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Subject: Historic Resource Evaluation for 528 B Street Development

Summary of Findings

The purpose of this report is to evaluate the proposed new building according to the standards that guide the Cultural Heritage Board when reviewing projects that would affect nationally- or locally-designated landmarks, locally listed, or registered historic properties, preservation districts, or other qualified or listed historic resources.

Zoning codes, building economics, density targets, and the housing crisis are pressuring our historic districts and requiring the development of advanced treatments within them to resolve these conflicts appropriately.

We have evaluated and defined these issues and proposed solutions as follows:

- Resolve the conflict between zoning code language, proposed densities and historic context.
- Proposed an appropriate design treatment for new or larger buildings based on historic buildings of traditional design standards and of a smaller scale.
- The established guidelines of the Secretary of the Interior and the National Park Service's technical documents (NPS) **do not address new buildings**, but rather additions to historic buildings. However, this report addresses the St. Rose Historic Preservation District itself as the cultural resource, and examines established treatments for additions to historic buildings -- as a reference to how they would apply to new buildings -- within an established historic district.

- An appropriate treatment is established and recommended for approval that utilizes traditional design composition, detailing, and features that reflect character-defining elements within the district, while utilizing contemporary materials and systems to meet current zoning and density needs.

Introduction

This report is supplemental to the Historic Property Survey and CEQA Evaluation provided by J. Longfellow¹ (Prj. 2005-LMA 20-002). It will examine and conclude that the design strategy and intent for the proposed new structure at 528 B Street to be a sensitive and appropriate inclusion in the district. The proposed new structure shall replace the non-contributing structure built in 1969, one outside the period of significance of the St. Rose Historic Preservation District.

As a new addition to the district, we are addressing the treatment of the building's design as it applies to established preservation issues and historic district design guidelines, both local and as an established precedence in other districts. The Secretary of the Interior's Standards for the Treatment of Historic Properties are not specific for defining how new buildings best contribute to historic districts. The City of Santa Rosa reference and expand upon these Standards in its Processing Review Procedures for Owners of Historic Properties and Design Guidelines for Historic Properties and Districts, the review criteria for the Cultural Heritage Board's for analyzing proposed design for developments in the eight designated Preservation Districts.

Report Intent

The prospect of defining how to design contemporary buildings to be sensitive additions to preservation districts is not easy. Meeting current space, functional, economic, and density needs -- supported and encouraged by the City of Santa Rosa's Downtown Station Area Specific Plan, zoning code policy, and by the Association of Bay Area Governments (ABAG) and MTC establishing Priority Development Areas, within established historic districts -- is the design challenge presented for 528 B Street.

528 B Street is within the Downtown Opportunity Zone, which was established as a tax incentive partnership between the State of California, and City of Santa Rosa intended to spur community development, supporting investments in environmental justice, sustainability, climate change, and **affordable housing**. In this context, adding downtown units to the housing stock leads to more affordable housing opportunities, especially in areas within a 1/2 mile radius of the transit mall and the Downtown SMART station, a priority.

The California Environmental Quality Act (CEQA) requires consideration of cultural resources during the environmental review process with an inventory of resources within a study area and an assessment of the cultural resources potentially affected by development. J. Longfellow's¹ Historic Property Survey attached to this report has provided this consideration and CEQA Evaluation. That report provided with this application, defines the potential effect of the development on the St. Rose District and determines that the building built in 1969 is not eligible as a cultural resource.

Mindful of the conflict between the opposing development forces and the values of the preservation communities, herein we examine the proposed design in relationship to City of Santa Rosa's design guidelines and established treatments for new buildings, or additions to historic buildings within preservation districts.

The project applicants consulted with Artisan Architecture for the purpose of finding an appropriate treatment for the design of the building in relationship to the historic context and character defining elements within the St. Rose Historic Neighborhood. We toured the district and discussed the issues and challenges of designing for authenticity and compatibility. The architects were engaged and responsive, sympathetic to the need to find an appropriate treatment that allows for new construction of higher density and scale, which likewise contributes to the character of the St. Rose Historic district.

