

Memorandum

Date: November 1, 2023

To: Brian Oh, Community Development Director

From: Dr. Dana DePietro, Director of Cultural Resources

Subject: Peer Review of Historic Cultural Resources Report for Petaluma Downtown Overlay Proposal prepared by Painter Preservation (dated September 22, 2023)

First Carbon Solutions (FCS) was retained by the City of Petaluma to conduct a structured peer review of the *Historic Cultural Resource Report for Petaluma Downtown Overlay Proposal* dated September 22, 2023 (Painter 2023b). FCS was asked to comment on the report's adequacy in consideration of Painter Preservation's scope of work: *Historic Cultural Resource Report for Petaluma Downtown Overlay Proposal* (Painter 2023a), and to assume that the City of Petaluma, as the Lead Agency, has already prepared a program-level California Environmental Quality Act (CEQA) analysis which includes an analysis of impacts to historical resources consistent with Section 15064.5 of the CEQA Guidelines. The City's program-level historical resource analysis was not reviewed as part of this peer review.

FCS engaged consulting Architectural Historian Sarah Corder, MFA and Samantha Murray, MA to conduct the peer review. Ms. Corder is the Principal Architectural Historian at South Environmental and meets the Secretary of the Interior's Professional Qualification Standards (PQS) for Architectural History and Historic Preservation. Ms. Murray is the Cultural Resources Director at South Environmental and meets the PQS for History and is an expert in the treatment of historical resources under CEQA Guidelines Section 15064.5.

The format of this peer review is as follows: 1) a high-level summary of the peer review findings; 2) identified data gaps in the report; 3) recommended edits and additions to the report for clarity; and 4) recommended edits to figures within the report. Within each section is a bulleted list of comments that apply to specific sections of the report. This peer review does not include a fact-check of the research or previous studies presented in the report and operates under the assumption that all information presented is accurate and based on thorough background research. Only substantive comments are presented below. Technical editing issues such as minor spelling, grammar, and acronym call outs were not assessed as part of this peer review.

PEER REVIEW

Summary of Findings

Peer reviewers found that the report does not adequately address the City's requested scope of work. Additionally, the organization of the report is confusing, and it lacks critical details relevant to a historical resources technical report and the proposed project.

The Introduction section of the report provides no details about the proposed project being analyzed, no project description, and no description of the report's purpose and function. It also fails to indicate if there are specific state and local regulatory requirements that are being addressed as part of the report.

If the report intends to present a high-level existing conditions assessment for historical resources within the Study Area and associated recommendations/mitigation for addressing historical resources at the project-level in the future, two significant data gaps should be addressed: 1) inclusion of industry-standard baseline records search results and 2) clear discussion of the state and local regulatory framework that drives the decisions the City makes concerning historical resources.

Another significant omission is clear recommendations for how the City should proceed in the future. Simply noting that CEQA should be followed to protect historical resources is inadequate. The report should be revised to clearly address what the City needs to do to avoid, reduce, or mitigate impacts to historical resources.

In summary, the peer review finds that the report does not fulfill the scope of work "to inform staff and decision-makers and assist with their review of the Petaluma Downtown Overlay Proposal and its potential impact on historic resources in the Overlay Study Area."

Identified Data Gaps

The following bullet points represent critical data gaps identified in the report that prevent it from fulfilling its scope of work to "inform staff and decision-makers and assist with their review of the Petaluma Downtown Overlay Proposal and its potential impact on historic resources in the Overlay Study Area" (Painter 2023a:1). Without the following information, project-related impacts on historical resources within the Overlay Study Area cannot adequately be assessed:

- The scope of work proposes to "Describe and map the historic districts and individual historic resources that are located within the Petaluma Downtown Overlay Study Area, as well as the resources that are directly adjacent to the Overlay Study Area boundary" (Painter 2023a:1). While the report presents detailed discussions of the existing historic districts, it lacks baseline records search data which must also be included in the report for it to provide the complete picture of the existing conditions of historical resources within the Overlay Study Area. The following items are industry-standard and necessary for a high-level existing conditions

discussion of historical resources in a program-level document: the results of a California Historical Resources Information Center (CHRIS) records search for the entire Study Area completed through the Northwest Information Center (NWIC), and review of the Office of Historic Preservation's (OHP) Built Environment Resources Directory (BERD). It is possible that this information was already requested as part of another cultural resources report prepared for the project.

