

P A S T
CONSULTANTS LLC

Seth A. Bergstein
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February 28, 2020

SC RiverFront LLC
PO Box 377
Santa Cruz, CA 95060
Attention: Owen Lawlor

Re: Historic Evaluation for 504 Front Street, Santa Cruz, CA
APN. 005-151-31

Dear Mr. Lawlor:

This letter states the findings of historic significance, based on our research and conditions assessment of the property located at 504 Front Street, in Santa Cruz, California. PAST Consultants, LLC (PAST) attended a site visit to the subject property on February 20, 2020 to photograph and inspect all buildings. Research in local repositories was conducted in February 2020 to determine the historic significance of the residential building on the subject property.

Summary of Findings

The property contains a commercial building constructed in two building campaigns. The first structure was completed in 1939 for the new location of Sweet Service Company, a wholesale and retail auto parts store. The operation gained further success and the owners constructed an addition to the south wall of the original building in 1957. Sweet Service Company stayed in operation until the early 1980s, when the building became subdivided for other local commercial businesses. Significant remodeling campaigns in 2004 and 2007 installed new entrances, fenestration, detailing and stucco wall cladding on the front (west) and primary elevation.

Given the changes made to the original design, the building no longer possesses sufficient integrity of design, setting, materials, workmanship, feeling and association for it to qualify for listing on the National Register of Historic Places or the California Register of Historical Resources. The subject building is not eligible for the Santa Cruz Historic Resources Inventory because it does not meet City preservation criteria and has been altered substantially.

The following historic evaluation report describes the subject property, presents a construction chronology of the commercial building on the property, provides a summary history of the property

and evaluates the property for historic significance according to criteria of the National Register, the California Register and the City of Santa Cruz municipal code.

Project Location

The project is located at 504 Front Street, in the City of Santa Cruz (**Figure 1**).

