



**ANDERSON BANK BUILDING WINDOW  
PROJECT  
203 G / 719 SECOND STREETS**

**FINAL  
ENVIRONMENTAL IMPACT REPORT**

SCH# 2006072047  
MARCH 2007

Community Development Department  
City of Davis

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## **1.0 INTRODUCTION**

This Final Environmental Impact Report (FEIR) contains public and Historical Resources Management Commission comments received during the public review period for the Anderson Bank Building Window Project Draft Environmental Impact Report (DEIR). This document has been prepared by the City of Davis in accordance with the California Environmental Quality Act (CEQA).

### **1.1 Background**

A Notice of Preparation (NOP) for the DEIR was released on July 11, 2006 for a 30-day review, which ended August 16, 2006. Two public scoping meetings were held on July 17 and July 20, 2006 and comments received were used to frame the DEIR.

The DEIR was circulated to the public for 45 days consistent with CEQA Guidelines, Section 15105(a). The public review period began on November 6, 2006 and ended on December 21, 2006. Notice was provided to owners of all properties and tenants within 500 feet of the project site, and public notice was published in the Davis Enterprise on November 6, 2006. A public hearing to receive comments on the DEIR was held on Monday, November 20, 2006 by the Historical Resources Management Commission (HRMC) at 2600 Fifth Street, Davis, California.

A total of five written comments plus the summary of oral comments during the open public comment period on the DEIR at the HRMC meetings were received and addressed in this FEIR.

### **1.2 SUMMARY OF TEXT CHANGES**

Section 2, Revisions to the DEIR text, identifies all changes to the DEIR. These changes are in response to comments on the DEIR made by the public and HRMC during the public review period, plus any amplifications or clarifications initiated by the city.

### **1.3 LIST OF COMMENTERS**

Written and oral comments were received during the public comment period on the DEIR. Responses to the oral and written comments received on the DEIR during the public comment period are presented in Section 4, Comments and Responses. A list of all the comment letters, including the commenter/agency/commission name as well as the page number that the responses to the letter occur in Section 4 are presented in Section 3, Lists of Commenters.

## **2.0 REVISIONS TO DEIR TEXT**

### **2.1 INTRODUCTION**

This section presents all the revisions made to the DEIR as a result of staff initiated changes, or in response to comments received. New text is double underlined and deleted text is stroke-through. Text changes are presented in the page order in which they appear in the DEIR.

Some revisions, which occurred as a result of public comments that were made during the DEIR circulation, are followed by comment numbers. Sections or sub-section plus the page numbers are used to introduce the revisions in some cases.

### **2.2 SUMMARY OF IMPACTS/MITIGATIONS**

The DEIR mitigation measures have been modified to address some issues raised during the comment period of the DEIR. Some changes address concerns about DEIR mitigation measures suggested by the applicant to have been completed, while others deal with HRMC's comments regarding mitigation measures' compliance and clarification of facts.

For clarification purposes, a new and last paragraph is added to Section 2.7 on page 20 of the DEIR to read as follows:

Under Design Option A, if all of the identified mitigation measures are implemented, the impact will be reduced to a less than significant level. However, failure to meet all mitigation measures would result in the project, under CEQA, having substantial impact.

Table 2.7 of the DEIR is hereby amended according to the revisions below.

**TABLE 2.7 -- SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
<b>4.2 Cultural Resources</b>			
<p>4.2.3A – Design Options A: Design Option A would have a significant impact on the historic nature of the building.</p>	Significant	<p><b>A.</b> <i>Historic American Buildings Survey (HABS) documentation shall be undertaken by a qualified professional at the expense of the project applicant as recommended in the Urbana Preservation &amp; Planning report. The purpose of the HABS documentation is to create a permanent record of the Anderson Bank Building. This HABS report will be a useful resource in the future, should additional changes be proposed or a restoration effort proposed. The HABS documentation shall be provided to the city for review and filing prior to implementation, should the city approve the design option, through a Certificate of Appropriateness. The HABS documentation shall be consistent with the standards established under the National Park Service’s Historic American Buildings Survey program, and include but not limited to the following:</i></p> <ul style="list-style-type: none"> <li>▪ <i>The development of site-specific history and appropriate contextual information regarding the particular resource, including archival research, oral histories, and comparative studies,</i></li> <li>▪ <i>A comprehensive architectural description of the resource,</i></li> <li>▪ <i>Preparation of measured drawings for the resource, and</i></li> <li>▪ <i>Photographic documentation of the resource in still and video formats.</i></li> </ul> <p><b>B.</b> <i>Preparation of a Historic Structures Report (HSR), <u>at the expense of the</u></i></p>	Less than significant

		<p><i><u>property owner, for the Anderson Bank Building that would serve as a preservation planning document for the building, documenting both the building's history, existing material conditions, and providing treatment recommendations for future projects. An HSR would inform the current property owner, as well as future property owners and the City of Davis of possible conservation/repair/rehabilitation projects for the building, identify potential funding sources, and help create a phased program for financing identified future projects. HABS Documentation completed under 4.23A would inform a portion of the HSR and could be integrated into the final HSR. The HSR would also assist the project sponsor in the successful execution of restoration/rehabilitation mitigation measures described below in 4.2.3A(C). The HSR shall be completed prior to execution of any restoration / rehabilitation tasks detailed in the following paragraph, and before commencement of construction tasks associated with the proposed window installation project.</u></i></p> <p><i><u>The HSR would serve as verification as to whether some of the mitigation measures required below had been performed in accordance with the applicant's statement (Letter 2-4 comment). The HSR will determine whether certain mitigation measures, such as repair and restoration of cornice and removal and replacement of the existing second floor windows to match in-kind the original second floor windows, have already been completed, or as in the case of the second floor windows not needed. The HSR will also identify if the completed mitigation measures were appropriately done or not.</u></i></p>	
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		<p><i>C. Restore or rehabilitate the Anderson Bank Building to the extent feasible relative to retaining the high integrity of the building. CEQA requires adoption of all feasible mitigation measures that would substantially lessen the impact of the project, the restoration / rehabilitation effort that maintains integrity of the building is desirable. The restoration / rehabilitation can be accomplished by restoring / rehabilitating previous reversible alterations that would contribute to the integrity of the building, which have not gained integrity individually. The alterations that have achieved integrity on their own merit shall not be changed as part of the restoration effort. The restoration / rehabilitation tasks shall be completed prior to implementation of the approved project. Below is a list of restoration work to be performed. A minimum of the following restoration work shall be performed:</i></p> <p><i>1. Remove all existing awnings on the <u>four arched windows at the southern and eastern elevations of the building, which exclude the retail spaces and offices windows</u>, in order to expose the historic and character-defining arched windows original to the building, Treatment options for consideration relative to energy issues associated with the removal of the awnings may include insertion of translucent film over the windows, new glazing or installation of interior sun shades to reduce the amount of sunlight entering the tenant space, etc. <u>The final treatment options for the removal of the existing awning shall be identified at the Certificate of Appropriateness (COA) stage, should the EIR be certified and a COA application filed for the project.</u></i></p>	
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		<ol style="list-style-type: none"> <li>2. <i>Repair and restore the building’s cornice along the street-facing elevations.</i></li> <li>3. <i>Removal and replacement of the existing second floor windows to match in-kind the original second floor windows of the building, <u>if the HSR determines this is appropriate to ensure consistency with the Secretary of the Interior Standards.</u></i></li> <li>4. <i>Using The Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings as a reference, clean the exterior of the building, and either expose the original brickwork or repaint the building.</i></li> <li>5. <i>Restore and replace all existing exterior lighting fixtures to match in-kind the original lighting fixtures (based on historic evidence).</i></li> <li>6. <i>Repair and restore the Grate for the Bank Bell.</i></li> <li>7. <u><i>Restore the terra cotta ceramic plaque over the corner door with the words “Bank of Davis” in raised lettering</i></u></li> </ol> <p>Retention of the removed bricks is important to the potential future restoration of the building regarding the proposed project. The purpose of retaining the removed bricks due to the approved project is to restore the “original” integrity in the event it <del>was</del> is determined by the property owner that the alteration is no longer needed.</p> <p><i>D. The property owner shall retain all removed brick to allow the project in a safe environment for future use to restore the building to its original integrity, should there be no use or reason to continue with the lower windows.</i></p>	
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		<p><u>While it is recognized that 100 percent reversibility is unlikely, the applicant shall store in a safe manner in perpetuity the removed bricks to accommodate the alteration, and shall pass on the bricks for safe keeping to future owners. In the event of future restoration of the altered portion of the building due to this proposal, the retained bricks shall be used. Failure to store the bricks in a safe manner could directly affect the future decision to allow the restoration effort.</u></p> <p>E. <u>All mitigation measures shall be completed prior to commencement of work on the window alteration, should the EIR be certified and the COA approved. However, any mitigation measure, such as the bricks preservation, found at the COA stage to require late completion may be allowed to be delayed and completed at the appropriate stage in the project implementation at the city's discretion and subject to EIR certification and COA approval. Acceptance of all mitigation measures and agreement to comply with all mitigation measures by the applicant shall be documented prior to certification of the EIR.</u></p>	
4.2.3B – Design Options B: -- would alter the appearance of the Anderson Bank building, and will not be consistent with <i>The Standards</i> .	Significant	Same as 4.2.3A "A" through "E" above and " <u>F</u> " below.	Significant
<b>4.3 Aesthetics</b>			

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>4.3.3A – Design Options A: Design Option A will alter the appearance of the Anderson Bank building; this under CEQA would be a substantive change.</p>	Significant	<p><i>Implement Mitigation Measures A-D from Section 4.2.3A</i></p> <p>There is the potential that any bracing for reinforcement used to implement the project could be unsightly or lessen the visual integrity of the building. To mitigate for this potential impact, the applicant is required to note and address the prospect of installing bracing that could result in aesthetics issue.</p> <p><u><i>F.</i></u> <i>Should reinforcement bracing be required <del>at the time of building permit</del> to implement Design Option A, any reinforcement bracing <u>and engineering</u> required shall be designed and installed in a manner that it is not visible from public view. <u>All construction details and engineering shall be submitted with Certificate of Appropriateness application.</u> The goal of this mitigation measure is to avoid unsightly impact of the reinforcement bracing.</i></p>	Less Than Significant
<p>4.3.3B – Design Options B: Design Option B would alter the appearance of the Anderson Bank building, and will not be consistent with <i>The Standards</i>.</p>	Significant	<i>Implement Mitigation Measures A-F above.</i>	Significant

## 2.2 TEXT CHANGES

The text changes are being made in response to comments made. Note that new text is double underlined, while deleted text is struck-through. The sections of the DEIR and sometimes pages affected are cited as well.

### 2.1.3 General Description of the Project (DEIR, page 16)

The DEIR, page 16, is hereby amended as follows:

The project sponsor, Mr. James A. Kidd, proposes to install display windows beneath the four existing ground floor arched windows on the south and east building elevations. The project under review in this EIR is two design concepts; Design Options A and B. The proposal is to install new windows in order to create additional storefront display space, and perhaps to allow for additional light in the ground floor space. Each of the two design options would result in approximately 10.5' wide by 2.5' high new openings. The footnote on page 26 explains that the Urbana Preservation & Planning report identified the dimension of the proposed window alteration as 5 x 2', while the simulated photo in the report showed approximately 10.5 x 2'. The dimension of the proposed conceptual window alteration is approximately 10.5' wide by 2.5' high. Without a detailed plan, which will be part of a Certificate of Appropriateness application, the dimension is estimated. See Oral Comment #21.

### 4.2.1 Environmental Setting (DEIR, pages 38-39, 40 & 49)

A last paragraph is hereby included to the DEIR, page 39, to read as follows (which addresses comments made regarding contents of pages 38-39, 40 and 49 of the DEIR):

Davis has five commercial historic resources of which two are Landmarks and three are Merit Resources. The majority of other historic resources in the downtown area were built as residential structures. The Anderson Building is the city's only commercial Landmark from the earliest period of the City's history and sole representative of its size and type; a two-story mixed retail, bank and office structure. Hence this building is of utmost importance as a cultural resource given that the city has comparatively few historic resources as compared to other cities in California, such as City of Woodland. See Letter 4-6 comment.

### 4.3.2 Regulatory Context (DEIR, pages 39-41)

Section 4.3.2 (Regulatory Context) of the DEIR, pages 39-41, is hereby amended as follows to address comments made during the DEIR comment period:

... **The Core Area Specific Plan includes the following policies:**

Land Use 4                      Require that the first floor of buildings in the Downtown Core (Retail Stores) be pedestrian oriented.

Storefront Design Guidelines (excerpts)

For commercial retail storefronts, generally there should be more glass and less wall at the storefront level, balanced by more wall and less glass on the upper façade. ... Historic structures with architectural significance need to be preserved whenever possible.

The Secretary of Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings shall be used as a reference standard for all designated resources. (Underline emphasis added)

This Core Area Specific Plan policy is applicable to the proposed project. This is because the Core Area Specific Plan also states that “inappropriate historical themes should be avoided” and “the Secretary of Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings shall be used as a reference standard for all designated resources.”

Alterations to all historic buildings within the City of Davis are covered by the historic ordinances and regulations of CEQA. In the case of the Anderson Bank Building, the arched windows are a major character-defining feature. Therefore, alterations resulting in more glass on a building within the Core Area should consider this guideline to a reasonable extent. Nothing in the guideline explicitly states that this guideline is to be applied only to new construction. See Letters 1-4, 4-3, 4-7 and 4-8 comments and responses.

“Weeks & Glimmer” in the DEIR, pages 40 and 49, is hereby corrected to read: “Weeks and Grimmer.” Also the word “deign” in the DEIR, page 16, is hereby changed to “design”. See Oral Comment #28.

### 4.3.3 Impacts / Mitigation Measures (DEIR, Pages 50 through 56)

The changes below are hereby made to the DEIR, pages 50 through 56.

... **Project-specific Impacts.** Each conceptual design option is discussed separately below.

The aesthetics impact discussion below is based on the building and the surrounding area

reflecting only the secondary issue of aesthetics. The following questions must be answered in order to address this issue:

- What impacts would each proposed conceptual design option (Design Options A and B) have on the building and area, reflecting only the secondary issue of aesthetics?
- ~~What impacts would each proposed conceptual design option (Design Options A and B) have on the building and area, reflecting only the secondary issue of aesthetics?~~

See Oral Comment #15.

**Design Option A impacts on the aesthetics of the Anderson Bank Building. (DEIR, pages 50 to 51)**

Clarifications are hereby made to the DEIR, pages 50 to 51, as follows:

Typically, most modern retail windows range from six inches to two feet above ground. The southwestern portion of the building elevation already has lower retail windows (twenty eight inches above ground/walkway). ~~Design Option A arguably is in keeping with the original design of the building and the Design Guidelines in that the window alteration would result in a similar lower window as the southwesterly portion of the building and a storefront display windowed provided consistent with the Design Guidelines. See page 51 of the DEIR, third sentence of second paragraph.~~

The Design Guidelines encourage provision of transparent display windows at the storefront, ~~level, which is what proposed Design Option A would do.~~ However, some functional and visual concerns were expressed about this proposal, which include 1) whether there is adequate display space provided, 2) its appearance as if there is a basement when there is no basement, and 3) the unusual knee-level window under a high window of different materials that presents a hodge-podge appearance. Although there are a wide range of window heights and sizes within the downtown, few – if any – buildings have windows above and below the heavy sill proposed in Design Option A. *See page 51, last paragraph of the DEIR.*

*Design Option A impacts on the aesthetics of the downtown area.* The aesthetics impact of Design Option A on the area appear to be minimal given that some surrounding buildings have differing types of low retail windows of varying forms, while others have high retail windows also of varying forms. There is no consistent retail window theme in the Core Commercial area. These storefront windows range from six inches to five feet above ground/sidewalk. Some lower retail window tenants have covered a portion of the windows

either with paint or other materials to give the appearance of a higher window given nature of uses on the spaces.

There is a combination of modern and historic buildings. There are a number of older buildings with historic significance as pointed out in Sections 2 and 4.1. ~~Noteworthy is the fact that all the windows in a given building have similar character, unlike Design Option A.~~ Noteworthy is the fact that each building has windows representative of the nature of use intended for the building at its original construction. See page 52 of the DEIR.

