for Publication** ☒ **Unrestricted** ***a. County** Los Angeles

and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

***b. USGS 7.5' Quad** *Azusa, Calif.* **Date** 2021 **T** 1N; **R** 10W **of Sec** 36; San Bernardino **B.M.**

c. Address 1035 East Mauna Loa Avenue City Azusa Zip 91702

d. UTM: (Give more than one for large and/or linear resources) Zone 11, 418217.32 mE/ 3776472.91 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate) Assessor Parcel Number (APN) 8628-004-900

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries) W.R. Powell Elementary School is located on a 9.77 acre parcel, on a corner lot immediately north of East Mauna Loa Avenue and west of North Calera Avenue (Photo 1). It sits within a residential area along the eastern edge of the City of Azusa. Powell Elementary contains six permanent educational buildings and one portable building. The school's Mid-Century Modern Style buildings served educational purposes from its opening in 1957 until the school's closure in 2023. See Continuation Sheet.

***P3b. Resource Attributes:** (List attributes and codes) HP15. Education Building

***P4. Resources Present:** ☒ Building ☐ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



P5b. Description of Photo: (View, date, accession #) Photo 1, south façade, looking northwest, September 10, 2025, Dudek, IMG_0207

***P6. Date Constructed/Age and Sources:**
☒ Historic ☐ Prehistoric ☐ Both
1957/ Pasadena Independent 1957: 34; NETR 2025

***P7. Owner and Address:**
Azusa Unified School District
546 S. Citrus Avenue
Azusa, CA 91702

***P8. Recorded by:** (Name, affiliation, address)
Andrea Dumovich Heywood, MHC
Dudek
225 S. Lake Avenue, Suite 225-M210
Pasadena, CA 91101

***P9. Date Recorded:**
July 28, 2025 and September 10, 2025

***P10. Survey Type:** (Describe)
Intensive

***P11. Report Citation:** (Cite survey report and other sources, or enter "none.") Dudek. 2025. *Built Environment Inventory and Evaluation Report: Delaney Square Residential Project, Los Angeles, County, California*. Prepared for Taylor Morrison.

***Attachments:** ☐ NONE ☒Location Map ☒Continuation Sheet ☒Building, Structure, and Object Record
☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record
☐Artifact Record ☐Photograph Record ☐Sketch Map ☐Other (List):

BUILDING, STRUCTURE, AND OBJECT RECORD

 ***NRHP Status Code** 6Z

***Resource Name or #** (Assigned by recorder) W.R. Powell Elementary School

B1. Historic Name: W.R. Powell Elementary School
B2. Common Name: Powell School
B3. Original Use: Elementary school
B4. Present Use: Elementary school
***B5. Architectural Style:** Mid-Century Modern
***B6. Construction History:** (Construction date, alterations, and date of alterations) The subject elementary school was originally constructed in 1957, consisting only of Buildings A and B, for the construction cost of $235,631. The school was designed by the San Diego and Los Angeles based architecture and engineering firm, Kistner, Wright & Wright, and built by W.T. Wadleigh Construction Company and the original architect is unknown. In circa 1959, Building C was constructed (Pasadena Independent 1957: 34; DNPMNP 1956a: 7; DNP 1598: 7; DNP 1959: 3; Kistner, Wright & Wright 1956). By circa 1964, the school's primary footprint was completed, consisting of five permanent buildings (Buildings A – E) designed in a finger plan. Building F was constructed in 2005 and located in the parcel's southwest corner (NETR 2025). The portable building (Building 1) is dated 1999, and the utility structure (Structure 2) is dated circa 1960. The canopy structure (Structure 3) to the north of Building E was added in circa 2009 (NETR 2025).

See Continuation Sheet.

***B7. Moved?** ☒**No** ☐**Yes** ☐**Unknown** **Date:** **Original Location:**
***B8. Related Features:** None

B9a. Architect: Kistner, Wright & Wright b. Builder: W.T. Wadleigh Construction Company
***B10. Significance: Theme** N/A **Area:** N/A
Period of Significance N/A **Property Type** N/A **Applicable Criteria** N/A
(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity.)

W.R. Powell Elementary School does not meet the criteria for the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR) or the Azusa Register of Historic Landmarks. The property was evaluated in accordance with Section 15064.5 (a)(2)-(3) of the CEQA Guidelines using the criteria outlined in Section 5024.1 of the California Public Resources Code. The property is not considered a historical resource under CEQA. As such, this evaluation assigns a 6Z California Historical Resources Status Code to W.R. Powell Elementary School. See Continuation Sheet.

B11. Additional Resource Attributes: (List attributes and codes)

***B12. References:** See Continuation Sheet

B13. Remarks: None

***B14. Evaluator:** Andrea Dumovich Heywood, MHC

***Date of Evaluation:** September 29, 2025

(This space reserved for official comments.)

(Sketch Map with north arrow required.)



