



December 12, 2016

Consulting  
Engineers and  
Scientists

Rhonda Reed  
*Sent Via Email*

Dear Ms. Reed:

Thank you for the opportunity to review the *Historical Resource Effects Analysis Study of the Revised Traskside Center Project 901-919 3<sup>rd</sup> Street, Davis Yolo County, California 95616* (Revised September 2016) and the *Addendum to the Historical Resource Effects Analysis Study of the Revised Traskside Center Project, 901-919 3<sup>rd</sup> Street, Davis, Yolo County, California 95616* (Revised September 2016).

### **Introduction**

GEI Consultants, Inc. (GEI) was hired to conduct a peer review of the above-named documents, both prepared by Historic Resource Associates (HRA). It was requested that GEI's analysis focus on a discussion of setting and feeling and whether the proposed project causes an impact to designated historic resources, but also to the Old East Davis Conservation District.

### **Methodology**

In addition to the two documents prepared by HRA, GEI's architectural historian, who meets the Secretary of the Interior's Professional Qualifications Standards for architectural history and history, reviewed the following documents:

- *Central Davis Historic Conservation District, City of Davis Historical Resources Survey* (August 2003);
- *Davis Downtown and Traditional Residential Neighborhoods Design Guidelines* (July 2001; Updated June 2007) (Design Guidelines);
- *Historical Resource Analysis Study of the Traskside Center Project 901-919 3<sup>rd</sup> Street, Davis Yolo County, California 95616* with a *Memorandum Attachment to HRA Report* (January 2016); and
- Staff Report from Eric Lee to the Historic Resources Management Commission, and attachments (December 12, 2016).

The 2003 survey documentation was reviewed to verify which historical resources in Davis are located in the Old East Davis neighborhood and assess whether outstanding questions remain. The Design Guidelines were used to assess statements in the staff report and the historic resources analysis by HRA. The January 2016 memorandum attachment was used to consider possible questions or comments.

### **Analysis**

Old East Davis, while not a designated historic district as noted by HRA, is situated within the boundaries of the Central Davis Historic Conservation District (Conservation District) and is identified as a sub area of the Conservation District and has a set of design guidelines. The fact that Old East Davis is not listed in the California Register of Historical Resources (CRHR) or one

of Davis' local registration programs, does not preclude the City of Davis, as the lead agency under the California Environmental Quality Act (CEQA), from determining that Old East Davis may be a historical resource as defined in Public Resources Code Section 5024.1. Pursuant to Public Resources Code Section 21084.1, when a resource is presumed to be historically significant, a lead agency may still find that the resource is not historical if that decision is supported by "the preponderance of the evidence." The intent of the design guidelines is to allow for development within certain areas of Davis, but also to preserve the character of Davis' neighborhoods, including Old East Davis. The fact that there are Design Guidelines that govern development could be considered as part of the evidence to determine that Old East Davis is a historical resource for the purposes of the proposed project.

It would appear that the establishment of the Conservation District and corresponding Design Guidelines, suggests the need to protect a collection of resources through a wide geographic area of Old East Davis. On December 14, 2015, the Historic Resources Management Commission determined that it was appropriate to assess impacts to the Conservation District as a whole and on the Old East Davis neighborhood as noted in Attachment 2 of the December 12, 2016, staff report. HRA does not make a determination on the existence of a historic district but rather cites to previous surveys conducted in the surrounding area. It is not clear if these previous surveys were tasked with specifically answering the question of whether a historic district exists in Old East Davis or had a broader goal. Surveys conducted more than 10 years ago seem to acknowledge the potential for some type of district; Roland-Nawi Associates reported in 2003 that: "However, the aforementioned I and J street corridor does contain a concentration of historic residences representing several decades of development, as well as some individually significant buildings. It along with some other, scattered buildings, does contribute to the historic character of the Old East neighborhood" (Roland-Nawi Associates 2003:30-31). More recently, surveyors apparently noted the adjacent area as portraying a "remnant of what appears to be a 19<sup>th</sup> century landscape" in relation to the Montgomery House (HRA 2016:3).

GEI agrees with HRA's conclusions that there would not be a direct impact to the designated historic resources in that the Montgomery House (Merit Resource), Williams-Drummond House (Landmark Resource), and the Schmeiser House (Landmark Resource) would not be physically altered. However, it is GEI's opinion that the proposed project would result in an indirect impact to the designated historic resources, particularly the Montgomery House because of its close proximity to the project and the larger Old East Davis neighborhood, a Conservation District. Conservation districts and their design guidelines are intended to protect buildings and conserve the traditional neighborhood character and setting of the area.

