



EVANS & DE SHAZO

ARCHAEOLOGY HISTORIC PRESERVATION

A SECRETARY OF INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES REVIEW OF THE PROJECT AT 6 5TH STREET, PETALUMA, SONOMA COUNTY, CALIFORNIA

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Updated August 12, 2022

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INTRODUCTION

Evans & De Shazo, Inc. (EDS) completed a Secretary of Interior’s Standards for the Treatment of Historic Properties (Standards) review of a proposed rehabilitation project at 6 5th Street, Petaluma, Sonoma County, California, within the 0.21-acre Assessor Parcel Number (APN) 008-046-007 (Property). The proposed project consists of the rehabilitation of a 1963 office building (aka as 1963/1974 office building), including alterations to the interior and exterior of the building and changes to the associated landscape. In 2017, EDS completed a Historic Resource Evaluation (HRE) of the 1963 office building and associated landscape to determine eligibility for individual listing on the California Register of Historical Resources (CRHR). The building was originally constructed in 1963 as a 960-square-foot nondescript vernacular concrete block building. In 1974 a 720-square-foot addition was added to the front of the building, along with a new roof element over the entire building which included the current “modern” design elements.¹ The results of the HRE concluded that the 1963 office building and associated landscape are not eligible for individual listing on the CRHR, under any criterion.² However, the Property is located within the ‘A’ Street Historic District as a non-contributing building to the district. As such, to assess the Project’s potential impacts on the local ‘A’ Street Historic District, EDS recommended a Standards review in compliance with the California Environmental Quality Act (CEQA) and a “local review” in compliance with the City of Petaluma Historic Preservation Guidelines and Standards.³

EDS utilized the Secretary of the Interiors Standards for Rehabilitation guidelines, various National Park Service (NPS) Historic Preservation Briefs, and the ‘A’ Street Historic District Preservation Guidelines and Standards to assess the proposed Project for compliance with the Standards and address potential impacts if warranted. The Standards review, completed by EDS Principal Architectural Historian Stacey De Shazo, M.A., who exceeds the Secretary of the Interior’s qualification standards in Architectural History and History, is presented herein.

PROPOSED PROJECT

The proposed Project design plans, provided to EDS by Steve vonRaesfeld of vR/a Architects (dated 3/18/2022; revised 8/8/2022), consist of the rehabilitation of the 1963 office building, including exterior changes and interior improvements, as well as changes to the associated landscape, detailed in the section below.

Building Exterior

- New front entry landing with stairs to the sidewalk with site accessible path-of-travel

¹ The 1974 addition with “modern” design elements is not associated with “Mid-Century Modern” architecture, noting this architectural style typically has an accepted period of significance from 1940 to 1970, depending on the region.

² Stacey De Shazo, “Historic Resource Evaluation of the Project at 6 and 10 5th Street, Petaluma, Sonoma County”, Evans & De Shazo, Inc., 2017.

³ Adopted by City Council in 1986 through Ordinance 1666 N.C.S.



- Replacement of existing doors and windows and three new window openings along the south elevation
- Removal of the existing electrical panels and replacement with a new, smaller panel
- Introduction of new exterior horizontal wood cladding on portions of the building
- New exterior paint
- Replacement of the existing roofing material and insulation

Interior Improvements

- Simplified office plan
- New electrical service, interior lighting, and power
- Replace existing HVAC (ductwork plus roof unit), including upgrading the building envelop to current Title-24 standards

Site and Landscaping

- New accessible parking stall and path of travel to the rear and front entries
- Modifications to the existing entry drive to provide shared access for both parcels while providing accessible paths of travel from the rear parking lot and the public way
- Upgraded frontage landscaping and new landscape at the rear and south of the building
- Trash enclosure and landscaping, and rear entry/patio of building

REGULATORY COMPLIANCE

The CEQA regulations, as they pertain to cultural resources, the Standards guidelines, and local 'A' Street Historic District Preservation Guidelines and Standards are outlined below.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA and the Guidelines for Implementing CEQA (State CEQA Guidelines § 15064.5) give direction and guidance for evaluating properties, and the preparation of Initial Studies, Categorical Exemptions, Negative Declarations, and Environmental Impact Reports. Pursuant to California State law, the City of Petaluma is legally responsible and accountable for determining the environmental impact of any land use proposal it approves. Cultural resources are aspects of the environment that require identification and assessment for potential significance under CEQA (14 CCR § 15064.5 and PRC § 21084.1).