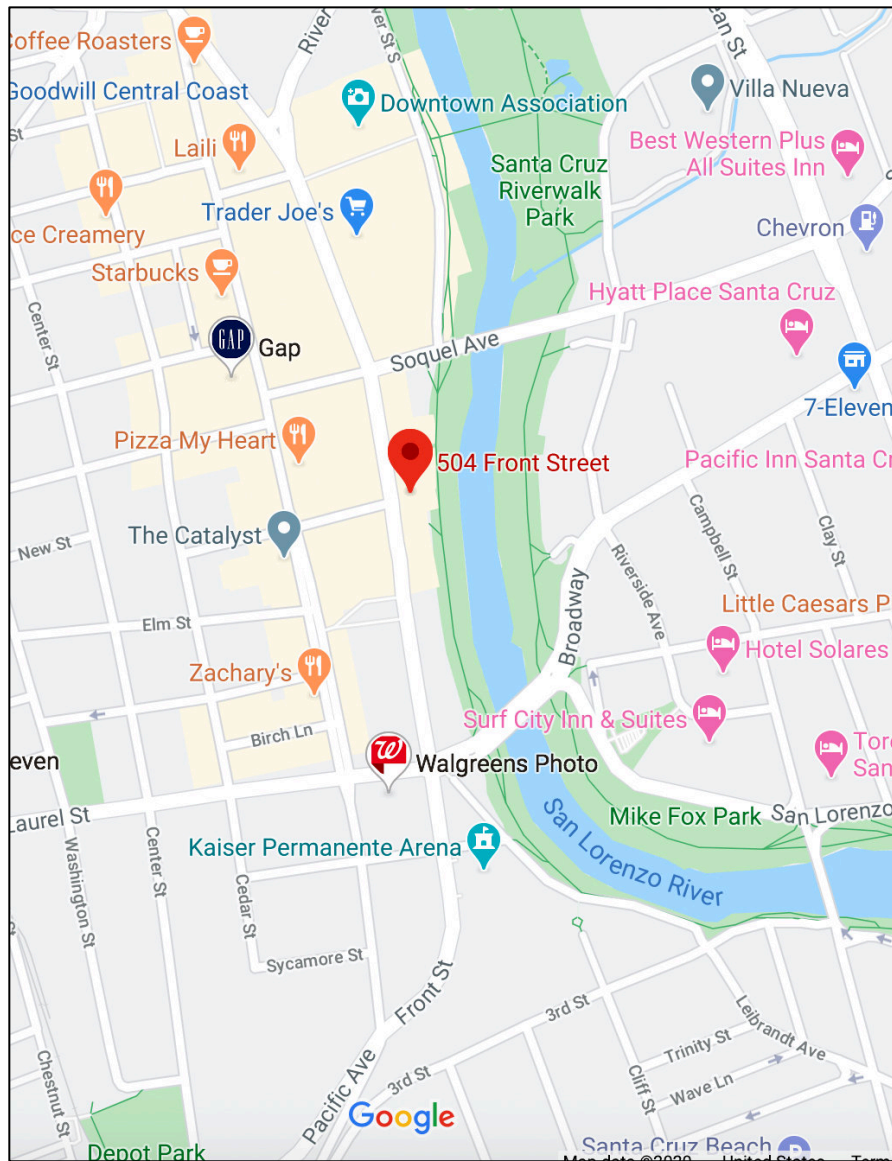


Figure 1. Location map (Courtesy: Google Maps).

Project Team

Client/Applicant

SC RiverFront LLC
PO Box 377
Santa Cruz, CA 95060
Attention: Owen Lawlor

Regulatory Agency

City of Santa Cruz Planning Department
809 Center Street, Rm. 206
Santa Cruz, CA 95060

Historic Preservation Consultant

PAST Consultants, LLC
P.O. Box 721
Pacific Grove, California 93950

Architectural Historian and Report Author: Seth Bergstein meets the Secretary of the Interior's Professional Qualifications Standards in Architectural History and History.

PAST Consultants: Qualifications

Seth A. Bergstein, Principal of PAST Consultants, LLC, began his technical career as a civil, structural and geotechnical engineer for a variety of commercial and transportation engineering projects. This experience created an appreciation for historic engineering and architectural structures and led him to architectural study at the University of Oregon, Eugene, and a Master of Arts in Historic Preservation from Cornell University. After Cornell, Seth was a materials conservator and project manager for Architectural Resources Group and managed projects for a diverse range of historic building types, including the Point Reyes Lighthouse, Bernard Maybeck's First Church of Christ, Scientist, Pasadena City Hall, the John Muir House, and a number of historic bridges, including project management for the restoration of the Wawona Covered Bridge in Yosemite National Park.

In 2004, Mr. Bergstein founded PAST Consultants, LLC (PAST), a historic preservation consulting firm specializing in preservation planning, documentation, and conservation for historic and cultural resources. PAST's clients include the State of California, public agencies, architectural and engineering firms, museums, nonprofit organizations, preservation advocates and private property owners. PAST is represented on the California Historical Resources Information System (CHRIS) list of qualified historic consultants sponsored by the California Office of Historic Preservation and is on numerous certified consultants lists for public agencies throughout California.

PAST has prepared numerous successful National Register nominations, written historic context statements for public agencies, photo-documented historic buildings for HABS/HAER projects, prepared historic structure reports and evaluated numerous historic buildings throughout central and northern California for both public and private clients. PAST is often hired to evaluate proposed

changes to historic buildings for conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. PAST is presently the on-call historic preservation consultant for the City of Carmel-by-the-Sea.

Principal Seth A. Bergstein has nearly 30 years combined experience in civil and structural engineering, materials conservation, architectural history and historic preservation planning. Seth meets the *Secretary of the Interior's Professional Qualifications Standards* in Architectural History and History. Mr. Bergstein has written articles on historic contexts and the preparation of historic context statements, spoken at preservation conferences and led architectural tours. In 2015 he was keynote speaker at the Western Association for Art Conservation's annual conference, held at the Asilomar Conference Grounds in Pacific Grove.

Methodology

Site Visits

PAST attended an initial site visit to the subject property on February 20, 2020 to photograph and perform a conditions assessment of the commercial building on the subject property.

Research Design

Research was conducted during February 2020. PAST performed research in local and regional repositories to develop this historic assessment report:

- Santa Cruz County Assessor's Office, Santa Cruz, CA;
- City of Santa Cruz Planning and Building Divisions, Santa Cruz, CA;
- Santa Cruz Genealogical Society, Santa Cruz, CA;
- Santa Cruz Public Library, Santa Cruz, CA;
- California History Room, Monterey Public Library, Monterey, CA; and
- On-line genealogy portals, including those associated with Ancestry.com.