**Design Option B impacts on the aesthetics of the Anderson Bank Building.**

Section 4.3.3, page 53, last paragraph (regarding Option B) is amended as follows:

~~Although it does not maintain the integrity of the existing high windows, replacing them with lower windows eliminates the unusual, and potentially unattractive, mix of windows on the same façade. The Anderson building was designed as a mixed-use building with three specific types of uses, which are retailing, banking, and office upstairs. Potentially, the aesthetic impact of this design option could produce an unusual and unattractive mix of windows on the same façade.~~

**Appendix 8.3.** The third paragraph from the bottom of the page (page 4 of 6) is thus amended:

~~Upon negotiation with the~~

Figure 9 on page 53 of the DEIR is hereby amended to read “High Bank Windows” rather than “High Retail Windows.”

The two new appendixes are:

- Anderson Bank Building State of California – The Resources Agency, Department of Parks and Recreation Primary Record.
- Resume of Wendy L. Tinsley, Principal Urbana Preservation & Planning.

### **3.0 LIST OF COMMENTERS**

The following is a list of letters received identifying the letter number, the person or entity submitting the letter, and the page number on which to these letters appear.

<b>Letter #</b>	<b>Person/Entity</b>	<b>Pages</b>
1.	City of Davis Historical Resources Management Commission	15-21
2.	James A. Kidd, Property Owner/Project Applicant	22-28
3.	Gale Sosnick	29-31
4.	Valerie Vann	32-48
5.	Richard Rifkin	49-52
6.	Oral Comments	53-60

## 4.0 COMMENT LETTERS AND RESPONSES

### Responses to Comments

This section contains comments and responses to the comments, which were received during the comment period on the Draft EIR. Each point in the comment letters is numbered consistent with the letter numbering and responses provided accordingly.

#### Letter 1

City of Davis Historical Resources Management Commission

Comments on the Anderson Bank Building Draft Environmental Impact Report.

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To: Ike Njoku, Staff Liason  
From: Rand Herbert, Chairperson  
Date: December 12, 2006

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The purpose of this memorandum is to summarize our verbal comments made regarding the Anderson Bank Building Draft EIR during the November 20, 2006 meeting; they are as follows. As you recall, Commission Sosnick recused herself and made separate comments as a public individual from the floor before leaving the meeting; these should be handled separately.

- |            |   |
|------------|---|
| <b>1-1</b> | 1. The commission wanted a clearer and more reasoned argument as to why Design Option A (hereafter DOA) was considered mitigable and Design Option B (DOB) was not. It was not clear how one could arrive at different conclusions based on SOI standards. The commission suggested that insertion of more text from the Urbana report would help. [see pages 18, 42, etc.]   |
| <b>1-2</b> | 2. The commission would like clarification on the question of, if only <u>part</u> of DOA's mitigation measures were completed, <u>would the resulting impacts still be "reduced to less than significant?"</u> It was the sense of the commissioners that all of the mitigation measures would have to be accomplished for this to be true -- at least, that was the implication from the document. The commissioners felt this point needs clarification. [see pages 42-45 and elsewhere] |
| <b>1-3</b> | 3. The commission wanted some statement in the DEIR regarding enforcement of the mitigation measures, and information on whether the applicant had agreed to complete them.   |
| <b>1-4</b> | 4. The commission wanted more clarity on the discussion of downtown window guidance vs. preservation of historic resources; this point was brought up by Commissioner Vann. That section could be read as being in favor of larger windows on all buildings, but the more reasoned view is that it pertained specifically to windows on new buildings or those on non-historic resources. [see page 49]   |



1-5 5. Clarification is needed on why DOA would result in non-eligibility for the National Register but not the California Register (CR). While it is true that a city listing can make a resource eligible for the California Register, all of the same requirements for the CR (in terms of significance and integrity) would have to be met. The document should clarify why DOA would not have an unmitigable adverse impact as does DOB. [pages 42-46, 69-70, and elsewhere]

1-6 6. Commissioner Berteaux mentioned that the DEIR should consider changing "window" in DOA to "glass wall." This would probably require a change in the project description. Can the City make such a change between the DEIR and FEIR? [See page 16 and elsewhere]

A minor correction / comment:

1-7 p. 54, Photograph Caption for Figure 9 should read "high **bank** windows" rather than "high **retail** windows."

**Response to Comment 1-1**

The differences between conceptual Design Option A and B are addressed in the Urbana Preservation & Planning Historical Resources Analysis report. The table below contains excerpt details of conceptual Design Options A and B from the Urbana Preservation & Planning report.

**Table 4.0 – Comparing Conceptual Design Options A and B**

Design Option A – Project Impacts	Design Option B – Project Impacts
Under Design Option A, the integrity of the Anderson Bank Building would be diminished through the addition of four new windows which would change the historic appearance of the building by altering the elevated ground floor window pattern that is typical to bank buildings constructed in the early part of the 19th Century. This	Design Option B does not appear to be consistent with the philosophical approach set forth in <i>The Standards for Rehabilitation</i> , and the execution of Design Option B would not to be in the best interest of the original design or historic character of the Anderson Bank

option, however, would retain the existing brick window sills that anchor the arched windows and provide a heavy horizontal base for the ground floor wall plane. As a result, Design Option A was determined generally consistent with *The Standards for Rehabilitation* because the proposed modification project would not appear to remove enough historic material or significantly alter character-defining features of the building such that it would no longer carry the ability to physically convey it's previously identified historical significance.

If the proposed building modifications identified as Design Option A were executed, the Anderson Bank Building would appear to maintain its eligibility as a City of Davis Landmark, and inclusion/eligibility for inclusion on the California Register of Historical Resources at the local level. The changes proposed under Design Option A, would likely preclude the Anderson Bank Building from future listing on or a future determination of eligibility for the National Register of Historic Places

Although Design Option A would not appear to cause a substantial adverse change in the significance of the Anderson bank Building for CEQA purposes, completion of a HABS documentation program for the Anderson Bank Building is recommended prior to issuance of a COA by the City of Davis or execution of the design project by the applicant. Information on the HABS program is included in the 'Mitigation Measures' section on the following pages.

Building. For the purposes of CEQA, Design Option B would cause a substantial adverse change in the significance of the Anderson Bank Building that could not be mitigated to a less-than-significant level of impact. Therefore, execution of Design Option D would result in a significant environmental effect.

If Design Option B were executed, the Anderson Bank Building would no longer appear eligible as a City of Davis Landmark, or for inclusion/eligibility on the California Register of Historical Resources. Similarly, the changes proposed under Design Option B would preclude the Anderson Bank Building from future listing on or a future determination of eligibility for the National Register of Historic Places.

Although the impacts to the Anderson Bank Building resultant from Design Option B cannot be reduced to a less-than-significant level, completion of a HABS documentation program for the Anderson Bank Building is recommended if the applicant elects to pursue this option. Information on the HABS program is included in the 'Mitigation Measures' section on the following pages.

According to the Urbana Preservation & Planning report, the Design Option A, unlike Design Option B

“would not appear to remove enough historic material or significantly alter character-defining features of the building such that it would no longer carry the ability to physically convey it's previously identified historical significance.”

The Urbana Preservation & Planning report states that Design Option A will

“remove the existing historic masonry units beneath each of the four arched windows in order to install new windows there. While the existing brick may not be considered a distinctive material and does not feature an ornamental bond pattern, the installation of new windows in that wall section would change the spatial pattern of the building by creating new openings in the wall plane. The new windows would diminish the ability of the building to convey its original use as a bank, which typically featured elevated ground floor windows. However, Design Option A proposes retention of the existing brick sills; strong horizontal elements which lend to the overall horizontal composition of the building.” “Under Design Option A, no changes have been proposed which would appear to modify or remove significant features of the building such as the ornamental brickwork and panels, and the existing arched windows. Nor have any conjectural modifications been proposed which would appear to create a false sense of history for the building.”

The report states that Design Option B

“entails removal of the existing brick sill, removal of the existing ornamental end panels, and installation of a new window with a tri-partite sash that is similar to the sash pattern currently incorporated in the building windows. A squared bracket/cap is proposed for installation on the wall in place of the existing historic end panels. The new opening would appear to measure approximately 5’ x 2’ – the same dimensions proposed for Design Option A.” ... “The conceptual sketch provided for Design Option B does not indicate whether the existing wood sill would be materially affected by the proposed window installation project; if it would be repaired or replaced as part of the new window installation project, or if the new window proposed for installation in the bulkhead would abut the bottom edge of the existing sill and require no invasive measures or material intervention to the historic sill. The comments provided above assume that no modifications would be made to the existing window sills. If changes are proposed for the existing wood sills than additional information is necessary to analyze the proposed modifications under *The Standards for Rehabilitation*, particularly *Rehabilitation Standards* #6, #7, and #8.”

It is noteworthy that the dimension of 5’ x 2’ is inaccurate, and the approximate dimension is 10.5’ wide by 2.5’ high. See Section 2.2, Text Changes.

The Urbana Preservation & Planning report concludes as follows relative to the key differences between Design Options A and B:

“Design Option B proposes removal of the existing brick sills; strong horizontal elements which lend to the overall horizontal composition of the building, as well as the ornamental panels that are considered distinctive, character-defining features for the building.”

As seen from the details above, Design Option A does not involve removal of the brick sills.

### **Response to Comment 1-2**

Table 2.7 of the DEIR containing the summary of impacts and mitigation measures has been modified to address certain aspects of this concern. All mitigation measures would have to be completed in order to reduce impacts to less than significant levels. Noteworthy is the fact that some items of restoration stated to have been completed by the applicant would have to be verified through the historic structure report (HSR) to be performed. Any of these items found to have been completed would not need to be repeated. See Mitigation Measures table on pages 6 through 11 of this FEIR.

### **Response to Comment 1-3**

Mitigation Measure “E” has been added requiring that the applicant agree to the overall mitigation measures prior to certification of the EIR. In addition, it is required that all the mitigation measures be met prior to commencement of alteration work on the windows, unless exceptions are granted at the discretion of the city. However, it is noteworthy that preservation of the bricks in a safe manner cannot

occur prior to commencement of alteration work on the windows. This would be an on-going mitigation measure if the EIR is certified and a Certificate of Appropriateness approved.

#### **Response to Comment 1-4**

The “Regulatory Context” (4.3.2) section of the DEIR appropriately cited the Core Area Specific Plan *Storefront Design Guidelines*, which states that retail storefronts in general should be “more glass and less wall at storefront level.” It is noteworthy that this section of the Core Area Specific Plan cited also contains a statement that historic structures with architectural significance need to be preserved whenever possible. See Section 2.2 (Text Changes) of this FEIR for additional information.

#### **Response to Comment 1-5**

See response to Letter 1-1 above. Design Option A would not involve the “removal of the existing brick sills; strong horizontal elements which lend to the overall horizontal composition of the building, as well as the ornamental panels that are considered distinctive, character-defining features for the building” as compared to Design Option B. This difference directly affects the inability to mitigate Design Option B to a less than significant level. The resultant effect is that Design Option A can be eligible for the California Register but not the National Register with implementation of all mitigation measures.

#### **Response to Comment 1-6**

The Historical Resource Analysis Report (Final January 2006) prepared by Urbana Preservation & Planning and subsequent DEIR did not include a review of the glass wall concept as an extension of Design Option A because the concept was informally introduced after the January 2006 Historical Resource Analysis Report was finalized and DEIR released. The glass wall concept is not addressed by this FEIR because of the concept's late introduction into the project review process. Newly developed interest in pursuing the glass wall concept as a viable design option has not been afforded adequate consideration as no conceptual renderings have been provided by the project applicant, and no detailed review or discussion has occurred regarding the concept.

Preliminarily the City of Davis and Urbana Preservation & Planning (Urbana) have opined that the glass wall concept would appear to entail installation of a fixed glass unit without a divide and flush with the exterior wall plane, whereas Design Options A and B entail insertion of a divided glass unit recessed into the wall plane. Preliminarily, it would appear that the resultant appearance from installation of a divided unit versus a single pane / undivided unit would not appear to have greater or lesser impacts than that resultant from Design Option A. However, specific design details and renderings should be provided by

the project applicant prior to any consideration of formal approval of the newly introduced glass wall concept.

As with Design Options A and B, further detailed analysis of the glass wall concept (as a variation of Design Option A) should be prepared under the Certificate of Appropriateness review process. Should the EIR be certified and Design Option A "or a variation thereof be selected" for further review and processing, the applicant would have to file for a COA application. During the application filing, the applicant would be required to "specify and submit" design details and renderings that assist staff in making the determination whether an addendum to the EIR will have to be prepared.

### **Response to Comment 1-7**

See page 14 of this FEIR where an amendment has been include to add "High Bank Windows" in place of "High Retail Windows."

## Letter 2

### Parkside Properties

200 B Street, Suite D, Davis, CA 95616 – Phone (530) 758-6868 Fax (530) 758-5638

December 14, 2006

Katherine Hess  
Community Development Director  
City of Davis  
23 Russell Blvd.  
Davis, CA 95616

RECEIVED

City of Davis  
Planning & Building

Re: Response to Anderson Bank Building EIR

Dear Katherine:

Introduction: I would like to summarize our Thursday meeting and provide some requests for inclusions to the final EIR. The report should address the following: 1) Discussion of the two 'display area' options and their respective limitations/merits; 2) condense 'historical designation' into specific list of elements; and 3) identify 'mitigation' completed. In addition, we have conducted some further research into the 'Prairie School of architecture,' and have attached a list of features, and their relevance to this particular building. As a bottom line, this building does not appear to conform sufficiently to the 'Prairie School of Design' as it contains only 1/4 of the twelve identifying elements. (A majority of the elements of any generic building would seem to have at least this many.)

2-1

Window Options: The two options are A) a glass panel insert under each window and B) addition of new framed windows. Option B would appear to copy existing windows as it has one of the specific elements constituting 'historical designation' (i.e. windows, sills and ornamental end panels) of the building. (Copying existing windows would not be a positive solution.) Conversely, option A would not replace any historical elements and *would* be a positive solution. Additionally, there are many examples of 'glass inserts' being placed in historical buildings, without altering the character of the building. (We suggest that you contact Richard Berteaux for some specific examples and photographs. These could be attached as an exhibit to your report.)

2-2

Building Elements: In our meeting we discussed a way to focus 'historical designation' into a format which will allow the Council to evaluate each item objectively and come to a conclusion on the application. We believe this is vital to provide a logical, clear and specific explanation to the Council. By contrast, if we continue to discuss 'historical designation' in general conceptual terms, without identifying its specific components, the discussion would remain subjective and vague, and would effectively prevent reaching any clear consensus. Therefore, we have reviewed the three-page addendum provided,

and it appears that the discussion of historical significance can successfully be condensed into the following five categories.

Building Categories/Design Elements:

1. History of the building (i.e. prior use, architect, builder, and their significance to the community)
2. Architecture of the building (i.e. the significance of the style of architecture and quality of building's representation of the style)
3. Integrity of the building (i.e. to what extent its current appearance remains true to its original character and appearance)
4. Elevation composition (i.e. outside appearance/materials)
5. Windows (i.e. how they effect the character of the building)

We believe that this list is comprehensive. (You may elect to add other specific items.) In any event, by creating a design element list, we can move the discussion from subjective to the specific and analytical. In this way, the proposed changes can be considered in reference to specific elements and provide clarity and general understanding of any changes.

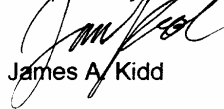
2-3

Prairie School of Architecture: With respect to the architecture of the building, we have done some further research on the 'Prairie School of Architecture.' As you may know, this style was popular from 1900 to 1920. Louis H. Sullivan, known as the 'father of American Architecture' mentored Frank Lloyd Wright who became one of the founders of the Prairie School. We are attaching a list of features typical of 'Prairie School' structures for your review. It appears that, of the twelve exterior features listed, the Anderson Building contains, at most, three. We also attach a list of all 'Prairie School' style buildings in California and note that the Anderson building is not on the list. We believe that your report should reference this and note that none of the proposed EIR changes would impact these design elements (see above.)