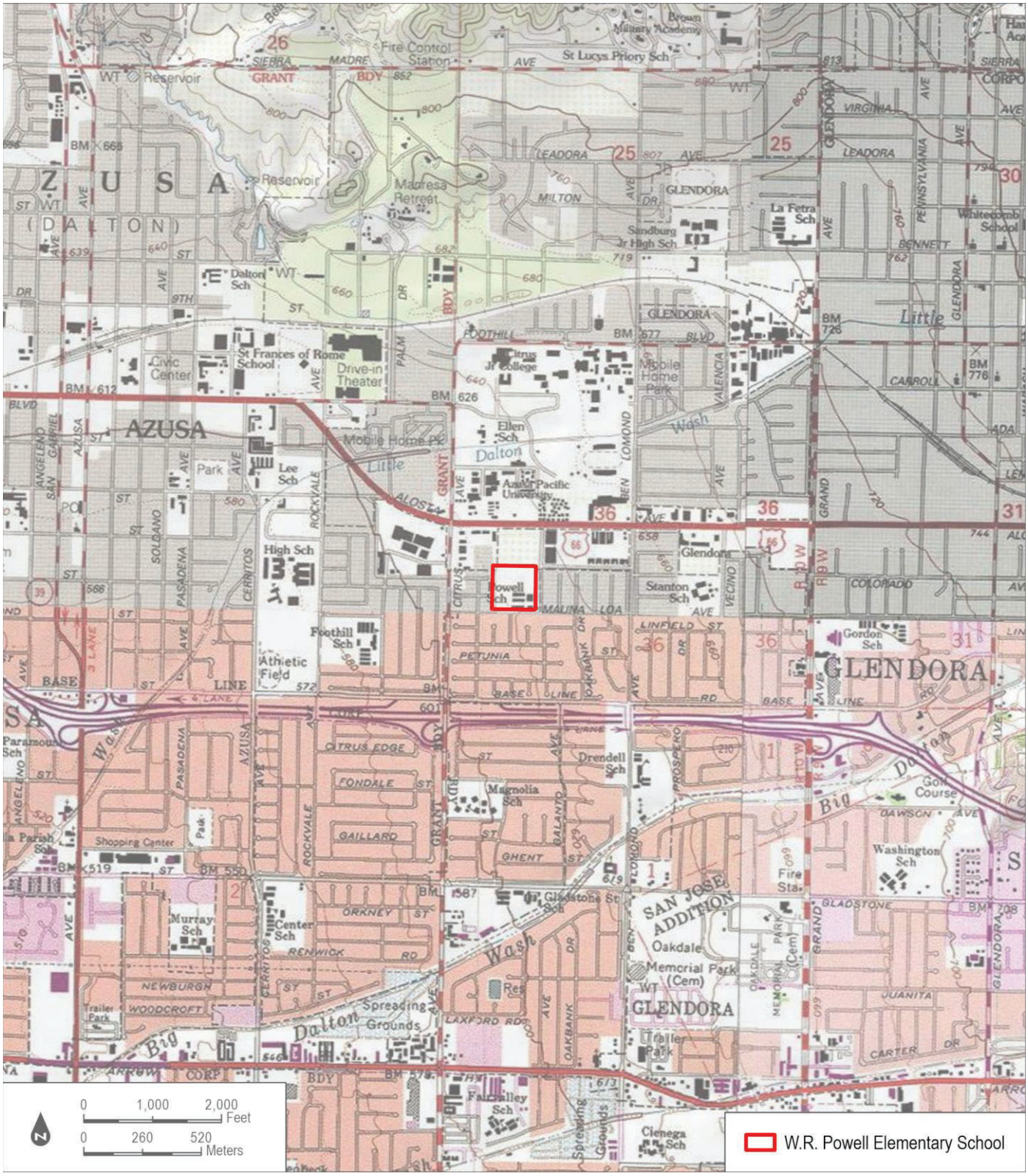
State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

LOCATION MAP

Primary #
HRI#
Trinomial

***Resource Name or #** (Assigned by recorder) W.R. Powell Elementary School

***Map Name:** *Azusa, Calif.* ***Scale:** 1:24,000 ***Date of Map:** 2021



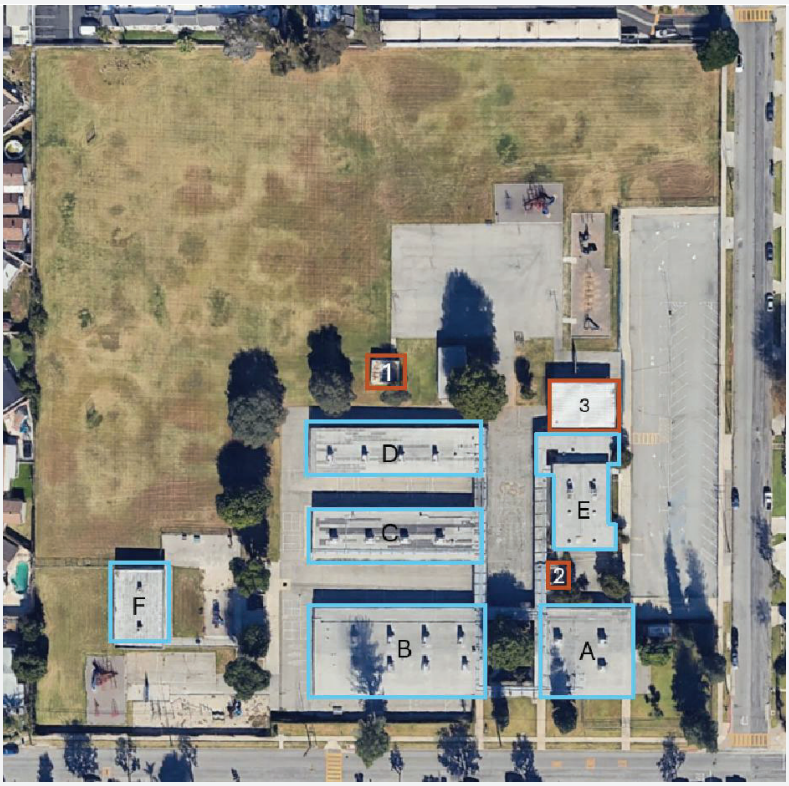
*** Required information**

Description (cont.)