Thus, the intent of the design is to conform to historic standards of care while responding to the dynamic pressures for growth and development.

Appropriate Treatments for a New Building within an Established Historic District

There is a vast amount of literature on the subject of additions to historic buildings that reflect widespread interest, as well as a divergence of opinions of appropriate treatments for additions to historic buildings. However, within the historic preservation and rehabilitation programs of the National Park Service, the focus is on new additions to historic resources, that ensure they preserve the character of the historic building or districts that they address. There is far less guidance on how to appropriately design new buildings to be sympathetic additions to established districts.

Historic districts or neighborhoods are recognized in the National Register of Historic Places due to their significance within a particular period. The 528 B Street Mixed Use development is situated in the St. Rose Historic Preservation District where the period of significance for contributing structures ranges from the 1870's to the 1940's¹. The Secretary of the Interior's Standards do not prohibit new constructions as additions to this district, but the design of structures three-stories or taller in the St. Rose Historic Preservation district is managed by the city of Santa Rosa, where approved by both the Cultural Heritage Board and the Design Review Board^{2,3}.

To accomplish this and meet the Secretary of the Interior's Standards we reference the standard for **Rehabilitation**, as it is the closest standard to address our situation. Any new addition or construction should therefore:

- Preserve significant historic materials, features, and forms;
- Be compatible with, and;
- Be differentiated from the original historic building or buildings.

It is necessary to address the following design features and character defining elements within the district to ensure the design of new buildings as sensitive to or compatible with additions to the district. Typical overall defining elements of historic buildings include:

- Building shape, form, and composition;
- Roof and related features;
- Door and window openings (proportions, detailing, material, etc.);
- Secondary features (projections, trim, detailing, etc.);
- Surface finishes and materials;
- Setting and site features;
- Materials and craftsmanship.

Contributing structures in the St. Rose Historic District are characterized by an eclectic collection of buildings that were built between the 1870's and the 1940's¹, where the design philosophy predates the 1930's modernist philosophies promoted by the Bauhaus Architects, whose ideology has dominated the twentieth century. Contemporary design ideologies often dismiss, ignore, or reject historic or traditional design elements, such as proportions, character defining elements, or traditional composition or detailing⁴.

Not all historic precedent or traditional contextual design elements are compatible, nor are they sensitive to the 1920's period of significance that is the conceptual foundation of the proposed structure. As previously referenced an eclectic makeup of significant or contributing structures in the St. Rose Historic Preservation District poses a challenge when designing a "compatible" present day addition to the neighborhood. One that celebrates these traditional contextual design elements, is sensitive to the context and is not an expression of false historicism. For a new building to successfully contribute to the district the compositional themes of the predominate eras within the district would take precedence over contemporary or modern themes.

FIGURE 1. Character Defining Elements, as represented in contributors within the St. Rose district.



Conversely, contrasting buildings have received approval in other instances, but one has to be careful as too many contrasting buildings are often equated with erosion of the district fabric, or artificiality. Thus, a building of this scale, as allowed by the CD-5-H-SA zoning district standards, is encouraged by the City of Santa Rosa Downtown Station Area Specific Plan policies, but presents challenges to the standard treatments as described by the Secretary of the Interior.

Summary of Typical Treatments

The following is a summary for **Treatments A or B**, which are explained within the Secretary's Standards as reflected in the NPS Technical Bulletins, and utilized by the historic architectural community as compatibility criteria. A proposed third **Treatment C** (at the discretion of the Cultural Heritage Board) permits this proposal achieving height and density allowed by the City of Santa Rosa's Zoning Code, while remaining a sensitive addition to the Historic District. It is an emerging approach recently approved in the Sacramento R Street Preservation District (see Image A).

A. The Contemporary Contrasting Buildings

This treatment utilizes sympathetic or matching historic materials in contemporary compositions, with contemporary systems and proportions that are generally subordinate to prevailing historic structures, in an attempt not to compete with them (**NOTE:** this treatment is not viable at the project's scale without over dominating the district and generally applies to smaller scale additions to historic resources).

