

Memorandum

Date 9 May 2018

Project 721-25 Bridgeway

To Mr. Danny Castro
City of Sausalito
Planning Division
420 Litho Street
San Francisco, CA 94965

From Christopher VerPlanck
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Topic Peer Review

Copied

Via Email

Dear Danny,

I prepared this Peer Review Memorandum (Memo) in response to your request for my opinion regarding the adequacy of Preservation Architecture's November 21, 2016 Memorandum for 721-25 Bridgeway, a contributor to the Downtown Historic Overlay Zoning District. As you know, the project sponsor seeks to demolish the building and replace it with a new two-story, mixed-use building containing a retail food hall on the first floor and three residential units on the second floor. I have carefully reviewed Preservation Architecture's Memo and I believe that it has several significant flaws – both technical and methodological – as well as no conclusion concerning the significance of the property or the proposed project's impacts under the California Environmental Quality Act (CEQA). I recommend that you ask Preservation Architecture to expand the Memo into a fully developed Historic Resource Evaluation (HRE) similar to other reports the City has requested and accepted in the past, because the existing Memo is insufficient in nearly every respect.

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Qualifications

As a preservation professional with over 20 years of experience, including almost a decade of accomplishments in Sausalito, I believe that I am well qualified to undertake this peer review. I hold a Master's Degree in Architectural History and a Certificate in Historic Preservation from University of Virginia's Graduate School of Architecture. Since 1997, I have worked in the fields of architectural history and historic preservation throughout the Bay Area. Among my projects in Sausalito, I authored the Marinship Historic Context Statement, a National Register nomination for the former Marinship Machine Shop, and the Administrative Draft Sausalito Historic Context Statement. Over the years, I have also prepared individual HREs for several properties in Sausalito.

Methodology

I am well aware of the Downtown Historic Overlay Zoning District and its 54 contributors, including 721-25 Bridgeway. I have several recent and historic photographs of the property in my archives, as well as some historical information on the building from research I completed for the Administrative Draft Sausalito Historic Context Statement. Aside from consulting Sanborn Maps, several secondary sources on Sausalito history, and the digitized *Sausalito News*, I did not complete any property-specific research on 721-25 Bridgeway. Instead, I trust that the permit research completed by Preservation Architecture is complete and accurate.

Background

I will first provide some background on the Downtown Historic Overlay Zoning District because it is pertinent to the analysis in Preservation Architecture's Memo. The Downtown Historic Overlay Zoning District (Historic District) is Sausalito's first and only designated historic district. It was first envisioned during the Bicentennial when many American communities started becoming aware of their heritage and took steps to preserve it. Adopted in 1981 by the Sausalito City Council, the Historic District encompasses 70 parcels within Sausalito's downtown. The California Historical Resource Information System's (CHRIS) database identifies 54 contributors to the Historic District. Most of the contributors have "2D2" status codes, meaning that they are "Contributor(s) to a district determined eligible for NR (National Register) by consensus through Section 106 process.¹ Listed in CR (California Register)."² The subject of this memo, 721-25 Bridgeway (identified in the CHRIS database as the Burlwood Gallery at 723 Bridgeway), is a contributor to the Historic District with a status code of 2D2. The Historic District's implementing regulations require all new construction and alterations to existing structures to be evaluated for compatibility by the Historic Landmarks Board (HLB).³ In addition, any proposal to demolish or significantly alter a property listed in or determined eligible for the California Register, including contributors to historic districts, must be evaluated under the provisions of CEQA.

¹ Section 106 refers to federally funded projects reviewed under the provisions of the National Historic Preservation Act (NHPA).

² California Office of Historic Preservation, "California Historical Resource Status Codes," December 8, 2003.

³ City of Sausalito Planning Division, *Historic Preservation Guidelines* (Sausalito Community Development Department, adopted January 21, 1993).

