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November 18, 2022

Dear Ms. Toomians,

Dudek has completed a peer review of the Helix Cultural Resources Assessment and Evaluation of 43 Middle Rincon Road, Santa Rosa, California. To assess the documentation of built environment cultural resources the reports were reviewed by Dudek Architectural Historian/Historic Built Environment Lead, Kathryn Haley, MA, who with 19 years' experience in cultural resources management meets the Secretary of the Interior's Professional Qualification Standards for Architectural History and History. The review of documentation of archaeological cultural resources was conducted by Dudek Senior Archaeologist, Adam Giacinto, M.A., RPA, with more than 17 years' experience in cultural resources management. Mr. Giacinto meets the Secretary of the Interior's Professional Qualification Standards for Archaeology.

Dudek was specifically contracted by TAIT & Associates, Inc. to provide a third-party peer review of the cultural resources reports prepared by Helix between July 2020 and June 2022 for the 43 Middle Rincon Road Project and to assess the adequacy of the report findings in consideration of compliance with the California Environmental Quality Act (CEQA). As part of this peer review Ms. Haley and Mr. Giacinto conducted a survey of the proposed project area and subject property on November 9, 2022. Additional efforts to review the work conducted by Helix included reviewing the above noted reports in consideration of the adequacy of background research and methodology, appropriate consideration of national, state, and local designation criteria and integrity requirements, and well-supported historic context and findings of significance. The format of this peer review is a bulleted list of comments, and a final summary paragraph that outlines significant issues, if any, identified and suggestions for resolution if needed. Reference verification, fact-checking, and review of spelling/grammar errors were not completed as part of the peer review.

Summary of Peer Review Findings

Built Environment

Dudek's review of the built environment work has confirmed that these efforts have generally met best practice standards:

- Overall, the Helix architectural historians who conducted work for both reports did a thorough job researching the subject property. The level of archival research conducted for the subject property and utilized to construct the historic context appears to meet industry standards.
- In both reports Helix evaluated the subject property under National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR) and City of Santa Rosa Landmark Criteria. Helix also prepared Department of Parks and Recreation 523 form sets for the property. These efforts are in line with current professional standards for documentation of built environment properties over the age of 45.

Analysis of Historical Significance Findings

Ms. Haley agrees with how the Baldi property was recorded and approached as one property in the 2020 report. In the first report, the property which has been split into two parcels in recent years was analyzed within its appropriate historic property boundary. Although she does not prefer how the historians who prepared the June 2022 report divided the Baldi property to document it within its current parcel lines instead of assessing the property within its historic period boundary, she does agree with the finding that the property does not appear eligible under federal, state, or local criteria. Consequently, although Ms. Haley does not fully agree with the evaluation approach in the 2022 report, in consideration of the extensive property research, extensive photo documentation of the property, and clearly outlined historic context she agrees with the finding that the Baldi does not meet historic significance standards. Based on the historic research, and contextual information presented in the report, the following outline provides a brief overview of how Ms. Haley would have likely come to the finding that the Baldi property did not meet eligibility requirements:

The Baldi Property – 4875 Sonoma Highway (4865 Highway 12 and 42 Middle Rincon Road)

- Period of Significance 1921 (year of construction) to 1967 (year of Highway 12 road widening and subdivision of the parcel which led to the demolition of the Baldi & Son's Market).

Significant Associations:

- NRHP A/CRHR 1 - Local Level – Early 20th century residential, agricultural, and commercial development of the Rincon Valley/Santa Rosa.
- NRHP B/CRHR 2 – Local Level – Association with Baldi as the place where he conducted the work for which he became known in the community.
- NRHP C/CRHR 3 – No significant associations, Ms. Haley agrees with Helix's June 2022 recommendation. The property type comparison work in the June 2022 report is well done. In consideration architecture and design the remaining buildings on the property do not appear to be associated with a master architect nor are they buildings that retain individual high artistic value. As such, it does not appear that the buildings on the property qualify for listing for their architectural merit.
- NRHP D/CRHR 4 – No significant associations. Ms. Haley agrees with Helix's June 2022 recommendation.

Historic Integrity Assessment:

The Baldi property has clear historic associations under NRHP A/CRHR 1 as an early 20th century representative of residential, agricultural, and commercial development of the Rincon Valley/Santa Rosa and under NRHP B/CRHR 2 for its association with Baldi as the place where he conducted the work for which he became known in the community (Baldi's Market/Baldi & Son's Market). However, modifications to the property that occurred during the Highway 12 road widening and, in the years following have resulted in compromising the historic integrity of the property to the extent that it can no longer adequately convey significance to its historic

associations under NRHP A/CRHR 1 and NRHP B/CRHR 2. Demolition of the original family market and replacement with the 7-11 chain store in 1968 resulted in the removal of the key building that provided a direct linkage to the property's significant association with Baldi under NRHP B/CRHR 2. Additionally, the original building property setbacks from the road were substantially altered following the widening of Highway 12 in 1967. Overtime, the property has not been maintained and is no longer utilized as a residential farm complex. There are no longer crops cultivated on the property and several of the agricultural auxiliary or utilitarian buildings and structures located on the property are in a state of disrepair. In consideration of these factors, the property no longer retains the ability to convey significance to its period of significance 1921 to 1967. Despite known historic associations under NRHP Criteria A and B, and CRHR Criteria 1 and 2, due to the property's compromised historic integrity to its period of significance (1921 to 1967) the property does not qualify for listing in the NRHP, CRHR, or as a locally significant resource. As such the property is not considered a CEQA historical resource.

Archaeological Resources

Dudek's review of the archaeological archival research, fieldwork and reporting has confirmed that these efforts have generally met best practice standards:

- California Historical Resources Information System (CHRIS) records search included the project site and a quarter-mile buffer. While a half-mile is more standard as a minimum buffer, given the urban context and that work was supplemented by Native American Heritage Commission (NAHC)/ tribal outreach and a pedestrian survey, it is considered sufficient.

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Conclusions

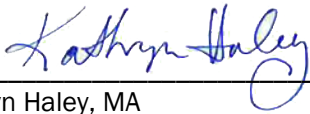
Although the documentation of the property could be approached differently, based on the review of the documents noted above, it appears that Helix's June 2022 report was prepared in conjunction with current professional standards for documentation of built environment cultural resources. Helix's approach to the consideration of the subject property's historic significance in the June 2022 report appears adequate. Helix's professional opinion and evaluation finding in the June 2022 document states that the property should not be considered a CEQA historical resource. Dudek agrees that the property does not appear to qualify as a CEQA historical resource because the property does not qualify for listing in the NRHP, CRHR, or considered significant under City of Santa Rosa Landmark Criteria. At this juncture, to move forward with the proposed project Dudek

suggests, the eligibility finding of the property be certified through a determination by the CEQA lead agency (City of Santa Rosa). Once the finding is certified no further study or mitigation measures will be necessary to move forward with the proposed project.

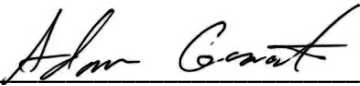
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Should you have any questions or concerns regarding this peer review, please do not hesitate to contact us directly at khaley@dudek.com or (916) 539-2202 and Adam Giacinto, MA, RPA at agiacinto@dudek.com.

Sincerely,



Kathryn Haley, MA
Cultural Resources – Historic Built Environment Lead



Adam Giacinto, MA, RPA
Cultural Resources – Senior Archaeologist