The purpose of the research design was to determine the construction chronologies of the building on the subject property, to understand the historical uses of the property, and to determine if any of the previous property owners were significant persons in national, California or Santa Cruz history.

Registration

The property is not listed on the National Register of Historic Places or the California Register of Historical Resources. The property is not included in any of the three volumes of the *Santa Cruz Historic Buildings Survey*. The property is not set within a concentration of historic buildings; nor is it in a historic district.

Regulatory Framework

The City of Santa Cruz evaluates historic resources according to the guidelines of the California Environmental Quality Act, the California Register Program and the City of Santa Cruz, under Municipal Code Section 24.12.440. The California Environmental Quality Act (CEQA) provides the framework for the evaluation and treatment of historic properties (Section 15064.5). CEQA defines a historical resource as: (1) a resource determined by the State Historical Resources Commission to be eligible for the California Register of Historical Resources (including all properties on the National Register); (2) a resource included in a local register of historical resources, as defined in Public Resources Code (PRC) Section 5020.1(k); (3) a resource identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) any object, building, structure, site, area, place, record, or manuscript that the City determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record.¹

National Register of Historic Places (National Register)

The National Historic Preservation Act of 1966 authorized the Secretary of the Interior to create the National Register of Historic Places. Districts, sites, buildings, structures, and objects significant in American history, architecture, archeology, engineering and culture are eligible for listing if they meet at least one of four criteria.² Eligible resources are those:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

Eligible resources must also retain sufficient integrity of location, design, setting, materials, workmanship, feeling, and association to convey the relevant historic significance.³ The seven aspects of integrity are described in a separate section below.

California Register of Historical Resources (California Register)

A resource is eligible for listing in the California Register of Historical Resources if it:

- 1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- 2. Is associated with the lives of persons important in our past.

¹ California Code of Regulations, 14 CCR § 15064.5.

² 16 U.S.C. 470, *et seq.*, as amended, 36 C.F.R. § 60.1(a).

³ 36 C.F.R. § 60.4.

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.⁴

The California Code of Regulations notes that integrity is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Resources eligible for listing in the California Register must retain enough of their historic character or appearance to be recognizable as historic resources and convey the reasons for their significance.

The same seven aspects of integrity are considered when evaluating resources for listing in the National Register and California Register: location, design, setting, materials, workmanship, feeling, and association. Alterations over time or historic changes in use may themselves be significant. However, resources that may not retain enough integrity to meet National Register criteria may still be eligible for listing in the California Register.

Historic Integrity

National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation defines **historic integrity** as "the ability of a property to convey its significance." Historic properties either retain their integrity or they do not. To retain integrity, a resource will always retain several and usually most of the seven aspects of integrity:

1. **Location:** the place where the historic property was constructed or the place where the historic event occurred.
2. **Design:** the combination of elements that create the form, plan, space, structure, and style of a property.
3. **Setting:** the physical environment of a historic property.
4. **Materials:** the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
5. **Workmanship:** the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
6. **Feeling:** a property's expression of the aesthetic or historic sense of a particular period of time.
7. **Association:** the direct link between an important historic event or person and a historic property.

After establishing the property's historic significance, the evaluator assesses integrity using *National Register Bulletin 15*'s four-step approach:

1. Define the **essential physical features** that must be present for a property to represent its significance.
2. Determine whether the **essential physical features are visible** enough to convey their significance.

⁴ California Public Resources Code § 5024.1(c).

3. Determine whether the property needs to be **compared with similar properties**. And,
4. Determine, based on the significance and essential physical features, **which aspects of integrity** are particularly vital to the property being nominated and if they are present.

National Register Bulletin 15 emphasizes that “ultimately, the question of integrity is answered by whether or not the property retains the **identity** for which it is significant.”⁵

City of Santa Cruz Municipal Code

The designation and treatment of historic properties is codified in the City of Santa Cruz Municipal Code, *Chapter 24.12 – Community Design, Part Five: Historic Preservation (Municipal Code Sections 24.12.400 – 24.12.450)*. Historic resources must meet the criteria of the National Register, California Register, or City of Santa Cruz Historic Preservation criteria. The City of Santa Cruz’s Historic Preservation criteria are located in *Chapter 24.12.440 - Santa Cruz Historic Building Survey*, and are the following:

The **property** is either a building, site, or object that is:

1. Recognized as a significant example of the cultural, natural, archaeological, or built heritage of the city, state, or nation; and/or
2. Associated with a significant local, state, or national event; and/or
3. Associated with a person or persons who significantly contributed to the development of the city, state, or nation; and/or
4. Associated with an architect, designer, or builder whose work has influenced the development of the city, state, or nation; and/or
5. Recognized as possessing special aesthetic merit or value as a building with quality of architecture and that retains sufficient features showing its architectural significance; and/or
6. Recognized as possessing distinctive stylistic characteristics or workmanship significant for the study of a period, method of construction, or use of native materials; and/or
7. Retains sufficient integrity to accurately convey its significance.

• The **district** is:

1. Recognized as a geographically definable area possessing a significant concentration of buildings that are well designed and other structures, sites, and objects which are united by past events or by a plan or physical development; or is
2. Recognized as an established and geographically definable neighborhood united by culture, architectural styles or physical development.⁶

⁵ U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington, D.C.: National Park Service, U.S. Department of the Interior, 1997, 44-49 (bold in original).

⁶ City of Santa Cruz, Municipal Code *Chapter 24.12 – Community Design, Part Five: Historic Preservation*.

Building Description and Construction Chronology

The building is located at 504 Front Street, at the intersection of Front and Cathcart streets, in downtown Santa Cruz (see **Figure 1 – Location Map**). The site contains a four-bay (circa-1939 & 1957) reinforced concrete commercial building. The first structure (circa-1939) is a reinforced concrete building with a curved roof containing three skylights. In 1957, a reinforced concrete structure was constructed and attached to the south wall of the circa-1939 building. The building was modified substantially in 2004 with the creation of two new storefronts, associated fenestration and stucco decoration (**Figures 2 - 7**).



Figures 2 and 3. Left image shows the front (west) and primary elevation, with two-storefront configuration that completely modified the building's primary elevation in 2004. Right image details the rear elevation, showing the construction detailing of the first structure (circa-1939: arrow) and second structure (circa-1957), with multiple-pane aluminum frame windows.



Figures 4 and 5. Left image shows the north elevation of the circa-1939 structure. The 2004 stucco detailing and new stucco wall cladding wraps around the building corner, modifying the original look of the building (arrow). Right image details the circa-1939 building's rear elevation, which does not contain any windows.

Additional photographs detailing the modified building appear below (**Figures 6 and 7**).



Figures 6 and 7. Left image details the new storefront installed in 2004. Comparison with Figure 8 below reveals that the entrances, fenestration and stucco parapet detailing are all new to the building. Right image details the rear elevation of the circa-1957 building (arrow).