B. The Compatible but Differentiated Designs

This treatment for additions acknowledges historic precedence in building form and composition by including sympathetic or matching contemporary versions of historic materials and systems (**NOTE:** if not carefully handled, this treatment can become a form of false historicism).

C. The Compatible Composition in Contemporary Materials with Elements Reflecting Historic Composition, Form, or Details

This treatment is a more compelling alternative for this context with the use of historic form and composition contrasted with contemporary systems and materials. The historic compositions and forms reflect precedence, while the new materials create the required differentiation from original historic elements. For this treatment to work, it must accurately reflect the historic form, composition, and proportioning systems (character-defining elements within our design are highlighted in Figure 3) of contributing structures to the St. Rose Historic District.

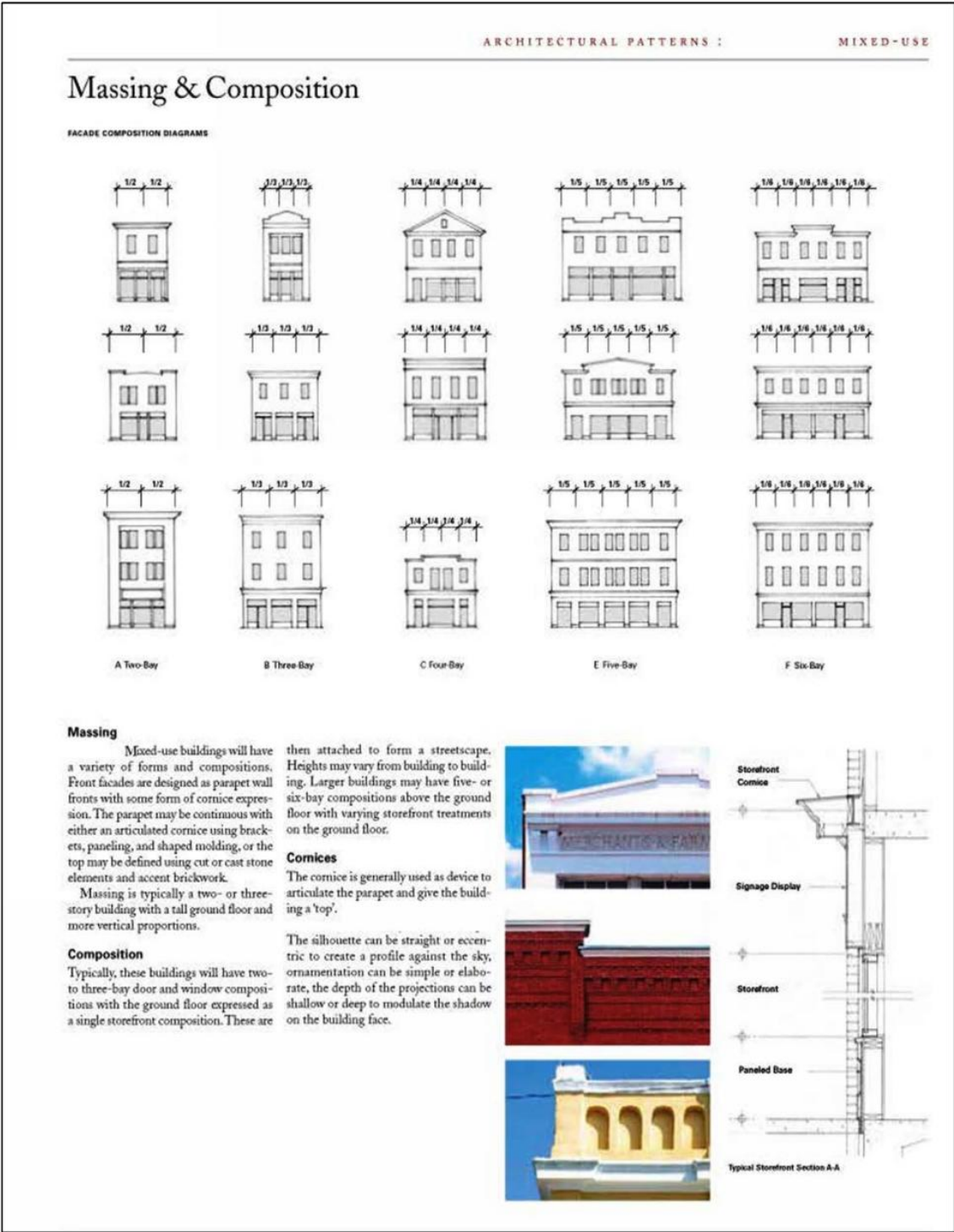
Secondary features, executed with contemporary materials and systems, should be consistent with historic proportions and detailing, and should accurately reflect the historic precedence or character-defining elements within the district. The balance of new materials and systems that honor, or reflect historic forms and compositions can create a sympathy and cohesion within the district, thus avoiding a false historicism created by contemporized historic systems.