The educational buildings are located on a large square parcel surrounded by single family residences to the west, east, and south; a multi-family apartment complex is to the north. The school buildings are primarily clustered to the parcel's southeast corner and face East Mauna Loa and North Calera Avenues, to the south and east respectively. Approximately half of the parcel remains as open green space to the north and west of the school buildings. Additional site features include three play areas as well as basketball and handball courts. Narrow front lawn buffers the school, fronting East Mauna Loa Avenue to the south and partially fronting North Calera Avenue to the east.

The six permanent buildings are identified as buildings A through F in this description, as well as shown in Exhibit 1, below. Three non-permanent buildings and structures are also identified in Exhibit 1 and discussed in the description below.

Exhibit 1. Site map showing permanent buildings (outlined in blue), lettered A through F. Portable buildings and structures (outlined in orange) are numbered 1 through 3.



Source: Google Earth 2025, edited by Dudek.

Table 1. W.R. Powell Elementary School Buildings and Structures

Building/Structure	Building Type	Year Built
W.R. Powell Elementary School: 1035 East Mauna Loa Avenue/ (APN) 8628-004-900		
A	Administration and Kindergarten Classroom	1957
B	Classroom	1957
C	Classroom	Circa 1959
D	Classroom	Circa 1964
E	Multipurpose	Circa 1964
F	Classroom	2005
1	Portable	1999
2	Utility Structure	Circa 1960
3	Canopy Structure	Circa 2009

Notes: APN = Assessor's Parcel Number

Building A: Administration and Kindergarten Building (1957)

Building A is a one-story Mid-Century Modern Style administration and kindergarten classroom building with a square plan, constructed in 1957 (Photo 2). Located at the parcel's southeast corner, Building A fronts both East Mauna Loa and North Calera Avenues, serving as the school's primary street-facing building or "face" of the school, along with Building B which also fronts East Mauna Loa. Administration Building A was originally built to house "offices, nurse's room, teachers' workroom and lounge" (DNPMNP 1956b: 7). The roof displays minimal pitch and primarily reads as a flat roof at the north and south facades, and a gable roof at the east and west facades, clad in white rolled composition roofing material. Wide eaves extend over the roofline at each elevation and stucco fascia wraps around the entire building along with upper metal flashing. Building A is primarily clad in stucco with the exception of what appears to be narrow vertical wood panels at the main entrance on the primary (south) façade. The school's one of two main entrances is situated at East Mauna Loa Avenue, at the southwest corner of Building A, as indicated by the school address along with "Welcome Panthers," and "Preparing the Future," stated along the fascia of the covered walkway between Buildings A and B. Below the covered walkway, a marquee with "Powell School" and "Panthers" is fixed to Building A's southwest corner. Fenestration throughout the building consists of repeating groups of metal framed windows in various sizes and arrangements. All windows appear to be fixed except for the clerestory hopper-style windows (Photo 3). A wide, covered walkway wraps around the entire building, with narrow metal support columns at the east and west facades. The west façade walkway externally connects Building A to Building B to the west and to Building E to the north (Photo 4).

Building B: Classroom Building (1957)

Building B is a one-story Mid-Century Modern Style classroom building with a long and wide rectangular plan,

constructed in 1957 (Photo 5). Located to the west of Building A, the two buildings are connected by a covered walkway and see-through metal vertical fence to the north and south, with an internal courtyard between the two buildings (Photo 6). The roof displays minimal pitch and primarily reads as a flat roof at the north and south facades, and a gable roof at the east and west facades, clad in white rolled composition roofing material. Wide eaves extend over the roofline at each elevation and stucco fascia wraps around the entire building along with upper metal flashing. Building B is primarily clad in stucco. Classrooms are located at the north and south facades, where the majority of the fenestration is also located. Fenestration consists of repeating groups of metal framed windows in various sizes and arrangements. All windows appear to be fixed except for the clerestory hopper-style windows. A wide, covered walkway wraps around the entire building, with narrow metal support columns at the east facade. The east façade walkway externally connects Building B to Building A to the east, and to Building C to the north.

Building C: Classroom Building (Circa 1959)

Building C is a one-story Mid-Century Modern Style classroom building with a long and narrow rectangular plan, constructed in circa 1959 (Photo 7). Located to the north of Building B and south of Building D, the roof displays minimal pitch and primarily reads as a flat roof at the north and south facades, and a gable roof at the east and west facades, clad in white rolled composition roofing material. Wide eaves extend over the roofline at the north, south, and east facades, and stucco fascia wraps around the entire building along with upper metal flashing. Building C is primarily clad in stucco. Classrooms are located at the north and south facades, where the majority of the fenestration is also located. Fenestration consists of repeating groups of metal framed windows in various sizes and arrangements. All windows appear to be fixed except for the clerestory hopper-style windows. A wide, covered walkway with narrow metal support columns is located at the east façade, which externally connects Building C to Building B to the north, and to Building D to the south. Children's murals are painted on the east façade, situated below the covered walkway.

Building D: Classroom Building (Crica 1964)

Building D is a one-story Mid-Century Modern Style classroom building with a rectangular plan, constructed in circa 1964 (Photo 8). Located to the north of Building C, the roof displays minimal pitch and primarily reads as a flat roof with the exception of the west where it reads as a gable roof. The roof is clad in white rolled composition roofing material. Wide eaves extend over the roofline, and stucco fascia wraps around the entire building along with upper metal flashing. Building C is primarily clad in stucco. Classrooms are located at the north and south facades, where fenestration is also located, consisting of repeating groups of metal framed windows in various sizes and arrangements. All windows appear to be fixed except for the clerestory hopper-style windows. A wide, covered walkway with narrow metal support columns is located at the east façade, which externally connects Building D to Building C to the south.