There are five classes of cultural resources defined by the State OHP. These are:

- **Building:** A structure created principally to shelter or assist in carrying out any form of human activity. A "building" may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.



- **Structure:** A construction made for a functional purpose rather than creating human shelter. Examples include mines, bridges, and tunnels.
- **Object:** Construction primarily artistic in nature or relatively small in scale and simply constructed. It may be movable by nature or design or made for a specific setting or environment. Objects should be in a setting appropriate to their significant historic use or character. Examples include fountains, monuments, maritime resources, sculptures, and boundary markers.
- **Site:** The location of a significant event. A prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archaeological value regardless of the value of any existing building, structure, or object. A site need not be marked by physical remains if it is the location of a prehistoric or historic event and if no buildings, structures, or objects marked it at that time. Examples include trails, designed landscapes, battlefields, habitation sites, Native American ceremonial areas, petroglyphs, and pictographs.
- **Historic District:** Unified geographic entities which contain a concentration of historic buildings, structures, or sites united historically, culturally, or architecturally.

According to CCR § 15064.5, cultural resources are historically significant if they are:

- (1) A resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources (PRC §5024.1, 14 CCR § 4850 et seq.).
- (2) A resource included in a local register of historical resources, as defined in PRC § 5020.1(k) or identified as significant in a historical resource survey meeting the requirements PRC § 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of the evidence demonstrates that it is not historically or culturally significant.
- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC § 5024.1, 14 CCR § 4852), including the following:
 - (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - (B) Is associated with the lives of persons important in our past;
 - (C) 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;
or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

- (4) The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources pursuant to PRC § 5020.1(k), or identified in a historical resources survey meeting the criteria in PRC § 5024.1(g) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC § 5020.1(j) or § 5024.1.

THE SECRETARY OF INTERIOR STANDARDS FOR REHABILITATION

The Standards (codified as 36 CFR 67) defines "Rehabilitation" as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values." The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation of historic materials and features.

The Standards pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and the interior, related landscape features, and the building's site and environment, as well as attached, adjacent, or related new construction. The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility. The following Standards review focused on the setting of the district.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall 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 architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.



7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall 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.

LOCAL REGULATIONS

City of Petaluma General Plan

The policies and programs laid out in the Historic Preservation chapter of Petaluma's General Plan ensure the preservation, protection, rehabilitation, and restoration of historical and cultural resources, by recognizing their inherent value in linking the present forms to Petaluma's roots and evolution.

"A" STREET HISTORIC DISTRICT

The 'A' Street Historic District is located south and west of downtown Petaluma and is comprised of residential and other property types. The district contains an eclectic mix of residences, offices, churches, and apartments, nearly all built before 1925, illustrating a cross-section of architectural history over a 65-year period of the 'A' Street neighborhood's development from 1860 to 1925, the period of significance. Nearly all buildings are "intact" examples of their various architectural styles from the period of significance, including several transitional combinations. The City Council adopted the district and its guidelines in 1986 through Ordinance 1666 N.C.S.

- 'A' Street Historic District Preservation Guidelines and Standards
- City Council Ordinance No. 1666 N.C.S.

METHODS

The methods used to complete the Standards review include a review of the proposed Project design plans by Steve vonRaesfeld of vR/a Architects (dated 3/18/2022; rev. 08/08/2022) for compliance with the Standards utilizing the *Secretary of the Interiors Standards for Rehabilitation* guidelines and various NPS Historic Preservation Briefs to assess potential impacts to historical resources and provide further guidance, as needed. To address the proposed Project's potential impacts to the 'A' Street Historic District, EDS completed a local review in compliance City of Petaluma 'A' Street Historic District Preservation Guidelines and Standards. The local review focuses on potential impacts to character-defining features of the district as defined in 'A' Street Historic District Preservation Guidelines and



Standards. EDS Principal Architectural Historian, Stacey De Shazo, M.A., conducted a site visit on July 1, 2021, to review the property's current condition and worked directly with vR/a Architects to ensure compliance with the Standards.

The Standards review and local review were completed based on the architectural drawings provided to EDS by Steve vonRaesfeld of vR/a Architects (dated 03/18/2022; rev. 08/08/2022).