HRA uses the definition of setting as what is cited in the Secretary of the Interior of Standards for Rehabilitation as codified in 36 CFR 67 (HRA 2016:5). That section cited is used for rehabilitation projects that are seeking federal historic tax credits and is not an appropriate definition of setting for this proposed project. Under CEQA Guidelines Section 15064.5(b)(3), a proposed project can be considered as mitigated to a level of less-than-significant impact if it meets those standards stated. The HRA analysis does not demonstrate how the proposed project would meet the Secretary of the Interior's Standards. To use that definition of setting, which is a technical guideline for a rehabilitation project, is not appropriate. The appropriate definition of setting that should be used is the one defined by the National Park Service in the bulletin *How to Apply the National Register Criteria for Evaluation* (U.S. National Park Service 1997). Setting is one of the seven aspects of integrity and those aspects of integrity are needed for historical resources to convey their significance. The CRHR uses the same aspects of integrity that are used

for the National Register of Historic Places (NRHP). The bulletin defines setting as:

“Setting is the physical environment of a historic property...setting refers to the *character* (emphasis original) of the place in which the property played its historical role. It involves *how* (emphasis original), not just where, the property is situated and its relationship to surrounding features and open space...”

That same bulletin defines integrity of feeling as a property’s:

“...expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property’s historic character.”

As was previously determined by the Historic Resources Management Commission, the analysis in the revised documentation by HRA does not adequately account for the impact the proposed project would have on the Conservation District, a defined area that needs to be considered during planning process for proposed projects, and designated historic resources. Currently, the location of the proposed project contains single-story buildings. Construction of a 4-story building would result in an indirect impact to the setting and feeling of the designated historic resources and the larger neighborhood. HRA’s revised analysis notes that the setting is not specifically discussed in the original documentation designating these properties as historic resources. However, HRA’s analysis did not identify which aspects of integrity are important. It is the opinion of GEI that setting and feeling are important aspects of integrity that assist in conveying the historical significance of the three houses and Old East Davis. Setting and feeling are not necessarily limited to parcel boundaries, but also the surrounding area, which in this instance includes the Old East Davis neighborhood. The neighborhood where the historic resources are located helps to convey the property’s character and while there have been intrusions on the neighborhood, there is still a strong sense of place and time in Old East Davis. This neighborhood is characterized with predominately single-story residences. There are post World War II two-story apartments within the neighborhood, and commercial buildings that are smaller in scale and massing in proximity to the neighborhood. But those do not introduce a stark visual element the same way the proposed project does. It is GEI’s opinion that the proposed project introduces a visual element that if allowed would diminish the setting and feeling of the area. Old East Davis was part of the original city grid and contains some of the earliest residences in the city. And while it is noted that the neighborhood was separated from its industrial neighbors by an alley, the industrial buildings were not of the mass and scale that are being proposed.

## **Conclusion**

It is GEI’s opinion that given the implementation of the Old East Davis Conservation District and previous survey information, questions surrounding a potential historic district remain present. For clarification, GEI recommends that it may be in the City’s best interest to specifically assess the existence, or not, of an Old East Davis Historic District for the purposes of evaluating the proposed project and potential future planning needs.

It is GEI’s opinion that the proposed project would result in an indirect impact, particularly to the Montgomery House, a Davis Landmark and a historical resource. It would also impact the setting and feeling of the Old East Davis neighborhood which is part of a conservation district.

## References

- Historic Resource Associates (HRA). 2016. *Addendum to the Historical Resource Effects Analysis Study for the Revised Traskside Center Project, 901-919 3<sup>rd</sup> Street, Davis, Yolo County, California 95616*.
- Roland-Nawi Associates. 2003. *Central Davis Historic Conservation District. City of Davis Historical Resources Survey, Davis, California*.
- U.S. National Park Service. 1997. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. U.S. Department of the Interior, Washington, D.C.

## Qualifications

Patricia Ambacher is an architectural historian and historian who meets the Secretary of the Interior's professional qualifications for both disciplines. She holds a Master of Arts degree in History. She has 13 years of cultural resources and historic preservation experience inventorying and evaluating a variety of properties including: residences, commercial corridors, historic districts, cultural landscapes, Mid-Century Modern resources, and levees and bridges for the NRHP, CRHR, and local registration criteria. Ms. Ambacher has prepared a range of technical documents including Historic Resources Evaluation Reports, Cultural Landscape Reports, Historic American Building Surveys, Historic American Engineering Records, Historic American Landscape Surveys, Built Environment Treatment Plans, Findings of Effect, and NRHP nominations. She is well versed in CEQA and has written cultural resources sections for Initial Studies/Mitigated Negative Declarations and Environmental Impact Reports. Prior to working in the private sector, Ms. Ambacher was a historian with the California Office of Historic Preservation. In 2016, Ms. Ambacher was awarded a *Preservation Design Award* from the California Preservation Foundation, an organization of which she is a member.

If you have questions, please feel free to contact me at 916.631.4535 (office), 916.213.3464 (mobile) or [pambacher@geiconsultants.com](mailto:pambacher@geiconsultants.com).

Sincerely,



Patricia E. Ambacher, MA  
Architectural Historian