Building E: Multipurpose Building (Circa 1964)

Building E is a combination one-and-two story Mid-Century Modern Style multipurpose building with an irregular-shaped plan, constructed in circa 1964 (Photo 9). Its massing is composed of two primary volumes: a two-story rectangular footprint attached to an intersecting smaller one-story rectangular footprint. Building E faces the

parking lot along North Calera Avenue to the east, serving as the school's secondary entrance or "face" of the school. The roof of both building volumes displays minimal pitch and primarily reads as a flat roof at the east and west, and a gable roof at the north and south facades, clad in white rolled composition roofing material. A deep gabled canopy extends past the small building volume to the north. Wide eaves extend over the roofline at each elevation and stucco fascia wraps around the entire building along with upper metal flashing. Building E is primarily clad in smooth plaster with brick veneer at the primary (east) façade and minimal brick cladding at the south facade. Fenestration throughout the building consists of repeating groups of metal framed windows in various sizes and arrangements. All windows appear to be fixed except for the clerestory hopper-style windows. The primary (east) façade's fenestration is limited to a few windows on the small volume with additional windows on the small volume's north façade. Similar to Building A, the secondary entrance is denoted with "Welcome" written along the fascia of the extended roof. The primary (east) façade exhibits a mural with panther footprints and face, along with "Powell Elementary Home of the Panthers" stated across most of the façade. The south façade contains another mural reading "Home of the Proud Panthers." A wide, covered walkway stretches along the west façade and externally connects Building E to Building A to the south.

Building F: Classroom Building (2005)

Located at the southwest corner of campus, Building F is a one-story institutional classroom building that has a rectangular plan with stucco cladding, and was constructed in 2005 (Photo 10).

Non-Permanent and Portable Buildings

The non-permanent buildings consist of one portable building (Building 1 in Exhibit 1), one utility structure (also referred to as a transformer vault in the 1960 as-built architectural plans) (Structure 2 in Exhibit 1), and one canopy structure (Structure 3 in Exhibit 1). All three lack architectural distinction and are utilitarian in design (Photos 11 through 13). A concrete platform for a previous building or structure that has since been demolished is to the west of the portable building. Large mature trees are scattered throughout the school campus, consisting of Oak and Redwood trees, among others (Photo 14). A narrow paved parking lot sits along the school's east side, parallel to North Calera Avenue.

Construction History (cont.)

Identified alterations to the school include: metal flashing added to fascia; HVAC added to rooftops and to some windows; replacement windows; and broken/missing windows throughout.

Significance (cont.)

Historic Development of Azusa

City of Azusa is located within the County of Los Angeles, situated against the base of the San Gabriel Mountains to the north. Present-day Azusa was part of Rancho Azusa de Dalton, a 4,431-acre Mexican land grant given in 1841 by Governor Juan Alvarado to Luis Arenas. In addition to Azusa, present-day cities located on the former land grant include Irwindale, Arcadia, Monrovia, and Baldwin Park. The land comprising Azusa, however, was not considered valuable due to an abundance of rocks and sand, which made farming and cattle grazing difficult (Petersen 2016; City of Irwindale 2025).

The County of Los Angeles was established on February 18, 1850, one of 27 counties established in the months prior to California acquiring official statehood in the United States two years after the Mexican American War. Settlement of the Los Angeles region continued in the early American Period. Many of the ranchos in the area now known as Los Angeles County remained intact after the United States took possession of California; however, a severe drought in the 1860s resulted in many of the ranchos being sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944: 3–6). Nonetheless, ranching retained its importance, and by the late 1860s, Los Angeles County was one of the top dairy production centers in the country (Dumke 1944: 14–15). In the 1870s, the county was divided into townships comprised of subdivided ranchos, and by 1876, the county reportedly had a population of 30,000 people (Dumke 1944: 7).

Los Angeles County maintained its role as a regional business center and the development of citriculture in the late 1800s and early 1900s further strengthened this status. These factors, combined with the expansion of port facilities and railroads throughout the county, contributed to the impact of the real estate boom of the 1880s in which many southern California towns were founded (Pitt 2024; Dumke 1944: 41-43).

By 1887, Jonathan S. Slauson established the town of Azusa and on December 29, 1898 Azusa incorporated. Azusa Valley became the first public school for the local community and in 1891, Citrus, the first Union High School, was located at the corner of Citrus next to Broadway. By 1899, Azusa's population consisted of 865 inhabitants (City of Azusa 2025).

Government leaders recognized the need for water to sustain the growing population in the County of Los Angeles. Irish immigrant William Mulholland personified the City of Los Angeles's efforts for a stable water supply (Survey LA 2016: 2). By 1913, the City of Los Angeles had purchased large tracts of land in the Owens Valley, and Mulholland planned and completed the construction of the 240-mile Los Angeles Aqueduct that brought the valley's water to the city. Access to water resulted in a population boom in the region; in the city of Los Angeles, for example, the population rose from 170,298 residents in 1900 to 936,455 by 1920 (Pitt 2024; Los Angeles Almanac 2020).

Increased population led to more available workers, which helped spur regional agricultural growth. Between 1900 – 1940s, Azusa's growth relied on its citrus and agricultural industry. The middle class shifted to mostly Anglo-Americans and the lower classes transitioned to mostly minority groups. Numerous American-born Hispanics worked in the citrus fields and packing structures. A Mexican barrio area developed in Azusa during this time (Hayes 2003: 4.5-4).

