



**6 December 2017**

Mr. Andrew Trippel, City Planner  
Planning & Economic Development  
100 Santa Rosa Ave., Rm 3  
Santa Rosa CA 95404

Subject: Kelly MLA, 230 Boyce Street, Santa Rosa CA

This report is to clarify the scope of work proposed for the Kelly Major Landmark Alteration Application as it applies to preservation issues identified in the Secretary of the Interior's Standards for Historic Preservation Projects. This is codified as 36 CFR 68 (July 12, 1992) replaced in 1978 & 1979 Federal Register (Vol 60, No.133) and its final standard of 1995. These only regulate projects receiving preservation fund grants, otherwise the guidelines are intended to provide general guidance for work on historic buildings.

The residence located at 230 Boyce Street is listed as a contributor to the West End Preservation District designated by the City Council on August 13, 1996. As a contributor it is considered an historical resource and is subject to review under the California Environmental Quality Act (CEQA). However, under CEQA Guidelines Section 15331, Class 31, projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (1995, Weeks and Grimmer) are exempt.

The applicant proposes raising the existing residence 18 inches to bring the lower level head height from 6 feet 1 inch to 7 feet 6 inches. This historic habitable space is currently occupied below the main residence. The scope of work includes installing new base trim at the exterior foundation to differentiate the historic changes from the original construction; the original structure including stairs will be preserved intact. A new lower landing receives the historic stair visible from Boyce Street. A new landing and three riser with new handrails and base trim are provided. Current exiting code requires installing new ground floor windows in various locations. Also the proposal suggests replacing two existing rear windows that are distinctive and miss-matched; also relocating and installing a new ground floor entry door at an existing opening.

The above work can be described as a mix of Preservation and Historic Rehabilitation efforts according to the Secretary of the Interiors Standards of Care. The bulk of the project consists of lifting of the residence necessary for the lower floor to comply with current ceiling height standards without changing its historic elements or conditions. These are preservation efforts. The trim, new landing and entry stair conditions are rehabilitation efforts. The historic conditions will be matched as practical, including the existing door and window trim and finish materials. These are rehabilitation efforts according the Standards. The change in window proportions at the upper element could be considered a restoration, but without documentation it is dubious. All the work proposed is in general conformance to the Secretary of Interior's Standards of Care for the treatment of historic properties.

Wm. Mark Parry AIA, CSI, SAH  
Historic Architect & Architectural Historian