2-4

Completed Mitigation: We would like you to include in your report reference to the mitigation already completed, namely 1) new corner glass doors, 2) new windows matching original windows, 3) original corner commercial doors, 4) new second floor access door, and 5) the completion of the cornice work with a new roof system. All of these completed items total an expenditure to date of \$52,454. A list of the billings for all work completed is attached. As requested, we are also attaching a list of mitigation items, noting those with which we agree and disagree.

Respectfully,



James A. Kidd

cc: Ike Njoku  
Enc.

**MIA** **UNIFIED VISION**  
THE ARCHITECTURE AND DESIGN OF THE PRAIRIE SCHOOL

INTRODUCTION THE COLLECTION PURCELL-GUTTS HAUSA TOUR ARCHITECTURAL TOUR COMMENTS

- UNIFIED VISION
- INTRODUCTION
- THE COLLECTION
- PURCELL-GUTTS HAUSA TOUR
- ARCHITECTURAL TOUR
- COMMENTS
- FEATURES OF THE PRAIRIE SCHOOL
- WHAT MAKES IT-1

### FEATURES OF THE PRAIRIE SCHOOL

The Prairie School style was popular from 1900 to 1920 all over the United States, and its manifestations ranged from sprawling progressive dwellings by Frank Lloyd Wright to simple, box-shaped interpretations by local architects who counted Prairie as just one of the styles in their repertoire.

Following is a list of features typical of Prairie School structures. They are not exclusive to progressive architecture, but are a good benchmark when identifying Prairie School buildings or those inspired by the style.



Select an image for more information.

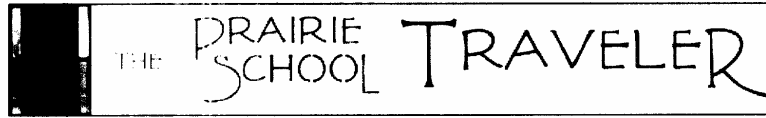
#### Features of Prairie School Architecture: Exterior, page 1 of 2



[next page >](#)

[Unified.vision.Introl](#) | [The.Collection](#) | [Purcell-Gutts.Hausa.Tour](#) | [Architectural.Tour](#) | [Comments](#)





### California

City	Structure	Address	Architect	Date
Albany	House	975 Ventura	atr. John Hudson Thomas	c. 1915
Berkeley	Kelly House	455 Wildwood	John Hudson Thomas	1910
Berkeley	Little, Margaret, House	382 Shattuck Avenue	Purcell & Elmslie	1914
Berkeley	Loring House	1730 Spruce Street	John Hudson Thomas	1914
Berkeley	House	158 Hillcrest Avenue	Charles W. McCall	
Cupertino	Older, Fremont, House	22800 Prospect Road	Wolfe & Wolfe	1912
Escondido	Wood, Mrs. J.M., House	455 East Fifth Street	John L. Wright	1911
Eureka	First Church of Christ, Scientist	11th & H Streets	Frank T. Georgeson	1914
Eureka	Wilson House	630 J Street	unknown	1912
Fresno	Eaton Flats	126 North Fresno Street	Glass & Butner	1917
Fresno	Hughes House	743 South Fourth Street	unknown	1912
Hayward	Oliver House	27240 Hesperian Boulevard	Wolfe & Wolfe	c. 1914
Hollister	Wapple House	498 Fifth Street	Wolfe & McKenzie	1909
Hollister	Dickinson, John, House	10034 Cienaga Road	Walter Burley Griffin	1907
Hollister	House	472 South Street	unknown	c. 1915
Los Altos	House	436 University Avenue	unknown	
Los Angeles	Weber, William J., House	3923 West Ninth Street	Lloyd Wright	1921
Los Gatos	House	25 Hernandez Avenue	Wolfe & Wolfe	1915
Milpitas	Dr. Renselaer J. Smith House	163 North Main Street	Wolfe & Wolfe	1915
Mill Valley	Carnegie Library	52 Lovell Avenue	C.H. Russell	1911
Montecito	Stewart, George C., House	196 Hot Springs Road	Frank Lloyd Wright	1909
Palo Alto	Haehl, H.A., House	1680 Bryant Street	John Hudson Thomas	1914
Pasadena	Blinn, E.B., House	1301 Chelton Way	George W. Maher	1906
Pasadena	Scofield House	280 South Orange Grove Blvd.	Frederick L. Roehrig	1909
San Diego	Lee, Alice, Cottage	3578 Seventh Avenue	Irving Gill	1905
San Diego	Price House	3202 Elliott	unknown	c. 1910
San Diego	Schiller, Rebecca, House	115 Redwood Street	Emmor Brooke Weaver	1913
San Diego	Teats, Katherine, Cottage	3560 Seventh Avenue	Irving Gill	1905
San Diego	Workingman's Hotel	South Fifth & G Streets	John L. Wright	1912
San Diego	House	2704 Evergreen	unknown	c. 1914
San Diego	House	3220 Goldsmith	unknown	c. 1914
San Diego	House	3238 Goldsmith	unknown	c. 1914
San Diego	House	3252 Goldsmith	unknown	c. 1914
San Diego	House	3279 Homer	unknown	c. 1914
San Diego	House	4130 Lark Street	Joel Brown	1916
San Diego	House	345 Laurel	unknown	c. 1912
San Diego	House	2947 First Avenue	unknown	
San Diego	House	3344 Fifth Avenue	unknown	
San Francisco	House	343 Montalvo	unknown	
San Francisco	House	770 Fourth Avenue	unknown	
San Francisco	House	780 Fourth Avenue	unknown	
San Jose	San Jose City Listing			
Santa Clara	Jones, Robert, House	1115 Lafayette Street	Wolfe & Wolfe	1914
Santa Cruz	House	332 Union Avenue	unknown	c. 1912
Torrance	House	1504 Post	unknown	c. 1916
Union City	House	41200 Mission Boulevard	unknown	
Venice	House	1304 Riviera	unknown	c. 1910
Venice	Apartment House	235 San Juan	unknown	c. 1910

**ANDERSON BUILDING  
COMPLETED MITIGATION EXPENSES**

	DOORS	ROOF	ENTRY	WINDOWS
<b>2004</b>	\$24,864.17	\$17,600.00	\$3,449.07	\$187.12
<b>2005</b>	\$89.95	NONE	\$826.00	NONE
<b>2006</b>	\$3,621.18	\$100.00	\$1,717.00	NONE
<b>SUB-TOTALS</b>	<b>\$28,575.30</b>	<b>\$17,700.00</b>	<b>\$5,992.07</b>	<b>\$187.12</b>

**COMBINED TOTAL OF EXPENSES \$52,454.49**

**Mitigation Items**

- 2-4**
1. We do not agree that the following items should be part of the EIR mitigation:
    - Windows – these are not different from the original windows
    - Removal of Awnings – there is no reasonable solution at this time to offset the energy loss this would create
  2. We agree with the following items:
    - We believe these items are completed and credit should be given for this work as part of the total mitigation costs. (See separate attachment totaling \$52,454.49)
    - We agree that these items are not completed but are reasonable for inclusion as part of the mitigation – clean and re-paint, restore lighting, repair and restore grating and retaining bricks.

## **Response to Comment 2-1**

See Response to Letter 1-6 above. Mr. Richard Berteaux was contacted and he had the following comments on the “glass panel/wall” insert:

“What I was suggesting when I said an opening 6 or 7 courses high, was to leave one course of brick at the top under the sill and one course of brick at the bottom above the base, which I think will make for a more subtle looking treatment. Opening the wall the maximum amount possible I believe would be less attractive and be a more obvious change.

An alternative is a flush glazed opening. This alternative also entails removal of existing masonry units beneath the arched windows in the bulkhead below the brick window sill similar to the other proposals. However, instead of installing a single horizontal window, the opening would have a piece of heavy glass (1/2" or more thick") installed flush with the exterior face of the brick wall in the bulkhead below the brick window sill. The edge of a steel framed opening behind the glass would provide a surface on which to adhere the glass with silicon adhesive. This alternative would not alter the existing three raised tiers of the brick sill and related ornamental panels, windows and arched elements. The opening for the glass would be somewhat smaller than that for "Design Option A", six or seven courses of brick tall and approximately 10.5' wide.”

It is noteworthy that no examples or architectural details of the “glass wall” insert have been provided.

## **Response to Comment 2-2**

Providing the City Council a clear and objective process to consider historical designations is a reasonable comment. However, this EIR evaluates a proposal to provide additional display space windows or openings on the building that is already designated and does not evaluate whether the building should be a Landmark.

It is understood that certain aspects of the past survey reports provide statements on the building and other buildings in the Core Commercial area that raise questions as to the assessment for their historic designations. Staff and the Historical Resources Management Commission are aware of this concern and agree with the applicant that additional work is needed to fully articulate the features that are essential to each building’s designation. Nonetheless, the primary focus of this EIR is whether the conceptual designs suggested for the windows alterations meet with the requirements of the Secretary of Interior’s Standards for a historic resource under CEQA.

A Historical Resources Analysis report has been prepared by Urbana Preservation & Planning, which directly evaluated the various design options proposed. The question now is whether the information contained in the DEIR and the FEIR adequately address the two equal weight conceptual projects and

their environmental impacts. The staff report to the Commission and Council would include discussions about the status of the building and the prior Council determinations that the building is a Landmark.

### **Response to Comment 2-3**

The DEIR under the discussion of the Environmental Setting (4.1.3, page 35), cites the city's 2003 Historical Resources Survey statement that the architectural styles of the downtown buildings varies and includes "Classical Revival (Yolo Bank), Prairie Style Commercial Block (Anderson Bank), ..." The 2003 survey report also indicates that the building is an "impressive Prairie Style Commercial building" identified in the 1980 and 1996 surveys. See Appendix A of this FEIR. The most recent historical resources analysis performed by Urbana Preservation & Planning (Urbana) states that the building "is a two-part commercial block structure designed with an observable, although simplistic, influence from the Sullivanesque style of architecture..." See page 41 of the DEIR, Section 4.2.3.

The Urbana report is the most up-to-date and detailed individual historical resources analysis report on the building. The issue is not what the label of the architectural style of the building is, rather if the proposed alteration to a Landmark conforms to all applicable standards and guidelines pursuant to the Secretary of Interior's Standards of Rehabilitation under CEQA.

The appendix section of this FEIR contains the existing site specific survey for the subject property contained in the 2003 Historical Resources Survey and in the Davis Register of Historical Places.

### **Response to Comment 2-4**

The mitigation measures have been modified to allow the Historic Structures Report (HSR) to assist in determining compliance with items identified by the applicant to have been completed, or whether the window restoration is needed. If these items are found to have been completed, no further action is necessary on the part of the applicant, and the related mitigation measures would be deemed completed. For instance, the HSR would verify whether there is a need to replace the second floor window, or not.

If the project is to be approved without overriding the significant impacts via a Statement of Overriding Consideration, it is necessary that the applicant accept all mitigation measures prior to certification of the EIR given that the total mitigation measures are deemed necessary to reduce impacts to less than significant levels.

**Letter 3**

Ike Njoku, Planning Department  
Davis City Hall  
23 Russell Blvd.  
Davis, CA 95616

December 6<sup>th</sup>, 2006

**RECEIVED**

DEC 13 2006  
City of Davis  
Planning & Building

ANDERSON BANK BUILDING

- The purpose of saving old buildings in the core are several:
- 3-1
    - to give the core area character: old buildings usually have a lot more detail than new buildings
    - to indicate that the city has a past and is not just a johny-come-lately
    - to re-use that which is good and not be just be a throw-away culture
    - to adapt them for modern use so they don't stand empty.
  - 3-2
    - If the building is architecturally worthwhile and the physical condition is such that it makes some economic sense to save it, or the building is an architecturally gem so that it is worth the extra cost and its use can be made compatible with the core area goal i.e. retail, the building should be adapted to make it viable. We don't need a white elephant in the downtown area. Stressed or empty stores do not give a good message.
  - 3-3
    - I firmly believe that when a building is adapted to present use, minor changes should be compatible with the original building. I don't want to look at a building and say 'oh, they added/changed it from the original.' It should look all of a piece. (I have never found anyone outside my Commission who disagrees with this.) Rehab is one of the choices under Historical Preservation
  - 3-4
    - Woodland is rehabilitating several of its historic buildings to find new uses for them. (Davis Enterprise 12/11/06)

**3-5** The Anderson bank building would still have its cornice and brick details, bas-relief tiles and its arched windows. Lowering the sill would not effect the above, and would make the building a viable retail space. The public would hardly notice the difference.

**3-6** It wouldn't even function as a bank today. I quote from the recent EIR, page 42, "the proposed project would diminish the ability of the building to convey its original use as a bank." Not true. I once spoke with a police captain who said that the police want total vision into a bank, and would have requested that the glass be brought down close to the floor. If anything, Plan B, lowering the sill, would enable its reconversion.

**3-7** Jim Kidd, the owner, says it 7 years that he has been petitioning for the change, at great cost. It's time to act. Plan B to me is a no-brainer.

Very truly yours,



Gale Sosnick  
621 Elmwood Drive, Davis  
758-5665

### Response to Comment 3-1

This is a policy comment. It is not comment on the adequacy of the EIR. Comment noted.

### **Response to Comment 3-2**

See Response to Comment 3-1 above. The building is a Landmark. It is proposed to be altered, which requires review consistent with applicable city Zoning Ordinance and state law. The historical resources management ordinance contains provisions for evaluating economic necessity for a proposed alteration based on financial hardship at the time of Certificate of Appropriateness.

### **Response to Comment 3-3**

Comment noted.

### **Response to Comment 3-4**

Comment noted. This is a policy comment rather than on the adequacy of the EIR.

### **Response to Comment 3-5**

The Anderson Bank Building window alteration EIR is being processed consistent with all applicable city and state requirements. The building is a Landmark, which must undergo special review consistent with the regulations and guidelines prescribed for such alterations.

### **Response to Comment 3-6**

The issue is not whether the building would function today as a bank, rather whether the proposed alterations would adversely affect the Landmark building.

### **Response to Comment 3-7**

The process currently embarked would lead to a resolution. This EIR analyzes equally both design options. The conclusion is that Design Option A with full mitigation measures applied would result in less than significant impacts to the historic resource, while Design Option B would result in significant impacts that cannot be mitigated. See the Urbana Preservation & Planning Historical Resources Analysis report attached to the DEIR. The policy decision of whether to approve either alternative will be made by the City Council upon the recommendation of the Historical Resources Management Commission.

## **Letter 4**

### **Comments on Anderson Building Window Alteration Project Draft EIR**

**December 11, 2006**

Valerie Vann

Contact info:  
Davis, CA  
valerie@vanngroup.com



Section 3.0 Project Description

Page 27 & Fig 4. The description of Option B states that the ornamental plaques at the ends of the brick sills will be removed as well as the sill, and that a " squared bracket/cap is proposed for installation on the wall in place of the existing historic end panels."

4-1

The photo doesn't show that the panels and remnant ends of the sill are to be removed under this design option. The new square "end cap" idea is vague, and there is no explanation why it is necessary to remove the historic plaques in this Option, since they are outside the area where the cuts for the new window opening will be made, or whether the existing wood sill at the bottom of the historic window is proposed to be retained.

Option B therefore seems to entail loss of or damage to more historic material than necessary to do what it is supposed to accomplish. (See also comments on p. 53, aesthetics, below.)

Section 4 .0 – Cultural Resources - General Comment

While the section lists the historic resources in the project area and downtown, and mentions the importance of the 2<sup>nd</sup> & G Street corner, I'd like to see it specifically stated that Davis has only seven identified *commercial* historic resources, and only five that have actually been designated. Of these, two are Landmarks and three Merit Resources. While there are a dozen or so other historic resources in the downtown, the vast majority are *residential* structures. The Anderson Building is the city's *only commercial Landmark* from the earliest period of the City's history and *sole* representative of its size and type (a two story mixed retail, bank & office "block"), hence its extreme importance as a cultural resource, in a city that has retained comparatively few historic resources compared to other cities its size.

4-2

There is also arguably a cumulative impact, since loss or impairment of any one of the very few commercial historic buildings, particularly in this specific location as the highly visible anchor of the original business block of G street, is a perhaps greater impact than loss of one of the more numerous residential historic buildings scattered throughout the downtown.