- The report lacks any discussion of CEQA or local policies when assessing impacts to historical resources. Page 44 provides a brief discussion of CEQA but does not acknowledge if the report is being prepared as part of a CEQA document (i.e., a Mitigated Negative Declaration (MND) or Environmental Impact Report (EIR), etc.); or if it is tiering from an existing CEQA document (i.e., the General Plan EIR). This is necessary to provide the City with appropriate guidance concerning the proposed project's potential impact on historical resources in the Overlay Study Area. This is perhaps most needed in the "Recommendations of the HCRR" section which should provide "feasible and fully enforceable" mitigation for the City to consider in the development of their CEQA document (CEQA Guidelines, § 15041). A more detailed discussion is provided below in the Recommended Edits for Clarity section.

Recommended Edits for Clarity

The following bullet points are recommended edits and additions for providing clarity in the report and to fulfill its purpose and scope of work (Painter 2023a:1). Comments are broken down by specific section and page numbers (where applicable):

Cover Page

- Add "for the City of Petaluma" to the report title.

Introduction

- Page 1: Revise the Introduction to begin with a project description and what the technical report is aiming to accomplish/its purpose. Move details about various meetings and presentations further down in the text after the reader is oriented to the project and where it is located.
- Page 1: Clearly define the Study Area and explain how the Study Area boundaries were developed.
- Page 1: Figure callouts should be added to the text for Figures 1 and 2.
- Add a discussion of whether or not building evaluations were completed as part of the study. If they were not, provide a brief discussion explaining why. (e.g., the purpose of the report is to provide a program-level historic analysis of the three Overlay Subareas, which includes the Hotel Development Site, with recommendations provided for future study and protection of identified historical resources within those areas).

Policies and Regulations

- Page 6: Following the main header, add a brief paragraph clearly stating that the following local policies, ordinances, and regulations apply to the project.

Historic Downtown Commercial District

- Page 17: The header, “Historic Downtown Commercial District,” implies the discussion will be about a single historic district called “The Historic Downtown Commercial District,” but then the report proceeds to describe the City’s three existing historic districts with particular focus on the “Petaluma Historic Commercial District.” It is recommended that the header be modified for clarity.
- Page 19: The following should be presented earlier (on page 17) to provide clarity to the reader: “Collectively, the two districts are referred to as the *Petaluma Historic Commercial District* and are governed by the *Petaluma Historic Commercial District Design Guidelines*, which were adopted under Ordinance No. 2097 in 1999.” Relocating this statement would also explain why we see three historic districts and not four historic districts in Figure 11.

Tables 1, 2, and 3

- Pages 31, 39-40 and 42: It is unclear if any of the buildings listed in Tables 1, 2, or 3 were previously evaluated for historical significance (e.g., was a CHRIS records search completed with the NWIC? Was the Sonoma County BERD checked? Are the buildings within Overlay Subareas A, B, or C locally eligible? Do they require evaluation as part of future project-specific activities? Which ones are district contributors?).

Protecting Historic Resources

- Page 43 (bottom): It is recommended that the information presented in the first paragraph of this section be presented in the Introduction section so the reader understands the purpose of the report and what it is aiming to accomplish.

Recommendations of the HCRR

- Page 44: It is recommended that this section be enhanced to provide more specific guidance about when Historic Resource Evaluations would be required, as this would fulfill the scope of work’s stated purpose. Stating that “redevelopment should proceed in compliance with CEQA” (Painter 2023a:44) is insufficient. If this section is designed to function as program-level mitigation for historical resources within the proposed Overlay, it should include clear, enforceable mitigation (e.g., when to evaluate resources over 45 years old and what to prepare; ensuring that modifications to historical resources/district contributors are completed in conformance with the Secretary of the Interior’s Standards to avoid material impairment/substantial adverse change and reduce project impacts to a less than significant level; and because CEQA requires consideration of all feasible mitigation, the report should also include a discussion of what type of mitigation is

required when future impacts remain significant and unavoidable). If the intention of the report is to point to existing mitigation prepared as part of the General Plan EIR or another document, this should be clearly stated.

Recommendations of the Downtown Housing and Economic Opportunity Overlay

- Page 44: Include this discussion in the Introduction so the reader can better understand the proposed Overlay and the focus of the HCRR.
- This section does not adequately explain the proposed design strategies. Include a discussion of these strategies and how they aim to comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties, or if any new development that meets these requirements for new construction adjacent to a historic building would be accepted.