SECRETARY OF INTERIOR STANDARDS FOR REHABILITATION REVIEW

The following section addresses the proposed Project within the context of the Secretary of the Interior's Standards for Rehabilitation. Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values. When repair and replacement of deteriorated features are necessary, when alterations or additions to the property are planned for a new or continued use, and when its depiction at a particular period of time is not appropriate, Rehabilitation may be considered as a treatment.

The 1963 office building and associated landscape

However, the 1963 office building is a non-contributing property to the 'A' Street Historic District and due to potential impacts to the *setting* of the district as a result of the proposed Project, EDS completed the following Standards review.

SETTING

The NPS definition of **setting** is the "larger area or environment in which a historic building is located. It may be an urban, suburban, or rural neighborhood or a natural landscape in which buildings have been constructed. The relationship of buildings to each other, setbacks, fence patterns, views, driveways and walkways, and street trees and other landscaping, together, establish the character of a district or neighborhood."⁴

⁴ National Park Service, "The Secretary of the Interior's Standards for the Treatment of Historic Properties", 2017.



SETTING (DISTRICT / NEIGHBORHOOD)

| RECOMMENDED | NOT RECOMMENDED |
|--|--|
| <p><i>Identifying, retaining, and preserving</i> building and landscape features that are important in defining the overall historic character of the setting. Such features can include circulation systems, such as roads and streets; furnishings and fixtures, such as light posts or benches; vegetation, gardens, and yards; adjacent open space, such as fields, parks, commons, or woodlands; and important views or visual relationships.</p> | <p>Altering those building and landscape features of the setting which are important in defining its historic character so that, as a result, the character is diminished.</p> |
| <p>Retaining the historic relationship between buildings and landscape features in the setting. For example, preserving the relationship between a town common or urban plaza and the adjacent houses, municipal buildings, roads, and landscape and streetscape features.</p> | <p>Altering the relationship between the buildings and landscape features in the setting by widening existing streets, changing landscape materials, or locating new streets or parking areas where they may negatively impact the historic character of the setting.</p> <p>Removing or relocating historic buildings or landscape features, thereby destroying the historic relationship between buildings and the landscape in the setting.</p> |

STANDARDS REVIEW

- 1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.**

The 1963 office building, a non-contributing building within the district, will continue to be used as a commercial building. In addition, there will be minimal change to the associated landscape, which will include the planting of small trees, shrubs, and the construction of a small modest paved areas, as well as the retention of the open-air parking area. As such, the proposed Project will not change the defining characteristics of the district environment.

EDS Analysis: The proposed Project complies with Standards 1.

- 2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.**

The Property containing the 1963 office building and associated landscape is a non-contributing element to the district. As such, no historical materials or features that characterize the district will require preservation. Furthermore, the space and relationship (i.e., setting) of the 1963 office building within the district will remain intact, as there are no proposed changes to the size or form of the building. Proposed changes to the associated landscape include modifications to the existing paved entry drive, which provides shared access for an adjacent parcel (APN 008-046-009), as well as an adjacent accessible path from the rear parking lot to the public right-of-way, patio, new trash enclosure, and new frontage, rear, and south elevation landscaping.

EDS Analysis: The proposed changes within the Property’s spaces within the district setting are minor and will not impact the district. Therefore, the proposed Project complies with Standard 2.

- 3. Each property shall 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**



architectural elements from other buildings, shall not be undertaken.

The proposed rehabilitation includes changes to the 1963 office building and associated landscape within the Property. The proposed changes include a new front entry landing and stairs to the sidewalk, replacement of existing doors and windows, and three new window openings along the south elevation, removal of the existing electrical panel, which will be replaced with a new, smaller electrical panel, new exterior horizontal wood cladding on portions of the building, new exterior paint, and the replacement of the existing roofing material and insulation (Figure 1 and Figure 2). These changes do not consist of any conjectural features or architectural elements that would create a false sense of historical development within the district. Instead, the design elements utilized are modest and contemporary, using materials found within the district to provide a continuity of design without creating a false sense of history. The rehabilitation provides for better conformity with the district.

EDS Analysis: The proposed Project complies with Standard 3.

