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Anderson Bank Building Background

- **Roland-Nawi Associates: Preservation Consultants 2002 Report and Architectural Resources Group February 1999 Report**
- **Synthesis Design Group: 2005 Alternatives Letter and 2003 Alternative Letter to Mr. James A. Kidd**

Anderson Bank Building Brief Alterations & Applications Background 203 G / 719 2nd Streets

1958 Corner Doors replaced with horizontal window, according to the blueprints on file at the Community Development Departments.

1940 – 1978: The changes that occurred during period are not well documented. According to research of microfiche files at Community Development Department, changes during this period include metal canopy over G Street door, boarding up of clerestory windows over retail entrances on Second Street and alterations to configure retail doors/windows, addition of awnings to all windows, painting the masonry, replacing second story windows with windows that are less than full size in the unchanged masonry openings, and removing/replacing exterior light fixtures. The Farmers Bank application (1978) included lowering the retail ceilings, so the clerestories may have been boarded up as part of that job.

1978 – First building permit application on file for converting bank to store front. No details on this application review process was found on file.

1984 – Application for seismic retrofit and conversion of first floor (including retail wing) for Farmers Bank Building – Application approved: Seismic retrofit was done, but it appears that the Farmers Bank project was never fully completed. The building was subsequently sold to current owners.

1986 – Repainting and awning replacement approved: The owners installed new awnings and repainted the building without a historic alteration permit. An application was later filed and the work approved.

1992 – Exterior signage approved: Signage and exterior wall-mounted sculpture for “Art Related Things” tenant John Natsoulas was installed without permit. An application was filed and the work approved, with conditions requiring the masonry to be repaired after removal. Date of removal not noted in file. Repair work was not done.

1995 – First Application to replace existing arched windows, removing sills and installing full glass storefront widows -- Denied by HRMC; No appeal filed: In 1995, Mr. Kidd applied for permission to replace the historic arched windows with modern, large store front windows. The window alteration was denied, but permission to increase visibility into the retail space by reinstalling a door in its historic corner

location was approved in order to help meet the retail goal while reinstating the historic pattern of voids and solids.

1999 -- Request to Council for city funds to pay for EIR expenses -- Request refused: In 1999, Mr. Kidd asked the City Council to fund the environmental analysis that was needed for the window proposal to go forward. Staff consulted with an historical architecture firm, Architectural Resources Group (ARG), and confirmed that an E.I.R. will be required. The Council turned down Mr. Kidd's request for public funding.

2003: Fire Repairs -- Commission request to install full size windows in historic second floor masonry openings: Installing full sized windows was not required because smaller windows existed at the time of the fire. However, the Commission authorized staff to request that the owner consider the replacement. This was unacceptable to the owner.

2002 -- Second Application to insert glass windows below existing arched windows -- Denied by HRMC. Appealed to City Council; Denied by City Council: In 2002, Mr. Kidd submitted a second application that proposed new windows to be inserted below the arched windows. Staff consulted with a second architectural historian (Carol Roland, Roland-Nawi Associates). She concluded that this approach, while different from the first, still had potential to cause substantial adverse change in a historic resource. The window insertion was denied by the Historical Resource Commission, and denied without prejudice on appeal to the City Council in December 2002. The denial without prejudice was done in recognition that the owner's architect stated that there might yet be a solution that would not require an EIR. Reinstalling a corner door at the location where one originally existed was once again approved.

2003 -- Third Application to insert windows below arched windows Environmental determination that EIR was required -- Appealed; Appeal withdrawn: In Feb. 2003, the city received the third application from Anderson Bank building owner Mr. Kidd. Mr. Kidd paid an initial fee for consultant evaluation. The city staff consulted with Architectural Resources Group to determine whether the new proposal, for slightly smaller lower windows, would result in a potentially significant alteration, requiring an EIR. The city determined that an EIR was required. Mr. Kidd appealed the city's determination. The appeal was continued multiple times at Mr. Kidd's request. No hearings were held. The appeal was ultimately withdrawn. See "2004" discussion below.

Application to De-list Building Submitted by Owners -- Recommended for denial by HRMC.

Denied by City Council: By letter on June 28, 2003, Mr. Kidd requested that the city remove the property from the Davis Historic Register. Staff confirmed via letter that the environmental determination appeal would remain on hold until the rescission review was complete.

Public hearings to consider the rescission request were heard in accordance with city zoning, first by the Historical Resources Management Commission and then by the City Council on October 21, 2003. Both bodies unanimously concluded that the building retains its historical character and affirmed its designation as a Landmark on the Davis Register of Historic Resources.

2004 -- Restoration of corner opening, first installation of new doors at corner: With the building's Landmark status re-affirmed, the staff moved ahead with the appeal by placing the item on the Planning Commission's December 3, 2003, agenda. Although published and noticed, the hearing was not held at Mr. Kidd's request.

Following the postponement, Mr. Kidd agreed to move ahead with the 2002 approval to install doors in the Second and G corner. The work restored the original opening. However, the masonry repairs were deemed inadequate by staff, and the door that was inserted did not meet the conditions of approval for a replacement door. During the spring of 2004, staff continued to work with Mr. Kidd on the selection of an appropriate door and the repair of the masonry. In addition, staff advised Mr. Kidd that the G Street door which was installed during the fire repairs, did not meet current accessibility standards and would need to be replaced.