Sec. 4.2. Cultural Resources  
4.2.2 Regulatory Context

The appropriate sections of the Davis City Zoning ordinance should be included in the Regulatory Context, particularly Section 40.23.090 (1) (B) Certificate of Appropriateness Standards of Review for exterior alteration of Landmarks, since the ordinance as well as CEQA make the Standards the criteria for evaluating projects affecting historic resources.

4-3

4-3

The same comment applies to Section 4.2.3 of the DEIR, Aesthetics, Regulatory Context. Alternately, to avoid duplication, the DEIR could have just one general "regulatory context" section, referred to in the separate Cultural Resources and Aesthetics section.

4.2.3 Project Impacts

The proposed alterations of Options A & B are deemed inconsistent with certain of the Secretary of Interior Standards for Rehabilitation of Historic Buildings. The reasoning process is rather technical and may not be adequately conveyed in the EIR for a lay person to understand how the Standards apply. Since CEQA is a process intended to disclose to the public the environmental impacts of projects, EIRs should be intelligible to members of the public.

More specific explanations along the following lines would help.

Standard 1. A property will be used as it was historically or be given a new use that requires **minimal change** to its **distinctive materials, features, spaces, and spatial relationships**.

4-4

Comment: The proposed alterations are a *major* change to materials (such as brick), features (windows and the distinctive window features - the brick window sills and decorative plaques), and to spatial relationships, particularly the arrangement, size and design of the windows (the "fenestration" or patterns of the openings in the exterior walls), a significant feature of the architectural style related to its original use as a bank, and therefore are a change not recommended by the Standards.

Standard 2. The historic character of a property will be retained and preserved. The **removal of distinctive materials** or **alteration of features, spaces, and spatial relationships that characterize a property will be avoided**.

Comment: The proposed alterations remove distinctive materials (brick; under Option B also the decorative plaques and brick sills); and drastically alter the original design of the fenestration (arched windows above a high bulkhead; massive masonry "secure" substantial building, specifically a bank), and the horizontal configuration of the lower part of the wall, all features and materials that characterized the Prairie Style architecture, and they are design details commonly used in the period to indicate (characterize) the original use for a bank located in the main space.

Loss or impairment of these materials and features impairs (reduces) the ability of the building to convey its historical significance as a Prairie Style building with different ground floor uses, each indicated by a variation in the window and entry styles for the retail and bank/post office sections of the building. In other words, one should still be able to look at the building today and recognize that the arched window section was designed to house a bank, while the western section with large rectangular windows was designed for retail storefronts.

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

Comment: Options A & B: The brick of the lower bulkhead is "common bond" (bond refers to pattern or arrangement of bricks), but with a distinctive pointing style (mortar style) specifically, *raked* (recessed) horizontal joints, *flush* struck vertical joints. This style of bond and pointing gives a strong horizontal banding effect to the brick, and was used in Prairie Style architecture to accentuate the horizontal look of the style (see page 31 of Dept. of Interior, *The Preservation of Historic Architecture*, example f).

The implication put forth in the historical analysis that this portion of the brick façade is not a "distinctive material", "finish" or "example of craftsmanship" puzzles me; the main decorative feature of the building design is almost entirely the effect of the placement, contrasting light, shadow and textures *of all of the different bonding and pointing styles of brickwork used* taken together as a whole façade design treatment.

The strong horizontal effect of the bulkhead style below the windows, in which the individual bricks meld into a continuous band, is as much a "distinctive material and finish" and example of the bricklayers' craftsmanship of the period as the other bonding & pointing style used, or the various decorative panels.

4-4

Removal of large expanses of the bulkhead brick results in substantial loss of material (approximately 100 sq. ft.), and alters the effect conveyed by the brick style from a massive horizontal "bulkhead" to isolated narrow "pillars" between the windows. This is incompatible with Standard 5.

Option B removes the distinctive design features of the sills and ornamental end plaques as well, and probably some of the original wood window framing, a further loss of historic material and distinguishing features of the design and style, also inconsistent with Standard 5.

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

Comment: Re: destroying historic materials etc., see comments above.

Differentiating new work: The purpose of this guideline is two-fold: the new work should be differentiated from the old in some way that would enable it to be located for documentation purposes or removed during a later restoration or repair of the building.

Compatibility with historic materials is important both visually and materially; incorrect types of mortar, for example, can result in damage through weathering of the original brick. Visual differentiation should also be sufficient to avoid conveying the impression that the new work is historic or original. However, there seems to be a tendency in some interpretations to go to extremes of visual differentiation at the expense of compatibility, using this Standard as justification for alterations or additions that are radically modern.

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

Comment: Standard 10 is not totally relevant because the recommendation in *Weeks & Grimmer* indicate that "new additions" doesn't mean "alterations." The Standards shouldn't be used in isolation, that is, trying to interpret the bare listing of the ten Standards for Rehabilitation without the guidance of the associated recommendations and examples in *Weeks & Grimmer*. The latter make it clear that by "new additions" and "adjacent or related new construction" is meant *new construction of a separate structure* related to the historic structure" or a *structural "addition"* (usually a stairwell, elevator tower or something similar), not an architectural detail added to the historic building, or an "exterior alteration" deemed necessary for adaptive reuse of the building. Moreover, the guidelines for the Standards specify that wherever possible "new additions" should be made to secondary elevations, not the principal facades.

4-4

However, generally it is desirable that exterior alterations should be removable so that the original integrity of the property could be restored. The possibility that the drastic change proposed could be successfully reversed is slight. What can be easily simulated in Photoshop is going to be very difficult to execute in practice without resulting in it being even more obvious that the building has had an inappropriate drastic alteration.

Restoration of the corner doorway, which merely involved removing the material from an original opening in the brick wall that had simply been bricked in (and that it had was entirely obvious in photos from the 40s & 50s), the proposed windows will involve *cutting through* the existing common bond brick work, which has alternating rows of offset bricks, so that the section proposed for removal is "keyed into" the part that will remain; individual bricks will have to be cut. The alteration will also remove a section of wall under what would then become an unsupported brick sill. Doing this without damaging the historic sill materials or having to replace or reconstruct the sill is problematic.

Moreover, examination of the existing brick reveals that unlike the brick surrounding the existing window openings, in the bulkhead wall the vertical mortar joints do not always line up vertically (on the alternate rows, of course, with standard bond). This doesn't matter in the original design, because the flush pointing style of the vertical joints makes each row of bricks appear to be a continuous band and the vertical joints are hardly noticeable. Cutting the new openings will entail leaving odd short lengths of brick on either side, cutting through individual bricks to make a vertical edge that won't correspond to any particular location in the brick pattern, or joint of the brickwork. The possibility of accomplishing this without

damage to the brick and pointing, even with expert workmanship, is slight, and repair and repointing in a manner that is a good match for the original will be very difficult.

In Option B it is proposed to remove both the brick sill and the decorative plaques. I fail to see the point of removing the plaques: it seems gratuitous additional loss of material and damage to the original design. Again, the idea that the remnant ends of the sill (which if left will look odd) and the plaques, that are either inset into the brick or mortared or bolted to the brick in some way, can all be removed without damage to the underlying and adjacent materials, and that such damage can be repaired in a compatible unobtrusive manner is overly optimistic, if not ludicrous, even with skilled workers and proper technique.

Doubling the height of the "piers" or pillars between the entry doors and arched windows may also affect the structural integrity of the building in *both* Options A and B, and the possible necessity of additional seismic retrofit measures should be evaluated by a structural engineer.

Lastly, even if the removed materials are retained, some of the materials are going to be cut, broken, or damaged in the course of the alteration, leaving *less usable material for a restoration than was removed*. Substitute materials would therefore have to be used in restoration to make up the difference, and matching the dimensions, texture and color of the original tan brick would be difficult if not impossible. The proposed alteration is therefore probably irreversible, and perhaps not feasible in any normal sense.

**4-4** Options A & B are deemed *generally* compatible with two of the Secretary of the Interior Standards:

3. Each property will 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 elements from other historic properties, will not be undertaken.

Comment: However, the proposed window alterations, especially Option B, could imply that the bank space was originally designed for retail, with some kind of arcaded façade, making the alteration introduce an unhistoric aspect.

Also Option A arguably implies that the building had a basement or partially below ground level usable for offices or other purposes requiring windows, as a number of people, including the present commentor, have previously noted in the record. While common in bank buildings of the period, such a basement usually went with a main floor raised above ground level; neither was true of the Anderson Building, again introducing an unhistoric feature.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

None are proposed.

Standards that are not relevant to the proposed project:

8. Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

Standards applicable during any alterations, repairs and mitigation measures:

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

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

Comment: The mitigation measures should specify that the work must conform to Standards 6 and 7 and follow the associated guidelines in the complete Weeks & Grimmer work, and Dept. Of Interior *Preservation of Historic Architecture* as "best practices". See discussion of Mitigation below.

Finally, the DEIR and historical study state at a number of locations in applying the Standards that the proposed alterations "generally comply" with one or more of the Standards. It should be noted that the applicable city ordinance (40.23.090 (1) (B) Certificate of Appropriateness Standards of Review for exterior alteration of Landmarks) states:

4-5 "the proposed project complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties" (emphasis added).

(The sections applicable to Merit Resources and Historic Districts, however, do use the phrase "generally complies" with the Standards. )

#### Section 4.3 Aesthetics

##### 4.3.1 Environmental Setting

p. 47 "The building is a historic resource, which has two architectural themes. The southwestern portion of the building consists of retail use design with low retail windows. The southeastern portion of the building was originally designed for a bank use with high retail windows." (underlining added.)

4-6 As was typical for a "commercial block" of its type and era, the Anderson Building had three architectural themes corresponding to its *three* types of intended occupancies: three retail spaces at the west end with rectangular retail show windows with low sills and recessed entries, the east end ground floor bank and post office (government / official) spaces with high arched windows with high sills (not "*retail windows*" at all), and second story office spaces accessed by a separate entry, with ribbons of conventional double hung sash windows (not retail style either). (Page 51 states it right: low retail, high bank).

#### 4.3.2 Regulatory Context

p. 49 Core Area Specific Plan

The first quote (“Land Use 4”) and the first parts of the second quote (“Store front Design Guidelines”, up through “..generally there should be more glass and less wall at the storefront level, balanced by more wall and less glass on the upper façade..”) are irrelevant and inapplicable to a Landmark historic structure. The city’s HRM ordinance requires use of The Secretary’s Standards as the criteria for alterations to a Landmark. Including the previous quotes from the CASP, by some kind of inverted logic, implies that a historic resources should be altered or redesigned to conform to the criteria for new construction, while the purpose of the Conservation District and Design Guidelines is the opposite, i.e. that new construction should be compatible with adjacent historic structures and respect the historic setting.

4-7

Similarly, on the bottom of page 49 and top of page 50 (Design Guidelines, under “Overview” through the quote under “Implementation Guideline#1B”), the quoted material does not apply to historic structures. It applies to new construction and non-historic structures, and was developed so that they would be compatible with the historic nature of the downtown. A historic resource can’t be altered to reflect “*the basic features of traditional “Main Street” structures in new, innovative ways*”; the Anderson Building **is itself one – if not the gold standard - of traditional Davis “Main Street” structures** whose features new construction are supposed to reflect. The quotes stand this idea on its head and are inappropriate.

See also comment on 4.2.2 above.

#### 4.3.3 Aesthetic Impacts – Project Specific Impacts

Page 51: (quote) “*Design Option A arguably is in keeping with the original design of the building and the Design Guidelines in that the window alteration would result in a similar lower window as the southwesterly portion of the building and a storefront display windowed (sic) provided consistent with the Design Guidelines.*”

4-8

Similar objection: you can’t argue that an alteration is “in keeping with the original design.” The original (i.e. historic) design **is was it is**. It is what the designer intended; you can’t redesign it, and especially not by an alteration that negates one of the three original design “themes” by turning “bank windows” into “retail windows”. The difference in the heights of the windows was the intent of the original designer and is one of the major distinctions characterizing the two ground floor “themes”, bank and retail. That the alteration might be consistent with the Design Guidelines is irrelevant and can’t be turned into an argument favoring the alteration.

The quote on page 51 “*The Design Guidelines encourage provision of transparent display windows at storefront, which is what proposed Design Option A would do*” is similarly irrelevant or inverted: you don’t redesign a historic structure to suit Design

4-8 Guidelines intended to make design of new construction and non-historic structure remodeling compatible with the traditional character of the downtown. The Anderson Building is part of the "traditional model" not the other way round. (And the arched windows are in fact both "transparent" and "at storefront," i.e. at the front wall and edge of sidewalk.)

Page 52: "There is a combination of modern and historic buildings. There are a number of older buildings with historic significance as pointed out in Sections 2 and 4.1. Noteworthy is the fact that *all the windows in a given building have similar character*, unlike Design Option A."

The point being made here is not clear, and the assertion about all the windows in a given building having a similar character is debatable. Is the intent to say "all the show windows in a given retail building are similar"? Or that "all the ground floor windows in a given building are similar"?

Whether windows are similar in a given building depends largely on the size of the building and whether it is intended to have a single purpose such as retail. Some new buildings in Davis that are designed for multiple types of occupancies have variations in the window styles. For example, the new building at the northeast corner of 4<sup>th</sup> and G Streets has no windows in the theatre section, planter boxes in front of the windows where the corner restaurant is located, and retail style shoe windows under the arcade (although that section is in fact occupied by a real estate office.)

The Anderson Building is a "commercial block" of a typical style of the period designed to accommodate three different types of use (bank, retail, office), and the different styles of windows clearly indicate that. So even if the building weren't historical, the applicability of the quoted statement is unclear.

Page 52: "The Anderson Bank Building already has two distinct window heights and shapes. Evaluated from architectural mix perspective, the variety of low and high retail windows in the Core Commercial area appear to support allowing the proposed alteration. It would provide another type of lower retail window in the area that adds to the mix of retail windows."

Again, it is unclear what the point here is. Is it intended to say that since the building already has a mix of window styles, it is alright to add an additional more peculiar style at odds with the original design, without affecting the aesthetics?

Photos Fig. top of page 52:

First, the photos should be identified.

4-9 The left is of the historic Brinley Block, a Merit Resource, designed as typical retail of the period; similar to the *retail section* of the Anderson Building (ironically, the section in the photo is currently a restaurant; other sections are still being used as retail.) The building



is so typical of retail that it doesn't really illustrate the point that downtown contains a mix of retail show window styles and / or sill heights.

The right photo is inappropriate: it is of the historic Yolo Bank Building, a Merit Resource, constructed a few years before the Anderson Building, and is a classic illustration of the arched windows with high sills that were typical of bank buildings, just like the bank section of the Anderson Building. The adaptive reuse of the building is not retail, but a restaurant.

4-9

Caption: The photo does not illustrate "high retail windows", but rather reinforces the point about bank style of the period. (The Yolo Bank Building could have been used elsewhere in discussing successful adaptive reuse and possible uses of the Anderson Building. The fact that it is one story, not two, and also has adequate rear access and garbage facilities does contrast with the situation of the G Street ground floor space at the Anderson Building.)

There are, however, other buildings that could be used, although most with higher window sills, whatever their original design purpose, are not in fact being used as retail, but as offices or service businesses (e.g. southeast corner of 3<sup>rd</sup> and F), or vice versa.

About all that can be asserted on the evidence is that downtown Davis buildings have a variety of window types and heights, and their intended and actual uses don't correlate with the window types or heights.

Page 53 Design Option B aesthetics discussion.

The flow of logic is unclear. The Project Description of Option B and paragraph 1 here indicate that Design Option B includes removing both the brick sill *and the decorative panels at the ends of the sills*.

4-10

Then paragraph 2 states: "Some argued at the scoping meeting that Design Option B would make the floral decorative element at each end of the windows appear out-of-place."

A better paraphrase of the argument from the scoping meeting might be "that retaining the floral panels at each side of the enlarged windows, along with a remnant of the original brick sill, appears incongruous and out-of-place." Then explain that this was the rationale for removing *both sill and the panels in Option B*, even though that would result in even more serious loss of historic material and significant features, contrary to the Standards.

However, in selection of project alternatives, preservation of cultural resources should arguably should have taken precedence over aesthetics in order to reduce impact, so the panels should be retained to reduce the impact to cultural (historic) resources, despite the possible improved aesthetics.