Peer Review

It is my understanding that the Sausalito Planning Division does not have a prescribed format for HREs. Nevertheless, I have prepared several HREs for the Sausalito Planning Division in recent years and I have reviewed others prepared by different consultants. All of these HREs have adhered to a basic format that your office evidently prefers. These HREs include, at a minimum, an introduction; a summary of the regulatory environment; an architectural description (including surrounding properties); a property history, including a chain of title and brief biographies on previous occupants; an evaluation of significance using California Register criteria; an analysis of the proposed project for impacts under CEQA, and a conclusion. In my eight years of working in Sausalito I have never reviewed a report as rudimentary as Preservation Architecture's November 21, 2016 Memo. This is not to suggest that an HRE cannot be concise, but Preservation Architecture's Memo is missing virtually every section identified above.

Some information is provided on the building's appearance and construction chronology, as well as a little information on prior occupants, but it is comingled and difficult to parse. Concerning the architectural description, there are several historic photographs and some anecdotal information provided about the building's original appearance when it was a pair of Victorian-era commercial blocks. There is no formal architectural description documenting the building's present appearance. There is also no discussion of prior owners and little discussion of prior occupants. In order to make adequate findings under California Register Criteria 1 (Events) and 2 (Persons), one needs a basic inventory of previous owners and occupants as well as biographical information on any individuals who may have made an impact on local, state, or national history. There is a brief discussion of the building's architectural styling. I agree with Preservation Architecture that the remodeled façade is more accurately described as "Spanish Eclectic/Mediterranean" rather than Mission Revival, which was popular between ca. 1895 and 1915.

Unfortunately, the little historic context that is provided in the Memo raises more questions than it answers. The author brackets the Spanish Eclectic/Mediterranean façade remodel to between 1927, when Purity Grocery first moved into the building, and 1934, when the store was expanded and remodeled. The author then concludes that the remodel must have occurred in 1927 because it was "unlikely" to have taken place during the Depression. This statement contradicts what was actually happening during the mid-1930s, a period in which the FHA and other New Deal agencies successfully stimulated construction activity by providing low interest loans and technical advice to business owners to encourage them to "modernize" the façades of their buildings.⁴ Leaving the question aside as to when the façade remodel happened, Preservation Architecture's Memo should address how the remodeled building became a contributor to the Historic District in 1981. Its inclusion in spite of its obvious alterations indicates that the changes were judged to have gained significance in their own right, especially because they happened within the district's period of significance. I do not think that anyone would assert that the subject property is an architectural masterpiece, but the California Register is not a beauty contest. If the building's primary façade was remodeled in the 1930s – especially if it used

⁴ Gabrielle Esperdy's *Modernizing Main Street: Architecture and Consumer Culture in the New Deal* (Chicago: University of Chicago Press, 2008) explains how these façade improvement programs worked and how popular they were.

funds and/or technical advice from the FHA – it may have significance under California Register Criterion 1 (Events) and its scale and compatibility with its neighbors likely qualify it under Criterion 3 (Design/Construction) as a district contributor.

Regarding its post-1935 alterations, it is clear that 721-25 Bridgeway has undergone several changes, in particular to its commercial storefronts. These changes, which according to Preservation Architecture’s Memo, occurred in the 1960s and 1970s, are unfortunate but it is a rare building that retains its historic storefronts. On the other hand, the pedestrian entrances at each corner of the first floor are still there and the second story remains intact. Finally, the changes to the storefronts are reversible, and the business owner should be encouraged to replace the existing storefronts with something more compatible the next time he or she applies for a permit affecting the storefronts.

More troubling than the paucity of architectural and historical information is the fact that Preservation Architecture’s Memo lacks any substantive information on the Downtown Historic Overlay Zoning District or how the demolition of a district contributor would impact it. Crucially, there is no CEQA analysis. As a property that is listed in the California Register, 721-25 Bridgeway is unquestionably a “historical resource” per CEQA.⁵ Its demolition would have a significant adverse effect on the resource itself as well as possibly the Downtown Overlay Historic Zoning District. Some sort of analysis should be provided to address this basic question.

In conclusion, I believe that Preservation Architecture’s Memo is not up to the task of providing the Sausalito Planning Division with the information that it needs to reach a conclusion regarding the significance of the property or the proposed project’s potential impact on the environment. I encourage the City to request a properly executed HRE that includes the sections I mention above and that adequately assesses the project’s potential impacts.

Sincerely,



Christopher VerPlanck

⁵ See Section 21084.1 of the CEQA Statute and Section 15064.5 of the CEQA Guidelines for a definition of a historical resource.