Application to install handicapped access ramp for Second Street office entrance, and replace non-historic Second Street office door with glass door without modifying existing opening: Mr. Kidd received a Certificate of Appropriateness (COA) from HRMC to install a handicapped access ramp on the south side of the building, leading to the Second Street entrance.

The approval was contingent in part on the completion of the corner door project and installation of an adequate replacement for the G Street door, prior to the initiation of the ramp project and completed to the satisfaction of the city. The contingency was required to eliminate potential for cumulative negative impacts on the historic character defining features of the building. Full glass doors have now been installed and approved by the city. The approval was further contingent on the Council's authorizing an

encroachment permit. Mr. Kidd appealed the COA contingency that the Corner and G Street doors be completed first.

In June of 2004 the City Council denied the appeal and approved a resolution authorizing the Encroachment Permit, subject to all conditions of approval. Doors at corner and G Street openings replaced with city-approved full glass doors. Masonry was repaired.

Following the final corrections to the G Street and corner door openings, Mr. Kidd proceeded with raising the Second Street lobby floor, replacing the Second Street door and installing a temporary exterior landing. This work was done without first receiving a city building permit or encroachment permit. The city worked extensively with Mr. Kidd over the next year on the plans for the ramp to complete adequate design plans.

On May 16, 2005 the City received an accurate and detailed set of plans from which to derive the full extent of the ramp dimensions, and full scope of sidewalk disruption. After approximately one year of working with the applicant a building permit for the ramp was issued on May 23, 2005. Shortly after issuance of the building permit, the applicant approached the Public Works Department to obtain an encroachment permit to authorize the work on the City right-of-way.

Normally, all sidewalk, curb and gutter improvements would be the responsibility of the applicant. However, after discussions at a meeting with the applicant's representatives the City acknowledged that some of the sidewalk would warrant replacement in the future, even absent the proposed ramp. Therefore, the City proposed cost sharing arrangement. Upon negotiation with the

Third Application to insert windows below arched windows: There was continued dialogue and correspondences between staff and the property owner on this issue.

2005 – Encroachment Permit Expiration Acknowledged and not Re-Authorized: On Sept. 13, 2005, City Council considered a staff report on the above encroachment permit. In the report, staff wrote that that the proposed cost sharing arrangement represented a fair and appropriate use of city funds to help offset the costs of the work. Further, staff stated that any contribution greater than this would be a contribution to a project that does not have a direct broad public benefit, but one that primarily provides the benefit of better access to a private property via use of the city right-of-way. Additionally, staff noted that the encroachment permit includes no on-going compensation to the City, other than a one-time

encroachment permit fee. And finally, the substantial non-reimbursed time spent on this proposal to date represents an in-kind contribution that, on most projects, would be reimbursed through application fees.

The City Council unanimously approved the staff's recommendation to:

1. Acknowledge the expiration of Resolution #04-174 which authorized the City Engineer to issue an encroachment permit for a ramp to be located within the 2nd Street right-of way adjacent to 719 2nd Street (Anderson Bank Building); and
2. Direct the property owner to remove the temporary wooden steps from the City right-of way and take those actions necessary to ensure compliance of the building with applicable building codes as may be directed by the City Building Official.

Third Application to insert windows below arched windows: Given continued discussion, it was mutually decided that an Environmental Impact Report, EIR, would be prepared to the windows alteration. Urbana Preservation & Planning, Inc. was contracted to conduct a historical resources analysis on the Anderson Bank Building.

2006 -- Third Application to insert windows below arched windows: Again, this third application was withdrawn in 2003. However, given the continued discussions between staff and the applicant, an Environment Impact Report process was commenced. The initial process involved preparation of a Historical Resource Analysis for the building. An Initial Study was also prepared. Both reports were presented to the Historical Resources Management Commission for review and comments several times. Based on the input and comments received, the Environmental Impact Report work began.

Recess entry door on Second Street to provide for landings and steps: On April 13, 2006 the Community Development Department approved a Certificate of Appropriateness for the building, to allow the recessing of the existing door on Second Street side. At its meeting on April 17, 2006 the Historical Resources Management Commission approved a motion to appeal the administrative approval. Subsequently, staff notified the Chairperson and later each Commissioner that the Commission's action was in error since the item was not on the Commission's agenda. Meanwhile, Mr. Jim Becket appealed the administrative approval on the basis that there needs to explanation of consistency with The Secretary of the Interior's Standards, and why the project was not taken to the HRMC for action. The appeal does not necessarily object to the administrative approval, but questions the process for action. On May

15, 2006, the Historical Resources Management Commission heard the appeal and denied it and upheld the administrative approval of the Certificate of Appropriateness #6-05. This allowed the recessing of the existing entry door and the provision of an outside landing and a second step to the sidewalk on the Second Street side of the Anderson Bank Building to take place. This improvement had been installed.

REPORT: PROJECT PROPOSAL
CITY OF DAVIS
ANDERSON BUILDING, 203 G STREET

City of Davis
Planning & Surveying

REPORT REQUEST: The City of Davis requested Roland-Nawi Associates: Preservation Consultants to prepare a report reviewing the proposed alteration to the Anderson Bank Building, 203 G Street, Davis, California, and to evaluate the conformance of the proposed project with the Secretary of Interior's Standards for the Treatment of Historic Properties.