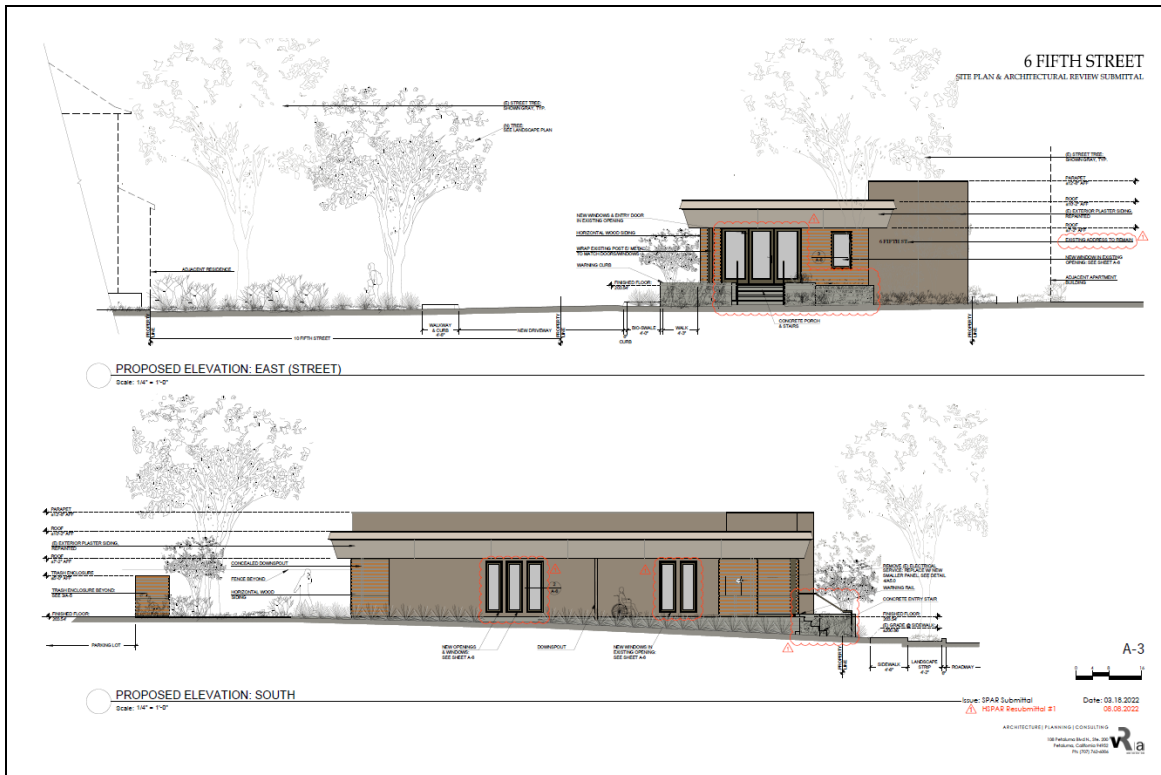


Figure 1. Proposed east and south elevations of the 1963 office building (Steve vonRaesfeld of vR/a Architects, dated 3/18/2022; rev 08/08/2022).



Figure 2. Proposed west and north elevations of the 1963 office building (Steve vonRaesfeld of vR/a Architects (dated 3/18/2022; rev 08/08/2022).

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

There are no significant changes to the 1963 building and associated landscape within the Property that have become “significant in their own right.”

EDS Analysis: The proposed Project complies with Standard 4.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

The 1963 office building and associated landscape is a non-contributing element to the district. As such, there are no distinctive features, finishes, or construction techniques that contribute character of the district that require preservation.

EDS Analysis: The proposed Project complies with Standard 5.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

As a non-contributing element of the district, the 1963 office building and associated landscape do not consist of any historic features.



EDS Analysis: The proposed Project complies with Standard 6.

- 7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.**

No historic materials will be damaged by chemical or physical treatments.

EDS Analysis: The proposed Project complies with Standard 7.

- 8. Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.**

The 2017 NWIC record search (NWIC# 16-1636) did not reveal any known archaeological resources or studies within the Property, and ground-disturbing activities are limited to minimal surface grading and above-grade concrete removal. However, it is unknown if there are any buried resources within the Property.

EDS Analysis: As such, Standard 8 does not apply to the proposed Project.

