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SUBJECT: *REVISION #3-* HISTORIC DISTRICT PROJECT EVALUATION FOR 320 COLLEGE AVE 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 and the Santa Rosa Design Review Board when reviewing projects that would affect nationally or locally designated landmarks, locally listed, or registered historic properties, preservation districts, and 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 evaluated 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 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.

- Establish an appropriate treatment and recommendations for approval that utilizes traditional design composition, detailing, and features that reflect character defining elements within the district, based on the period of significance, while utilizing contemporary materials, systems, and design standards to meet current zoning and density needs.

Introduction

This report will explain, examine and conclude that the design strategy and intent for the proposed new structure at 320 College Avenue to be a sensitive and appropriate inclusion in the 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 locally 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, and the review criteria for the Cultural Heritage Board when 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. The design challenge presented for 320 College Avenue is to meet current space, functional, economic, and density needs, supported and encouraged by the City of Santa Rosas Downtown Station Area Specific Plan, Zoning Code policy, as well as the Association of Bay Area Governments (ABAG) and MTC establishing Priority Development Areas within established historic districts.

320 College Avenue 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 half 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. There is no historic resource on the site, the property is not developed nor listed as a contributor to the District. This report determines that the property is not a contributor to the district and the building is not eligible as a cultural resource.

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 developer and his architect was engaged and responsive, sympathetic to the need to find an appropriate treatment that allows for new construction of higher density and a larger 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.

While some individual members of the Santa Rosa Design Review Board have publicly advanced that “You can do whatever you want” within Historic Districts or neighborhoods recognized in the National Register of Historic Places, that is simply not true. Historic Standards of Care are recommended by the Secretary of the Interior for qualified, qualifiable or designated historic resources. They are codified in the California Historic Building Code.

The 320 College Avenue is a residential development situated in the St. Rose Historic Preservation District where the period of significance for contributing structures ranges from the 1878's to the 1940's ¹. 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
- Artistry of design and craftsmanship

Contributing structures in the St. Rose Historic District are characterized by an eclectic collection of buildings that were built between the 1872 through 1942 ¹, where the design philosophy predates the 1930's modernist philosophies promoted by the Modernist Bauhaus Architects. An ideology was developed during the Weimar Republic and its proponents brought their National Socialist Ideals into American schools of architecture as they fled the rise of the Nazi regime in Germany. These ideals have dominated the twentieth century architectural landscape. ⁴

Traditional Architecture developed long before the Marxist/Socialist ideologies of the twentieth century that dismissed the value of other civilizations, artist, ethnicities, traditions of the era or citizens with contrasting perspectives.

These Modernist design ideologies (continue to dismiss, devalue, ignore, or simply reject historic or traditional design elements, such as traditional proportions, character defining elements, composition and detailing⁴. This

self referencing ideology is in stark contrast with the 2,821 years of Architectural design philosophies and ideals that pre-dated the modernist era⁴.

FIGURE 1. Contributors within the district that present Character Defining Element represented in design.



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 A The Contemporary Contrasting Buildings