BUILDING DESCRIPTION: The Anderson Bank Building, constructed in 1914, is a two-story brick commercial building with brick and terra cotta detailing. Wrapping around the block at the intersection of 2d and G Streets, it is an excellent example of the corner commercial building form which played an important role in defining business districts in small towns and neighborhood commercial centers from the 1870's through the 1940's. In a clear architectural reference to the arcaded urban business block, the building's two major street level elevations are punctuated by four large arched windows that are divided by wooden mullions. Breaking up the planar surface of the walls, these massive openings are significant features of the building's otherwise restrained and subtle interpretation of the Prairie School architectural vocabulary. Two slightly recessed, double, swinging doors provided entry into the former bank area, while a third door, of similar design, provided entry to the upper story offices. The main entrance, located at the angled corner of the building was a prominent feature; its importance highlighted by a decorative terra cotta plaque placed over the opening. Together with the arched windows, the entries, enhanced by patterned brick pilasters and originally flanked by sconces, are the major features of the building which visually establish its commercial identity and purpose. The Anderson building, like many corner commercial enterprises, combined financial, office and retail functions into a single building envelope. The south side of the building extends west of the 2d floor entry in a separate bay which includes a series of shop/storefronts. Originally there were three individual retail spaces with separate entrances, each flanked by half-length display windows. The ribbons of double hung upper story windows clearly organize the buildings into three primary bays, one on the east side of the building and two on the south side.

Over time several changes have been made to the building. The most important of these is the removal of the main corner entry doors and enclosure of the opening by a brick wall and a small fixed display window. In addition the store window transoms in the third (west) bay have been boarded to accommodate dropped ceilings on the interior, and one of the store entrances has been removed. It appears from photographs that a decorative glazing in the upper lights of the arched windows has been replaced and large canvas awnings have been inset into the arches that obscuring the upper portion of the windows. The south office entry door also has been replaced by a modern steel security door. All of these changes have impaired the buildings historic integrity by removing historic fabric, and in the case of the primary entry, compromising the original design. However, none of these changes have been evaluated to be of sufficient severity or scope to affect the building's historic significance.

HISTORIC STATUS OF THE BUILDING:

The Anderson Building was surveyed and evaluated in historical resource surveys conducted by the City of Davis in 1980 and in 1996. Under section 29-145 of the Davis Municipal Code the City



Council designated the building as an Outstanding Historical Resource in 1984. In the 1996 survey, which was prepared to the standards of the State Office of Historic Preservation, the building was evaluated as individually eligible for listing on the National Register of Historic Places (a ranking of 3S on a Department of Parks and Recreation Form 523). A building identified as significant in a local survey prepared in accordance with the State Office of Historic Preservation standards and procedure and/or a survey which has been included in the State Historic Resources Inventory, as well as a building designated under a municipal ordinance, is eligible for listing on the California Register of Historical Resources and is an historical resource for purposes of CEQA (Public Resources Code §5024.1(e)(g) and § 21084.1).

PROJECT DESCRIPTION:

The project involves two major alterations to the Anderson Building:

The first would reconstruct the original entry door at the 2d and G Street corner which was removed and the entry enclosed at an unknown date. If restored, the reconstructed entry would be based on historical photographic documentation. The proposal also indicates that an alternative to restoration of the historical feature might be the installation of a replacement door utilizing modern, substitute materials and ornamentation.

The second part of the project would introduce a new area of glazing below each of the four existing massive arched windows. This band of glazing, extending the full width of the historic window, would be inserted between the brick banding at the sill of the historic window and the existing brick base trim. According to the proposal the windows would be single light anodized aluminum set on a cast stone sill. The insertion of these windows would necessitate the removal of the brick trim bands and their reconstruction as a brick veneer following structural strengthening. The project proposal does not indicate if the structural work would allow for replacement of the veneered brick in the same plane as the original trim bands.

The purpose of the increase in glazed surface would be to create more display space.

EVALUATION CRITERIA:

In California the established standard for assessing the effects of a project on an historical resource is the Secretary of Interior's Standards for the Treatment of Historic Properties (Weeks and Grimmer). The CEQA Guidelines find that generally a project that follows the Secretary of Interior's Standards is mitigated to a level of less than significant impact on historical resources (CEQA Guidelines § 15084.5). Additionally, the Guidelines provide that a project which follows the Standards is categorically exempt from CEQA (CEQA Guidelines § 15331)



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PROJECT IMPACTS

The first part of the project proposal, to reconstruct the missing primary entry door on the corner of the building, is consistent with the Secretary of Interior's Standards for Rehabilitation: Entrances and Porches (pp. 85 to 89). In discussing the design for replacement of missing historic features the Standards recommend designing and constructing new entrances when the historic entrance is completely missing, as it is in this case. Either of the alternatives proposed by the project proponent, reconstruction based on historical documentation, or a new design compatible with the character of the building, would meet the Standards. Since there is no proposed design at this time, this aspect of the project will require further review once an alternative is selected and design details are available.

The proposal to insert additional glazing below the four arched windows is not consistent with the Secretary of Interior's Standards. While the Standards do allow for the installation of additional/new window openings on the rear or non-character defining elevations of a building, they stress that windows on primary elevations are almost always important elements in defining the overall historic character of a building. The National Park Service points out that "In most buildings, windows also comprise a considerable amount of historic fabric of the wall plane and thus are deserving of special consideration in a rehabilitation project." (Grimmer and Weeks, *Illustrated Guideline for Rehabilitation*, 1992, p. 30) The four massive arched windows that punctuate the east and south street-level facades of the Anderson Building are essential character defining elements of the building and occupy a substantial portion of the lower building façade. They are the single most prominent and detailed design element in the façade, with the recessed brickwork arches and sills not only framing the window opening, but also defining the wall plane both above and below through the contrast of their projecting and recessed brickwork features.