Further Considerations

- The scope of work states that it will “summarize advantages and possible disadvantages that may result from the adoption of the Petaluma Downtown Overlay for discussion purposes” (Painter 2023a:2). However, the opening paragraph of this report section states the following: “Significant study would have to take place to explore the advantages and disadvantages of some of these suggestions before they might be incorporated in redevelopment plans, with exceptions as noted below.” No discussion of advantages or disadvantages was identified in the report and all information is presented as for “discussion purposes only” (Painter 2023b:46).

Recommended Edits to Figures

- **Figure 2** (page 3): Rather than showing this figure, which is not helpful for understanding where the Hotel Development Site is relative to the Overlay Subareas, it is recommended that the hotel site be added to Figure 4. As it currently stands, we do not see a map clearly depicting the location of the hotel site until Figure 17. It is recommended that Figure 17 be moved up to the beginning of the document and Figure 4 be moved down to replace Figure 11.
- **Figure 7** (page 12): It would be helpful to include more information on what the goal of Figure 7 is, so that the reader has a better understanding of what is presented and why the boundaries of Overlay Subareas B and C are not included.
- **Figure 11** (page 18): It would be helpful if the boundaries of the Overlay Subareas could be added to this figure, so the reader has a clear understanding of the proximity of these areas to the existing historic districts. This figure tells the reader to see Figure 4 for this information, Figure 4 shows four historic districts, not three. Consider using Figure 4 in place of Figure 11, as it is much more helpful to understanding the Overlay Subareas relative to the historic districts.
- **Figure 13** (page 20): It would be helpful if the boundaries of Overlay Subarea A, Overlay Subarea B, and the Hotel Development Site were included on Figure 13 so the reader can visually understand the extent of the overlap.

- **Figure 17** (page 24): Consider showing this Figure much earlier in the document as part of the Introduction as it helps the reader understand the relationship between the various elements of the project described throughout the document.
- **Figures 32 and 33** (pages 45 and 46): More explanation is needed to understand these figures and what they are showing relative to the analysis being presented in the HCRR. Figure 32 appears to be more general, whereas Figure 33 appears to be specific to Overlay Subarea B. If these figures remain in the report, more explanation is needed.
- **Global comment:** from Figure 10 forward, text callouts for figures no longer appear in the text. Figure callouts should be added throughout the document for clarity and consistency.

Please do not hesitate to contact me directly at ddepietro@fcs-intl.com or 530.219.1432, and glad to be of any further assistance on this or other projects.

Sincerely,

A handwritten signature in black ink that reads "Dana DePietro". The signature is fluid and cursive, with the first name "Dana" and last name "DePietro" clearly distinguishable.

Dr. Dana Douglas DePietro, RPA
Director of Cultural and Biological Resources
FirstCarbon Solutions
2999 Oak Road, Suite 250
Walnut Creek, CA 94597

**Attachment A:
Resumes**

EDUCATION

M.F.A., Historic Preservation,
Savannah College of Art and
Design, Savannah, Georgia,
2004

B.A., History, Bridgewater
College, Bridgewater,
Virginia, 2002

PROFESSIONAL

AFFILIATIONS

California Preservation
Foundation

Los Angeles Conservancy

Society of Architectural
Historians

National Trust for Historic
Preservation

Sarah Corder, MFA

PRINCIPAL ARCHITECTURAL HISTORIAN

Sarah Corder is the Principal Architectural Historian at South Environmental with 18 years' experience in all elements of cultural resources management, including project management, historic preservation planning, rehabilitation of historic buildings, community engagement, intensive-level field investigations, citywide surveys, architectural history studies, and historical significance evaluations in consideration of the NRHP, CRHR, and local-level evaluation criteria. Sarah has conducted thousands of historical resource evaluations and developed detailed historic context statements for a multitude of property types and architectural styles, including private residential, commercial, military, industrial, educational, recreational, civic, and agricultural properties. Sarah has also worked closely with design teams, property owners, and agencies on numerous projects that required conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) and local design guidelines.

Sarah exceeds the Secretary of the Interior's Professional Qualification Standards for both Architectural History and History. She has extensive experience preparing environmental compliance documentation in support of projects that fall under the CEQA/NEPA, and Sections 106 and 110 of the National Historic Preservation Act. Sarah also has extensive experience consulting with lead agencies and managing large scale projects for municipalities like the City of Gilroy, City of Coronado, the City of San Diego, and the County of Los Angeles.