Image 1 NPS Technical Journals, Grimmer & Weeks

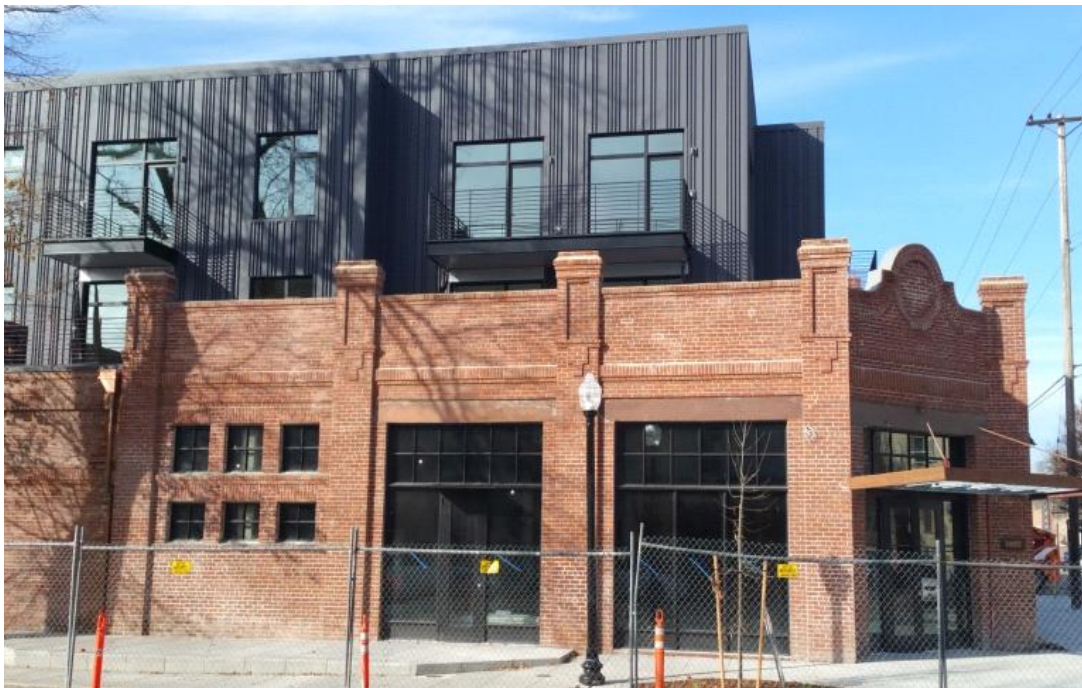


Image 2 NPS Technical Journals, Grimmer & Weeks



Treatment B. The Compatible but Differentiated Designs

Image 3. R Street Historic District, Sacramento, CA



Treatment C. The Compatible Composition in Contemporary Materials

Image 4 Santa Rosa Railroad Square (**NOTE:** false historicism)



Image5 Example of Compatible Composition in Contemporary Materials

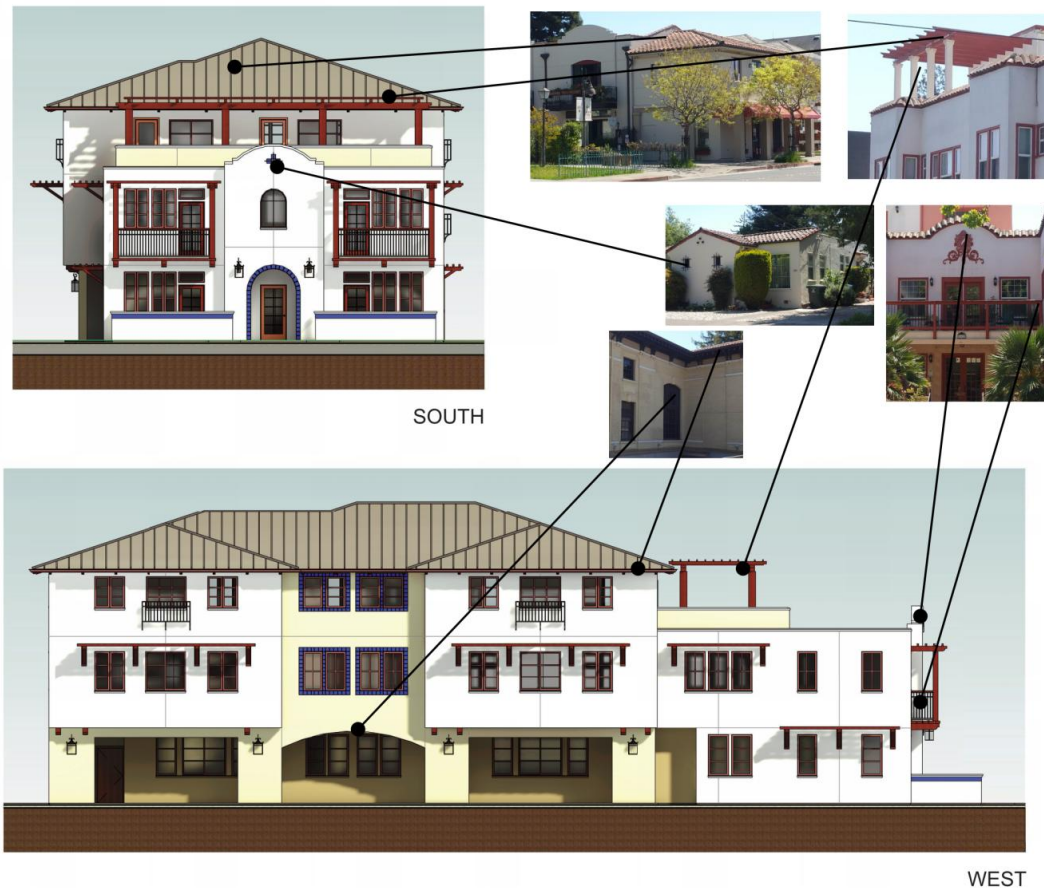


Treatment of Project Design

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

- The detailing of 1920's Mission Revival or Spanish Colonial Revival buildings was chosen as the period of significance to inform the design
- Prototypical compositions and features of Mission Revival/ Mediterranean Houses/ Spanish Colonial Buildings within the district were considered and other historic building were referenced, and thereby informed the design (see Figure 3&4 noted as sheet 1&2)
- Character-defining elements from the district were referenced and applied to the building, including:
 - 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

FIGURE 2 District- Character Defining Elements referenced in new design & Historic References used



The City of Santa Rosa's Processing Review Procedures for Owners of Historic Properties outlines requirements and details of the 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 sympathetic features, differentiated by the use of contemporary materials, particularly a metal roof.*

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. Note: the lot is currently a parking lot. No historic fabric is affected by this development.