Page 53 bottom paragraph: "Although it does not maintain the integrity of the existing high windows, replacing them with lower windows eliminates the unusual, and potentially

- 4-10 unattractive, mix of windows on the same façade. “ (emphasis added)
- Staff explained at the previous HRMC meeting on the DEIR that the underlined phrase was meant to refer to the results of Design Option A, and that some at the scoping meetings thought that the new windows below the sill envisioned by Option A produced an unusual, odd, and unattractive mixture of windows on the same façade, and that therefore Option B was more aesthetically pleasing. The paragraph could be revised and clarified along these lines.
- 4-11 Table 2.7 & Sections 4.2 & 4.3 p. 42-46 Mitigations
- It should be made clear that all of the listed mitigation measures are required to reduce the impacts to less than significant, and that the table is not a “menu” for selection of mitigation actions.
- 4-12 A total moratorium on repairs to the exterior except emergency repairs (such as a roof or window leak, or repairs needed to preserve the structural integrity of the building, especially repairs to the brick), should be imposed until the required mitigation measures and project are complete.
- 4-13 The HSR should specifically include an analysis of the type of mortar used, pointing styles, and type of brick.
- 4-14 Mitigation should include repair of damaged brick (e.g. at the alley corner, along with installation of some kind of protective measure to avoid future damage), removal of remnants of bolts left after removal of prior signage and awnings, etc.
- Since one major impact of the proposed alteration is loss of the ability of the building to convey its original use as a bank, a possible mitigation (feasibility or method could be explored in the HSR) would be restoration of the other original feature that conveyed that use as a bank: the decorative plaque over the corner entry, originally the entry to the Bank. While the plaque is still in place, the raised lettering “Bank of Davis” was ground or chipped off at some point in time, probably when the bank changed its name. Perhaps through some kind of epoxy and ceramic material, the raised lettering could be restored (the locations of the the letters are still visible in the right light.) This mitigation would have a definite nexus with the project impact, as required by CEQA.
- 4-15 Page 43 Mitigation B: “*The HSR shall be completed prior to execution of any restoration / rehabilitation tasks detailed in the following paragraph, and before commencement of construction tasks associated with the proposed window installation project.*” Add: “except as specifically noted below.”
- The reason for this addition: A number of the measures in Mitigation C (e.g. 1, 3), as well as the project itself will result in damage to the brick and / or pointing (for example, the awnings are bolted into the brick and in at least one case into the mortar joint), and further

**4-15** damage will result from these mitigations. (This is a potential impact of the mitigation measures that probably should be discussed.) As noted above, the project itself is likely to result in some damage, particularly removal of the sill and plaques under Option B.

Page 44, Mitigation B.4 calls for either exposing the original brick or repainting the building. First, because of previous damage to the brick from attaching signage and awnings, etc., possible previous graffiti, and (probably) more than one application of paint, and that the brick has perhaps been discolored during the fire, paint removal would almost surely require repointing ( an expensive and technically demanding task), so it is doubtful whether restoring (exposing) the original brick in compliance with the Standards (i.e. using the gentlest feasible means) could be successfully done.

If it could be, it would very probably be very expensive, must be done by expert workers under the supervision of an experienced preservation architect and contractor approved by the City with methods and materials specified in the HSR.

**4-16** Consequently, although painting the brick has lost the original tan color and the distinctive texture and color variations of both the brick and the decorative terra cotta panels, and obscures the detail of the latter, repainting would perhaps be a more feasible mitigation, although that too should require a COA specifying color, approved materials, preparation and application methods, and that it be done by an approved experienced preservation contractor with proper supervision, again following the HSR.

It should also be noted that the wooden window frames, and other details have had multiple coats of paint applied, so both the brick and other details may require some limited paint removal and surface preparation prior to repainting, which also requires care to avoid damage to historic materials.

Since both the project and some of the other mitigation measures are likely to result in a need for repairs to the brick or wooden windows, it would be inadvisable to repaint the building before minor repairs and the project are completed, although this sequence will make a detailed mitigation timetable, performance benchmark plan, and close supervision a necessity to assure compliance. Mitigation B 4 should specify the order of performance as after all other mitigations and project completion.

Page 44 Mitigation B3. *“Removal and replacement of the existing second floor windows to match in-kind the original second floor windows of the building.”*

**4-17** The project sponsor has asserted in the previous HRMC meeting to review the DEIR that the current modern replacement windows are not inappropriate, contrary to the finding of the Historical Resource Assessment Report. Consequently, a more extensive summary the considerable evidence and discussion of the second story windows, including current and historical photos, from the project and building record, should probably be placed in the Appendix 8.3 (Building Background) in support of this mitigation.

4-18

Page 44 Mitigation D:

As noted previously, since the project Options will of necessity damage (by cutting or chipping) some material in the process of cutting the new openings, there will be less material retained than would be required to reverse the project alterations. The project will be essentially irreversible; however, the removed materials should still be securely retained for possible future repairs or a restoration attempt.

### **Response to Comment 4-1**

The description of Design Option B in the DEIR and Figure 4 are consistent with the Urbana Preservation & Planning *Historical Resources Analysis* report. The photo simulation was not intended to serve as a detailed plan of Design Option B, rather just a conceptual simulation as no accurate photo simulations or scaled drawings were provided by the applicant. At the stage of Certificate of Appropriateness, details of the chosen plan would be provided for public review and comments.

Removal of the ornamental caps may be required to implement Design Option B, therefore, this is evaluated as a potential significant impact in the EIR.

#### **Response to Comment 4-2**

The comment is noted. See pages 11 through 14 of this FEIR for text update regarding this comment. The cumulative impact of the proposed project is addressed in Section 6 of the DEIR.

#### **Response to Comment 4-3**

Section 1.8 (Required Approvals) of the DEIR cited Section 40.23.190 of the Zoning Ordinance as well as stated that Certificate of Appropriateness would be required should the EIR be certified and a proposal selected for the project. The DEIR included adequate statements as to what the next steps would involve should the EIR be certified and a specific design option chosen.

#### **Response to Comment 4-4**

The analysis of compliance with the Secretary of Interior's Standards for Rehabilitation of Historic Buildings for the proposal is in the Urbana Preservation & Planning report. The DEIR does not re-evaluate the design concepts already analyzed by this report; rather it is based on this report.

#### **Response to Comment 4-5**

Had the proposed Design Options A and B complied with SOI Standards, there would have been no need for the preparation of this EIR as well as identification of mitigation measures. The DEIR incorporates the Historical Resources Analysis (HRA) report prepared by Urbana Preservation & Planning, which states that the proposed alterations "generally comply" with one or more of the SOI Standards. This statement is appropriate as both the DEIR and the HRA state that Design Option A impacts can be mitigated to less than significant levels with implementation of identified mitigation measures.

#### **Response to Comment 4-6**

Comment noted and clarification has been made. See pages 11 through 14 of this FEIR.

#### **Response to Comment 4-7**

Comment noted and clarification has been made. See pages 11 through 14 of this FEIR.

#### **Response to Comment 4-8**

Comment noted and clarification has been made. See pages 11 through 14 of this FEIR. The quote cited from page 51 of the DEIR was never intended to imply that conceptual Design Option A was envisioned at the time of the original construction. The sentence was intended to compare between the two equal weight conceptual options under the assumption that the building is not a Landmark.

Pages 11 through 14 of this FEIR address the issue of transparent display windows at storefronts in the Core Area. It is factual that transparent storefronts are encouraged in the Core Area. Whether it should be more applicable to new construction or existing buildings was never addressed in the guidelines. Consideration of the storefront transparency with other applicable guidelines from local and state is essential. Other comments regarding transparent storefront, Design Option A window's similarities and distinctions are appropriate.

#### **Response to Comment 4-9**

Comment noted and clarification has been made. See page 14 of the FEIR.

#### **Response to Comment 4-10**

This comment is appropriate and noted. The explanation provided is noted. As stated in the comment, the essence of the paragraph in question was to report prior comments on Design Options A and B.

#### **Response to Comment 4-11**

The FEIR clearly states that under Design Option A, full compliance with all the mitigation measures is required.

#### **Response to Comment 4-12**

The proposed conceptual project may or may not materialize. The city policies encourage maintenance and conducting of needed repairs on historic structures so as to maintain their integrity. Requiring a total moratorium on repairs to the exterior with or without the exceptions because of this proposal may hinder routine and yet needed aesthetic, health and/or safety repairs. It should be acknowledged that future repair activities may not have nexus to the current alteration request. Any changes to the building require a Certificate of Appropriateness.

#### **Response to Comment 4-13**

The suggestion to require the HSR to specifically include the type of mortar used, etc., would be more appropriate as a condition of approval of the Certificate of Appropriateness, should the EIR be certified

and a project is submitted for review and approval. The HSR is required to be performed prior to filing for the Certificate of Appropriateness. It should be noted that an HSR is prepared to minimize loss of character-defining features and materials whenever existing information about the condition of the historic structure does not provide an adequate basis upon which to address anticipated management objectives, whenever alternative courses of action for impending treatment and use could have adverse effects, or to record treatment. So, if the HSR finds it necessary to identify such materials for the alteration, it would be included. The identified mitigation measures directly reflect what is necessary to address the impacts of the proposal to a less than significant level, should the EIR be certified and Design Option A approved. Additional conditions of approval may be imposed at the stage of COA, if determined by HRMC to be necessary.

#### **Response to Comment 4-14**

See Response to Comment 4-13 above. Repair of “damaged brick” at the alley corner for instance and other activities to protect materials during construction presupposes that the EIR would be certified and COA approved for a project. These types of details are appropriate at the COA stage, not at this stage of conceptual project environmental impacts analysis.

#### **Response to Comment 4-15**

See Response to Comment 4-14 above. The details of work to be performed should the project be implemented would be addressed as part of COA review and approval. It should be noted that approval of the COA is not automatic, therefore, is not being presupposed by these responses.

#### **Response to Comment 4-16**

The levels of details proposed by this comment are items to be addressed as part of the Certificate of Appropriateness. See previous comments above regarding details of implementing the proposal.

#### **Response to Comment 4-17**

The mitigation measures have been modified to require that the HSR address whether the windows needed to be matched in-kind or not.

#### **Response to Comment 4-18**

It is reasonable to state that the alteration will result in irreversible alteration. However, a higher degree of reversibility exists hence the mitigation measure to save in a safe environment the bricks removed to allow the opening, should the EIR be certified and the COA approved. No specific penalties could be

identified now that would apply. If no future requests to reverse the alteration are proposed, it is very likely that nothing can trigger the city to require proof that the bricks are appropriately maintained. See Mitigation Measure 4.2D.



From: Richard Rifkin  
To: Ike Njoku

**Letter 5**

Anderson Bank Building – Draft EIR Questions and Comments

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- 5-1** \* Where has the applicant demonstrated that failure to approve the COA will cause an extreme hardship to him?
- The Zoning Ordinance states that the HRMC “is authorized to request that the applicant furnish additional information, documentation and expert testimony, the cost of which shall be paid by the applicant, to be considered by the Commission in its related findings.”
- Other than the claims of the applicant, what documentation or expert testimony has been produced to show that our rejection of the COA would cause extreme hardship?
- 5-2** \* Page 29: “The project applicant indicates that the purpose of the proposed project is to provide opportunity for visibility and display spaces within the building in anticipation of attracting viable retailers.”
- He has a tenant in the building now, the Futon Shop. Why is the space viable for them?
- The applicant states that, “Because of the limited garbage area at this location, no access to the rear of the store to haul garbage away and the requirement for a hood to support a restaurant, the best use of this location is a non-food oriented retail operation.”
- Where is the expert testimony to prove this? Just because the applicant says it cannot be used as a restaurant space does not prove it to be true. Perhaps mitigations could be made to use it as a restaurant – perhaps a ventilation system for restaurant cooking could be added for less money than it would cost to alter the building’s fenestration? Perhaps an expert could find an alternative egress for the garbage?
- What about other non-retail uses, such as a bar? Or a coffee shop? Or a poker lounge which serves alcohol? What expert testimony has been provided by the applicant to demonstrate that these uses are all not viable? Or perhaps could show that they are viable with certain modifications or mitigations?
- 5-3** \* Page 31: “The subject property was designated an Outstanding Historical Resource on July 25, 1984.” The applicant bought the property more than 1 year later.
- What expert testimony has been provided by the applicant to show that the retail environment has changed at Second and G over the last 20 years, so that it was viable when the applicant bought the building, but no longer is?
- 5-4** \* Page 44: Mitigation Measure 4.2.3C – Six restoration mitigations are suggested: 1) remove the awnings; 2) repair the cornice; 3) replace the 2<sup>nd</sup> floor windows to match the originals; 4) clean the exterior of the building or repaint the building; 5) restore and replace exterior lighting fixtures; and 6) restore the Grate for the Bank Bell.

Comment – It seems to me that if the concern of the applicant is to derive his highest and best use of this building, he would at a minimum do these measures on his own. The fact that he has not done any of them, and the fact that he has not properly maintained the exterior of the building, suggests to me that he is not serious about deriving this building's highest and best use.

5-5

\* Page 44: Mitigation Measure 4.2.3D – “The property owner shall retain all removed brick ...”

What is the penalty if he “loses” the bricks?

\* Page 58: Lists 5 alternatives considered and analyzed.

5-6

Comment: I don't think enough attention in this DEIR has been paid to 1) questioning the basis premise that the building as it stands is not viable economically; or 2) that the building cannot be used for a restaurant site; or 3) that it cannot be used as a bar; or 4) that it cannot be used as a poker lounge and bar; or 5) that it cannot be used as a night club or some other uses.

\* Page 60: “Removal of the existing awnings could result in better display and signage spaces on the windows. A retail display specialist could be utilized in preparing such concepts for a retailer. The applicant does not concur with this view.”

5-7

Where is the expert testimony that could comment on this mitigation? Why is it a good idea for the Petaluma Bank Building but not the Anderson Bank Building?

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### Response to Comment 5-1

At the time of Certificate of Appropriateness, should this EIR be certified and a design option approved, the applicant would be required to provide all applicable materials, including financial hardship analysis, if necessary (for an alternative inconsistent with the SOI Standards). The DEIR is not assessing whether the applicant has experienced hardship, rather it is addressing the environmental impacts associated with the proposed alteration work to a historic resource consistent with both city and state requirements. It is essential to note, as stated in the DEIR, that should the EIR be certified and the applicant files a COA application, then the details of the proposal would be required of the applicant.

It should be noted however, that documentation of potential hardships encountered by the applicant, whether financial or in securing a tenant for the building's ground floor retail space, was requested at the initial site visit attended by the applicant's project team members, City staff members, and Wendy L. Tinsley of Urbana Preservation & Planning. Similar documentary evidence was also requested at the first project meeting attended by the applicant, City staff members and Wendy L. Tinsley of Urbana Preservation & Planning. The purpose of these requests was to better develop the definition of the proposed project for CEQA purposes. No substantive documentation was provided to either reference or include in the Historical Resource Analysis Report (Final January 2006) or the DEIR.

### **Response to Comment 5-2**

See Response to Comment 5-1 above. Only if the EIR is certified, a project concept selected, and a Certificate of Appropriateness application filed, could the applicant be asked to provide details regarding why the space is not viable as is for retail. The nature of details to be required at the COA stage is governed by the applicable Zoning Ordinance.

### **Response to Comment 5-3**

The comment is noted, but it does not address the adequacy of the EIR. It should be remembered that the EIR is addressing two conceptual alteration designs rather than a concrete proposal.

### **Response to Comment 5-4**

This is a policy comment and not related to the adequacy of the EIR. Comment noted.

### **Response to Comment 5-5**

There is no nexus to require penalty should the applicant request reversibility of the alteration in the future. Should in the future the applicant request restoration of the alteration, the applicable SOI Standards would be utilized. There is no known financial value to be associated with the bricks that could be used to assess financial penalty, for instance. There is no other known penalty that can be articulated now that would address this comment.

### **Response to Comment 5-6**

Should the EIR be certified and a design concept recommended to be pursued, the applicant would have to request for a Certificate of Appropriateness approval. See Response to Comments 5-1 through 5-5 above. Assumptions by the comment include that these uses are interested in locating at the subject site.

The EIR does not speculate what types of tenants may be interested in occupying the building. This EIR analysis has identified cultural resources and aesthetics as the two environmental factors impacted.

