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I. INTRODUCTION

This Proposed Project Impact Analysis has been prepared for the proposed project at 109 Kentucky Street (APN 006-363-020) in Petaluma. The 0.43-acre site is located at the northwest corner of Kentucky Street and Western Avenue and includes a three-story commercial retail building. Built in 1941, the building was designed by architects Hertzka & Knowles in the Streamline Moderne style for the Leader Department Store, which was later purchased by the Carithers Department Store. The property is a contributor to the Petaluma Historic Commercial District, which is a locally designated historic district and listed in the National Register of Historic Places (National Register). Therefore, the property is a historical resource for the purposes of the California Environmental Quality Act (CEQA).

The Project Sponsor has proposed to adaptively reuse the building as an office for a new tenant, Amy’s Kitchen, a local Petaluma-based organic food producer. The proposed project will include the introduction of new window openings, a seismic upgrade, non-structural interior remodeling, and new exterior signage.

Figure 1. Bird's-eye view of proposed project site at 109 Kentucky Street, indicated by a dashed red outline. Source: Google Maps, 2022. Edited by Page & Turnbull.
Methodology
This Proposed Project Impact Analysis report provides a summary of the historic status of the subject property and the Petaluma Historic Commercial District, including the historic significance and character-defining features, and a brief building description and site history. As the property is a contributor to the Petaluma Historic Commercial District, the proposed project is evaluated using the Secretary of the Interior's Standards for Rehabilitation (the Standards) in accordance with CEQA and the Petaluma Implementing Zoning Ordinance Section 15.070, and for compliance with the Petaluma Historic Commercial District Design Guidelines. The report provides an analysis of potential project-specific and cumulative impacts pursuant to CEQA.

To prepare this report, Page & Turnbull consulted historical photographs in the Sonoma County Library collection and original architectural drawings provided by the property owner, as well as the Petaluma Historic Commercial District National Register Nomination (Ref. No. 95000354, listed in 1995) and the Petaluma Historic Commercial District Design Guidelines (1999). Page & Turnbull also reviewed an “Historic Resource Evaluation” prepared by Carey & Co. in 2012 for a previously proposed project that included ten new windows at each of the primary facades that was approved by the Petaluma Historic and Cultural Preservation Committee (HCPC), but never executed.¹ Page & Turnbull reviewed proposed project drawings prepared by Quezada Architects titled “Amy’s Kitchen – Site Plan & Architectural Review,” dated March 14, 2022. Page & Turnbull also reviewed a signage graphic package prepared by Clarke & Reilly titled “Amy’s” (dated January 31, 2022).

Photographs in this report were taken by Page & Turnbull during a site visit on January 11, 2022, unless otherwise noted.

¹ Although titled a “Historic Resource Evaluation,” the report by Carey & Co. might be more accurately described as a Secretary of the Interior's Standards compliance analysis.
II. BRIEF PROPERTY DESCRIPTION & SITE HISTORY

Brief Building Description

Exterior
The subject building is a three-story steel-frame and concrete building with a bow truss roof behind a flat parapet with a simple coping. The building has a square footprint with a curved southeast corner and is clad in scored stucco (Figure 2). The primary entrance is at the curved corner and a dramatic two-story, steel frame curved window is located above; the window is set in a punched opening and has divided lites that align with the stucco scoring at the two upper stories. The primary entrance has two sets of paired fully glazed wood doors with angled metal handlebars, set on either side of a glazed central panel with transom windows above (Figure 3). Built to house a retail department store, the building features a series of full-height storefront display windows along the east (Kentucky Street) and south (Western Avenue) façades, which are covered by a cantilevered canopy that wraps around the corner. Alternating between the display windows are scored stucco walls recessed behind low planters; a small aluminum-framed display case is set into each of the walls (Figure 4). Secondary entrances are located at either end of the storefront windows, each with a paired door that matches the primary doors. The primary and secondary entrance vestibules have small green and black square tile flooring.

Figure 2. 109 Kentucky Street, looking northwest at the primary entrance.
A narrow projecting band frames the two upper stories above the storefront canopy (Figure 5). The upper two stories are largely unfenestrated, except for a row of three horizontal punched openings at the upper corner of each façade (Figure 6). The vertical edges of the punched openings are slightly curved. Each opening has a deeply recessed tripartite, non-original fiberglass sliding sash window. Three small windows with textured glass are vertically arranged at the far north (right) end of the east façade along an interior staircase.

The north façade extends above the abutting two-story building at 113 Kentucky Street and is unfenestrated. The west façade faces Telephone Alley and has two punched openings at the first story and six at the second story, which have a mix of original and replacement window sashes (Figure 7). A loading dock doorway has been infilled. A recessed pedestrian door toward the south end of the west façade has a metal door (Figure 8). The west wall of the building is partly concrete...
construction and partly brick construction; the brick portion of the wall was salvaged from a previous building located on the site.