The decline of the citrus industry and the impact of World War II, including the arrival of Aerojet in 1944, led to the end of Azusa's citrus markets. (Hayes 2003: 4.5-4). After World War II's conclusion in 1945, California experienced a massive wave of migration and building boom. In Los Angeles County, the rise in wartime employment in aircraft factories and shipyards during World War II, as well as statewide post-war immigration/emigration patterns, increased the county's population from 2,208,492 residents in 1930 to 4,151,687 residents by 1950 (Los Angeles Almanac 2020).

The postwar decades saw much of the county transformed from ranches and farms into residential subdivisions surrounding commercial and industrial centers. Previous agricultural success and the booming oil and aerospace industries were key factors in the county's growth in the twentieth century (Pitt 2024; Los Angeles Almanac 2020; Survey LA 2016: 2). In response to the rise in population, developers built tract homes, and multi-family residences on former agricultural properties in Los Angeles County throughout the 1940s and 1950s (Pitt 2024). Throughout the post-World War II period, residential styles reflected a range of regional styles that often combined Regional Modernism with elements of the Ranch style. Inspired by new construction materials and techniques refined during the war, many architects focused on producing low-cost mass-produced designs. Prefabricated housing systems, also known as manufactured homes or modular homes, were introduced to the market during the post-war period (Survey LA 2021: 91-92).

With the advent of the state and federal highway systems during the 1950s and 1960s, automobiles allowed travelers to take themselves to places that were only previously accessible by railroads. The highway system encouraged tourism that propelled the county's economy and spurred growth in the area. Freeway systems replaced former Route 66, bringing new populations to Azusa who sought affordable homes and community (Hayes

2003: 4.5-4). This automobile-oriented growth is reflected in the much of Azusa's present-day built environment that includes sprawling post-World War II suburbs characterized by concentrations of single-family residences with distinctive planning features such as street alignments, setbacks, curbs, sidewalks, and landscaping (Caltrans 2011: 17-18; Survey LA 2021: 153).

By 1965, Azusa Pacific (College) University was established, bringing academia to the city (Hayes 2003: 4.5-4). The Los Angeles County region continued to grow, as its population reached 6,038,771 residents by 1960 and later increased to 8,863,164 residents by 1990 as the county continued to expand during the last half of the twentieth century and into the twenty-first century (Los Angeles Almanac 2020). As of 2020, the City of Azusa had 50,000 residents (United States Census Bureau 2025).

Development of Public Education in Azusa

In 1888, Azusa City School District (ACSD) is first noted in the *Los Angeles Tribune* (Los Angeles Tribune 1888:4). Azusa Valley became the first public school to serve the local Azusa community, and in 1891, Citrus opened as the first Union High School (City of Azusa 2025). By July 1, 1900, ACSD formally organized as its population reached 5,250 (LAT 1924: 15).

By 1948, ACSD received $164,593 in state funding to address the "tremendous influx of people" into Azusa (Monrovia News-Post 1948: 2). Most of the funding was allocated towards aiding strained classrooms with new construction to accommodate for population increase. A flyer that appears to be dated from c.1950s for Azusa states that the city had five existing elementary schools at that time, with two additional schools being planned, along with future Azusa High School expansions (City of Azusa c.1950s).

Today, AUSD has approximately 7,000 enrolled students who attend one of the following Azusa Unified schools: Dalton Elementary School, Hodge Elementary School, Lee Elementary School, Longfellow School, Magnolia Elementary School, Valleydale Elementary School, Murray Elementary School, Paramount Elementary School, Gladstone Middle School, Azusa High School, and Sierra High School (AUSD 2025).

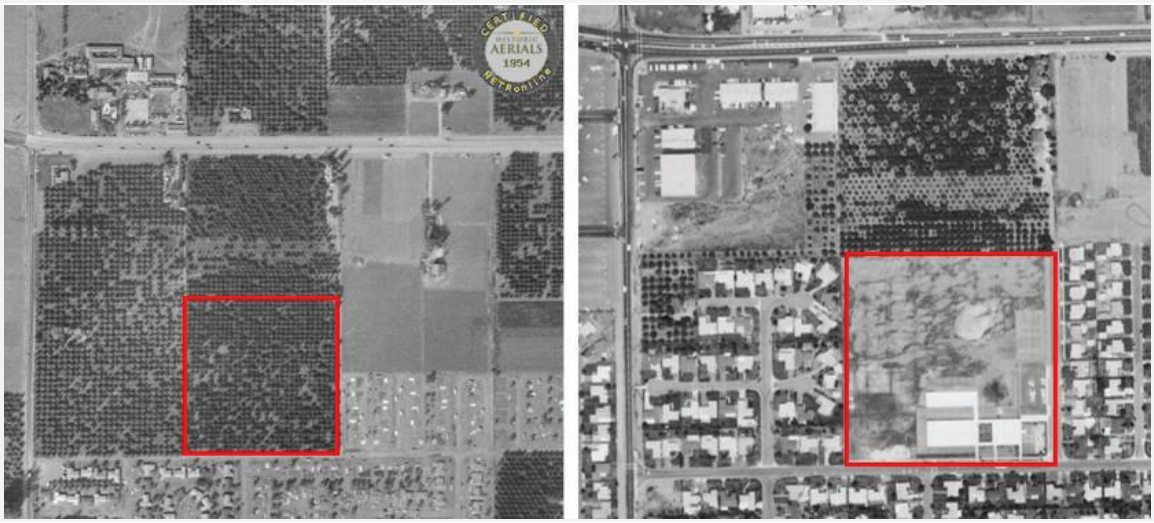
Development of W.R. Powell Elementary School

According to available historic aerials, the subject property was used for agricultural purposes in the 1940s. By the mid-1950s, housing began to develop adjacent to the site that would later become W.R. Powell Elementary School, while the future school site remained agricultural (Exhibit 2) (NETR 2025).