Construction Chronology

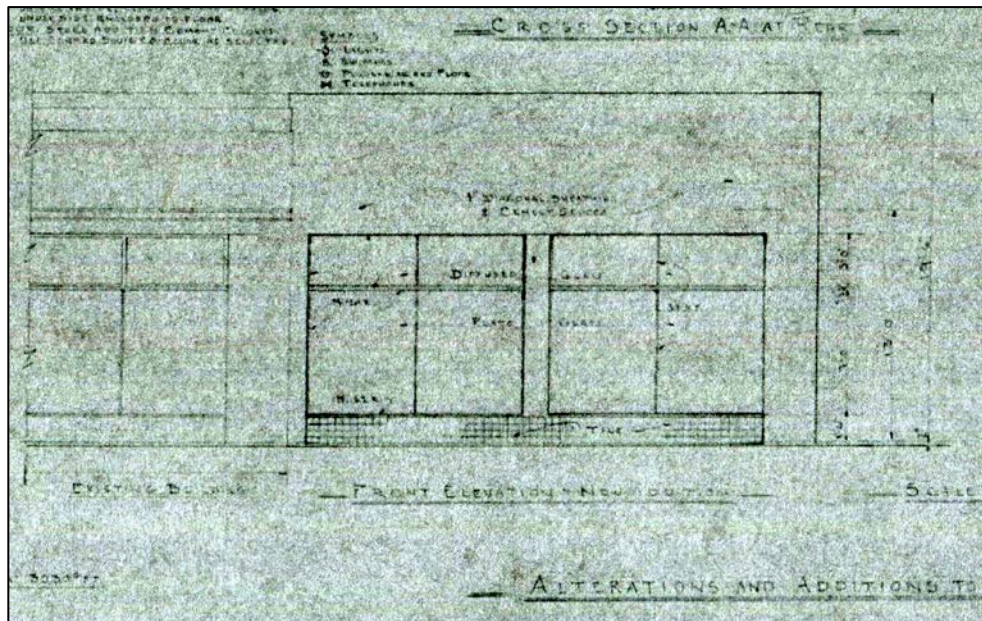


Figure 8. Detail of 1957 addition's front elevation, taken from original drawings. Note the paired display window with a tile spandrel beneath. The 2004 storefront remodeling campaign removed all of the 1957 fenestration and detailing (Courtesy: Santa Cruz Planning Department, 504 Front Street).

A records search was conducted at the City of Santa Cruz planning and building departments and the Santa Cruz County Assessor to obtain permits to date the alterations. Based on the existing permits, Assessor's records, available Sanborn Maps and a materials assessment during the site visit, the following is the building chronology:

- Permit No. 3003, 1938/1939: Construct reinforced concrete commercial building for \$9,000. George Wilson, Sr., contractor; architect unknown.
- Permit No. A4033, 1957: Construct reinforced concrete addition to the south wall of the original building for \$19,504. Charles W. Lawrence, Designer; George Wilson, Jr., contractor.
- Permit No. 04-0327, 2004: Remodel existing building into a two-storefront configuration. Install new twin-door entrances, new fenestration, new stucco building façade decoration and new stucco wall cladding. William S. Bagnall, Architects, Inc. was the architect of record. These additions completely modified the existing west and primary elevation of the building.
- Permit No. 04-0834, 2004: Construct interior partition bisecting the existing interior space of north storefront. William S. Bagnall, Architects, Inc. and William C. Kempf were the architect of record.
- Permit No. B071335, 2007: Construct interior improvements to building. William S. Bagnall, Architects, Inc. was the architect of record.

Summary Property History

The property appears on the 1928 (updated 1950) Sanborn map (Figure 9).



Figure 9. Cropped image of the 1928 – updated 1950 Sanborn map, showing the subject property with an arrow. Only the first building appears, as the south addition was constructed in 1957.

The Front Street area adjacent to and south of the subject property began to develop as the automobile sales and service district of the city in the 1920s. Examination of the 1928 Sanborn map (Figure 10) shows locations for the sale, parking and service of automobiles – primarily on Pacific Avenue. By 1950, automobile service facilities, including the subject property, have filled out along Front Street to the south of the subject property (see Figure 9).



Figure 10. Cropped image of the 1928 –Sanborn map, showing the project vicinity, which serviced the automobile industry. The subject building replaced a smaller service building in 1939 (arrow).

Since the 1950s, many of the buildings servicing the automobile industry have either been removed or repurposed for different use. The conversion of the subject property from an automobile-centered commercial operation into retail and other uses supports this trend within the study area. The 1989 Loma Prieta Earthquake hastened the demise of automobile-related buildings, as many structurally damaged buildings were either removed or remodeled substantially. It should be noted that the *Historic Context Statement for the City of Santa Cruz* does not discuss automobile facilities as a historic context; however, it is clear from the review of Sanborn maps and a windshield survey of the project area that automobile-related commercial operations were centered in the project area, particularly along Pacific Avenue and Front Street to the south of the subject property.

Property Ownership

The Sweet Service Company was the sole owner and occupant of the subject commercial building during the historic research period of 1939 – 1970. Led by Lloyd D. Sweet of Watsonville, Ralph W. Sanford of Watsonville and Fitz-Mac Chandler of Santa Cruz, the company provided wholesale automobile parts and accessories. After 19 successful years in their first location at 260 Pacific Avenue, the Sweet Service Company constructed the subject building at 504 (originally 245) Front Street in 1938. The *Santa Cruz Sentinel* published a front page article anticipating the company's relocation, noting the construction of a reinforced concrete structure 40'x100' with a 30 foot parking space on the south side and an 8 foot driveway on the north."⁷ The Company moved to its new building in 1939. By 1944 the company added Grover C. Speegle of Santa Cruz, Albert Fowler of Monterey, and Earl Nielsen of Santa Cruz as shareholders.⁸

The company prospered, despite the Depression and downturn in the Santa Cruz economy. Growth was strong after World War II and the operation expanded with the construction of the 1957 addition to the south. Sweet Service Company's participation in the automobile market mirrored much of the automobile-related growth on the surrounding blocks. The rise in popularity of auto travel precipitated their early success in the 1920s and their relocation in 1939 to Front Street after surviving the Great Depression. Following the supply shortages created by World War II, the company again gained success and expanded in 1957. The company remained in business into the early 1980s, however, the demand for automobile parts and accessories declined steadily after 1960, as evidenced by company advertisements in local newspapers for the sale of consumer goods, particularly home electronics, as the need to diversify after the automobile's heyday from 1920 – 1960 was evident.