**Figure 7.** West façade (left) facing Telephone Alley indicated by red arrow.

**Figure 8.** Pedestrian door at the west façade, looking north.

**Interior**

Upon entering from the primary entrance, the interior space is an open triple-height space. The second story extends into the space, supported by round columns (**Figure 9**). The curved shape of the second story wraps along the rear north and west walls of the building and is enclosed by a metal railing with full-height plastered walls at either end. A much narrower mezzanine below follows the same shape of the second story and is also enclosed with a metal railing (**Figure 10**). The primary circulation is a staircase and elevator at the rear northwest corner of the building. A secondary staircase is located at the northeast corner. Recessed can lights are located in the plaster soffits of the main ceiling and mezzanine soffits, but the space is primarily day-lit by the massive two-story curved window above the primary entrance.

At the first floor, a small, enclosed room is located at the southwest corner of the building, originally used as a delivery room, and a storage room is located behind the elevator and main staircase. The mezzanine has a small vault room and two narrow storage rooms that extend along the south and east walls (**Figure 11**). A bathroom is located behind the elevator and stairway at the second story, and two narrow storage areas extend out along the south and east walls above the triple-height entry area (**Figure 12**).
Brief Site History

The subject building was constructed in 1941 for Leaders Department Store in the Streamline Moderne style (Figure 13). The building is a rare example of the style in Petaluma and was designed by prominent San Francisco-based architects Hertzka & Knowles. The original large-scale signage for Leaders was removed in 1946, when the building was purchased by the Carithers family for the Carithers Department Store. Carithers occupied the building for 40 years, and installed iconic cursive three-dimensional, flush-mounted lettering on the two primary east and south façades (Figure 14). The Carithers signage was removed in 1986 when the building was purchased by Couches Etc., and smaller wall-mounted signage was installed (Figure 16).² The building, which is currently vacant, does not have any signage. The only other notable exterior alteration to the building has been the

replacement of the upper, horizontally oriented windows at the primary facades sometime prior to 2012; the windows were originally tripartite steel windows with central casement sashes and are now tripartite fiberglass windows with sliding sashes.

Figure 13. Leader Department Store, 1944. Source: Sonoma County Library.
Figure 14. Carithers Department Store, 1965. Source: Sonoma County Library.

Figure 15. Carithers, c. 1950. Source: Sonoma County Library.

Figure 16. Couches Etc, 2008. Source: Southern Sonoma Country Life.
III. PETALUMA HISTORIC COMMERCIAL DISTRICT

Petaluma Historic Commercial District Significance & Boundary

The Petaluma Historic Commercial District encompasses about 23 acres of Downtown Petaluma and was listed in the National Register of Historic Places (National Register) in 1995. The district was also locally designated with Historic Overlay District (H-3) zoning in 1999, and the Petaluma Historic Commercial District Design Guidelines were adopted through Ordinance No. 2097 N.C.S.³ The historic district is listed in the National Register under Criterion A (Events) and Criterion C (Architecture) for its statewide significance in commerce and architecture, with a period of significance from 1854 to 1945.⁴

A more extensive statement of significance is provided in the National Register nomination, but is summarized in the Petaluma Historic Commercial District Design Guidelines as follows:

Petaluma's Historic Commercial District represents the development of commerce in the City from the mid-nineteenth century to the end of World War II. It also provides a diverse and well designed collection of commercial buildings, the architecture of which is unmatched in Sonoma County. Although the district has changed its appearance somewhat since 1945, it retains a high degree of architectural integrity, and building improvements have maintained an association to the historic period.⁵

The boundaries of the National Register and local historic districts vary slightly. The local historic district encompasses all the properties in the National Register historic district, plus an additional five blocks at the southeast end of the district (Figure 17).

⁴ National Register of Historic Places, Petaluma Historic Commercial District, Petaluma, Sonoma County, California, National Register # 95000354 (listed 1995), Section 8, Page 3.
Contributors and Non-Contributors

Historic districts may have contributing and non-contributing resources (buildings, sites, structures, objects, or open spaces). A contributor adds to the historic associations, historic architectural qualities, or archeological values for which a historic district is significant because it was present during the period of significance, relates to the documented significance of the district, and possesses historic integrity or is capable of yielding important information about the period. In the case of the Downtown Historic Commercial District, the period of significance is 1854 to 1945.

Downtown Petaluma was surveyed in 1994 to inform the Petaluma Historic Commercial District National Register nomination, which ultimately identified 63 contributing buildings and 33 non-
contributing buildings, one contributing object, one non-contributing object, and one non-contributing site.\textsuperscript{6}

The five-block extension of the local historic district does not appear to have been surveyed to identify contributors and non-contributors.\textsuperscript{7} Overall, the historic district retains a high degree of historic integrity with 63 contributors (66 percent contributors) within the National Register historic district boundary. Although there are a number of vacant lots, remodeled buildings, and some new construction within the district, it retains a high concentration of intact commercial buildings, including notable examples of nineteenth century commercial buildings. As noted in the National Register nomination, “The district's integrity is high due to the concentration of resources, the size and importance of the contributors, and the inconspicuousness of non-contributors.”\textsuperscript{8}

The subject building at 109 Kentucky Street is listed in the National Register nomination as a contributing building (Figure 18).