Although the project would not directly affect or remove the fabric of the historic windows, the insertion of glazing beneath the brick sill would substantially alter the character and appearance of the building. The effect of the added lower glazing is to create a glazed mass that reads as a single, floor length unit, reducing the sill into an ornamental bar. These changes would obscure the original design of the fenestration, alter the plane of the lower flat wall and remove the function of the sill. The new glazing introduces an element inconsistent with the building's Prairie School architectural style and is uncharacteristic of commercial structures of the period in general.

The applicable standards include:

- 1) Not recommended: Installing new windows including frames, sash and muntin configurations that are incompatible with the buildings historic appearance or obscure, damage or destroy character defining features.
- 2) Not recommended: Changing the number, location, size or glazing pattern of windows, through cutting new openings, blocking-in windows, and installing replacement sash that do not fit the historic window opening.



3) **Not recommended:** Changing the historic appearance of windows through the use of inappropriate designs, materials

ENVIRONMENTAL REVIEW:

A project that may cause a substantial adverse change in the significance of an historical resource is a project that will have an effect on the environment (Public Resources Code § 21084.2).

The proposal to reconstruct the double entry doors on the corner of the building, whether through restoration of its historical appearance or using modern, compatible design, would restore the building to a more accurate historical appearance by reconstructing a primary opening in the building envelope. While the effect of this alteration would be a benefit to the building's historic integrity it would not compensate for the removal of historic fabric and the insertion of proposed new window openings.

The current design scheme to add additional window space to the Anderson Building would be incompatible with the building's historic appearance, it would damage defining features, and it would necessitate cutting new openings on principal elevations of the building. These alterations would cause a substantial adverse change in the significance of an historical resource by impairing its integrity and altering those physical and visual qualities that convey its importance.

CUMULATIVE EFFECT

As noted in the description section of this report, other previous alterations have been made to the building, including the removal of the corner entry door, the removal of one of the storefront entries, the closing of the storefront transoms (although probably reversible) and the replacement of the south office entry door. The currently proposed alterations should be considered in the light of these previous changes to assess whether cumulative changes to the building's original appearance and the removal or alteration of historic fabric as proposed in this project would render the building ineligible for listing on the National Register of Historic Places and/or the California Register of Historical Resources or if such changes could be mitigated.



ARCHITECTURAL RESOURCES GROUP
Architects, Planners & Conservators, Inc.

MEMORANDUM

To: Ms. Esther Polito
Cultural Resources Manager
City of Davis
Parks and Community Services
23 Russell Boulevard
Davis, California 95616

Pier 9, The Embarcadero
San Francisco
California
94111
fax 415.421.0127
415.421.1680

From: Bridget Maley, Architectural Historian

Subject: Design Review - 203 G Street

Project No: 99029

Date: February 24, 1999

SUBJECT / REQUEST:

In response to a request by the City of Davis, Architectural Resources Group has evaluated the impacts of the proposed project at the Anderson Bank Building at 203 G Street in Davis, California. Our review is based on the undated "Retail Modification" drawings by Aubrey Moore, Architects & Associates and additional information provided by the City on February 16, 1999.

BACKGROUND INFORMATION:

Building Description:

This two-story, brick, Prairie School commercial building has a flat roof with a pronounced overhang. The elaborate decorative brick-work is one of the design components that gives the building its Prairie School character. Most of the architectural ornament is achieved by simple relief modulations in the brick surface; however, there are some decorative terra cotta inserts. The building faces both Second and G Streets with the more lengthy elevation at Second Street. The ground floor windows consist of massive, arched, divided-lite wood windows. At the western end of the Second Street elevation there are also a series of storefronts with plate glass windows and individual doors. Although the building has been altered through time, it is in good condition and has maintained many of its character-defining features.

Building Significance:

Constructed in 1914, this building was originally occupied by the Bank of Davis, the Davis Post Office, as well as several professionals who occupied office space on the second floor. This building is an outstanding example of the Prairie School style of architecture and is perhaps one of the finest commercial structures in Davis. The building was constructed by C. Guth, a Sacramento contractor, at a cost of \$22,998. John B. Anderson served as the Mayor of Davis in 1917, and he financed the construction of the building.

The Anderson Bank Building was evaluated in both the 1980 and 1996 Davis architectural surveys. The building was designated an Outstanding Historical Resource under Section 29-145 of the City of Davis municipal code in 1984. After review of the 1996 Survey by the Office of Historic Preservation (OHP), the Anderson Bank Building was given the OHP National Register

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of Historic Places (National Register) rating of 3S. The OHP 3S rating is defined as "appears eligible for separate listing in the National Register."

PROJECT DESCRIPTION:

The project involves two major components: the insertion of doors at the angled corner at Second and G Streets and the enlargement of four windows at the first floor along the Second and G Street elevations. The proposed new door is placed at an original door location that was enclosed sometime prior to 1953. The new doors, as well as the associated header and side trim, will match the existing doors on G Street including the depth of the doors.

The second major component of the project involves considerably lowering the sills of the four arched window openings along both the Second and G Street elevations. The proposed windows are metal sash and the profiles will be similar to the older wood sash above. The brick window surrounds will be replicated.

