

MEMORANDUM

DATE	July 30, 2019	PROJECT NO.	16282
TO	Owen Lawlor	PROJECT	418 and 428 Front Street Historic Consultation
	SC River Front, LLC		
OF	P.O. Box 377	FROM	Christina Dikas, Senior Architectural Historian
	Santa Cruz, CA 95061		
CC	Ruth Todd, Principal-in- Charge	VIA	Email

REGARDING: 418 & 428 Front Street, Santa Cruz, California
Preservation Alternatives Analysis

INTRODUCTION

This Preservation Alternatives Analysis Memorandum has been prepared at the request of the Santa Cruz Planning Department for the proposed project at 418 and 428 Front Street in Santa Cruz. California Department of Parks and Recreation (DPR) historic survey forms were completed in 2009 for the two commercial buildings and found them to be individually eligible for listing in the California Register of Historical Resources under Criterion 3 (Architecture). 418 Front Street is one of the earliest of extant automotive service-related buildings in the City of Santa Cruz and retains overall historic integrity associated with the building's original Mission Revival/Art Deco design by Lee Dill Esty, a prominent architect of many residential and commercial buildings in Santa Cruz County. 428 Front Street is significant as an intact example of the Streamline Moderne architectural style that gained popularity in downtowns in the 1930s and 1940s.

The proposed project at the site includes three seven-story buildings containing mixed-use residential over commercial, separated by midblock passages, and a two-level subterranean parking garage. This memorandum includes a summary of the two historic buildings' character-defining features and an analysis of four project alternatives for impacts to historic resources, pursuant to CEQA. The project alternatives include a No Project Alternative, a Full Preservation Alternative, and two Partial Preservation Alternatives. The memorandum refers to the Secretary of the Interior's Standards for the Treatment of Historic Properties but does not include detailed analysis of the proposed alternatives using the Standards.

This Preservation Alternatives Analysis Memorandum follows a report that Page & Turnbull produced in June 2018 for the properties, which included additional historic research, outlined the buildings' character-defining features, and provided preliminary recommendations for historic

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resource mitigation or alternative design approaches related to CEQA review since the proposed project includes the demolition of both buildings. Two of Page & Turnbull's suggested alternative approaches were requested by the City of Santa Cruz Planning Department, as lead agency for environmental review, for further development and analysis to be included in the Environmental Impact Report. A third preservation alternative was suggested by Dudek, the environmental planning consultant. The alternatives concepts were developed in coordination between the project applicant, Planning Department, Dudek, and Page & Turnbull. Page & Turnbull also consulted the memorandum produced by Walid Naja of FBA, Inc. Structural Engineers, dated July 17, 2019, which responds to the structural feasibility of each of the preservation alternatives concepts.

Determination of Significant Adverse Change Under CEQA

According to CEQA, a "project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment."¹ Substantial adverse change is defined as: "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired."² The significance of an historic resource is materially impaired when a project "demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance" and that justify or account for its inclusion in, or eligibility for inclusion in a local register of historical resources pursuant to local ordinance or resolution.³ Thus, a project may cause a change in a historic resource but still not have a significant adverse effect on the environment as defined by CEQA as long as the impact of the change on the historic resource is determined to be less-than-significant, negligible, neutral, or even beneficial.

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings provides national standards and guidance for reviewing proposed work on historic properties.⁴ The Standards for the Treatment of Historic Properties are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. The Secretary of the Interior offers four sets of standards to guide the treatment of historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The four distinct treatments are defined as follows:

Preservation: The Standards for Preservation "require retention of the greatest amount of historic fabric, along with the building's historic form, features, and detailing as they have evolved over time."

¹ CEQA Guidelines subsection 15064.5(b).

² CEQA Guidelines subsection 15064.5(b)(1).

³ CEQA Guidelines subsection 15064.5(b)(2).

⁴ Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* (U.S. Department of the Interior National Park Service Technical Preservation Services, Washington, D.C.: 2017), accessed July 20, 2017, <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

Rehabilitation: The Standards for Rehabilitation “acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building’s historic character.”