### **Response to Comment 5-7**

There is no expert opinion on whether removing the awnings could result in better display and signage. However, a former tenant of the space had indicated to staff that removal of the awning could result in better visibility into the space. Staff at the time tried working with that tenant and the property owner to evaluate possible signage for the location, but nothing came of it. Staff speculates that visibility has increased to some extent within the space given the installation of the wider corner door, which was part of the previous COA approved when this window alteration was brought before the Historical Resources Management Commission.

The Urbana Preservation & Planning report suggests removal of the awnings would “expose the historic arched windows coverings that are considered significant and character-defining.” The report only articulates the historic resource benefit, rather than the commercial.

## Oral Comments.

There were several comments made during the DEIR comment period and public hearing meetings. These comments are numbered from one to thirty-four. The oral comments below are numbered and italicized. Each response is provided immediately after the oral comment. This format is used as it is easier to follow. The oral comments were made by the public, the Commission, and the applicant during the public meetings held during the DEIR comment period. Some of the oral comments were repeated in the individual letter comments. No credits to individuals or groups were given on the oral comments.

1. *Section 2.1.1, page 13: The Masonic Lodge should no longer be considered a historic resource because the character of the building has been changed as the result of past remodels.*

The Masonic Lodge is a City of Davis Merit Resource and accordingly identified on the Davis Register.

2. *Section 4.1.3, page 35: The list of architectural styles in the downtown (Classical Revival, Prairie Style, Renaissance Revival, and Streamline Moderne) should include Victorian and Mission because two important downtown buildings are examples of these styles.*

Section 4.1.3, page 35 of the DEIR cited contains an excerpt from the city's 2003 Historical Resources Survey report regarding architectural styles found in the downtown. The adopted 2003 Historical Survey contains information based on surveys conducted and prepared by a qualified expert.

3. *Section 4.1.3, page 34, Item 3, last paragraph states that one of the purposes of the Davis Downtown and Traditional Neighborhood Overlay District is "planning for new commercial and residential infill construction that is compatible and complementary to the character of existing neighborhood areas within the district." Complementary to which of the above-mentioned styles in the Downtown District?*

Section 4.1.3, page 34 of the DEIR cited contains a summation of the purposes of the Davis Downtown and Traditional Neighborhood Overlay District, which encompass both residential and commercial areas. The determination of what is deemed complementary depends on multiple variables.

4. *Section 4.2.3, page 42, Design Option A, first paragraph and page 45, Design Option B: “The proposed project would diminish the ability of the building to convey its original use as a bank . . . .” The building could not go back to being a bank because current safety standards for banks require large windows to provide increased visibility and act as a deterrent to crime.*

Comment noted. The DEIR is not suggesting that the building should be used as bank building. See response to Comment 5-6.

5. *Section 4.2.3A, Page 43, Mitigation Measure B: “The HSR [Historic Structures Report] shall be completed prior to execution of any restoration . . . .” Who pays for the studies?*

The mitigation measure has been revised to explicitly state that property owner is required to pay for the Historic Structures Report.

6. *Section 4.2.3A, pages 43 and 44, Mitigation Measure C: “[T]he restoration / rehabilitation effort that maintains integrity of the building is desirable.” “A minimum of the following restoration work shall be performed . . . .” The former is discretionary and the latter is mandated, which seems to be in conflict.*

The minimum identified actions have been determined by the Urbana Preservation & Planning report to restore to a reasonable extent the integrity of the building. These measures are mandatory to mitigate impacts. See Section 4.2.3A, page 43 and 44 of the DEIR.

7. *Who decided that the awnings should come down?*

A recommended mitigation measure requires restoration work that includes removal of the awnings so as to expose the arched windows, which are historic features and considered character-defining. The City Council will make the final decision on the EIR.

8. *Section 1.1, page 4: “The EIR does not recommend approval or denial of the project.” The EIR should be non-biased, but I think the text is very prejudicial to one plan over another. The use of the word “substantial” as in “substantially adverse impact” seems to make the assessment a judgment call rather than a presentation of the facts.*

The equal weight analysis does not mean that both design options would have equal weight impacts, rather it does provide information on the impacts of each design options based on the Urbana Preservation & Planning report. The report finds that conceptual Design Option B has impacts that could not be mitigated to less than significant levels, and that is what is addressed in the DEIR.

9. *Section 2.3, page 18 and Impact/Mitigation Measure 4.2.3B – Design Options B, page 46: The report holds out the potential that the Downtown could become a Historic District and implies that changing the windows on the Anderson Bank building might be the ultimate stroke that prevents the Downtown from becoming a Historic District. However, in light of the discussion of what makes a Historic District on page 35, Davis does not have the makings of a Historic District, especially when compared to Old Sacramento or Folsom.*

The city has not formally adopted historic districts. However, the 2003 Historic Resources Survey adopted by the city has identified potential historic districts within the city.

10. *The Historic Resources Management Commission needs to have a discussion regarding goals for the Downtown Core Area in regard to historical buildings and preservation.*

The Historical Resources Management Commission may wish to include discussion of goals for the Downtown Core Area regarding historical buildings and preservation in its goal setting for this year. However, this is not an EIR issue relative to this proposal.

11. *An alternate option, installing a glass insert flush with the brick (“glass wall”) was not adequately discussed in the DEIR. This could be considered a modification of Design Option A.*

See Response to Comment 1-6.

12. *The photo simulations in the DEIR are inadequate. Recommend using Photoshop rather than felt pens.*

Comment noted regarding the use of Photoshop photo simulations. It should be noted that we are dealing with conceptual design options, and the photo simulations were only intended to convey the concepts to a reasonable extent. Photo simulations and/or accurately scaled elevations drawings of all proposed design concepts were not submitted by the project applicant. Any simulation drawings included in the Historical Resource Analysis Report prepared by Urbana Preservation & Planning (Urbana) were solely created for Urbana’s in-house use as part of the project analysis process. For the sake of project transparency, these simulations were included in the report in order to inform City Staff, the project applicant, and other interested individuals regarding the actual proposed window dimensions and appearance resultant from the various proposed design schemes.

13. *The recommended mitigation measures are directed at cumulative effects of changes to the building rather than to specific changes; this point needs to be clarified in the DEIR.*

The recommended mitigation measures address the identified cultural resources and aesthetic impacts relative to the window alteration on a city Landmark. The proposed conceptual alteration project is analyzed and all identified impacts appropriately mitigated for Design Option A.

14. *It is not clear in the DEIR why impacts of Option A would become less than significant after application of the mitigation measures while impacts of Option B would remain significant after application of the mitigation measures. Text from previous discussions of the project needs to be incorporated into the report to clarify how the options result in different impacts on the building.*

See Response to Comment 1-1.

15. *Page 50: Two identical bullet points.*

See FEIR Section 4.3.3. The repeated bullet point is deleted.

16. *Although it is suggested that the project be approved if the applicant could show financial hardship as a result of denial, it is not made clear in the DEIR whether the applicant would suffer economic hardship if his application is denied. No other uses of the property are discussed in the DEIR.*

See Response to Comment 5-6. The financial hardship analysis would be addressed as part of the Certificate of Appropriateness application, should the City Council certify the EIR and approve a design concept for the project.

17. *Page 44, Impact/Mitigation Measure 4.2.3A – Design Option A, Item D states that “The property owner shall retain all removed brick . . . for future use . . . .” However, no consequences are outlined in relation to loss of the bricks by the property owner.*

See prior responses to this comment.

18. *Appendix 8.3, page 4 of 6, third paragraph from the bottom of the page: The last sentence ends in the middle: “Upon negotiation with the ”*

The FEIR has addressed this item by deleting the unintended phrase.

19. *Table 2.7, page 23, Item 1: “Remove all existing awnings on the southern and eastern elevations of the building in order to expose the historic and character-defining arched windows original to the building.” Does this mean just the arched window awnings or all of the window awnings, including those of the retail spaces? This should be clarified.*



The applicable mitigation measure text has been changed to reflect that the awnings removal was intended for the four arched bank high windows, not the retail or office windows.

20. *Somewhere in the DEIR it states that removing the awnings would not entail any cost. However, the awnings are bolted to the bricks or mortar of the exterior wall; therefore, removal of the awnings would result in damage to the brick and mortar of the exterior walls, thus incurring costs for repairing the damage.*

The Urbana Preservation & Planning Report indicates that removing the awnings may not entail any costs. Given information provided that screws used to fasten the awnings would require special care in being removed, it reasonable to anticipate that the applicant might incur minimal costs to remove the awnings in an appropriate manner.

21. *Section 2.1.3, page 16: The size of the window openings is stated as 10.5' by 2.5'. In Section 3.0, page 26, Footnote 1: The size of the window alteration is stated as 2' x 10.5'. The report by Urbana Preservation and Planning states that the proposed dimensions are 2' x 5'.*

The window size is further clarified in the FEIR "Text Changes" section. See FEIR Section 2.2.

22. *Section 4.3.3, page 53: The caption under the picture at the right characterizes the building pictured as "A building in the Core Area with High Retail Windows." However, the building (Yolo Bank) in question was originally used as a bank and is now a restaurant; it has never housed a retail establishment. The picture is not appropriate for illustrating the range of cases for heights of retail windows in Davis. In contrast, the picture on the left illustrates a historic Brinley Block building of approximately the same era that was designed for retail. These windows are about the same height as the retail section of the Anderson Bank Building.*

See Response to Comment 1-7. The caption has been changed to read "High Bank Windows".

23. *Section 4.3.2, pages 48 and 49: The report makes reference to the General Plan and the Core Area Specific Plan and includes the following quote from the Storefront Design Guidelines: "[T]here should be more glass and less wall at the storefront level . . ." This does not seem to be a quote relevant to the discussion of a historic building, because the Design Guidelines are for new or infill construction or alterations to non-historic buildings. The Guidelines are intended to make new construction, additions and remodels compatible with the traditional nature of the area, not to make changes to historic buildings conform to existing later construction. Historic buildings within the City of Davis are covered by the historic ordinances and regulations of CEQA. The point should be clarified that, although the Storefront Design Guidelines promote "more glass and less wall," this policy is not promoted for historic buildings (given that windows are a major character-defining feature of historic buildings).*

See Response to Comment 4-7.

24. *Section 4.3.3, page 53, last paragraph: Regarding Option B: “Although it does not maintain the integrity of the existing high windows, replacing them with lower windows eliminates the unusual, and potentially unattractive, mix of windows on the same façade.” This is not correct. The mix of windows on the south façade of the Anderson building is not unusual; the building was designed as a mixed-use building with three specific types of uses: a retail section, a banking section, and an office section upstairs. The architecture reflects those uses. It needs to be clarified whether this sentence is referring strictly to the effects of a specific design option, or if it is making a general statement about historic building design. Suggestion: “A possible aesthetic impact of Design Option A is to produce an unusual and unattractive mix of windows on the same façade.”*

See Response to Comment 4-10.

25. *Restore the terra cotta ceramic plaque over the corner door with the words “Bank of Davis” in raised lettering.*

The appropriate recommended mitigation measure has been modified to include restoring the terra cotta ceramic plaque over the door with the words “Bank of Davis” in raised letters.

26. *A general comment about general repair and restoration of the façade should be added.*

Routine maintenance of the building is expected to be performed by the property owner irrespective of this project. However, the comment about general repair and restoration of the façade is noted.

- i. *The applicant chose to restore the corner doorway. The DEIR should explain why replacing the door with a show window is no longer an option.*

The applicant restored the corner door consistent with HRMC approved Certificate of Appropriateness. To bring the corner doorway back to what it was or modified to provide a display space would require approval of another Certificate of Appropriateness and determination of compliance with the SOI Standards. It should be recognized that the restored door also provides additional visibility into the space.

- ii. *Is the treatment rehabilitation or restoration?*

The proposal is a rehabilitation project and the mitigation measures ask for restoration of prior treatments to the building that was determined to be inappropriate.

27. *It was suggested that a staff member, a member of the Historic Resources Management Commission and the applicant assess exactly which items on the façade need to be repaired / restored.*

It would be more appropriate to assess exactly which items on the façade needed to be repaired/restored through the Historical Structures Report, rather than the combination of staff, HRMC member and the applicant. Given the recommended mitigation measure, it is not necessary to require this combined effort at this time. However, if during the COA stage, the HRMC determines that this combined effort is necessary, a condition of approval may be imposed requiring it.

28. *“Weeks & Glimmer” should be “Weeks and Grimmer.” The word “deign” needs to be changed to “design.”*

See “Text Changes” section of this FEIR for correction.

29. *Provide a résumé for Wendy L. Tinsley (Principal, Urbana Preservation & Planning).*

The resume of Wendy L. Tinsley (Principal, Urbana Preservation & Planning) is included in this FEIR. See the Appendix section below.

30. *The document did a good job of explaining the structure and purpose of the EIR and the background for the study, making the EIR process understandable to most people. The options are generally well described, with the exception of the omission of the “wall of glass” concept.*

See Response to Comments 1-6 and 2-1.

31. *Regarding the Mitigation Measures, a comment needs to be added related to what would be the effect of not completing any or all of the mitigation measures. It needs to be clarified whether or not these mitigation measures are a full package; in other words, in order to arrive at a less than significant impact for Design Option A, do 100 % of these measures need to be done? The point needs to be made that, if all of these mitigation measures are not taken, the impact will not be reduced to less than significant.*

The Mitigation Measures and the text of this FEIR contain changes and statements to the fact that the Design Option A would require compliance with all recommended mitigation measures in order to reduce impacts to less than significant levels.

32. *A timetable for completion of the mitigation measures needs to be framed.*

The time table for the completion of the mitigation measures will be as shown on the Mitigation Monitoring Plan section of this FEIR. At the COA stage, conditions of approval might include time table for the implementation of the EIR's mitigation measures as well.

33. *An enforcement mechanism needs to be outlined.*

The recommended mitigation measures have been modified to include reasonable and feasible enforcement mechanisms. It should be noted that more enforcement mechanisms could be included in the form of conditions of approval of the COA.

34. *Section 6.2.2, pages 69 and 70: "Under Design Option A, the application of the recommended mitigation measures, the Anderson Bank Building would appear to maintain its eligibility as a City Landmark, and retain its inclusion / eligibility for inclusion on the California Register of Historical Resources. Implementation of Design Option A with or without Mitigation would likely preclude the building from future listing on or a future determination of eligibility for the National Register of Historic Places." This statement needs to be clarified in order for members of the public to understand how Design Option A would result in non-eligibility for the National Register but not the California Register. If the building is no longer eligible for listing on the National Register, it is also the case that it would no longer be eligible for listing on the California Register. If the building is not eligible for the National Register because of a loss of integrity, it is not going to be eligible for the California Register. The integrity issue needs to be brought out. What measure of integrity would be lost?*

See Response to Comment 1-1.

## **5.0 MITIGATION MONITORING PLAN**

### **5.1 INTRODUCTION**

Section 15097 of the California Environmental Quality Act (CEQA) requires all local and state agencies to establish monitoring or reporting programs for projects approved by the public agency whenever approval involves the adoption of either a “mitigated negative declaration” or specified environmental findings relate to environmental impact reports.

The table below contains the Mitigation Monitoring Plan for the Anderson Bank Window Alteration project. The plan includes description of the requirements of CEQA and a compliance checklist. The project chosen would include mitigation measures. The intent of the Plan is to prescribe and enforce a means for properly and successfully implementing the mitigation measures as identified in this EIR. Unless otherwise noted, the applicant shall fund the cost of implementing the mitigation measures as prescribed by this Plan.

### **5.2 COMPLIANCE CHECKLIST**

The Mitigation Monitoring Plan (MMP) contained herein is intended to satisfy the requirements of CEQA as they relate to the EIR for the Anderson Bank Building Window project prepared by the City of Davis. This MMP is to be used by city staff and mitigation monitoring personnel to ensure compliance with the mitigation measures during and as part of the project implementation. Again, the mitigation measures in this MMP are identified in this EIR prepared for the proposal. Given that the EIR addresses conceptually two equal weight projects, the chosen conceptual project would require provision of detailed information at the Certificate of Appropriateness stage. The subsequent details to be submitted as part of the application for COA might dictate additional conditions of approval, which could augment the mitigation measures and implementation of the MMP. At the time of the COA, the MMP maybe updated as appropriate given the conceptual nature of the project at this time. However, no mitigation measures could be deleted as a result of the COA, rather updated to address the actual project impacts.