\textsuperscript{6} Petaluma Historic Commercial District Design Guidelines (1999), 10.

\textsuperscript{7} Three of the additional blocks in the local historic district are redevelopment sites, which may have been included in order to subject them to the Petaluma Historic Commercial District Design Guidelines to ensure compatibility. The local district extension also includes Petaluma Fire Department Station No. 1, a PG&E substation, and several historic buildings at 1st and C streets.

\textsuperscript{8} National Register of Historic Places, Petaluma Historic Commercial District, Petaluma, Sonoma County, California, National Register # 95000354 (listed 1995), Section 7, Page 1.
Character-Defining Features

For a property to be eligible for national or state designation under criteria related to type, period, or method of construction, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. These distinctive character-defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.
The National Register nomination and Petaluma Historic Commercial District Design Guidelines do not specifically outline character-defining features. Based on a review of the National Register nomination, Petaluma Historic Commercial District Design Guidelines, historic architectural drawings, and visual inspection, Page & Turnbull has identified the following character-defining features of 109 Kentucky Street:

- Overall form, massing, and footprint
- Scored stucco siding
- Flat parapet and projecting horizontal band around upper two stories
- Curved corner with two-story curved multi-lite steel window
- Curved cantilevered canopy
- Full-height storefront display windows at the Kentucky Street (east) and Western Avenue (south) façades
- Primary corner entrance and two secondary side entrances, including original doors, transoms, and floor tiling
- Largely unfenestrated (blank) Kentucky Street and Western Avenue facades at the upper two stories
- Three horizontal punched window openings at the upper corners of the Kentucky Street and Western Avenue façades
- Three vertically oriented windows at the north end of the Kentucky Street façade.

The north and west facades do not include any character-defining features. The window sashes at the three horizontal windows on the Kentucky Street and Western Avenue facades have been replaced and are non-contributing materials. The large-scale signage on the blank Kentucky Street and Western Avenue facades was a significant feature that has since been removed; the original signage read “The Leader” and was replaced in 1946 with signage that read “Carithers,” which remained in place until 1986. Although the Carithers sign was not original, it was designed in a similar scale, placement, and style as the original signage and gained significance in its own right over 40 years. Although the signage has been removed, the building retains historic integrity.
IV. REGULATORY FRAMEWORK

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) is state legislation (Pub. Res. Code §21000 et seq.) that provides for the development and maintenance of a high-quality environment for the present-day and future through the identification of significant environmental effects. CEQA applies to “projects” proposed to be undertaken or requiring approval from state or local government agencies. “Projects” are defined as “...activities which have the potential to have a physical impact on the environment and may include the enactment of zoning ordinances, the issuance of conditional use permits and the approval of tentative subdivision maps.” Historic and cultural resources are considered to be part of the environment. In general, the lead agency must complete the environmental review process as required by CEQA. In the case of the proposed project at 109 Kentucky Street, the City of Petaluma will act as the lead agency.

In general, a resource that meets any of the four criteria listed in CEQA Guidelines Section 15064.5(a)(2) is considered to be a historical resource unless “the preponderance of evidence demonstrates” that the resource “is not historically or culturally significant.” The subject property at 109 Kentucky Street is a contributor to a locally listed and National Register-listed historic district, the Petaluma Commercial Historic District, and is therefore considered a historical resource under CEQA.

Threshold for Substantial Adverse Change

According to CEQA, a “project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment.” Substantial adverse change is defined as: “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired.” The historic 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”

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11 14 CCR § 15378: Project.
12 14 CCR § 15064.5(a)(2).
13 14 CCR § 15064.5(b).
14 14 CCR § 15064.5(b)(1).
and that justify or account for its inclusion in, or eligibility for inclusion in, the California Register. Thus, a project may cause an adverse change in a historic resource but still not have a significant effect on the environment as defined by CEQA as long as the impact of the change on the historic resource is determined to be less-than-significant, negligible, neutral, or even beneficial.

In other words, a project may have an impact on a historic resource, and that impact may or may not impair the resource's eligibility for inclusion in the California Register. If an identified impact would result in a resource that is no longer able to convey its historic significance and is therefore no longer eligible for listing in the California Register, then it would be considered a significant effect.

Petaluma Implementing Zoning Ordinance & Historic District Design Guidelines

The Petaluma Implementing Zoning Ordinance (IZO) Chapter 15 establishes the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards for Rehabilitation) as the standards for review of historic landmarks and districts within Petaluma. IZO Section 15.070 further notes that for properties within historic districts, project applications “shall not be approved” unless the project meets the following criteria:

The proposed work shall not adversely affect the exterior architectural characteristics or other features of the property which is the subject of the application, nor adversely affect its relationship in terms of harmony and appropriateness with its surroundings, including neighboring structures, nor adversely affect the character, or the historical, architectural, or aesthetic interest or value of the district. In addition, applications shall be consistent with standards included in the designating ordinance.