Restoration: The Standards for Restoration “allow for the depiction of a building at a particular time in its history by preserving materials from the period of significance and removing materials from other periods.”

Reconstruction: The Standards for Reconstruction “establish a limited framework for recreating a vanished or non-surviving building with new materials, primarily for interpretive purposes.”⁵

Typically, one treatment (and the appropriate set of standards) is chosen for a project based on the project scope. As preservation alternatives seek to alter a historic property to meet a new use while retaining the property’s historic character, the Standards for Rehabilitation are typically most appropriate. Under CEQA, projects that comply with the Standards for Rehabilitation benefit from a regulatory presumption that they would have a less-than-significant adverse impact on a historic resource.⁶ This is because the historic resource’s material integrity would be retained to the extent that the property would continue to convey its historic significance and retain its eligibility for listing in the California Register. The Secretary of the Interior’s Standards for the Treatment of Historic Properties are available at the following National Park Service link:

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

CHARACTER-DEFINING FEATURES

Character-defining features enable a property to convey its historic identity. Generally, CDFs can be defined as materials, forms, location, spatial configurations, or uses that contribute to an individual historic resource’s historic significance. CDFs often relate to a particular architectural typology, style, or period of construction.

418 Front Street (Period of Significance: 1925-1955)

- Placement at front of lot line
- One-story rectangular plan and box massing
- Stepped and shaped parapet, recalling Mission style curved parapets
- Smooth stucco-clad primary façade, a common feature of Mission Revival designs
- Art Deco ornamentation, including:
 - Raised cement plaster arrowhead motifs
 - Stepped coping along roof and parapet line
 - Raised cement plaster belt course along primary façade.
- Symmetrical composition along primary façade

⁵ National Park Service, “Four Approaches to the Treatment of Historic Properties,” accessed July 30, 2019, <https://www.nps.gov/tps/standards/four-treatments.htm>

⁶ CEQA Guidelines, subsection 15064.5(b)(3).

- The building's northernmost and southernmost bays flank a central lobby that likely delineated original office and garage uses. The windows and storefront entrance system within these bays are not original.

428 Front Street (Period of Significance: 1948-1954)

- Placement at front of lot line
- Main two story, T-shaped volume and secondary one-story volumes
 - The building's size and massing create variation in height along the main façade where the volumes are integrated and connected by multiple planes, curved features, and streamlined elements.
- Symmetrical composition along primary façade
 - Outer bays at north and south of property flank recessed central bays of the main volume.
- Multiple planes along primary façade
 - The primary volume and outermost bays are not coplanar and are joined by curved surfaces. Multiple surface planes are commonly utilized within Streamline Moderne style.
- Streamlined Horizontality
 - Flat parapets at the roofline
 - Flat awning between the first and second story levels emphasizes the building's horizontal orientation.
 - "Speed Stripes" add to the streamlined identity of the building, connecting to an era of construction in which mobility, speed, and technology were transferred from the public conscious to roadside architecture.
- Combination of materials of varying texture
 - Glass block bulkhead at display windows
 - Square tile applied to several locations of primary façade
 - Smooth stucco finish void of excessive ornamentation

NO PROJECT ALTERNATIVE

Description

Under the No Project Alternative, no modifications to the existing historic resources would be completed. No additional residential, retail, and/or commercial units or buildings would be added. The historic character-defining features of the two buildings at 418 and 428 Front Street would be retained; no modifications, repairs, or restoration activities would be conducted.

Analysis of Impacts Under CEQA

Since the No Project Alternative would not demolish or make any modifications to the historic resources, it would not cause substantial adverse change. Compared to the proposed project, which would result in a significant and unavoidable impact, the No Project Alternative would not result in any project-level impacts to historic architectural resources.

FULL PRESERVATION ALTERNATIVE

Description

The Full Preservation Alternative would include the construction of three seven-story multi-use buildings over two-level subterranean parking while preserving the existing two buildings while construction is performed around them.