On September 16, 1957, the school first opened as part of the Azusa City Schools District (Pasadena Independent 1957: 34). The elementary school was named after Azusa civic leader, citrus rancher, and pioneer agriculturalist, W.R. Powell (LAT 1956: 154; DNPMNP 1956c: 6). In 1957, Jack Maloof served as the school's first principal (Pasadena Independent 1957: 34).

The original school layout from 1957 consisted of Building A and B, which housed the administration building, along with a kindergarten and nine grade-level classrooms (NETR 2025; Pasadena Independent 1957: 34). By circa 1959, Building C was added to the school campus to house four additional classrooms, completed by architect Kistner, Wright, and Wright, and contactor K.F. Gantner, along with Custom Wood Products (Exhibit 2) (DNP 1958: 7; DNP 1959: 3).

Exhibit 2. 1954 aerial photograph (L) showing the subject property at 1035 East Mauna Loa Avenue as agricultural land; 1960 aerial photograph (R) showing the subject school property with three buildings (outlined in red).



Source: NETR 2025; UCSB 2025

In circa 1960, the utility structure (Structure 2) was added to the campus. By 1964, former Powell school teacher, Lerald Teter, was promoted to school principal (Progress-Bulletin 1964: 11).

Historic aerials from 1964 also show that the school expanded by that time, adding Classroom Building D and Multipurpose Building E to the north of the existing school buildings in circa 1964 (Exhibit 3). From 1964 to the early 2000s, the school's footprint remained consistent with the exception of what appears to be portable or modular buildings that came and went beginning in the late 1990s. Portable Building 1 was added in 1999. In 2005, Building F was added to the parcel's southwest corner and in circa 2009 the canopy structure (Structure 3) was placed north of Building E (Exhibit 3) (NETR 2025).

Exhibit 3. 1964 aerial photograph (L) first showing the subject school with two new buildings added (outlined in red); 2005 aerial photograph (R) showing the subject school with a new building added to the west (outlined in red).



Source: NETR 2025

Between 2009 and 2025, the subject school's footprint remained consistent, with the addition of new playground areas added to northeast and southwest in circa 2020 (NETR 2025).

Kistner, Wright & Wright Firm Biography

The architectural and engineering firm based in San Diego and Los Angeles known as Kistner, Wright & Wright, was active between circa 1952 to 1973. The firm was founded by the following three architects: Theodore C. Kistner, Henry Lyman Wright, and William Theodore Wright. After Kistner died, the firm closed in 1973 (OAC 2025). Their best known projects include large-scale designs, including two rare Late Moderne style buildings in Westlake, Los Angeles known as the Kidney Center (1955) and the Universal Care Medical & Dental Building (1967), as well as Cerritos College (1961), and the Norwalk Civic Center (1965) which references Mid-Century Modern's Miesian school of design through its architecture (Los Angeles Conservancy 2025a, Los Angeles Conservancy 2025b, Los Angeles Conservancy 2025c).

Typology: Finger-Plan School Design (1940-1959)

By the 1950s, design ideas for schools that had been considered experimental in the 1930s had come to full maturity and became the national standard, including the finger-plan and the cluster-plan. Similar to the way in which architectural styles go in and out of popularity as do building plans and designs. Post-World War II, school's exhibiting a unified campus design, buildings that accompanied a high degree of indoor and outdoor integration, ample outdoor spaces, and sheltered corridors became characteristics of the functionalist typology. Educational buildings were given a more domestic scale as opposed to the formality and monumentality that characterized earlier eras of school design. Elementary schools remained one-story in height, while middle and high schools went

up to two-stories. Finger-plan schools are decentralized and pavilion-like, with "finger-like" wings, arranged on an axis. The plan was frequently utilized because it allowed for more students to fit on a smaller lot and allowed for easy expansion. During the 1940s and 1950s the flinger-plan and the cluster-plan were the most popular school campus designs in the United States (SE 2014).

Characteristics of the Finger-plan design:

- Building plans and site design clearly express their function
- Classrooms "finger-like" wings arranged on an axis
- Buildings that accompanied a high degree of indoor and outdoor integration
- Large outdoor spaces
- Sheltered corridors
- Generous expanses of windows
- Flat roof or broken pediment roof used for lighting and acoustics
- One-story massing for elementary schools; up to two-stories for junior/high schools

Architectural Style: Mid-Century Modern (1933-1965)

Mid-century Modern style is reflective of International and Bauhaus styles popular in Europe in the early 20th century. This style and its living designers (e.g., Mies Van der Rohe and Gropius) were disrupted by World War II and moved to the United States. During World War II, the United States established itself as a burgeoning manufacturing and industrial leader, with incredible demand for modern buildings to reflect modern products in the mid-20th century. As a result, many industrial buildings are often "decorated boxes"—plain buildings with applied ornament to suit the era and appear more modern without detracting from the importance of the activity *inside* the building. Following WWII, the United States had a focus on forward thinking, which sparked architectural movements like Mid-Century Modern. Practitioners of the style were focused on the most cutting-edge materials and techniques. Architects throughout Southern California implemented the design aesthetics made famous by early Modernists like Richard Neutra and Frank Lloyd Wright, who created a variety of modern architectural forms throughout Southern California. Like other buildings of this era, Mid-century Modern buildings had to be quickly assembled, and use modern materials that could be mass-produced (McAlester 2013; Morgan 2004).