In addition to the Standards for Rehabilitation, the Petaluma Historic and Cultural Preservation Committee (HCPC) utilizes the Petaluma Historic Commercial District Design Guidelines to review and approve proposed projects within the historic district.

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15 14 CCR § 15064.5(b)(2).
17 Petaluma IZO § 15.070(A)2.
18 Petaluma IZO § 15.050(A)3 and § 15.110.
V. PROJECT IMPACT ANALYSIS

This section analyzes the potential project-specific impacts of the proposed project at 109 Kentucky Street on the environment, as required by CEQA and City of Petaluma regulations and guidelines. The following analysis describes the proposed project, assesses its compliance with the Secretary of the Interior's Standards for Rehabilitation, identifies whether the project will result in any project-specific and/or cumulative impacts under CEQA, and assesses the compliance with the Petaluma Historic Commercial District Design Guidelines.

Proposed Project Description

Page & Turnbull reviewed proposed project drawings prepared by Quezada Architects titled “Amy's Kitchen – Site Plan & Architectural Review” (dated March 14, 2022) and a signage graphic package prepared by Clarke & Reilly title “Amy's,” (dated January 31, 2022). The scope of work includes a seismic retrofit and the adaptive reuse of the existing retail space as a headquarters and collaborative workspace for Amy's Kitchen, a local Petaluma-based food company.

In order to provide additional daylighting at the second floor and to address seismic code requirements, new window openings will be added on the two primary façades and several existing windows on the west façade will be enlarged. On the two primary façades—the south (Western Avenue) and east (Kentucky Street) façades—three new punched openings will be inserted below the three contributing windows and will have tripartite metal (steel or aluminum to be determined by owner) casement windows. The non-contributing replacement windows within the existing openings will be replaced with matching tripartite metal casement windows. The three new windows (at each of the south and east facades) will match the dimension and reveal of the three existing window openings, and be aligned directly below (Figure 19 and Figure 20).10 The jambs at the three existing windows have a slightly curved (fillet) profile, which will be retained. In order to provide a subtle distinction between the historic window openings and the new window openings, the jambs at the new openings will be squared off (90-degree angles) (Figure 21). Three non-contributing windows on the west façade will be enlarged with new, larger windows.

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10 To reduce the seismic load at the south and east walls, the three new openings will be cut from the sill of the existing window openings down to the floor plate, removing the concrete wall material. However, the area around the new row of the windows will be patched, stuccoed, scored and painted to match the existing wall.
Figure 19. Existing east façade showing proposed enlarged openings (which will match the proposed alterations at the south façade. Source: Quezada Architects, “Amy’s Kitchen – Site Plan & Architectural Review” (March 14, 2022), SPAR-200.

Figure 20. Proposed new windows and painted signage at the east façade. Matching windows will be at the south façade, but the signage will only be located at the east façade. Quezada Architects, “Amy’s Kitchen – Site Plan & Architectural Review” (March 14, 2022), SPAR-201.
The secondary entrance on Kentucky Street will be modified to provide for a code-required fire exit (Figure 22). The opening size and location will remain unchanged, and the transom will remain unaltered. A new full height locking window and refurbished existing door and hardware will be divided by a new central wood panel.
Figure 22. Proposed fire exit door at existing entrance on Kentucky Street. Quezada Architects, “Amy’s Kitchen: Site Plan & Architectural Review” (March 14, 2022), SPAR-203.

A new sign reading “Amy's” will be painted on the blank section of the east (Kentucky Street) façade (Figure 23). All other existing exterior features will be retained and unaltered. Interior alterations will include the construction of several seismic shear walls, enclosed office and work areas, and the extension of the mezzanine along the south and east walls to meet at a circular connection space behind the primary corner entrance and two-story corner window. The mezzanine extension will be an integral aspect of the seismic upgrade work. The mezzanine will be cantilevered behind the southeast corner entrance and window such that there will be no physical connection at the corner (Figure 24). The extended mezzanine will be at the level of the exterior awning and base of the two-story corner window, such that the new mezzanine extension will not be visible from the exterior.

Figure 23. Proposed painted sign at the east façade (facing Kentucky Street). Note that the illustration is overlayed on a photo of the existing facades and does not show other elements of the proposed project (such as the proposed new window openings). Source: Clarke & Reilly, “Amy’s,” (January 31, 2022), 6.
In summary, the project, as currently proposed, includes the following alterations:

**Proposed exterior alterations:**

- Three new window openings will be constructed below the existing windows with matching dimensions and reveal; new windows will be tripartite metal (aluminum or metal to be determined by owner) casement windows.
• Three existing, non-contributing replacement windows at each the upper east and south facades within the openings described above will be replaced with new tripartite metal (aluminum or metal to be determined by owner) casement windows to match new windows at the new openings directly below.
• Enlargement of three existing, non-contributing window openings at the west rear façade for new paired casement windows.
• Reconfiguration of secondary entrance on Kentucky Street to include a refurbished existing door and hardware as a code-required fire exit; a new central wood panel will be installed and a full height locking window.
• The primary color at the exterior stucco-clad walls will be a neutral, light tone beige, and a painted sign will have two complimentary darker tones.
• Painted sign reading “Amy's” at the blank portion of the east (Kentucky Street) façade.