Analysis of Impacts Under CEQA

The purpose of the Full Preservation Alternative is to consider a plan that would lessen the significant impacts of the proposed project on the existing historic resources. The Full Preservation Alternative project would theoretically retain a majority of character-defining features of the historic resources at 418 and 428 Front Street, including the characteristic placement of the buildings at the front of the lot line, portions of the building volumes, and all significant features of the exterior facades. However, as described in the memorandum from structural engineer Walid Naja of FBA, Inc., dated July 17, 2019, it does not appear structurally feasible to retain the buildings in place in order to temporarily shore them, excavate under them, and build the podium structures underneath. The infeasibility of this option is due to the quality of the soil and the construction materials of the two existing buildings, which consist of perimeter concrete and CMU walls on non-structural slabs on grade.

Because the buildings would need to be disassembled and re-erected, with likely additional alterations made to incorporate them into the project design, this approach would not meet the Secretary of the Interior's Standards for Rehabilitation, nor the intention of the Full Preservation Alternative. It would cause a significant impact on the two historic resources at 418 and 428 Front Street because it would demolish or materially alter in an adverse manner those physical characteristics of the historical resources that convey their historical significance, and that justify their eligibility for inclusion in the California Register.

PARTIAL PRESERVATION ALTERNATIVE 1

Description

Partial Preservation Alternative 1 involves the partial preservation of the existing historic buildings on the site. This alternative would involve the preservation of the primary street facades and the demolition of all secondary facades, structure, foundations, and roofs. The street facades would be disassembled in eight- to ten-foot-wide segments, stored at a different location, and put back in place after the podium structure is constructed. Per the July 17, 2019 memorandum from FBA, Inc., it is not possible to retain the facades in place during construction using bracing. Once reassembled on location, the facades would be strengthened with gunnite or shotcrete walls on the inside faces.

The three seven-story mixed-use buildings would be constructed behind the two one-story facades. In one conceptual scheme, the facades would be retained in their existing locations. The façade of

418 Front Street would be located at the south end of the southern proposed new building, and a mid-block passage would extend behind the north portion of the façade of 428 Front Street. An opening would presumably be required through the façade to access the mid-block passage. In a second conceptual scheme, the two facades would be relocated so that the façade of 418 Front Street would be located at the middle of the center proposed building and the façade of 428 Front Street would be located at the center of the southern proposed building. The new construction behind the facades would be differentiated from the historic resources through the use of modern materials and design.

Analysis of Impacts Under CEQA

The purpose of Partial Preservation Alternative 1 is to consider a plan that would lessen the significant impacts of the proposed project on the existing historic resources. Partial Preservation Alternative 1 would retain a number of character-defining features of the historic resources at 418 and 428 Front Street, including the characteristic placement of the buildings at the front of the lot line and all characteristic features of the exterior facades. Partial Preservation Alternative 1 would not retain the buildings' character-defining massing or height as volumetric structures. Thus, the buildings' significant architectural styles would be conveyed in the features of their facades, but their representation as whole buildings would be compromised. Furthermore, the massing, size, and scale of the new seven-story buildings to be constructed behind the historic primary façades would not be compatible with the one-story historic resources. The new buildings would significantly overshadow the historic façades due to the height difference and lack of strong setback. The additional stories would create a significant change in the overall visual impression of the property and its environment. As a result, the project would not be in compliance with the Secretary of the Interior's Standards for Rehabilitation. Specifically, it would not meet the following Rehabilitation Standards:

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.

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.

Standard 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 its environment.

Standard 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.

Partial Preservation Alternative 1 would be a minimal improvement over the proposed project based on the retention of some character-defining features, but it would still cause a significant impact on the two historic resources at 418 and 428 Front Street because it would demolish or materially alter in an adverse manner those physical characteristics of the historical resources that convey their historical significance, and that justify their eligibility for inclusion in the California Register.