Treatment C. Compatible Composition in Contemporary Materials

Image A. R Street Historic District, Sacramento, CA



FIGURE 2. Pattern Book for Gulf Coast Neighborhoods, prepared by Urban Design Associates, Pittsburgh, PA.



Excerpt from *Mississippi Renewal Forum* 2005

Figure 2 above describes accurately historic compositions typical throughout nation and region for mixed use and commercial districts.

Treatment A. Examples of Contemporary Contrasting (please note the subordinate massing)

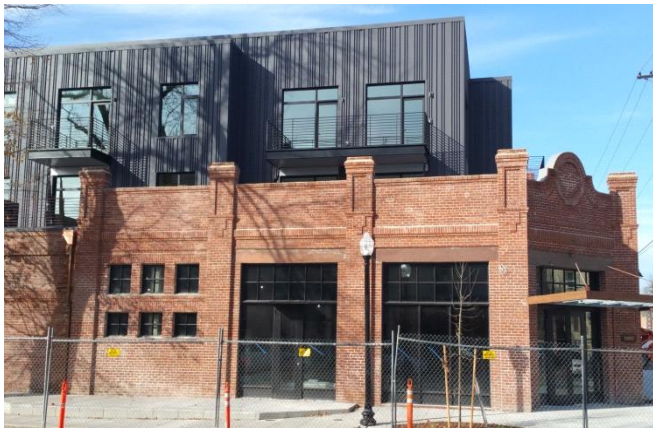
Image B. NPS Technical Journals, Grimmer & Weeks



Image C. NPS Technical Journals, Grimmer & Weeks



Image D. R Street Historic District, Sacramento, CA



Treatment B. Example of Compatible, but Differentiated

Image E. Santa Rosa Railroad Square (**NOTE:** false historicism)