In addition to the work outlined above, a new light fixture will be added at the Second Street elevation, and a pay telephone mounted at the Second Street elevation will be removed.

EVALUATION CRITERIA:

In order to evaluate the impacts of the proposed project and to consider alternatives to the intended project, it is helpful, if not necessary, to draw upon established criteria or standards. For the purposes of this review, *The Secretary of the Interior's Standards for the Treatment of Historic Properties* has been consulted, with specific consultation of *The Secretary's Standards for Rehabilitation*.

The Standards is the primary document used by a broad range of government entities and private sector organizations to plan and evaluate the treatment of historic buildings. As indicated in its introduction, *The Standards* are "neither technical nor prescriptive, but are intended to promote responsible preservation practices. . . For example, they cannot, in and of themselves, be used to make essential decisions about which features of the historic building should be saved and which can be changed. But once a treatment is selected, *The Standards* provide philosophical consistency to the work." Intended as a planning tool and to provide guidance, *The Standards for Rehabilitation* rely on an understanding of the character-defining features of a building.

The overall historic character of a property is the sum of all visual aspects, features, materials, and spaces associated with a property's history. Character-defining elements are those features of a structure that are essential to the perception or understanding of the historic resource. The character-defining elements contribute to the special quality of the resource; without them the uniqueness of the structure is lost.

PROJECT IMPACTS:

The reintroduction of the doors at the angled corner appears to be an appropriate design solution and would not alter any character-defining features. However, the lowering of the window sills does not meet the intention of *The Standards*. The proposed project, as it involves significantly

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Architects, Planners & Conservators, Inc.

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altering character-defining features, has the potential to change the design and cause a substantial adverse change in the significance of the resource.

The other minor components of the project including the lighting and pay telephone changes, if executed with care, will not impact the resource.

RECOMMENDATIONS:

Architectural Resources Group recommends that the project be modified to meet the intent of *The Standards*. The arched windows should be retained in their present and historical configuration. To achieve the need for storefront windows, perhaps the corner opening, which does not appear necessary for egress, could be enlarged to its historical dimension and be converted to a storefront window instead of a door. The original masonry corner opening could be restored and glazing could be installed in this opening with display space behind. The retail entry would continue to be located at the G Street location.

A second option would be to reintroduce the doors at the angled corner and to convert the G Street entry to window display area. This would allow for some display space, but would not necessitate the alteration of the original arched windows. The original surround at the G Street entry could be retained and perhaps the door could be reused at the corner entry.

Lastly, care should be taken when removing the pay telephone to insure that the masonry is not damaged when this non-historic feature is removed.

ENVIRONMENTAL REVIEW:

Under the California Environmental Quality Act (CEQA), a project that results in a "substantial adverse change" in the significance of an "historical resource" is a project that may have a significant adverse effect on the environment {Cal. Pub. Res. Code § 21084.1}. An "historical resource" is a resource listed in, or determined to be eligible for listing in, the California Register. Certain resources are automatically listed in the California Register, including California properties which are listed in or formally determined eligible for the National Register of Historic Places {Cal. Pub. Res. Code § 5024.1(d)(1)}. The Public Resources Code defines "substantial adverse change" as "demolition, destruction, relocation or alteration," activities that would impair the significance of an historical resource {Cal. Pub. Res. Code § 5020.1(q)}.

The identified historical resource in relation to this project is the Anderson Bank Building, a designated "Outstanding Historical Resource" under Section 29-145 of the City of Davis municipal code. As this resource is covered under Davis' Ordinance, the proposed project would require discretionary review of an "alteration," by the Historical Resources Management Commission (HRMC). This necessity for review by the HRMC triggers CEQA.

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If the project were modified to meet *The Secretary of the Interior's Standards*, the project would likely meet the requirements of a mitigated negative declaration under CEQA. If the project proponent can not modify the project to meet *The Standards*, the project has the potential to trigger a focused EIR. The project as proposed will result in a substantial adverse change in the significance of the historic resource resulting in the EIR requirement. The project will not likely impact other environmental considerations such as traffic, parking, and archaeological resources, thus a focused EIR would likely be sufficient.

ATTACHMENTS:

The Secretary of the Interior's Standards for Rehabilitation.

EXHIBIT B

Synthesis Design Group
419 Main Street, Suite 301 Placerville, CA 95667

RECEIVED

March 2, 2005

Jim Kidd
Parkside Properties
200 B St., Suite D
Davis, CA 95616

2005

2005
March 4, 2005

Dear Jim,

The first alternative involves the removal of the existing brick below the four arched windows, starting at the top of the existing base course brick and extending upwards to a point three courses of brick below the existing windowsill. The width of the removed brick would match the width of the existing window above. The top three courses of remaining brick would be supported by an interior (not visible from the exterior) steel tube and a thin metal plate under the bricks.

Clear tempered glass would be placed in the opening created by the removed brick. Its outside surface would align with the adjoining brick. The glass would be held in place with small metal clips, located at intermittent positions at the top and bottom of the glass. The edges of the glass would be sealed to the brick ends with clear silicone sealant.

The second alternative is similar to the first. It involves the removal of the brick below the windows from the top and the base course to the underside of the wood windowsill. A steel tube would be installed below the sill to carry the structural loads of the window. The glass would be held in place with similar metal clips and its edges sealed to the brick and top steel tube with clear silicone sealant.

Both alternatives provide new façade openings that appear significantly different than existing openings. As the new glass is essentially frameless, it is clearly of a type and style of construction that is new and not historic in appearance.