Preservation, Rehabilitation, Standards of Consideration and Evaluation

The Secretary of the Interior & California National Park Service establish 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. 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, in that the design provided references the period of significance in composition of the building elements, details and styling.
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. In that it is Sympathetic to their design principles, not in contrast with them and includes appropriate references to district character.
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 the use of contemporized character defining elements.

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. The commercial building on College Avenue is not a historic resource; the residential building to be developed is on an empty lot. It is compatible in scale with the site/block context at the street elevation and its general character.
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. No existing building is on the site to be developed and the existing building to be modified is not historical in nature or a contributor to the district. The Site is not likely to yield historic archeological data should any be discovered according to State Law construction will cease pending appropriate evaluation of them.
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 320 College Avenue. The existing building to remain is not historical or a contributor to the district.

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 as the project is built On an empty sight and the existing building to remain Is made more sensitive to the addition but is not a historic structure or a contributor to the district..
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.	5. Not applicable in that no building exists on the portion of the site to be developed and the exiting building to remain is not a contributor or historical.
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. No subsurface artifacts are anticipated as the site is not in an area generally known to provide archeological evidence however according to State Law if such evidence is found construction will cease pending appropriate evaluation.
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 application of contemporary reflections of character defining elements. The Mission/Spanish Colonial Revival style references are within the district. These all differentiated from other historic properties 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. No existing historic construction is on this site.

Conclusions and Recommendations

The proposed project generally conforms to the Secretary of the Interior's Standards for Rehabilitation, and The City of Santa Rosa 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 existing College Avenue building (not a contributor or historical in nature) is improved to support the new buildings design features and character to provide integrated site and design aesthetic. This through the use of cementitious siding to replace the wood siding on the front elevation. The unification of the two buildings with consistent color and similar material treatment is effective.

This project provides unit densities that are in support of the Downtown Station Area Specific Plan yet the scale and proportional adjustments reflect the smaller scale existing residence at the street and entry elevation.

Therefore 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 for Rehabilitation. Also the design satisfies current zoning requirements, density needs, and superior design qualities as defined by the DRB. This project is recommended for approval based on our evaluation.



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References

¹ City of Santa Rosa

Design Guidelines: 4.7 Historic Properties and Districts

<https://srcity.org/DocumentCenter/Home/View/3054>

³ National Park Service

2017 - The Secretary of the Interior's Standards for the Treatment of Historic Properties

<https://www.nps.gov/tps/standards.htm>

⁴ From Bauhaus to Our House

1981 Tom Wolfe; Farrar; Straus and Giroux

⁵ Experiencing Architecture

1959, 1962 Steen Eiler Rasmussen; The MIT Press

City of Santa Rosa

2006 - Processing Review Procedures for Owners of Historic Properties

<https://srcity.org/Document Center/View/3259>

City of Santa Rosa

2004 - City of Santa Rosa Zoning Codes: 20-28.040 Historic (-H) combining district

http://qcode.us/codes/santarosa/view.php?topic=20-2-20_28-20_28_040

City of Santa Rosa

1989 - Report, Cultural Resources Survey of the City of Santa Rosa, California

Anne Bloomfield, Architectural Historian

City of Santa Rosa

1977 - Santa Rosa Historic Resource Survey

Survey conducted by Dan Peterson, AIA, for the City of Santa Rosa

On file at City of Santa Rosa Community Development Department

City of Santa Rosa

2001 - Processing Review Procedures for Owners of Historic Properties

City of Santa Rosa Community Development Department

<http://ci.santa-rosa.ca.us/doclib/documents/historicreview.pdf>

City of Santa Rosa

2007 - Historic Preservation District Properties

http://ci.santa-rosa.ca.us/doclib/Documents/Historic_Pres_Districts_C_size.pdf

National Park Service

National Park Services: Technical Briefs

2010-New Exterior Additions to Historic Buildings: Preservation Concerns

Anne E. Grimmer and Kay D. Weeks

<https://www.nps.gov/tps/index.htm>