The intent of the MMP is to ensure the effective implementation and enforcement of the adopted mitigation measures and permit conditions (i.e., COA). The MMP will provide for monitoring of the construction activities as necessary and in-the-field identification and resolution of environmental concerns. Hence the monitoring and documenting the implementation of mitigation measures will be coordinated by the City of Davis. The table below identifies the mitigation measures, the monitoring

action for the mitigation measure, the responsible party for the monitoring action, and timing of the monitoring action where feasible at this stage. The applicant will be responsible for fully understanding and effectively implementing the mitigation measures contained in the MMP. The City of Davis will be responsible for ensuring compliance.

**Table 5.2**  
**MITIGATION MONITORING PLAN**  
**ANDERSON BANK BUILDING WINDOW PROJECT**

Mitigation Number	Impact	Mitigation Measures	Monitoring Agency	Implementation Schedule	Sign Off
<b>4.2 Cultural Resources</b>					
4.2.3A Design Options A:	Design Option A would have a significant impact on the historic nature of the building.	<p><b>A.</b> Historic American Buildings Survey (HABS) documentation shall be undertaken by a qualified professional at the expense of the project applicant as recommended in the Urbana Preservation &amp; Planning report. The purpose of the HABS documentation is to create a permanent record of the Anderson Bank Building. This HABS report will be a useful resource in the future, should additional changes be proposed or a restoration effort proposed. The HABS documentation shall be provided to the city for review and filing prior to implementation, should the city approve the design option, through a Certificate of Appropriateness. The HABS documentation shall be consistent with the standards established under the National Park Service’s Historic American Buildings Survey program, and include but not limited to the following:</p> <ul style="list-style-type: none"> <li>▪ The development of site-specific history and</li> </ul>	City of Davis Community Development Department.	A. Prior to filing for Certificate of Appropriateness.	

		<p>appropriate contextual information regarding the particular resource, including archival research, oral histories, and comparative studies,</p> <ul style="list-style-type: none"> <li>▪ A comprehensive architectural description of the resource,</li> <li>▪ Preparation of measured drawings for the resource, and</li> <li>▪ Photographic documentation of the resource in still and video formats.</li> </ul> <p><b>B.</b> Preparation of a Historic Structures Report (HSR), at the expense of the property owner, for the Anderson Bank Building that would serve as a preservation planning document for the building, documenting both the building’s history, existing material conditions, and providing treatment recommendations for future projects. An HSR would inform the current property owner, as well as future property owners and the City of Davis of possible conservation/repair/rehabilitation projects for the building, identify potential funding sources, and help create a phased program for financing identified future projects. HABS Documentation completed under 4.23A would inform a portion of the HSR and could be integrated into the final HSR. The</p>		<p><b>B.</b> Prior to filing for Certificate of Appropriateness.</p>	
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		<p>HSR would also assist the project sponsor in the successful execution of restoration/rehabilitation mitigation measures described below in 4.2.3A(C). The HSR shall be completed prior to execution of any restoration / rehabilitation tasks detailed in the following paragraph, and before commencement of construction tasks associated with the proposed window installation project.</p> <p>The HSR would serve as verification as to whether some of the mitigation measures required below had been performed in accordance with the applicant's statement (Letter 2-4 comment). The HSR will determine whether certain mitigation measures, such as repair and restoration of cornice and removal and replacement of the existing second floor windows to match in-kind the original second floor windows, have already been completed, or as in the case of the second floor windows not needed. The HSR will also identify if the completed mitigation measures were appropriately done or not.</p> <p><b>C. Restore or rehabilitate the Anderson Bank Building to the extent feasible relative to retaining the high</b></p>		<p><b>C. Prior to issuance of building</b></p>	
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		<p>integrity of the building. CEQA requires adoption of all feasible mitigation measures that would substantially lessen the impact of the project, the restoration / rehabilitation effort that maintains integrity of the building is desirable. The restoration / rehabilitation can be accomplished by restoring / rehabilitating previous reversible alterations that would contribute to the integrity of the building, which have not gained integrity individually. The alterations that have achieved integrity on their own merit shall not be changed as part of the restoration effort. The restoration / rehabilitation tasks shall be completed prior to implementation of the approved project. Below is a list of restoration work to be performed. A minimum of the following restoration work shall be performed:</p> <p><b>1. Remove all existing awnings on the four arched windows at the southern and eastern elevations of the building, which exclude the retail spaces and offices windows, in order to expose the historic and character-defining arched windows original to the building, Treatment options for consideration relative to energy issues associated with the removal</b></p>		<p>permit for the alteration activities on the building.</p>	
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		<p>of the awnings may include insertion of translucent film over the windows, new glazing or installation of interior sun shades to reduce the amount of sunlight entering the tenant space, etc. The final treatment options for the removal of the existing awning shall be identified at the Certificate of Appropriateness (COA) stage, should the EIR be certified and a COA application filed for the project.</p> <ol style="list-style-type: none"> <li><b>2.</b> Repair and restore the building's cornice along the street-facing elevations.</li> <li><b>3.</b> Removal and replacement of the existing second floor windows to match in-kind the original second floor windows of the building, if the HSR determines this is appropriate to ensure consistency with the Secretary of the Interior Standards.</li> <li><b>4.</b> Using the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings as a reference, clean the exterior of the building and either expose the original brickwork or repaint the building.</li> <li><b>5.</b> Restore and replace all existing exterior lighting fixtures to match in-kind the original lighting fixtures (based on historic evidence).</li> <li><b>6.</b> Repair and restore the Grate for the Bank Bell.</li> </ol>			
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		<p>7. Restore the terra cotta ceramic plaque over the corner door with the words “Bank of Davis” in raised lettering</p> <p>Retention of the removed bricks is important to the potential future restoration of the building regarding the proposed project. The purpose of retaining the removed bricks due to the approved project is to restore the “original” integrity in the event it is determined by the property owner that the alteration is no longer needed.</p> <p><b>D.</b> The property owner shall retain all removed brick to allow the project in a safe environment for future use to restore the building to its original integrity, should there be no use or reason to continue with the lower windows.</p> <p>While it is recognized that 100 percent reversibility is unlikely, the applicant shall store in a safe manner in perpetuity the removed bricks to accommodate the alteration, and shall pass on the bricks for safe keeping to future owners. In the event of future restoration of the altered portion of the building due to this proposal, the retained bricks shall be used. Failure to store the</p>		<p><b>D.</b> Beginning only after the COA is approved and removed bricks stored in a safe manner permanently until any future request to restore.</p>	
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		<p>bricks in a safe manner could directly affect the future decision to allow the restoration effort.</p> <p><b>E.</b> All mitigation measures shall be completed prior to commencement of work on the window alteration, should the EIR be certified and the COA approved. However, any mitigation measure, such as the bricks preservation, found at the COA stage to require late completion may be allowed to be delayed and completed at the appropriate stage in the project implementation at the city’s discretion and subject to EIR certification and COA approval. Acceptance of all mitigation measures and agreement to comply with all mitigation measures by the applicant shall be documented prior to certification of the EIR.</p>		<p>E. Prior to the certification of the EIR.</p>	
4.2.3B – Design Options B:	Design Option B would alter the appearance of the Anderson Bank building, and will not be consistent with <i>The Standards</i> .	Same as 4.2.3A "A" through "E" above plus F below.			

### 4.3 Aesthetics

Mitigation Number	Impact	Mitigation Measures	Monitoring Agency	Implementation Schedule	Sign Off
4.3.3A – Design Options A:	Design Option A will alter the appearance of the Anderson Bank building; this under CEQA would be a substantive change.	<p>Implement Mitigation Measures A-D from Section 4.2.3A</p> <p>There is the potential that any bracing for reinforcement used to implement the project could be unsightly or lessen the visual integrity of the building. To mitigate for this potential impact, the applicant is required to note and address the prospect of installing bracing that could result in aesthetics issue.</p> <p>F. Should reinforcement bracing be required to implement Design Option A, any reinforcement bracing and engineering details required shall be designed and installed in a manner that it is not visible from public view. All construction details and engineering shall be submitted with the Certificate of Appropriateness application. The goal of this mitigation measure is to avoid unsightly impact of the reinforcement bracing.</p>	City of Davis Community Development Department.	<b>F.</b> Prior to the commencement of any alteration activities on the building.	
4.3.3B – Design Options B:	Design Option B would alter the appearance of the Anderson Bank building,	Implement Mitigation Measures A-F above.			

	and will not be consistent with <i>The Standards.</i>				
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## **APPENDIX**

Appendix A Anderson Bank Building State of California – The Resources Agency, Department of Parks and Recreation Primary Record.

Appendix B Wendy L. Tinsley, Principal Urbana Preservation & Planning Resume.



## **Appendix A**

### **Anderson Bank Building State of California – The Resources Agency, Department of Parks and Recreation Primary Record**

State of California — The Resources Agency  
 DEPARTMENT OF PARKS AND RECREATION  
**PRIMARY RECORD**

Primary #: \_\_\_\_\_  
 HRI # \_\_\_\_\_  
 Trinomial \_\_\_\_\_  
 NRHP Status Code: **5S1** \_\_\_\_\_  
 Other Listings \_\_\_\_\_  
 Review Code \_\_\_\_\_ Reviewer \_\_\_\_\_ Date \_\_\_\_\_

- \*Resource Name or Address 203 G Street  
**P1. Other Identifier:** Anderson Bank  
**\*P2. .Location: \*a. County** Yolo  
**b. Address** 203 G Street  
**\*c. City** Davis **Zip** 95616  
**d. UTM:** N/A  
**e. USGS Quad:** Davis Quadrangle  
**\*f. Other Locational Data (APN #):** 070-251-008  
**\*P3a. Description:**

This impressive Prairie Style Commercial building was identified in the 1980 and 1996 surveys. It is a pivotal building in the remaining group of historic commercial buildings in Davis' original commercial district. It remains relatively unchanged since the last survey, although it suffered from a fire in 2002. The building retains its integrity of design, materials, workmanship, setting and association. The building contributes to the historic character of the Downtown/ Commercial area of the Conservation District. It is designated by the City as a Landmark. It is eligible for individual listing on the California Register of Historic Places due to its local designation, its importance in the commercial and economic history of Davis, its association with the JB Anderson, a mayor and important businessman, as well as for its architectural distinction. It is the only Prairie Style commercial building in Davis and the only example of a commercial block type of structure.

- \*P3b. Resource Attributes:** HP6  
**\*P4. Resources Present:**  Building  Structure  Object  Site  District  Element of District  
**P5b. Description of Photo:**  
 View west \*

**P5. Photograph or Drawing** (Photograph required for buildings, structures, and objects.)



- P6. Date Constructed/Age:**  
 1940 63 years old documented  
 Prehistoric  Historic  
 Both  
**\*P7. Owner and Address:**  
 BRB Investments  
 712 5<sup>th</sup> Street #C  
 Davis, CA 95616  
**\*P8. Recorded by:**  
 Carol Roland  
 Roland-Nawi Associates  
 4829 Crestwood Way  
 Sacramento, CA 95822  
**\*P9. Date Recorded:** 04/07-10/2003  
**\*P10. Type of Survey:**  Intensive  
 Reconnaissance  Other  
**Describe:** Determination of  
 Local District Eligibility  
**\*P11. Report Citation:** none  
**\*Attachments:**  NONE  Map  
 Sheet  Continuation Sheet   
 Building, Structure, and Object Record   
 Linear Resource Record   
 Archaeological Record  District Record  
 Milling Station Record  Rock Art  
 Record  
 Artifact Record  Photograph Record  
 Other (List):

## **Appendix B**

### **Wendy L. Tinsley, Principal Urbana Preservation & Planning Resume**

**WENDY L. TINSLEY**  
**PRINCIPAL HISTORIAN / PRESERVATION PLANNER**  
[wendy@urbanapreservation.com](mailto:wendy@urbanapreservation.com)

Ms. Tinsley brings a solid background in both history and urban planning, with a particular emphasis on issues relating to historic preservation. Her statewide experience includes extensive historical resources survey work, design review under *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, single-site historic property research and documentation, and practice in municipal regulatory planning and cultural resources compliance issues including code compliance, revision and review, CEQA, NEPA, and Section 106 of the National Historic Preservation Act. As a preservation planning consultant she participates in the development and administration of local land use regulations, policies, programs and projects; prepares reports involving research and analysis of various planning issues; conducts site-specific project and design review; and facilitates project coordination between contractors, architects, developers, citizens and other stakeholders. Wendy meets the *Secretary of the Interior's Historic Preservation Professional Qualifications Standards* in the disciplines of History and Architectural History and the *draft standards* established for Preservation Planning.

Ms. Tinsley recently completed a 1 ½ year term as the founding President of the Jack London District Association, a non-profit community advocacy organization for the Jack London District, an emerging neighborhood located along the historic industrial waterfront of Oakland, California that is anchored by a ten-block district of intact historically and architecturally significant warehouse properties listed on the National Register of Historic Places. In this position Ms. Tinsley regularly facilitated community visioning workshops, presided over community meetings, corresponded and negotiated with City Staff and Council representatives, and development interests on behalf of the Jack London District.

Wendy served as a Board member of the Northern California Chapter of the American Planning Association from 2004 through 2006 where she served as the San Francisco and East Bay Chair for the group's Regional Advisory Council. She recently joined the instructor team at the University of California at San Diego's Urban Planning & Development professional certificate program, where she teaches Historic Preservation Planning. Wendy has authored invited contributions for the *Encyclopedia of the City* publication and authored the United States Research Bibliography for the newly published book *The International Faces of Urban Sprawl*. She is currently completing a book on the planning and development history of San Diego, which will be a valuable reference resource to historic preservation and planning professionals, academics, and local historians.

**EDUCATION**

Master of City Planning, Historic Preservation & Urban Design Concentration  
Thesis Title: *How Cities Grow: A History Of San Diego Neighborhood Development Patterns, 1769-1955*  
California State University, San Diego

Public History & Historic Preservation Graduate Coursework (Master of Arts – History)  
Colorado State University, Fort Collins

Bachelor of Arts - History  
California State University, San Diego

**PROFESSIONAL EXPERIENCE**

Principal: Urbana Preservation & Planning, (Oakland & San Diego) 04/2005-present  
Architectural Historian & Preservation Planner: Architectural Resources Group (San Francisco & Los Angeles), 10/2002-04/2005  
Architectural Historian & Preservation Planner: Historic Research Services, (San Diego) 12/2001-10/2002  
Historian & Historic Preservation Planner: Office of Marie Burke Lia, Attorney at Law, (San Diego) 01/2000-11/2001  
Urban Design Assistant – El Cajon Boulevard Storefront Revitalization Project: Tokaro Nakamura, AIA, (San Diego), 2001-2002  
Assistant Coordinator: SHPO/CHRIS-South Coastal Information Center, 07/1998-08/1999  
Consultant, East Side Survey and Oral History Program: City of Oceanside Department of Planning and Land Use, 01/1999-06/1999  
Consultant, National Register of Historic Places Travel Itinerary: City of San Diego Historic Site Board, 06/1998-06/1999  
Research Assistant: SHPO/CHRIS-South Coastal Information Center, 12/1996-07/1998

**SELECT RELATED EXPERIENCE / CONTINUING EDUCATION**

Instructor: UCSD Urban Planning & Development Extension Certificate Program.  
Courses Taught: *Historic Preservation Planning* – Winter Quarter January 2007  
*Historic Preservation Planning* – Summer Quarter 2007 (scheduled)  
Seminar Facilitator / Panel Speaker: *Planning for Preservation: A Survey of Municipal Preservation Programs Throughout San Diego County*, UCSD Extension–UPD Cert. Program, 11/2006  
Invited Speaker: *Local Historic Site Designation & The Mills Act Historic Property Tax Credit Program*, City of San Leandro (CA), 04/2005  
Attendee: California Preservation Foundation & California Office of Historic Preservation, *Historical Resource Surveys for Local Governments*, San Diego (CA) 02/2004  
Attendee: National Charrette Institute, *Introduction to Dynamic Planning* (Level 1 NCI Charrette Manager Certification Training), San Diego (CA) 10/2003  
Attendee: California Preservation Foundation, *Incentives for Historic Preservation Projects*, Berkeley (CA) 09/2003  
Attendee: University of Southern California, *Preservation Planning & Law*, Los Angeles (CA) 07/2003  
Attendee: League of California Cities, *Smart Growth Zoning Codes*, Lodi (CA) 12/2002  
Invited Participant: *Second Natures, Redefining The Los Angeles Riverfront*, Los Angeles (CA) 01/2002 (2-Day Planning & Design Charrette hosted by MOCA & The Geffen)  
Graduate Instructor: Urban Studies & Planning Program, University of California at San Diego, Courses Taught: USP 124-Land Use Planning, Dr. Nico Calavita, 09/2001 – 12/2001  
Graduate Teaching Assistant: City Planning Graduate Program, San Diego State University, Dr. Nico Calavita, 01/2000 – 08/2000, 09/2001 – 12/2001, 01/2002 – 05/2002  
Selected Smart Growth Researcher: San Diego State University Foundation & City Planning Graduate Program, Dr. Roger Caves, 01/2001 – 08/2001 (Grant Topic: Planning for Sprawl in the U.S)  
Attendee: *Section 106 An Introductory Course*, National Preservation Institute, San Francisco (CA) 04/1999

### **MEMBERSHIPS**

Society of Architectural Historians (SAH)  
Society for American City and Regional Planning History (SACRPH)  
American Planning Association (APA)  
American Institute of Architects (AIA - Allied)  
National Trust for Historic Preservation (NTHP)

### **BOARDS**

Advisory Committee Member – UCSD Extension Historic Preservation Certificate Program, 2006-present  
President – Jack London District Association, 2005-2006  
East Bay Co-Chair – Regional Advisory Council, APA Northern Section-California Chapter, 2005-2006  
San Francisco Chair – Regional Advisory Council, APA Northern Section-California Chapter, 2004-2005

### **SELECT PUBLICATIONS**

Article in-progress     *The General Plan and Historic Preservation; An Overview of Historic Preservation Elements in the State of California.*  
2006                     “United States Research Bibliography” *The International Faces of Urban Sprawl: Lessons Learned From North America.* Fritz Wagner (ed.) Geography Dept. University of Waterloo: Waterloo, Ontario.  
2005                     “Courtyards” invited entry for *Encyclopedia Of The City.* Roger Caves (ed.) Routledge: London.  
2005                     “Robert Venturi” invited entry for *Encyclopedia Of The City.* Roger Caves (ed.) Routledge: London.