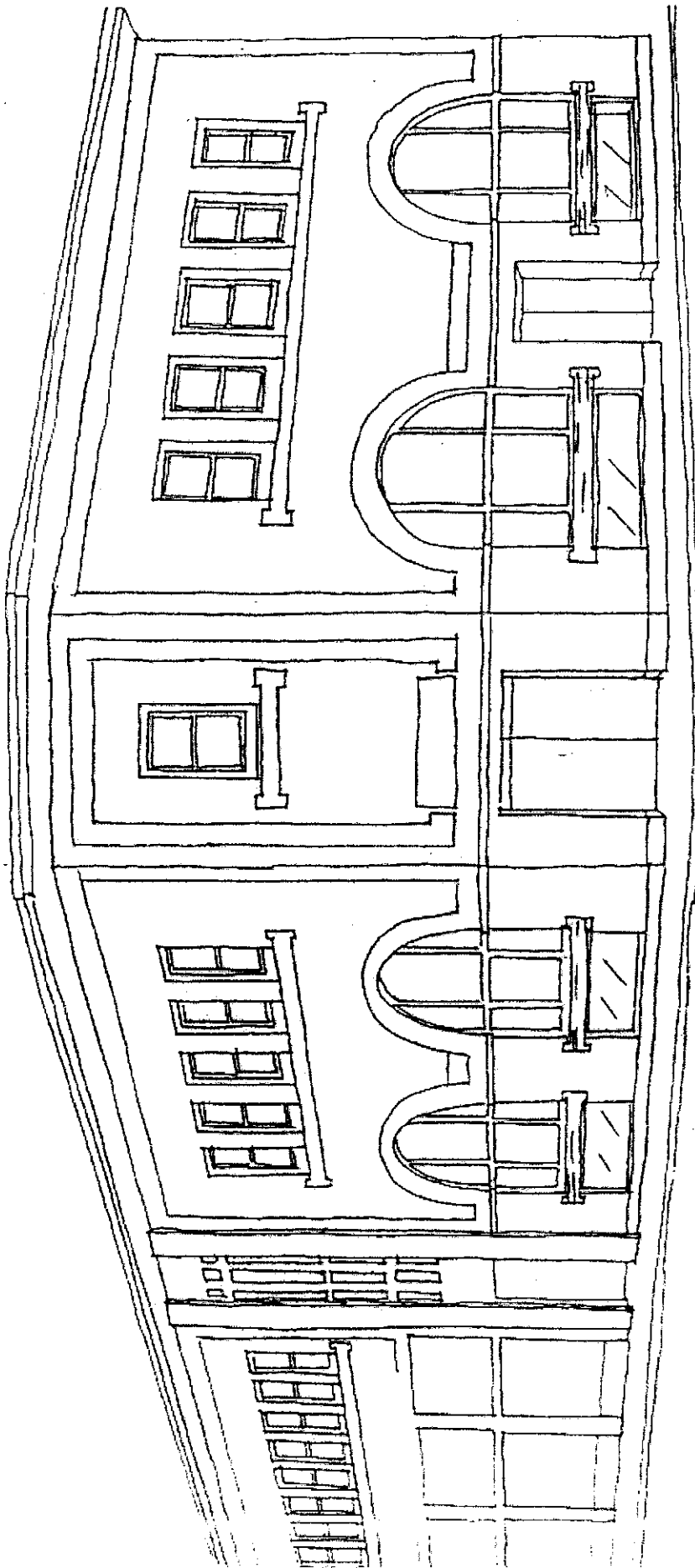
The Secretary of the Interior's Standards for Historic Preservation state:
"The new work (exterior alterations) shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment."

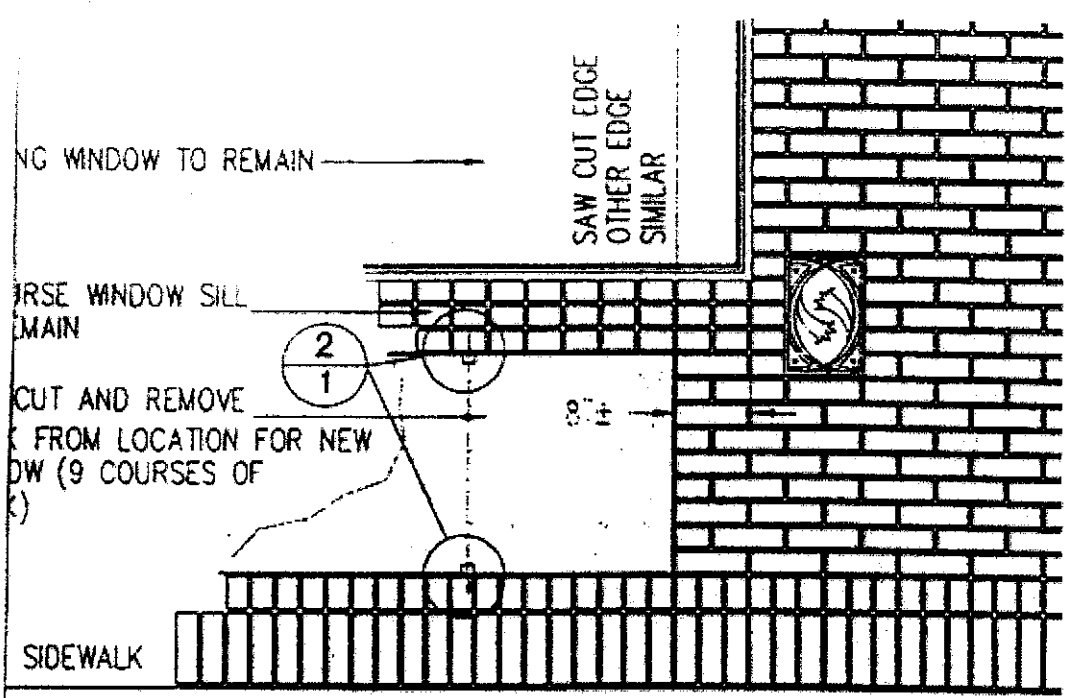
By placing the glass at the plane of the brick, it occurs in a different plane than the glass of the existing windows above it. By reducing the treatment of the glass to a frameless condition, the new glazing does not mimic the existing wood framed windows. The glass appears, instead, to become a substitute for the removed brick.