Proposed interior alterations:
• Addition of seismic shear walls at existing walls and at the edge of the mezzanine
• Addition of new internal walls to enclose offices, workspaces, etc.
• Extension of the mezzanine along the south and east walls with a circular connection point cantilevered behind the two-story corner window.

Analysis of Project-Specific Impacts Under CEQA
Secretary of the Interior’s Standards for Rehabilitation Analysis
As stated previously, the project site includes eligible historic resources for the purposes of CEQA and must substantially meet the Secretary of the Interior’s Standards for the Treatment of Historic Properties (the Standards) in order to avoid significant adverse impacts to the historic resource. The Standards provide guidance for reviewing proposed work on historic properties and are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. Conformance with the Standards does not determine whether a project would cause a substantial adverse change in the significance of a historic resource. Rather, projects that comply with the Standards benefit from a regulatory presumption that they would have a less-than-significant adverse impact on a historic resource. Projects that do not comply with the Standards may or may not cause a substantial adverse change in the significance of an historic resource.

The Secretary of the Interior offers four sets of standards to guide the treatment of historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. Typically, one set of

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standards is chosen for a project based on the project scope. For the purposes of the proposed project at 109 Kentucky Street, the Standards for Rehabilitation, which “acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building’s historic character,” would be the appropriate Standards for the proposed project’s scope.21

The following analysis applies each of the Standards for Rehabilitation to the proposed project at 109 Kentucky Street, based on the Quezada Architects titled “Amy's Kitchen – Site Plan & Architectural Review” (dated March 14, 2022) and a signage graphic package prepared by Clarke & Reilly title “Amy's,” (dated January 31, 2022) (Appendix B).

**Rehabilitation Standard 1:** A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.22

**Discussion:** Originally, 109 Kentucky Street was constructed for a department store retail use. The building remained a department store until 1986, at which point it became a furniture retail store for several decades. The building has sat vacant for over a decade as the nature of retail has changed, particularly for downtown brick-and-mortar retail stores. The proposed project will change the building’s function to an office use for Amy’s Kitchen, a local Petaluma-based food company. The proposed adaptive reuse will require minimal change to the building, including to its distinctive features, spaces, and spatial relationships. The only proposed exterior alterations are the addition of three new windows below the existing windows at each of the two primary facades, reconfiguration of the secondary entrance on Kentucky Street, and the installation of new signage. The installation of new painted signage is consistent with the original building design and nature of commercial buildings changing tenants and businesses. The proposed new windows are sensitively designed and located to be compatible with the original design and remove a minimal amount of exterior material, as will be discussed in greater detail under Standards for Rehabilitation 2, 3, 5, 9, and 10. Therefore, the proposed project is consistent with Rehabilitation Standard 1.

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

**Discussion:** The proposed project retains and preserves all of the character-defining features of the building. No distinctive materials or features will be removed, and no spatial relationships will be

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22 This and the following ten Standards for Rehabilitation are listed in Grimmer (2017) and also at National Park Service, U.S. Department of the Interior, “Technical Preservation Services: Rehabilitation as a Treatment,” accessed January 19, 2022, [https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm](https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm).
altered. All the building's character-defining features, including the overall form and massing, flat parapet, projecting trim, scored stucco cladding, curved corner window, cantilevered canopy, primary entrance, storefront window displays, and all original punched window openings, will be retained. The proposed new signage and window openings are compatible with the building's Streamline Moderne style. The new window openings will be aligned with the existing windows and of a matching size, to reinforce the horizontal orientation of the windows, and will not disrupt the large blank portion of the facades. The proposed new window sashes at the east and south façades will be tripartite metal windows with casement sashes, which is compatible with the original window design. The secondary Kentucky Street entrance will be reconfigured, but the size, design, and location of the recessed entrance will remain in-tact, along with the transom window and flanking storefront window displays. One of the paired original doors will be refurbished for use at the code-required fire exit, and the other two entrances—the main corner entrance and the secondary entrance on Western Avenue—will be unaltered. Additionally, the extension of the mezzanine along the east and south walls to connect at the southeast corner will not impact the distinctive spatial relationships or the character of the two-story corner window, as it will be cantilevered away from the southeast interior corner and will not be visible from the exterior. Therefore, the proposed project is consistent with Rehabilitation Standard 2.