Key character-defining features of the Mid-century Modern style include (McAlester 2013; Morgan 2004; Gebhard and Winter 2003):

- Low, boxy, horizontal proportions;
- Mass-produced materials;
- Flat, smooth sheathing;
- Flat roofed without coping at roof line; flat roofs hidden behind parapets;
- Lack of exterior decoration or abstract geometrical motif;
- Simple windows (metal or wood);
- Industrially plain doors;
- Large window groupings;
- Commonly asymmetrical; and
- Whites, buffs, and pale pastel colors.

Evaluation

NRHP/CRHR Criteria

Under NRHP and CRHR Criteria A/1, the property at 1035 East Mauna Loa Avenue lacks a direct and important association with any event significant in local, state, or national history. W.R. Powell Elementary School was constructed in 1957 and subsequently expanded, during the Post-World War II construction and population boom in Southern California. The federal highway development of the 1950s and 1960s enabled new populations to move to Los Angeles County and Azusa in search of cheaper housing and community. W.R. Powell Elementary School was constructed to serve the adjacent sprawling post-World War II suburbs and single-family residences that were developed around that time and were in need of an elementary school. Archival research did not indicate that W.R. Powell Elementary School was the first or last elementary school campus to be built in Azusa or within the Azusa Unified School District. Therefore, the subject property does not meet NRHP Criterion A and CRHR Criterion 1.

Under NRHP and CRHR Criteria B/2, the W.R. Powell Elementary School at 1035 East Mauna Loa Avenue lacks a significant association with the productive life of any person important in local, state, or national history. Research identified that the school was named after Azusa civic leader, citrus rancher, and pioneer agriculturalist, W.R. Powell. However, research did not uncover additional information regarding W.R. Powell, nor did it reveal any direct connection between W.R. Powell and the work for which he is known and the subject property.. The subject property represents a school district and statewide trend of post-World War II educational expansion. While this is an important trend both regionally and statewide, the subject property did not play a significant role in this trend, nor did it influence this trend. Due to a lack of identified significant associations with any persons important in our past, the property is recommended not eligible under NRHP Criterion B and CRHR Criterion 2.

Under NRHP and CRHR Criterion C/3, the W.R. Powell Elementary School at 1035 East Mauna Loa Avenue represents a modest example of a Mid-Century Modern style elementary school. Architecturally, the school campus buildings do not possess high artistic value as they are typical post-war Mid-Century Modern style campus buildings found throughout Southern California. Kistner, Wright & Wright (active between circa 1952 to 1973) is noted as the school's architect as indicated in 1956 architectural drawings, however, available research compiled to date has not suggested that Kistner, Wright & Wright should be considered a master architectural firm (OAC 2025). They were best known in the Southern California region for completing a number of large-scale projects including two rare Late Moderne style buildings in Westlake, Los Angeles known as the Kidney Center (1955) and the Universal Care Medical & Dental Building (1967), Cerritos College (1961), and the Norwalk Civic Center (1965) which references Mid-Century Modern's Miesian school of design through its architecture. Although research revealed that the school was designed by architectural and engineering firm Kistner, Wright & Wright, the firm likely had several employees and drafts-people and it is not known which architect specifically designed the school. Although constructed by W.T. Wadleigh Construction Company, research did not indicate that W.T. Wadleigh Construction Company is considered a master contractor. W.R. Powell Elementary School also does not appear to be a component of a potential or existing historic district. Overall, the property lacks distinctive design and construction value and therefore does not meet NRHP Criterion C and CRHR Criterion 3.

Under NRHP and CRHR Criteria D/4, the subject property as a historic-era built environment property is not significant as a source, or likely source, of important historical information, nor does it appear likely to yield important information about historic construction methods, materials, or technologies, or information important in prehistory or history. This technology is well understood through contemporary trade journals and scientific monographs. As such, the property lacks significance under NRHP Criterion D and CRHR Criterion 4.

City of Azusa Criteria

1) *It is identified with persons or events significant in local, regional, state or national history.*

   Research identified that W.R Powell Elementary School was named after Azusa civic leader, citrus rancher, and pioneer agriculturalist, W.R. Powell. However, research did not uncover additional information regarding W.R. Powell, nor did it reveal any direct connection between W.R. Powell and the work for which he is known and the subject property. Archival research did not identify any associations with any significant persons involved in the efforts to develop the school. As such, the property does not meet local criteria 1.

2) *It is representative of the work of a notable builder, designer, architect or artist.*

   Kistner, Wright & Wright (active between circa 1952 to 1973) is noted as the school's architect as indicated in 1956 architectural drawings, however, available research compiled to date has not suggested that Kistner, Wright & Wright should be considered a master architectural firm (OAC 2025). Work that is more representative of Kistner, Wright & Wright's designs include a number of large-scale projects including two rare Late Moderne style buildings in Westlake, Los Angeles known as the Kidney Center (1955) and the Universal Care Medical & Dental Building (1967), Cerritos College (1961), and the Norwalk Civic Center (1965) which references Mid-Century Modern's Miesian school of design through its architecture. Although constructed by W.T. Wadleigh Construction Company, research did not indicate that W.T. Wadleigh Construction Company was a master contractor. As such, the property does not meet local criteria 2.

3) *It is at least 50 years old.*

   W.R. Powell Elementary school was constructed in 1957, and therefore is over 50 years old. As such, the property meets local criteria 3.

4) *It is less than 50 years old, however it is of exceptional importance in one or more of the criteria set forth in this section.*

   W.R. Powell Elementary school is not less than 50 years old. As such, the property does not meet local criteria 4.