EXPERTISE

- CEQA, NEPA, and Section 106 of the NHPA compliance documentation in consideration of impacts to historical resources, and historic properties.
- Large scale historic resources survey management and execution.
- Large scale historic context statement development.
- Community engagement.
- Resource significance evaluations in consideration of NRHP, CRHR, and local designation criteria.
- Project design review for conformance with the Secretary of the Interior's Standards.

PROJECT EXPERIENCE

Historic Built Environment Survey Report for the Barber Yard Specific Plan, City of Chico, Butte County, California (2023). South Environmental was retained by FirstCarbon Solutions to prepare a Historic Built Environment Survey Report in support of the Barber Yard Specific Plan. This report included the results of an intensive-level pedestrian survey of all built environment resources over 45 years old within the project's Area of Potential Effect (APE); site development and archival research; and recordation and evaluation of the Machine Shop and the Match Block Storage Building of the former Diamond Match Company site for historical significance in consideration of federal, state, and local designation criteria and integrity requirements. Responsibilities included co-authorship of the report, QA/QC of the DPR forms, and coordination with the GIS team.

Historic Built Environment Assessment for the 1170 Pedro Street Project, City of San José, California (2023). South Environmental was retained to prepare a historic built environment assessment for the San José Swim and Racquet Club that was constructed in 1957 within the City of San José. The assessment included the results of an intensive-level, pedestrian survey of the project site; building development and archival research; and recordation and evaluation of one property for historical significance in consideration of CRHR and City of San José criteria and integrity requirements. As a result of the property significance evaluation, the property was recommended not eligible for local and CRHR designation. Ms. Corder served as the principal architectural historian for the project and provided QA/QC on all project deliverables.

Historic Built Environment Assessment for the BoDean Company Construction Materials Processing Plant, Planned Development and Subdivision Project, Town of Windsor, Sonoma County, California (2023). South Environmental was retained to prepare a historic built environment assessment for multiple industrial buildings that were part of the Fluor-Ecodyne Manufacturing Facility, which developed from 1943-1985. The assessment included the results of an intensive-level, pedestrian survey of the project site and a reconnaissance-level survey of the remaining sections of the manufacturing facility; building development and archival research; and recordation and evaluation of a historic district for historical significance in consideration of NRHP and CRHR criteria and integrity requirements. As a result of the assessment, the manufacturing facility was recommended not eligible for designation due to the lack of visual cohesion and integrity. Ms. Corder served as the principal architectural historian for the project, performed archival research, and co-authored the report.

California State University Monterey Bay, City of Seaside, California (2021). While working for her previous firm, Ms. Corder served as the principal architectural historian and primary report author. The project included a built environment inventory and evaluation study and report for the proposed CSUMB Master Plan. For the purposes of this project Ms. Corder formally recorded and evaluated 11 campus properties over 45 years old that were proposed for renovation, alteration, or demolition as part of the Project. All 11 of these built environment properties were identified as not eligible for national, state, or local designation.

Gilroy Citywide Historic Resources Inventory and Historic Context Statement, City of Gilroy, California (2018-2020). While at a previous firm, Ms. Corder served as the project's senior architectural historian and survey lead. The project included the development of a citywide historic context statement (HCS) and updating of the City's 1986 historic resource inventory. Ms. Corder completed reconnaissance-level survey of over 3,400 properties on time and within budget. Responsibilities also included co-authorship of the HCS and survey report, attendance at the public kick-off meeting, preparation of DPR forms, development registration requirements, QA/QC of DPR forms, and coordination with GIS team.

San Francisco State University Master Plan EIR, San Francisco State University, City of San Francisco, California. (2019). While working at her previous firm, Ms. Corder served as the project's senior architectural historian and task manager. The project included the evaluation of all buildings and structures on campus over 45 years old that were proposed for demolition or substantial alteration as part of the proposed Master Plan Program. The study entailed conducting archival and building development research, a records search, detailed impacts assessment, and development of mitigation measures for project conformance with the Secretary of the Interior's Standards for Rehabilitation. Responsibilities included task management, field survey leadership, archival research, evaluation of built environment resources, co-authorship of the technical report, and preparation of DPR forms.

St. Joseph's Hospital Master Plan Project, Stockton, California (2020-2021). While working at her previous firm, Ms. Corder served as the project's senior architectural historian and task manager. The project included the preparation of a historical resources inventory and evaluation report in support of the St. Joseph's Master Plan Project for the applicant, Dignity Health. The project site contained four properties: 1800 North California Street and 542 McCloud Avenue (St. Joseph's Medical Center), 534 East Maple Street, 425 East Harding Way, and 445 East Harding Way in the City of Stockton, California. The report included conducting archival research, site descriptions, and historical significance evaluations and integrity assessments for resources identified within the project area. As a result of the project, it was determined that none of the properties were eligible for the NRHP, CRHR, or as local landmark/structure of merit due to lack of architectural merit and compromised integrity. Responsibilities included archival research, field survey, preparation of DPR forms, and co-authorship of the report.