Sincerely,



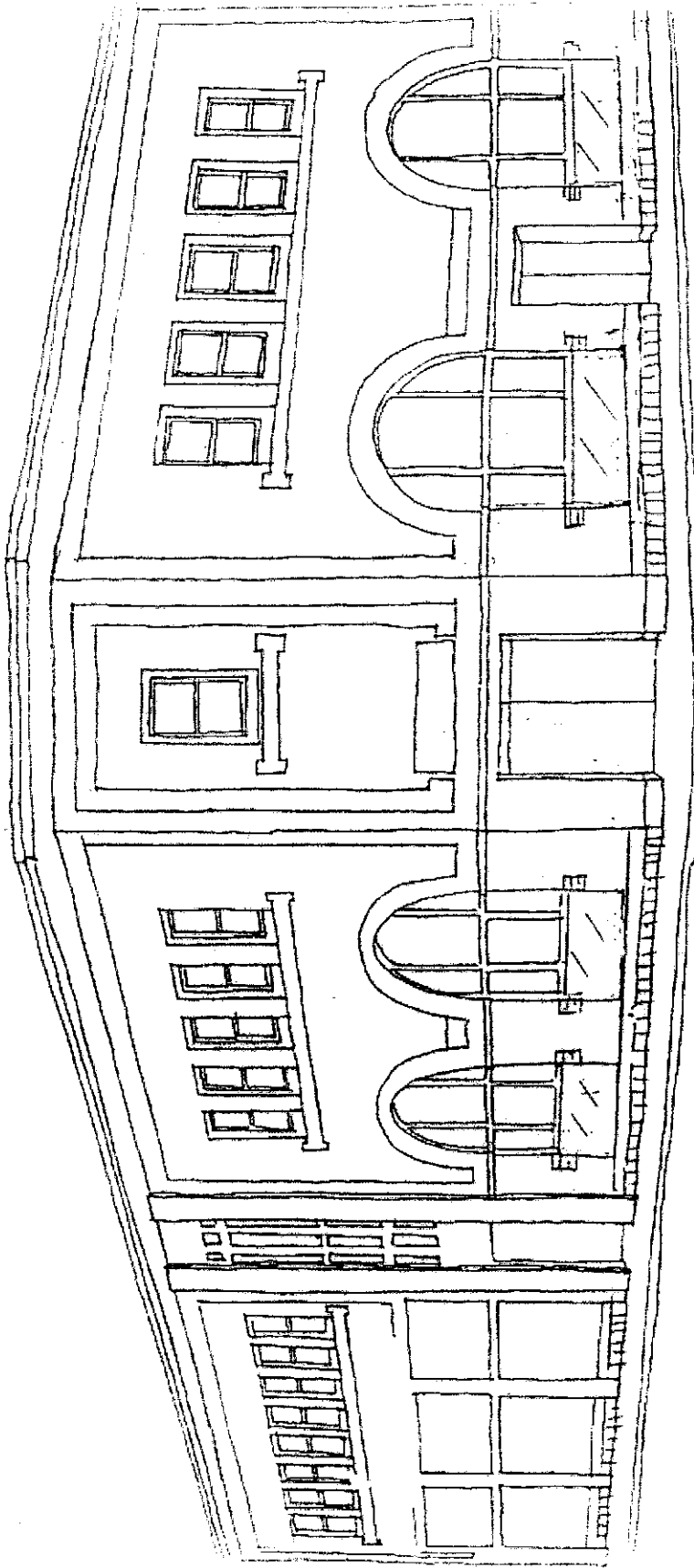
Roger Klemm

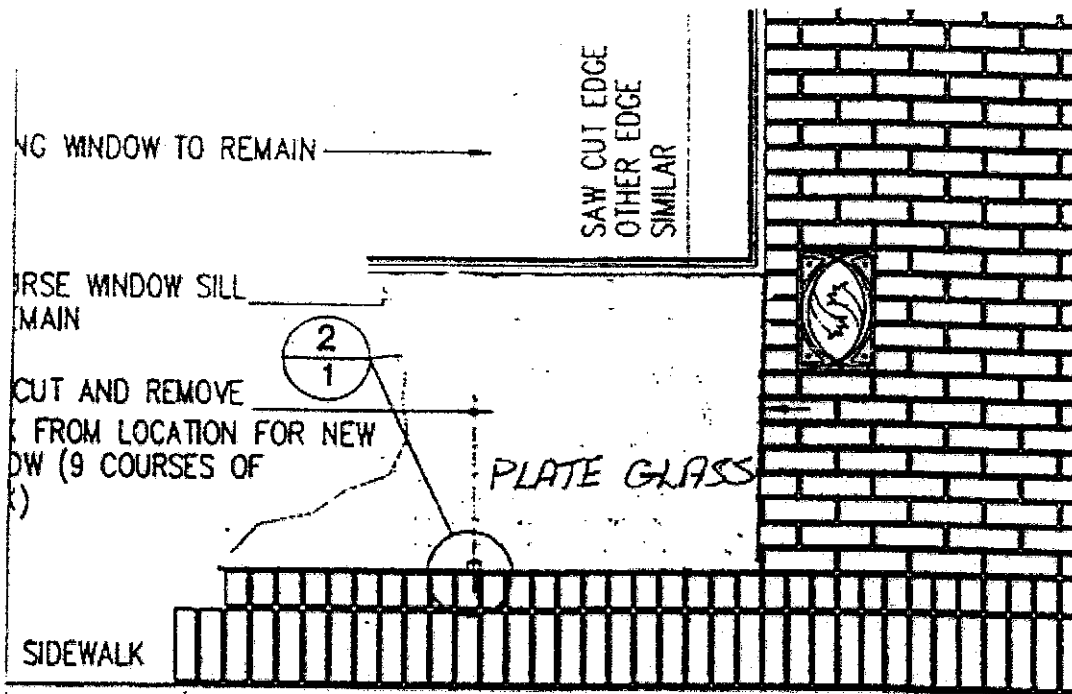




SECTION **B** 1/2'-1'-0'

SAW CUT BRICK WINDOW SILL **1**





SECTION **B** 1/2'-1'-0'

SAW CUT BRICK WINDOW SILL **2**

419 Main Street, Suite 301

Placerville, CA 95667

(530) 622-8200

March 26, 2003

Mr. James Kidd
Parkside Properties
712 5th Street
Davis, CA 95616

re: Anderson Bank Building

SDG Project No: 2002.1003

Dear Mr. Kidd,

We have reviewed the drawings prepared by Owen O'Neil, dated 3/21/03, for the Anderson Bank Building. These drawings contain details related to the construction of new windows below the four large arched windows at the ground floor of the building.

The depiction of these windows by Mr. O'Neil follows the design intent we believe to be the most appropriate and historically respectful solution for introducing new windows at the storefront area of the building.

The *Secretary of the Interior's Standards* are intended to provide for and allow alterations to existing buildings - the *Standards* speak to how new work may be accomplished. If alterations to existing buildings were prohibited by the *Standards*, this document would not provide guidance and instructions for change. Accordingly, in reviewing the design, we apply the *Standards* to assure the design's conformance with that guidance.

The introduction of new windows without window frames, as shown on the drawings, is consistent with the *Secretary of the Interior's Standards*, as follows:

Standard 9: "The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.."

Windows without perimeter frames is clearly of modern construction, compared to the existing conditions. In this way they are differentiated from the old.

Regarding the width of the windows, I believe that providing windows of a width which differs from the existing windows will avoid conflicts with the *Standards*. Same width windows violates the *Standards* as follows:

Standard 2: "The ...alteration of features...that characterize a property shall be avoided."

Windows / Not Recommended: "Changing the number, size or glazing pattern of windows, through cutting new openings..."

For example, the City's Preservation Consultant, Roland-Nawi Associates, correctly assessed the insertion of same width windows as violating the *Standards*:

"Although the project would not directly affect or remove the fabric of the historic windows, the insertion of glazing beneath the brick sill would substantially alter the character and appearance of the building. The effect of the added lower glazing is to create a glazed mass that reads as a single, floor length unit, reducing the sill into an ornamental bar. The new glazing introduces an element inconsistent with the building's Prairie School architectural style..."

I believe that the new windows, as shown on the drawings, can be added to the facade and remain in accordance with the *Standards*. These new windows are of a narrower width than the existing, so that they are subordinate to the original windows - allowing the original windows to dominate the window pattern, and more importantly, avoiding the creation of "a glazed mass that reads as a single, floor length unit." The building elevations from Mr. O'Neil clearly demonstrate this proper hierarchy.

This design complies with *Standard 9*, as follows:

"New additions, exterior alterations [which the new windows are], or related new construction shall not destroy historic materials that characterize the property."

As can be seen from the O'Neil window sections, the existing windows, the intermediate brick sill, and the grade level brick sill have not been removed or altered. The support of the upper brick sill and the attachment of the windows to the opening perimeter takes the lightest touch possible - proper structural support of the sill and the glass is provided in a manner that will not visually intrude on the exterior appearance of the building.

We believe that the design as shown by Mr. O'Neil is fully supported by the *Standards*. To quote the *Standards*, "...rehabilitation assumes that at least some repair or alteration of the historic building will be needed in order to provide for an efficient contemporary use; however, these repairs and alteration must not damage or destroy materials, features, or finishes that are important in defining the building's historic character."

In summary, the new windows as shown, do not, in my professional opinion as a preservation architect, damage materials or features that are important character defining elements. The new windows, as shown in a narrower width than the upper windows, allow the existing windows to dominate - the building continues to "read" true to its architectural style. The new windows, without any frames, are clearly different in appearance from the existing. All of these characteristics are consistent with the *Standards*.

Sincerely,



Roger W. Klemm
Principal
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