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

The Project consists of alterations to the 1963 office building, including a new front entry landing and stairs to the sidewalk, replacement of existing doors and windows, and three new window openings along the south elevation, removal of the existing electrical panel, which will be replaced with a new, smaller electrical panel, new exterior horizontal wood cladding on portions of the building, new exterior paint, and the replacement of the existing roofing material and insulation and changes to the associated landscape, including modifications to the existing paved entry drive, which provides shared access for an adjacent parcel (APN 008-046-009), an adjacent accessible path from the rear parking lot to the public right-of-way, patio, new trash enclosure, and new frontage, rear, and south elevation landscaping.

1963 Office Building

The proposed changes to the office building within the Property include design elements that are modest and contemporary, utilizing materials such as exterior plaster, wood siding, and concrete found within the district (Figure 3). The new materials are compatible with the district setting and provide a design that is more cohesive with the district's setting without creating a false sense of history.

Associated Landscape

The proposed changes to the associated landscape include modifications to the existing paved entry drive, an adjacent accessible path along the south elevation of the building, and new frontage, rear, and south elevation landscaping, using materials including asphalt and concrete.



The plantings are modest and harmonious with the district setting (Figure 4). The new trash enclosure is constructed of horizontal wood siding, matching the proposed wood siding along with the 1963 office building and new concrete rear patio; though it is not visible from the 5th Street, the design is restrained and will not impact the integrity of the district setting. The proposed changes to the associated landscape are modest and do not negatively impact the character of the district setting or environment.

EDS Analysis: The proposed Project complies with Standard 9.



Figure 3. Proposed Materials (Steve vonRaesfeld of vR/a Architects (dated 3/18/2022; rev 08/08/2022).

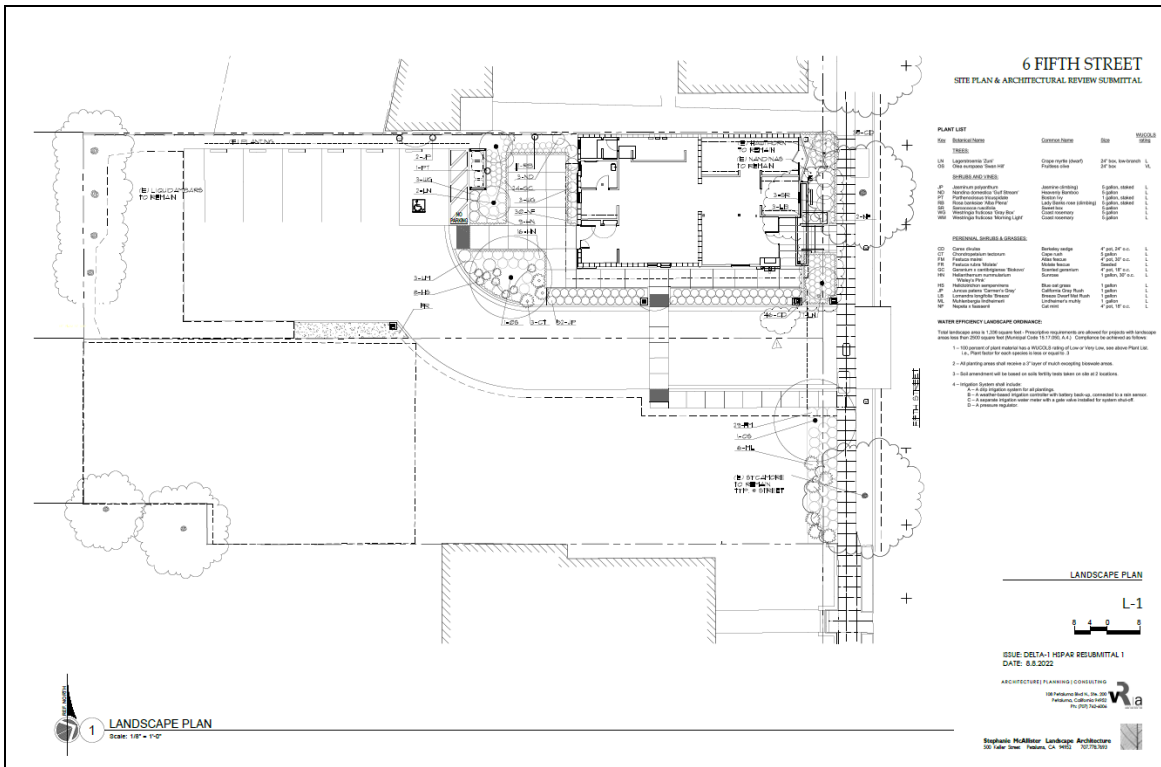


Figure 4. Landscape elements shown with the proposed floor plan (Steve vonRaesfeld of vR/a Architects (dated 3/18/2022; rev 08/08/2022).