Blue Diamond Growers A Street Annex Project, City of Sacramento, California (2018). While working at her previous firm, Ms. Corder served as the project's senior architectural historian. The project included the preparation of a cultural resources evaluation for the proposed demolition of the A Street Annex building constructed in 1926 and currently located on the Blue Diamond Growers Complex in Sacramento. Responsibilities included architectural history field survey, building permit research, background research, preparation of DPR forms for the evaluation of built resources, and co-authorship of the cultural resources report.

CSU Chico College Park Demolition Project, CSU Chico, Butte County, California (2018). While working for her previous firm, Ms. Corder served as the architectural historian and primary report author. The project included a cultural resources study for a project that proposes demolition of 10 single-family residences near the CSU Chico campus. The study involved completion of a CHRIS records search; a pedestrian survey of the project area for built-environment resources; archival and building development research for each property; outreach with local libraries, historical societies, and advocacy groups; and a historic context and evaluation of 10 properties for historical significance.

Eldredge Property (Farmstead) Project, City of Vacaville, California (2018). While working at her previous firm, Ms. Corder served as the project's senior architectural historian. The proposed project consisted of development of 130 residential lots on 15.82 acres along with 4.75 acres dedicated for a park and trail uses and project access roads and sidewalks. The project included completion of a cultural resources study that included a CHRIS records search, archival research, an intensive-level pedestrian survey of the project area, and documentation/evaluation of a large block of farmland, including numerous buildings and structures located at 369 North Orchard Avenue in consideration of the NRHP, CRHR, and city designation criteria. Responsibilities included archival research, significance evaluations, and co-authorship of the report.

CSU Chico College Park Demolition Project, CSU Chico, Butte County, California (2018). While working for her previous firm, Ms. Corder served as the architectural historian and primary report author. The project included a cultural resources study for a project that proposes demolition of 10 single-family residences near the CSU Chico campus. The study involved completion of a CHRIS records search; a pedestrian survey of the project area for built-environment resources; archival and building development research for each property; outreach with local libraries, historical societies, and advocacy groups; and a historic context and evaluation of 10 properties for historical significance.

Historical Resources Assessment for the San Francisco International Airport Residential Sound Insulation Program, Cities of San Bruno and Millbrae, California (2017). While working at her previous firm, Ms. Corder served as the project's architectural historian. The project included the evaluation of 28 residential properties constructed 50 years ago or more within the Cities of San Bruno and Millbrae in San Mateo County, California. These properties are proposed to receive installation of sound insulation materials as part of San Francisco International Airport's Residential Sound Insulation Program. All 28 properties were recorded and evaluated on State of California Department of Parks and Recreation Series 523 Forms for historical significance in consideration of NRHP designation criteria and integrity requirements. Responsibilities included architectural history field survey, background research, preparation of DPR forms for the evaluation of built resources, and co-authorship the cultural resources report.

Fall River Gun Club Project, Pit 1 Hydroelectric Project (FERC NO. 2687), Pacific Gas & Electric Company, Fall River Mills, California (2017). While working at her previous firm, Ms. Corder served as the project's senior architectural historian. The project included the completion of a historic resource evaluation for a project that is guided by a Historic Properties Management Plan. This study involved an intensive-level pedestrian survey of the project area for built-environment resources and recordation and evaluation of all historic age buildings in consideration of NRHP designation criteria and integrity requirements. Responsibilities included architectural history field survey, building permit research, background research, and co-authorship the historic resources report.

The 1431 El Camino Real Project, City of Burlingame, San Mateo County, California (2017). While working at her previous firm, Ms. Corder served as the project's architectural historian. The City of Burlingame proposed to demolish an existing four-unit (two-story) apartment building at 1431-1433 El Camino Real along with the detached five-car garage structure at the rear and construct a new six-unit (three-story) townhouse complex. The property was constructed in 1947 and required evaluation for historical significance. Because the property required a California Department of Transportation (Caltrans) encroachment permit, a Caltrans-compliant Historical Resources Compliance Report was prepared. It was also necessary to address impacts to an NRHP-listed tree row within the project area. Responsibilities included background research, building permit research, co-authorship of the report, and preparation of DPR forms.