**Rehabilitation Standard 3:** Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

*Discussion:* The proposed project does not create a false sense of historical development. The proposed new painted signage is designed to be compatible with the scale and character of the building, and new signage for a new commercial tenant is consistent with development patterns in the Petaluma Historic Commercial District. The proposed project does not add conjectural features or elements from other historic properties. Therefore, the proposed project is consistent with Rehabilitation Standard 3.

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

*Discussion:* The subject building has been minimally altered since original construction. The Carithers signage that was installed in 1946 acquired its own significance, as the building was associated with Carithers Department Store for 40 years, much longer than the five years that The Leaders Department Store initially occupied the building. However, the Carithers signage was previously removed in 1986. No other changes to the property have acquired historic significance. Therefore, the proposed project is consistent with Rehabilitation Standard 4.
**Rehabilitation Standard 5:** Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

*Discussion:* The materials, features, finishes, and construction techniques that characterize the Streamline Moderne building will be retained with no substantial change to the resource's historic character-defining features. The proposed new windows will require the removal of a small portion of the existing scored stucco cladding; however, the vast majority of the material will be retained across the remainder of the two primary facades. The window sashes that will be removed at the existing three upper windows on the east and south facades are non-contributing replacement window sashes, and the windows on the rear north façade are also non-contributing. One of the paired doors at the Kentucky Street entrance will be removed, and the other refurbished for a code-required fire exit; the overall design and size of the entrance will remain intact. All other distinctive materials, features, and finishes will be retained in place, including the storefront windows, primary corner entrance and doors, Western Avenue entrance and doors, projecting awning, and scored stucco cladding. Therefore, the proposed project is consistent with Rehabilitation Standard 5.

**Rehabilitation Standard 6:** Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

*Discussion:* The proposed project does not include the repair or replacement of any historic materials or features. Therefore, the proposed project is consistent with Rehabilitation Standard 6.

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

*Discussion:* As planned, the proposed project does not involve chemical or physical treatments of historic materials. Therefore, the proposed project is consistent with Rehabilitation Standard 7.

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

*Discussion:* The proposed project will involve some excavation at the foundation for seismic upgrade work, but will not involve disturbance of ground not previously disturbed for the original construction of the building. Therefore, the proposed project is consistent with Rehabilitation Standard 8.
Rehabilitation Standard 9: *New additions, exterior alterations or related new construction will not destroy historic materials, features and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.*

Discussion: The proposed project does not include any exterior additions. The new signage reading “Amy's” will utilize the new tenant's branding, including font and color palette. The cursive font and large lettering, while larger in scale than previous signage on the building, is consistent in its placement across the blank east façade. Furthermore, as the sign will be painted, it will not destroy any historic materials, features, or spatial relationships. The proposed new windows will be located below the existing rows of three windows on each of the primary facades and will have a matching size and shape. However, the proposed new punched openings will be fully squared off (90-degree angles), distinct from the slight curve at the vertical edges between the original openings. This detail will serve as a subtle visual indicator that the compatible new window openings are contemporary. As previously noted, a code-required fire exit will be accommodated within the existing secondary Kentucky Street entryway. While one of the existing paired doors will be removed and the other refurbished, the overall recessed design of the entrance will be unaltered, and the transom and flanking storefront display windows will remain. The Western Avenue entrance and the main corner entrance will be unaltered. Therefore, the proposed project is consistent with Rehabilitation Standard 9.

Rehabilitation Standard 10: *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

Discussion: The proposed new signage and window openings could, hypothetically, be removed in the future and the essential form and integrity of the building would remain unimpaired. The signage on the blank facades of the building have been replaced several times in the past, and the proposed painted sign could be easily painted over in the future as the exterior stucco walls are currently (and have historically always been) painted. The proposed new window openings could be patched, stuccoed, and painted to match the historic texture and look of the exterior facades, such that they would no longer be visible. Therefore, the proposed project is consistent with Rehabilitation Standard 10.
**Standards for Rehabilitation Compliance & Project-Specific Impacts Summary**

As the above analysis illustrates, the proposed project at 109 Kentucky Street, as currently designed, is in full compliance with all ten Standards. Thus, the historic building will continue to be able to express the features, design, and context that make it significant as a contributor to the Petaluma Historic Commercial District. According to CEQA Guidelines Section 15126.4(b)(1), if a project complies with the Standards for Rehabilitation, the project’s impact “will generally be considered mitigated below a level of significance and thus is not significant.” As the proposed project is in full compliance with all ten Standards for Rehabilitation, 109 Kentucky Street will continue to be eligible as a contributor to the Petaluma Historic Commercial District, and the proposed project will not cause a significant adverse impact the overall Petaluma Historic Commercial District.

**Analysis of Cumulative Impacts Under CEQA**

The California Environmental Quality Act defines cumulative impacts as follows:

“Cumulative impacts” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

a) The individual effects may be changes resulting from a single project or a number of separate projects.

b) The cumulative impact from several projects is the change in the environment which 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.23

According to the City of Petaluma’s list of ‘major development projects,’ including those that are in planning process, in plan check, under construction, inactive, and have received all planning approvals, the following major development projects are located within the Petaluma Historic Commercial District (Figure 25):

- **2 Petaluma Blvd S (Petaluman Hotel)** (in planning process) – Construction of a 54-room boutique hotel within a four-story building with a rooftop terrace.
- **132 Petaluma Blvd N** (in planning process) – Site Plan and Architectural Review (SPAR) for renovation of a commercial building with a new residential component.