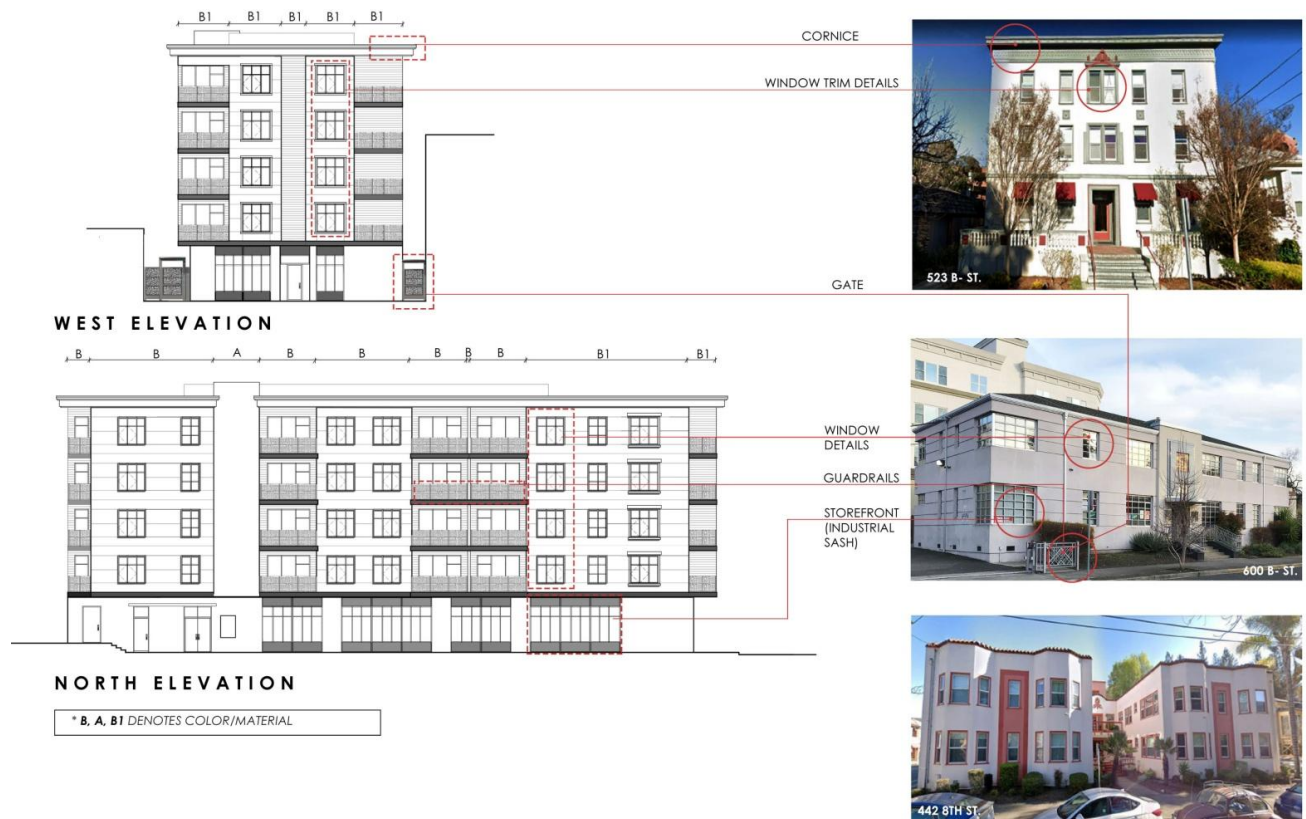


Treatment of Project Design

A number of historic architectural considerations have guided the treatment for the design of the new structure:

- The detailing of 1920's or 1930's industrial buildings, or mixed-use buildings was chosen as the period of significance to inform the design ;
- Prototypical compositions and features of mixed-use historic building were referenced, and thereby informed the design (see excerpt from Mississippi Renewal Forum 2005; Figure 2);
- Character-defining elements from the district were referenced and applied to the building, including:
 - window proportions
 - cornice detailing
 - building composition
 - edge and trim detailing

FIGURE 3. District- Character Defining Elements referenced in new design treatment.



The City of Santa Rosa's Processing Review Procedures for Owners of Historic Properties outlines requirements and details review procedure for proposals within historic districts based on the Secretary of the Interior's Standards as delineated above. Elements of the guidelines applicable to the current proposed project suggest that no new additions be "overpowering," and should be "as inconspicuous as possible." *In summary, it was the intent of the project design to comply with the City of Santa Rosa's CD-5-H-SA design guidelines and the established treatments currently found acceptable in the preservation community through the use of compatible composition, proportions and detailing, differentiated by the use of contemporary materials.*

Project Evaluation Criteria

As previously noted the purpose of this report is the evaluation of the proposed new building according to the standard given to guide the Cultural Heritage Board when reviewing projects that would affect nationally- or locally-designated landmarks, locally listed, or registered historic properties, preservation districts, or other qualified or listed historic resources. Please note the existing building proposed to be demolished to make way for the new structure is not a contributor to the St. Rose Historic Neighborhood, and it does not appear on a National register¹. Also, please consider that this building and its location is a uniquely excellent opportunity to hide the parking garage structure that ignores all the required standards of historic district design.