The founding partners participated in various community activities; however, the three partners do not appear to have risen to a level of historic significance. Ralph W. Sanford (1890-1951) arrived in Santa Cruz from Fresno in 1921, joined the company in 1925 as purchasing agent and rose to the top of the operation by the time of the 1939 relocation to Front Street. He was active in local men's clubs, but does not appear to have made any significant contributions to national, California or Santa Cruz history.⁹

Lloyd D. Sweet (1889-1988) was active in local men's clubs in Santa Cruz and retired in the community. Aside from leading in the success of Sweet Service Company, he does not appear to have made any significant contributions to national, California or Santa Cruz history.

Fitz-Mac (F.M.) Chandler (1897-1979) was born in Denver, Colorado and resided at 928 Walnut Avenue in Santa Cruz. He served during World War II, was a member of the Santa Cruz Rotary Club and was a member of the city's Chamber of Commerce in the 1950s.¹⁰ F.M. Chandler does not appear to have made any significant contributions to national, California or Santa Cruz history.

⁷ "Sweet Service Will Build on Front St. Site," *Santa Cruz Sentinel*, 11/29/1938.

⁸ "Court Briefs," *Santa Cruz Sentinel*, 5/4/1944.

⁹ "Ralph Sanford, Sweet Service Executive, Dies," *Santa Cruz Sentinel*, 7/2/1951.

¹⁰ "Chamber of Commerce Ponders Action on Car Wrecking Yard," *Santa Cruz Sentinel*, 1/24/1958.

The architect of the 1939 structure is unknown. Charles W. Lawrence appears in the title block of the 1957 addition. He is listed as a draftsman in local city directories, with an office at the Farmers & Merchants Bank Building (108 Locust Street, Santa Cruz) and resided at 111 Rulofson Street. Charles W. Lawrence was not a significant architect or designer in Santa Cruz.

George G. Wilson, Sr. was a builder in Santa Cruz and constructed buildings predominantly in the 1920s – 1930s. His son, George G. Wilson, Jr. was the contractor for the 1957 addition. He served in the U.S. Navy at the Bremerton, Washington Naval Yard in World War II and became Lt. Commander of the Santa Cruz Naval Reserve Unit from 1946 – 1949. He studied engineering and was active in local politics, serving on the city school board and becoming a Santa Cruz City Council member in 1961.¹¹

Historic Assessment of the Subject Property

Historic listing for the National and California registers requires that the subject building achieves satisfaction of one of the four criteria listed below and possesses significant historic integrity. An integrity analysis appears at the end of this section and demonstrates that the exterior alterations constructed in 2004 have removed a substantial amount of the integrity of design, workmanship, materials, feeling and association from the subject building, making it ineligible for inclusion on the National or California register. Details of historic significance are discussed further below.

National Register and California Register Significance

The National (NR) and California (CR) registers have the same four-part criteria (see *Regulatory Framework* section). The criteria break down into Association with an *event* (NR - A; CR – 1); Association with an *important person* (NR - B; CR – 2); Association with *architectural and/or construction method* (NR - C; CR – 3); and *Information potential* (NR - D; CR – 4).

Given the disturbed nature of the site and development of the area, the subject property does not qualify under the fourth criterion, archaeological/informational potential (NR - D; CR – 4). The following evaluates the subject properties under the remaining three criteria.

Event: National Register- Criterion A/ California Register-Criterion 1.

Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.

The subject property developed initially in 1939 in what had become the epicenter of automobile related development, with numerous buildings constructed for the sale, service and support of the automobile industry. The 1957 addition was constructed toward the end of automobile development in the lower Front Street area. Today, the setting of lower Front Street as the “automobile row of Santa Cruz” has changed dramatically, due to removal, infill construction and the damage caused by the 1989 Loma Prieta Earthquake. More critically, the subject building has suffered from a dramatic loss of historic integrity, making it not capable of supporting an automobile-related theme. The subject property does not qualify under this Criterion.