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23 14 CCR § 15355.
• **215 Water Street (Rear Façade Rehabilitation HSPAR)** (all planning approvals) - Historic Site Plan and Architectural Review (HSPAR) for façade rehabilitation including window replacement and installation, brick repair and site improvements.\(^{24}\)

![Figure 25. Map of major development projects in the Petaluma Historic Commercial District. The National Register-listed historic district boundary is indicated in teal, and the local historic district extension is indicated in pink. Source: Google Maps, 2022, edited by Page & Turnbull based on information at "Major Development Projects," City of Petaluma Official City Website.](image)

The proposed project at 215 Water Street is a rear façade rehabilitation project that was approved by the City through the Historic Site and Architectural Planning Review (HSPAR) process. The proposed project at 132 Petaluma Blvd N is a renovation to a district contributor that is still in the planning process. The Petaluman Hotel project at 2 Petaluma Blvd S proposes construction of a 54-room boutique hotel within a four-story building with a rooftop terrace on a currently vacant, non-contributing property within the historic district. The 215 Water Street and 132 Petaluma Blvd N projects are rehabilitation projects that have been or will be reviewed in accordance with the district design guidelines, and do not appear likely to result in environmental impacts. The proposed Petaluman Hotel is a large new building on a presently non-contributing parcel and would be

reviewed for compatibility within the historic district. None of the projects will demolish a
certifying building within the district, and they do not appear likely to result in a change in
contributory status of any of the properties. The projects do not appear likely to cause significant
cumulative impacts to the historic district which would compound or increase environmental
impacts. Thus, the proposed project at 109 Kentucky Street would not contribute to a cumulative
impact to the historic district resulting from several projects.
Assessment of other potential environmental impacts such as aesthetics, air quality, noise, pollution,
etc. are outside the scope of this report.

Analysis of Compliance with the Petaluma Implementing Zoning Ordinance and
Petaluma Historic Commercial District Design Guidelines
In accordance with Petaluma IZO Chapter 15, the proposed project will not adversely affect any
exterior architectural characteristics or the character of the adjacent properties. As previously
discussed, the proposed project is in full compliance with the Secretary of the Interior's Standards
for Rehabilitation, which are the review standards adopted in the IZO for historic resources and are
specified as the overarching standards that provide the framework for the Petaluma Historic
Commercial District Design Guidelines (Guideline 4.1). Additional specific guidelines in the Petaluma
Historic Commercial District Design Guidelines that are applicable to the proposed project at 109
Kentucky Street include Paint Color (Guideline 4.6) and the Standards for Permitted Signs (Guideline
5.2).

The proposed project complies with the guidance for paint color as no previously unpainted
materials will be painted and the color palette is consistent with the historic character, as well as the
surrounding character of the neighborhood. The primary color at the exterior stucco-clad walls will
be a neutral, light tone beige, and the painted sign will have two complimentary darker tones. The
proposed project includes one primary sign, which will be a large painted sign on the east (Kentucky
Street) façade. While the design guidelines address many of the typical signage types in the historic
district, including flush mounted and wall signs, the signage that has been historically installed at the
subject building has been of a larger scale than many of the older buildings in the district; the
original Leaders, and later Carithers, signage was much larger than the 24-inch by 18-inch maximum
flush mounted/wall signage size specified in the design guidelines (Figure 13 and Figure 14). Thus,
there are decades of precedent for larger signage at this particular building. The proposed new
painted sign will be located on the blank portion of the east façade, where various company signage
has historically been located. While the proposed painted sign is larger than previous flush mounted
metal signage, it is scaled to the available exterior wall space and evocative of the simple yet visually

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striking, large scale cursive signage of the original Leaders and Carithers department stores. The new painted signage is treated as an architectural element that is consistent with the building’s character.

Thus, the proposed project appears to be compliant with Petaluma IZO Chapter 15 and the *Petaluma Historic Commercial District Design Guidelines*.
VI. CONCLUSION

Based on Page & Turnbull's analysis, the proposed project is in compliance with all ten of the Secretary of the Interior's Standards for Rehabilitation for CEQA. The proposed project is designed in a compatible manner with the Petaluma Historic Commercial District Design Guidelines and the Petaluma Implementing Zoning Ordinance Chapter 15, which also adopt the Secretary of the Interior's Standards. As such, 109 Kentucky Street will retain historic significance and integrity as a contributor to the Petaluma Historic Commercial District. No potential cumulative impacts have been identified. Thus, the proposed project will have no significant adverse impact to historic resources under CEQA.
VII. REFERENCES

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Sonoma County Library Photograph Library.
VIII. APPENDICES

Appendix A – Preparer Qualifications
This Proposed Project Impact Analysis report was prepared by Page & Turnbull of San Francisco, California. Page & Turnbull staff responsible for this report include Ruth Todd, FAIA, Principal-in-charge and Hannah Simonson, Cultural Resources Planner and primary author, both of whom meet or exceed the Secretary of the Interior’s Professional Qualification Standards for Historic Architecture, Architectural History, or History.
Appendix B – Proposed Project Drawings
EXISTING FLOOR PLAN - LEVEL 1.5

3/16" = 1'-0"
EXTERIOR DETAILS - PROPOSED WINDOWS TYP.