Preservation, Rehabilitation, Standards of Consideration and Evaluation

The Secretary of the Interior & California National Park Service establishes four treatments as standards for historic properties. They are:

- **Preservation.** The act or process of applying measures necessary to sustain the existing form, integrity, and materials of a historic property.
- **Rehabilitation.** 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.
- **Restoration.** The act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period.
- **Reconstruction.** The act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure.

The proposed work is a new structure within an established district. The existing structure to be demolished has been evaluated to "Not meet CEQA's significance criteria," as "the property does not qualify as a historic resource¹." Therefore, the evaluation at hand should be based only on the CHB's criteria for an appropriate addition to the St. Rose Historic Preservation district. The Santa Rosa Cultural Heritage Board establishes the following criteria for evaluation that we now compare with the proposed design:

TABLE 1.

CHB Criteria for decisions	Artisan Architecture's Evaluation
1. Whether the proposed change is consistent with, or compatible with the architectural period of the building, or district.	1. The proposed changes are consistent with, and compatible with the architectural of the district, as provided in the determined period of significance for stylistic innovation and composition of the building elements.
2. Whether the proposed change is compatible with any adjacent or nearby landmark structures, or preservation district structures.	2. The proposed building is compatible with adjacent or nearby landmark structures, or preservation districts.
3. Whether the colors, textures, materials, fenestration, decorative features, and detail proposed are consistent with the period, or are compatible with adjacent structures.	3. The colors, textures, materials, fenestration, and decorative features and details as proposed are consistent with the period, and are compatible with the historic resource through a strategy of compatible composition with contemporary materials.
4. Whether the proposed change destroys or adversely affects an important architectural feature, or features.	4. The proposed changes will not destroy or adversely affect any important architectural features critical to the identification or character of the original historic resource.
5. The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1983 Revision).	5. See Table 2

The following table compares the Standards for Rehabilitation from The Secretary of the Interior with the context and design of the proposed structure. They are the criteria used to determine if a rehabilitation project qualifies as a certified rehabilitation. 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.

However, the Standards pertain to additions to historic buildings and the proposed structure is not a historic building. These criteria are offered as consideration for the appropriateness of our proposal as a sensitive and appropriate addition within the overall district considered herein as the Cultural Resource.

This report finds that the project aligns with the criteria for evaluation as follows:

TABLE 2.

Secretary of the Interiors Standards of Rehabilitation	Artisan Architecture's Evaluation
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.	1. Site previously first served as a residence followed by a business. Vertical mixed-use of commercial office and residential units is a combination of previous uses and is compatible for the site/block context.
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.	2. Not applicable. Existing building to be removed is not historic, and no historic materials are on site.
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.	3. The proposed building reflects but does not copy or reproduce elements and details from contributing historic structures in the neighborhood. These inspire or guide the design of 528 B Street proposal.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.	4. Not applicable in this instance.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.	5. Not applicable.
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.	6. Not applicable.
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.	7. Not applicable.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.	8. A property survey and CEQA Evaluation has been provided. The existing structure is not a historic resource.
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.	9. Historic integrity of the district is preserved utilizing, sympathetic composition detailing and applicant of contemporary reflections of character defining elements within the district. These all differentiated with the use of contemporary materials and construction techniques.
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.	10. This condition is met with the treatment of the new structures design and materiality.

Conclusions and Recommendations

The proposed project generally conforms to the Secretary of the Interior's Standards for Rehabilitation, and The City of Santa Rosa's guidelines for additions within historic districts. The use of traditional historic building composition in forms and detailing lends a familiarity and sensitivity to the surrounding district buildings. The contemporary materials provide a differentiation, and avoid false historicisms.

The new building reflects the basic district context and sufficient character-defining elements to be sensitive to and in keeping with the Secretary of the Interiors Standards. Also the design satisfies current zoning requirements, density needs. This project is recommended for approval based on our evaluation.



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