5) *It contributes to the significance of a historic area, being a geographically definable area possessing a concentration of not less than 50 percent of historic or architecturally related grouping of properties that contribute to each other and are unified aesthetically by physical layout or development.*

W.R. Powell Elementary School also does not appear to be a component of a potential or existing historic district. As such, the property does not meet local criteria 5.

6) *It embodies one or more distinctive characteristics of style, type, period design, materials, detail, or craftsmanship.*

Architecturally, the school campus buildings do not possess high artistic value or contain distinctive characteristics or craftsmanship, as they are typical post-war Mid-Century Modern style campus buildings found throughout Southern California. As such, the property does not meet local criteria 6.

7) *It has a unique location or physical characteristics or represents an established and familiar visual feature of neighborhood, community, or the city.*

W.R. Powell Elementary School does not have a unique location or physical characteristics or represents an established and familiar visual feature of neighborhood, community, or the city. As such, the property does not meet local criteria 7.

8) *It incorporates elements that help to preserve and protect a historic place or area of historic interest in the city.*

W.R. Powell Elementary School does not incorporate elements that help to preserve and protect a historic place or area of historic interest in the city. As such, the property does not meet local criteria 8.

9) *It has yielded, or may be likely to yield information important in prehistory or history.*

The subject property has not yielded and does not appear likely to yield information important in prehistory or history. As such, the property does not meet local criteria 9.

Integrity

Because the historic integrity of a property is based on associative significance under applicable criteria, the assessment of a property's integrity can only proceed after its significance has been fully established. When appropriate, the assessment of integrity requires consideration under the seven aspects or qualities. To retain integrity, a property will always possess several, and generally most, aspects of integrity. Determining which aspects are most important requires an understanding of why, where, and when the property is significant. Although the school meets the City of Azuza Local Criteria 3 for being over 50 years of age, meeting this Criteria alone does not qualify the property for listing in the City of Azuza Register of Landmarks. It was not found to meet any other City Criteria. Additionally, the subject property (W.R. Powell Elementary School) evaluated was not found to have associative significance under any of the Criteria for listing in the NRHP or CRHR, therefore, analysis of historic integrity of the subject property is inconsequential.

Conclusion

The W.R. Powell Elementary School does not meet any NRHP, CRHR, or City of Azusa Register of Historic Landmarks, eligibility criteria individually or as a contributing element to any known or potential historic district.

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Photographs (cont.)

Photo 2. South façade view of Building A, showing the school's main entrance under a covered walkway, facing north.



Source: Dudek 2025, IMG_0203

Photo 3. View of east elevation fenestration on Building A, facing southwest.



Source: Dudek 2025, IMG_8532

Photo 4. View of covered walkways, with Building E in left foreground, Building A in left background, Building C in right foreground, Building B in right background, facing south.



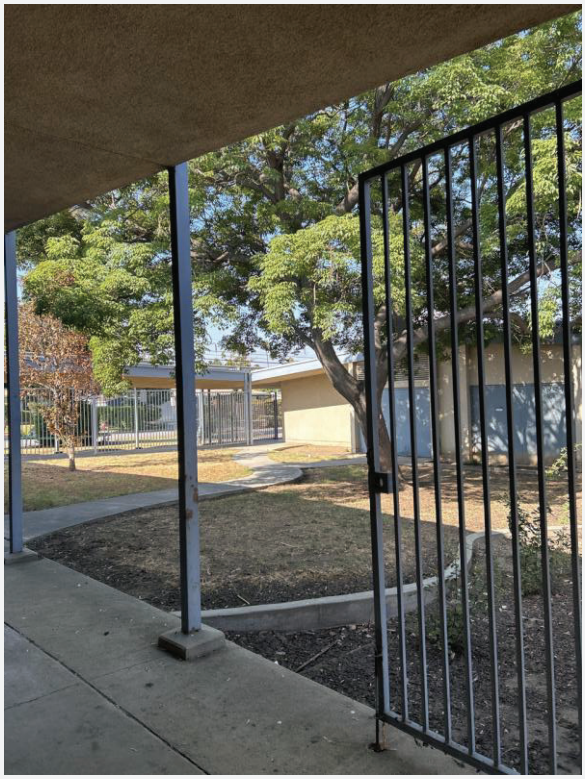
Source: Dudek 2025, IMG_8446

Photo 5. View of Building B, west and north elevations, facing southeast.



Source: Dudek 2025, IMG_0156

Photo 6. View of courtyard between Building A (left) and Building B (right), facing southwest.



Source: Dudek 2025, IMG_8428

Photo 7. View of Building C, east and north elevations, facing southwest.



Source: Dudek 2025, IMG_8439

Photo 8. View of Building D, south and west elevations, facing northeast.



Source: Dudek 2025, IMG_8478

Photo 9. View of Building E, east elevation, facing southwest.



Source: Dudek 2025, IMG_181

Photo 10. View of Building F, east and north elevations, facing southwest.



Source: Dudek 2025, IMG_181

Photo 11. View of portable building (portable 1 on Exhibit 1), east and north elevations, facing southwest.



Source: Dudek 2025, IMG_8463

Photo 12. View of utility structure (structure 2 on Exhibit 1), east elevation, facing west.



Source: Dudek 2025, IMG_8435

Photo 13. View of canopy structure (structure 3 on Exhibit 1), east and south elevations with Building E to the left, facing west.



Source: Dudek 2025, IMG_0183

Photo 14. View mature trees at the school's west end, with Building F in the background, facing southwest.



Source: Dudek 2025, IMG_8477