1. PERSPECTIVE ELEVATION - PROPOSED WINDOW TYP.
   - N.T.S.

2. PERSPECTIVE - DETAIL - PROPOSED WINDOWS TYP.
   - N.T.S.

(N) RECONSTRUCTED CURVED WALL BETWEEN JAMBS OF EXISTING WINDOW OPENINGS

(N) WINDOWS IN EXISTING OPENINGS

(N) INFILL PANEL TO PATCH CUTTING OF NEW WINDOW OPENINGS

(N) WINDOWS

(N) SQUARE PROFILE WALL BETWEEN JAMBS OF NEW WINDOW OPENINGS

EXTERIOR FINISHES TO MATCH EXISTING COLORS. NEW PAINT APPLICATIONS TO MATCH SHEEN, TEXTURE AND LOCATION FOR EXISTING BUILDING.

(N) RECONSTRUCTED STUCCO CLAD WALL BETWEEN WINDOW JAMBS TO MATCH HISTORIC DESIGN

(N) WINDOWS, MATERIAL, SIZE, PROFILE AND COLOR TO MATCH (E) HISTORIC WINDOWS

(N) STUCCO PANEL TEXTURE AND FINISH TO MATCH (E) SCORED CONCRETE TYP.

(E) SCORED CONCRETE TO REMAIN. PATCH AND REPAIR NEW OPENING TO MATCH EXISTING

(N) WINDOWS IN EXISTING OPENINGS

(N) INFILL PANEL TO PATCH CUTTING OF WINDOW OPENINGS

(N) CURVED INFILL BETWEEN WINDOW JAMBS

(N) RECONSTRUCTED CURVED WALL BETWEEN JAMBS OF EXISTING WINDOW OPENINGS

(N) RECONSTRUCTED CURVED WALL BETWEEN JAMBS OF EXISTING WINDOW OPENINGS

(E) CURVED INFILL BETWEEN WINDOW JAMBS

(E) SCORED CONCRETE

(E) AWNING

(E) SCORED CONCRETE TO REMAIN. PATCH AND REPAIR NEW OPENING TO MATCH EXISTING

(N) WINDOWS IN EXISTING OPENINGS

(N) INFILL PANEL TO PATCH CUTTING OF WINDOW OPENINGS

(N) CURVED INFILL BETWEEN WINDOW JAMBS

EXTERIOR FINISHES TO MATCH EXISTING COLORS. NEW PAINT APPLICATIONS TO MATCH SHEEN, TEXTURE AND LOCATION FOR EXISTING BUILDING.
ENLARGED ELEVATION DETAIL - PROPOSED MODIFIED ENTRANCE

(E) CONCRETE

(E) AWNING

(N) WALL INFILL W/ STUCCO PRESS TO MATCH (E) CONCRETE

(E) DISPLAY WINDOWS

(E) DOOR AS FIXED WINDOW PANEL

(N) DOOR TO MATCH PROFILE, COLOR AND FINISH OF HISTORIC DOOR W/ ALL REQUIRED CLEARANCES

(E) DISPLAY WINDOWS

(E) ENTRANCE DOORS AND HARDWARE

SEE ENLARGED DETAIL

SEE ENLARGED DETAIL ENTRANCE

(E) ENTRANCE DOORS

(E) DISPLAY WINDOWS

(E) LIGHTING

EXTERIOR FINISHES TO MATCH EXISTING COLORS. NEW PAINT APPLICATIONS TO MATCH SHEEN, TEXTURE AND LOCATION FOR EXISTING BUILDING.

(E) STOREFRONT AND AWNING AT ENTRANCE

(E) DOOR AS FIXED WINDOW PANEL

N.T.S.

(E) DISPLAY WINDOWS

(E) ENTRANCE DOORS AND HARDWARE

EXTERIOR DETAILS - PROPOSED WINDOWS

(E) DOOR AS FIXED WINDOW PANEL

N.T.S.

(E) DISPLAY WINDOWS

(E) ENTRANCE DOORS AND HARDWARE

EXTERIOR FINISHES TO MATCH EXISTING COLORS. NEW PAINT APPLICATIONS TO MATCH SHEEN, TEXTURE AND LOCATION FOR EXISTING BUILDING.

(E) STOREFRONT AND AWNING AT ENTRANCE
Colour Reference
Mock Ups
Thankyou