¹¹ “George Wilson Appointed as SC City Councilman,” *Santa Cruz Sentinel*, 12/2/1960.

Important Person: National Register Criterion B/California Register-Criterion 2. Associated with the lives of persons important to local, California or national history.

The Sweet Service Company was a successful operation in Santa Cruz for decades, with the three founders active in the same organization throughout their careers. While these founders operated a successful business, they did not contribute to national, California or Santa Cruz history significantly.

For historic significance to be established for either builder – George G. Wilson Senior (1939) and George G. Wilson Junior (1957) – the extant building would need to possess a high degree of historic integrity, which is not possible with the present condition of the subject building, which is highly altered. The subject property is not eligible under this Criterion.

Architectural Design: National Register Criterion C/California Register-Criterion 3. Architectural design/construction method or represents the work of a master or possesses high artistic values.

The subject building has been altered substantially and can no longer establish historic significance under this Criterion, which emphasizes the presence of period historic design and/or construction method. The subject property is not eligible under this Criterion.

City of Santa Cruz Historic Criteria

1. Recognized as a significant example of the cultural, natural, archaeological, or built heritage of the city, state, or nation; and/or
The subject property contains a highly modified reinforced concrete commercial building and is not a significant example of the built heritage of Santa Cruz.
2. Associated with a significant local, state, or national event; and/or
The property is not associated with a significant local, state or national event.
3. Associated with a person or persons who significantly contributed to the development of the city, state, or nation; and/or
The subject property was occupied by the Sweet Service Company. The three partners: Lloyd D. Sweet, Ralph W. Sanford and Fitz-Mac Chandler led a successful company, but did not contribute significantly to the national, California or Santa Cruz history.
4. Associated with an architect, designer, or builder whose work has influenced the development of the city, state, or nation; and/or
The property is not associated with a significant architect in Santa Cruz. While the 1957 addition was constructed by George G. Wilson, Jr., a citizen who was involved in Santa Cruz politics, the alterations made to the building have removed its ability to convey its significance as an example of the builder's work.
5. Recognized as possessing special aesthetic merit or value as a building with quality of architecture and that retains sufficient features showing its architectural significance; and/or

The subject building is a highly modified commercial structure that no longer retains sufficient character-defining features to communicate its period design.

6. Recognized as possessing distinctive stylistic characteristics or workmanship significant for the study of a period, method of construction, or use of native materials; and/or
The modifications made to the subject building have removed any distinctive stylistic features, examples of period workmanship or construction method from the original building.
7. Retains sufficient integrity to accurately convey its significance.
The building has been altered significantly and has lost substantial historic integrity.

Historic Integrity Analysis

A historic integrity analysis appears below.

- **Location.** The building is in its original location and maintains integrity of location.
- **Design.** The 2004 modifications have changed radically the original design of this modest commercial building. The original entrances, fenestration and detailing on the primary elevation have been completely modified due to the alterations.
- **Setting.** A dramatic loss of setting has occurred due to the removal of automobile-related commercial buildings and the 1989 Loma Prieta Earthquake.
- **Materials.** The primary elevation remodeling has modified the exterior finishes, fenestration and detailing from the original design.
- **Workmanship.** Nearly all features of period workmanship have been removed due to the alterations to the front and primary elevation.
- **Feeling.** The building alterations have reduced considerably the integrity of feeling as a period commercial building.
- **Association.** Integrity of association as an example of the work of George G. Wilson (father and son) is also reduced substantially due to the alterations.

Conclusion

In conclusion, the subject property located at 504 Front Street, Santa Cruz, California does not qualify for listing on the National Register of Historic Places, the California Register of Historical Resources or the Santa Cruz Historic Resources Inventory. The proposed project does not require mitigations for historic resources according to the California Environmental Quality Act (CEQA - Section 15064.5), as the subject property is not historically significant.

Please contact me if you have any questions about this historic evaluation report.

Sincerely,

A handwritten signature in black ink that reads "Seth A. Bergstein". The signature is written in a cursive, slightly slanted style.

Seth A. Bergstein, Principal

cc: City of Santa Cruz Planning Department