10. New additions and adjacent or related new construction shall 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.

There are no new additions to the 1963 office building; however, the Project proposes the construction of a new trash enclosure. The trash enclosure is a narrow rectangular form clad in horizontal wood siding with a flat roof. Although it is not visible from 5th Street, the design is restrained and will not impact the integrity of the district setting or environment. In addition, the trash enclosure can be removed in the future without any impairment to the district setting or environment.

EDS Analysis: The proposed Project complies with Standard 10.

Based on the above Standards review, the proposed Project at 6 5th Street complies with all ten Standards.

LOCAL REVIEW

'A' Street Historic District Character-Defining Features

According to the 'A' Street Historic District Preservation Guidelines and Standards, the district consists of 77 buildings, including houses, commercial buildings, churches, and apartments. The historic character of the 'A' Street Historic District consists of an eclectic neighborhood with various architectural styles,



such as Greek Revival, Gothic Revival, Italianate, Stick Style, Queen Anne, Shingle Style, Colonial Revival, Georgian Revival, Neo-Classical Revival, Craftsman, Spanish Colonial Revival, and Period Revival, constructed between 1860 and 1925, which is the period of significance of the district. According to the guidelines, the setting of the district is a “representative slice of Petaluma’s past.”⁵ The character-defining features of the district coexist in a harmony of scale and material. Although most of the ‘A’ Street Historic District Preservation Guidelines and Standards focus on contributing buildings, EDS utilized the guidelines and standards to assess potential impacts to the district. Some of the character-defining elements, such as paint colors, landscape, and signage, were considered when assessing changes to non-contributing properties within the district. As such, EDS completed the following local review in the section below.

Paint Colors

According to the ‘A’ Street Historic District Preservation Guidelines and Standards, “the color scheme should be harmonious with surrounding structures and consistent with the architectural time period of the building”. Although the 1963 office building is not a contributing element, the proposed paint colors on the building were reviewed for consisting with the district.

Proposed colors (revised 8/8/22; clouded to show change):



PAINT

⁵ Jane Lauder, “‘A’ Street Historic District Preservation Guidelines and Standards”, City of Petaluma, 1986.



EDS Analysis: *The paint palette includes three muted colors that will not stand out or that mimic the historic color scheme of the district but are colors that are appropriate for non-contributors within the district, which spans two centuries of development from 1860 to 1925. Therefore, the Project appears to be in compliance with the ‘A’ Street Historic District Preservation Guidelines and Standards related to paint colors.*

Landscape

According to the ‘A’ Street Historic District Preservation Guidelines and Standards, fencing, plantings, paving, and signs are elements of the landscape that are character-defining features of the district. As such, the landscape design within the Property was careful not to mimic historic landscaping from the district. Instead, the landscape design consists of simple, harmonious elements, such as small trees, shrubs, and modest paved areas. No new fencing is proposed.

Signage

According to the ‘A’ Street Historic District Preservation Guidelines and Standards, the design, color, and texture of signage should be reviewed within the district. Currently, there is no proposed signage within the Property.

EDS Analysis: *The Project appears to be in compliance with the ‘A’ Street Historic District Preservation Guidelines and Standards related to landscape and signage.*

CONCLUSIONS

In compliance with CEQA and ‘A’ Street Historic District Preservation Guidelines and Standards, EDS completed a Standards review and a local review of the proposed Project at 6 5th Street, Petaluma, Sonoma County, California, within APN 008-046-007, including the 1963 office building and associated landscape, a non-contributing Property to the Petaluma’s “A” Street Historic District. The proposed Project consists of the rehabilitation of the 1963 office building, including exterior changes and interior alternations, and changes to the associated landscape that could impact the integrity of the district.

EDS assessed the architectural designs provided by Steve vonRaesfeld of vR/a Architects (dated 3/18/2022; rev 08/08/2022) for the proposed Project to determine if as a result of the Project there would be any impacts on the integrity of ‘A’ Street Historic District. EDS has determined that the proposed Project complies with all ten Standards and is in compliance with the ‘A’ Street Historic District Preservation Guidelines and Standards. Therefore, the proposed Project will not impact the “A” Street Historic District.