PARTIAL PRESERVATION ALTERNATIVE 2

Description

Partial Preservation Alternative 2 involves the relocation of the two historic buildings to a new site while the proposed mixed-use project would be constructed on the project site. According to the July 17, 2019 memorandum by structural engineer FBA, Inc., due to the nature of the historic buildings' perimeter concrete and CMU walls on non-structural slabs on grade, this alternative would involve deconstruction followed by reconstruction. More specifically, it would involve vertical shoring and bracing of the structures' roofs and walls; removal of existing roofing material; salvaging the roof beams, trusses, and interior columns and supports; and disassembly of all perimeter walls into eight-to ten-foot sections. These materials would be delivered to a new site. Floor slabs, non-structural partition walls, and existing foundations would be demolished and recycled. New foundations and floor slabs would be built at the new site, and all salvaged elements would be reassembled. The buildings would be reconstructed as close to their original forms as possible, while upgrading the buildings to meet current building codes.

Analysis of Impacts Under CEQA

The purpose of Partial Preservation Alternative 2 is to consider a plan that would lessen the significant impacts of the proposed project on the existing historic resources. Partial Preservation Alternative 2 would retain a number of character-defining features of the historic resources at 418 and 428 Front Street, including all or most of the characteristic features of the exterior facades, as well as the character-defining massing and height as volumetric structures. Some of the buildings' exterior character-defining features may be altered in order to meet current building codes and/or conditions at the new site. Depending on the location of the receiving site, the buildings' characteristic placement at the front of the lot line next to the sidewalk may be compromised. The buildings' setting as it currently exists on a commercial street, adjacent to the San Lorenzo River, is likely also to be compromised by moving the buildings to a new receiving site.

Due to the deconstruction and reconstruction, the Secretary of the Interior's Standards for Rehabilitation would not be applicable, as they require minimal alteration to historic features and materials. Secretary of the Interior's Standards for Reconstruction may apply, and are outlined as follows:

Standard 1: Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property.

Standard 2: Reconstruction of a landscape, building, structure or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts that are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.

Standard 3: Reconstruction will include measures to preserve any remaining historic materials, features and spatial relationships.

Standard 4: Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color and texture.

Standard 5: A reconstruction will be clearly identified as a contemporary re-creation.

Standard 6: Designs that were never executed historically will not be constructed.

Partial Preservation Alternative 2 could meet the Standards for Reconstruction provided that reconstruction is based on documented evidence of the appearance of the buildings and does not include conjecture or design that was not executed historically. In order to comply with the Standards for Reconstruction, the receiving site would need to resemble the historic location's setting (placement at the front of the lot line on a commercial street, adjacent to the San Lorenzo River) and also accommodate the buildings' existing spatial relationships, for example their spacing from each other.

Partial Preservation Alternative 2 would be an improvement over the proposed project based on the retention of some character-defining features. Provided that Partial Preservation Alternative 2 could comply with the Standards for Reconstruction, it would likely cause a less-than-significant impact with mitigation. If Partial Preservation Alternative 2 is not able to meet the Standards for Reconstruction, it would cause a significant impact on the two historic resources at 418 and 428 Front Street because it would demolish or materially alter in an adverse manner those physical characteristics of the historical resources that convey their historical significance, and that justify their eligibility for inclusion in the California Register.

CONCLUSION

The buildings at 418 and 428 Front Street in Santa Cruz were previously found eligible for listing in the California Register under Criterion 3 (Architecture) and are therefore considered historic resources for the purpose of CEQA review. The proposed project would demolish the existing buildings and would therefore cause a substantial adverse change to the historic resources under CEQA.

A No Project Alternative would not cause any substantial adverse change to the historic resources. The Full Preservation Alternative would theoretically preserve the buildings, but this alternative is not structurally feasible and therefore would cause a substantial adverse change to the historic resources. Partial Preservation Alternative 1 would retain a majority of the character-defining features of the historic resources at 418 and 428 Front Street; however, it would change the setting and would demolish the structure and spaces that constitute the historic resources as buildings and would therefore cause a substantial adverse change to the historic resources. Partial Preservation Alternative 2 would also retain a majority of the character-defining features of the historic resources at 418 and 428 Front Street, but the ability of the alternative to avoid substantial adverse change would depend on the similarity of the receiving site to the current site.