### **SELECT REPORTS AND DOCUMENTATION**

In-Progress             *USDA Forest Service Meeks Creeks Historic Bridge Assessment, Lake Tahoe, CA*  
In-Progress             *Fresno County Library Site C Block Historic Property Survey, Fresno, CA*  
In-Progress             *Historic Site Designation Report & Mills Act Property Tax Consulting - Ocean Beach Cottage Emerging Historic District Contributor, 4675 Del Monte Ave., San Diego, CA*  
In-Progress             *Merit Resource Designation Report & Mills Act Property Tax Credit Application, 338 Warren Avenue, San Leandro, CA*  
February 2007         *419 Park Way Historical Resource Analysis Report, Chula Vista, CA*  
January 2007            *Upper Triangle Areas Historic Property Survey (Historic Context Statement and Architectural/Historical Documentation of 50 Properties over 15 City Blocks), Fresno, CA*  
December 2006         *Historic Site Designation & Mills Act Historic Property Tax Consulting for the Charles Wakefield Cadman Residence, Mt. Helix, CA.*  
November 2006         *Historical Resource Analysis of the 4303 Narragansett Avenue Property, San Diego, CA*  
September 2006        *Section 106 Review of the 1333 Balboa Street Property, San Francisco, CA*  
September 2006        *Section 106 Review of the Historic Delta-Mendota Canal, Los Banos, CA*  
August 2006            *Historical Evaluation Report – 2959 East Avenue, Hayward, CA*  
June 2006                *Historical Resource Analysis Report for the 418-450 10<sup>th</sup> Avenue Properties, San Diego, CA 92101*  
May 2006                *Section 106 Review of the Coconut Grove Building – Santa Cruz Beach Boardwalk, Santa Cruz, CA*  
May 2006                *Historical Resource Evaluation Report for the 70 15<sup>th</sup> Street Warehouse, San Diego, CA*  
April 2006                *Historic Site Designation Report & Mills Act Property Tax Consulting - Ocean Beach Cottage Emerging Historic District Contributor, 4528 Saratoga Avenue, San Diego, CA*  
March 2006             *City of Fresno Arts-Culture District Historic Property Survey (Historic Context Statement and Architectural/Historical Documentation of 90-100 Properties over 18 City Blocks), Fresno, CA*  
March 2006             *South Mossdale Historic-Era House Evaluation, Lathrop, CA*  
February 2006          *Westwind Barn Historic Preservation Study, Los Altos Hills, CA*  
January 2006            *Section 106 Review of the 2654 Mission Street Property, San Francisco, CA*  
January 2006            *Section 106 Review of the 325 Mowry Avenue Property, Fremont, CA 94536*  
January 2006            *Section 106 Review of Ardenwood 34551 Ardenwood Bouevard, Fremont, CA 94555*  
December 2005         *Section 106 Review of the 1230 N Street Property, Sacramento, CA 95814*

December 2005	<i>Section 106 Review of the Sacramento City College Water Tower, Sacramento, CA</i>
November 2005	<i>Section 106 Review of Fair Oaks Watts, 525 La Sierra Drive, Sacramento, CA</i>
November 2005	<i>Napa Valley College Bus Shelter West Historical Resource Analysis Report, Napa, CA</i>
October 2005	<i>Section 106 Review of the 1025 3<sup>rd</sup> Street Property, Sacramento, CA 95818</i>
September 2005	<i>City of Davis, Historic Anderson Bank Building Research, Documentation &amp; Design Review Analysis, 203 G Street, Davis, CA</i>
September 2005	<i>Historical Resource Analysis Report, 1212 &amp; 1214 Second Street, San Rafael, CA</i>
August 2005	<i>Historical Resource Analysis Report – Somky Property/Thompson’s Soscol Ranch, Napa, CA 94558</i>
July 2005	<i>Walnut Creek Women’s Club Environmental Impact Report, 1224 Lincoln Avenue, Walnut Creek, CA</i>
June 2005	<i>Tam Property Lot Split Historic Preservation Consulting, Castro Valley, CA</i>
May 2005	<i>Historical Resource Analysis Report, 7329-7331 Eads Avenue, San Diego, California</i>
March 2005	<i>Ehlers Estate Historical Resource Analysis, 3222 Ehlers Lane, St. Helena, California</i>
March 2005	<i>University of California at Santa Cruz Preservation Consulting (Campus Wide Cultural Resources Inventory, Historic Context Statement – Campus Planning History)</i>
February 2005	<i>Hall Winery Historical Resource Analysis, St. Helena, California</i>
January 2005	<i>Historical Resource Evaluation, 700 28<sup>th</sup> Avenue, San Mateo, California</i>
January 2005	<i>Historical Resource Evaluation, 312 &amp; 318 Highland Avenue, San Mateo, California</i>
December 2004	<i>San Mateo Motel Historical Resource Report – Park Bayshore Townhomes – Environmental Impact Report (Revised February 2005)</i>
November 2004	<i>Historical Evaluation of the San Mateo Motel, 801 South Bayshore Boulevard, San Mateo, California</i>
October 2004	<i>Stonegate Homes Subdivision Plan, and Single-and-Multi-Family Dwellings Design Review, San Mateo, California</i>
September 2004	<i>University of California at Santa Cruz, Getty Campus Heritage Grant Application</i>
September 2004	<i>City of Riverside Downtown Fire Station No.1 Cultural Resources Analysis, Riverside, California</i>
August 2004	<i>Residential Remodel Design Review – Glazenwood Historic District Contributor, 929 Laurel Avenue, San Mateo, California</i>
August 2004	<i>Odd Fellows Hall, Historic Structure Report, 113 South B Street, San Mateo, California (with Conservator Seth Bergstein)</i>
July 2004	<i>Design Review Analysis – Schneider’s Building, 208 East Third Street, San Mateo, California 94401</i>
July 2004	<i>Embarcadero Cove Development Project Initial Study – Preliminary Historical Resource Analysis, Oakland, California 94606</i>
July 2004	<i>Historical Resource Evaluation Report – 4830 Cape May Avenue, San Diego, California 92107 (Revised January 2005)</i>
June 2004	<i>City of Monterey Alvarado Street Mixed-Use Project - APE Survey, Monterey, California</i>
June 2004	<i>City and County of San Francisco Historical Resource Evaluation Report – 450 Frederick Street, San Francisco, California 94117</i>
June 2004	<i>Design Review Analysis – 117 Clark Drive, San Mateo, California 94402</i>
May 2004	<i>Historical Evaluation of the 426 Clark Drive Residence, San Mateo, California 94402</i>
April 2004	<i>City and County of San Francisco Historical Resource Evaluation Report – 1272 42<sup>nd</sup> Avenue, San Francisco, California 94122</i>
April 2004	<i>City of Fresno Broadway Row Historical Resource Survey</i>
March 2004	<i>Historical Evaluation of the 117 Clark Drive Residence, San Mateo, California 94402</i>
March 2004	<i>Historical Evaluation Of The Fresno Republican/McMahan’s Building, 2030 Tulare Street, Fresno, California 93721</i>
February 2004	<i>Crocker Bank Building Preservation Planning Considerations Memorandum</i>
January 2004	<i>Historical Evaluation of the 501 Walnut Street Residence, San Carlos, California 94070</i>
January 2004	<i>Historical Evaluation of the 20 Madison Avenue and 29 Hobart Avenue Properties, San Mateo, California 94402</i>
January 2004	<i>Historical Evaluation Of The Residence Located At 571 Valley Street, San Francisco, California 94131</i>
January 2004	<i>Historical Evaluation Of The 3925 20<sup>th</sup> Street Residence, San Francisco, California 94131</i>

November 2003	<i>Historical Evaluation of Commercial Building Located at 1022 El Camino Real, San Carlos, California 94070</i>
November 2003	<i>Peer Review Statement for the K &amp; T Foods Building, 451 University Avenue, Palo Alto, California 94301</i>
November 2003	<i>Historical Evaluation of the Greer-O'Brine Property, 51 Encina Avenue, Palo Alto, California, 94301</i>
November 2003	<i>Embarcadero Hotel Environmental Impact Report, Historical Resources Analysis and Design Review Statement</i>
October 2003	<i>City of San Leandro Historical Resources Survey, Historic Context Statement, Historic Preservation Ordinance, and Draft Historic Preservation Benefits/Incentive Program</i>
August 2003	<i>Palm Theater Environmental Impact Report, Historical Resources Analysis</i>
July 2003	<i>Historical Evaluation Of The First Christian Church Building, 2701 Flores Street, San Mateo, California 94403</i>
June 2003	<i>Alameda Naval Air Station Reuse Project Historic Preservation Regulatory and Policy Memorandum (Prepared for Alameda Point Community Partners-Master Developer for NAS Alameda)</i>
May 2003	<i>Historical Evaluation Of The Residence Located At 606 Dorchester Road, San Mateo, California 94403</i>
March 2003	<i>Ames Aeronautical Laboratory 40' x 80' Wind Tunnel National Register Nomination (Prepared for NASA Ames Research Center)</i>
March 2003	<i>Ames Aeronautical Laboratory 6' x 6' Supersonic Wind Tunnel National Register Nomination (Prepared for NASA Ames Research Center)</i>
March 2003	<i>Ames Aeronautical Laboratory Administration Building National Register Nomination (Prepared for NASA Ames Research Center)</i>
March 2003	<i>Historical Evaluation Of The Residence Located At 1015 South Grant Street, San Mateo, California 94402</i>
February 2003	<i>8<sup>th</sup> &amp; Market, 10 United Nations Plaza, Cell Site Impact Review</i>
February 2003	<i>Existing Conditions and Subdivision Design Alternatives For The Proposed Hayman Homes Tract No. 7267, Proctor Road, Castro Valley, California</i>
February 2003	<i>Historical Evaluation Of The Residence Located At 336 West Poplar Avenue, San Mateo, California 94402</i>
January 2003	<i>Historical Evaluation Of The Residence Located At 744 Occidental Avenue, San Mateo, California 94402</i>
January 2003	<i>Historical Evaluation Of The 131 and 141 West Third Avenue Apartment Buildings, San Mateo, California, 94402</i>
December 2002	<i>California State Capitol Building, Sacramento, California Wireless Antenna Site Review</i>
November 2002	<i>Wireless Antenna Site Review, Medical Arts Building, 2000 Van Ness Avenue, San Francisco, California 94109</i>
October 2002	<i>Historical Evaluation Of The LeDucq Winery Estate, 3222 Ehlers Lane, St. Helena, California 94574 (Revised June 2003)</i>
October 2002	<i>Historical Assessment Of The St. Patrick's Parish Community Building Located At 3585 30<sup>th</sup> Street, San Diego, California, 92104</i>
September 2002	<i>Historical Assessment Of The Building Located At 4257 Third Street, San Diego, California, 92103</i>
April 2002	<i>Historical Assessment Of The Building Located At 3567 Ray Street, San Diego, California, 92104</i>
October 2001	<i>Historical Assessment Of The Gustafson's Furniture Building Located At 2930 El Cajon Boulevard, San Diego, California, 92104</i>
September 2001	<i>Historical Review Of Lots A, B, K &amp; L, Block 93, Horton's Addition Lockling</i>
August 2001	<i>Core Inventory Of All Sites Appearing To Be More Than 45 Years Of Age Not Previously Documented (Prepared For Centre City Development Corporation)</i>
August 2001	<i>Urbana Project Abstract Bibliography (Prepared for Dr. Roger Caves, San Diego State University and San Diego State University Foundation)</i>
July 2001	<i>Historical Assessment Of The Kirkland Apartments Building Located At 2309 Fifth Avenue, San Diego, California, 92103</i>
July 2001	<i>Historical Assessment Of The Building Located At 4230 Maryland Street, San Diego, California, 92103 (With Kathleen A. Crawford)</i>



June 2001 *Historical Assessment Of The 2525-2529, 2537-2547, 2561 First Avenue Residences, San Diego, California 92103*

May 2001 *Update Of The November 1988 Historic Site Inventory Of Centre City East For Centre City Development Corporation*

April 2001 *East Village Inventory Of All Sites Appearing To Be More Than 45 Years Of Age Not Previously Documented (Prepared For Centre City Development Corporation)*

April 2001 *Update Of The May 1989 Historic Site Inventory Of Bayside For Centre City Development Corporation*

January 2001 *Historic Survey Report Of The Former Teledyne-Ryan Aeronautical Complex 2701 North Harbor Drive San Diego, California 92101 (with Scott Moomjian)*

January 2001 *Historical Assessment Of The Fletcher-Salmons Building 602-624 Broadway, San Diego, California 92101*

December 2000 *Cultural Resource Report for The Winona Avenue Area Elementary School Preferred Site, Alternative 1 Site, and Alternative 2 Site*

November 2000 *Cultural Resource Report for The Edison/Hamilton/Parks Area Elementary School Preferred Site and Alternative Sites*

November 2000 *Cultural Resource Report for The Adams/Franklin Area Elementary School Preferred Site and Alternative Site*

October 2000 *The National Register of Historic Places Travel Itinerary; Old Town San Diego*

August 2000 *Cultural Resource Report for The Winona Avenue Area Elementary School Preferred Site and Alternative Sites*

July 2000 *Cultural Resource Report For The 52<sup>nd</sup> Street Area Elementary School Preferred And Alternative Sites*

July 2000 *Historical Assessment Of The 3658 Warner Street Residence, San Diego, California 92106*

July 2000 *Historical Assessment Of The 367 Catalina Boulevard Residence, San Diego, California 92106*

July 2000 *Historical Assessment Of The 906 West Lewis Street Residence, San Diego, California 92103*

May 2000 *Historical Assessment Of The 501-503, 507 and 509 14<sup>th</sup> Street Residences, San Diego, California 92101*

May 2000 *The San Diego Flume Company System Redwood Pipeline, San Diego County, California*

March 2000 *Historical Assessment of The Society For Crippled Children's Hydrotherapy Gymnasium Located at 851 South 35<sup>th</sup> Street, San Diego, California 92113*