Yosemite Avenue-Gardner Avenue to Hatch Road Annexation Project, City of Merced, Merced County, California (2017). While working at her previous firm, Ms. Corder served as the project's architectural historian. The project included the preparation of a historic resource significance evaluation of a single-family residence/agricultural property within the proposed project site. The project proposed to annex 70 acres from Merced County to the City of Merced and to construct and operate the University Village Merced Student Housing and Commercial component on an approximately 30-acre portion of the project site. No development was proposed on the remaining 40 acres. The evaluation found the property not eligible under all NRHP and CRHR designation criteria. Responsibilities for the project included archival research.

EDUCATION

M.A., Anthropology,
California State University,
Los Angeles, 2013

B.A., Anthropology,
California State University,
Northridge, 2003

PROFESSIONAL

AFFILIATIONS

California Preservation
Foundation

Society of Architectural
Historians

National Trust for Historic
Preservation

PROFESSIONAL

CERTIFICATIONS

Registered Professional
Archaeologist (2013)

Samantha Murray, MA

PRESIDENT AND CULTURAL RESOURCES DIRECTOR

Samantha Murray is the cultural resources director at South Environmental and a senior architectural historian with over 17 years' experience in all elements of cultural resources management, including project management, architectural history studies, and historical significance evaluations in consideration of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and local-level designation criteria. Ms. Murray has conducted thousands of historical resource evaluations and developed detailed historic context statements for a multitude of property types and architectural styles. She has also provided expertise on numerous projects requiring conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Ms. Murray meets the Secretary of the Interior's Professional Qualification Standards for Architectural History, History, and Archaeology. She is experienced managing multidisciplinary projects in the lines of private development, transportation, transmission and generation, federal land management, land development, and state and local government. She is an expert in preparation of cultural resources compliance documentation for projects that fall under the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), and Sections 106 and 110 of the National Historic Preservation Act (NHPA). Ms. Murray has also served as an expert witness in legal proceedings concerning historical resources under CEQA and local ordinance protection.

EXPERTISE

- CEQA, NEPA, and Section 106 of the NHPA compliance documentation in consideration of impacts to historical, archaeological, and tribal cultural resources, and historic properties
- Historic resource significance evaluations in consideration of NRHP, CRHR, and local designation criteria.
- Project design review for conformance with the Secretary of the Interior's Standards.
- Preparation of archival documentation for HABS/HAER/HALS.
- Assistance with complex mitigation including salvage and interpretive displays.
- Peer review.

RECENT PROJECT EXPERIENCE

Historic Built Environment Assessment for the CA3-2590 Walsh Avenue Project, City of Santa Clara, California (2021). South Environmental was retained by FirstCarbon Solutions to prepare a historic built environment assessment report for the City of Santa Clara in support of the CA3-2590 Walsh Avenue Project. Two built environment resources over 45 years old were identified within the project study area: the Uranium Substation and an unrecorded segment of the larger Southern Pacific Commute Service Line (P-43-000928). These resources were recorded and evaluated for historical significance in consideration of CRHR and City designation criteria and integrity requirements. Both resources were found not eligible under all designation criteria. The proposed project was found to have a less than significant impact on historical resources under CEQA.

Historic Built Environment Assessment for the Solid Waste and Recycling Transfer Station Replacement Project, City of Berkeley, California (2021). South Environmental was retained by FirstCarbon Solutions to prepare a historic built environment assessment report for the City of Berkeley in support of the Solid Waste and Recycling Transfer Station Replacement Project. One built environment resource over 40 years old was identified within the project study site: City of Berkeley Solid Waste Transfer Station and Recycling Center. The entire property was recorded and evaluated for historical significance in consideration of CRHR and City Landmark and Structure of Merit designation criteria and integrity requirements. The property was found not eligible under all designation criteria due to a lack of significant historical associations and integrity. The proposed project was found to have a less than significant impact on historical resources under CEQA.

Historic Built Environment Assessment for 100 38th Street Project, City of Richmond, California (2021). South Environmental was retained by FirstCarbon Solutions to prepare a historic built environment assessment report for the City of Richmond in support of the 100 38th Street Project. One built environment resource over 45 years old was identified within the project study site: the Richmond Health Center building, constructed c. 1968. The property was recorded and evaluated for historical significance in consideration of CRHR and City designation criteria and integrity requirements. The property was found not eligible under all designation criteria due to a lack of significant historical associations and architectural merit. The proposed project was found to have a less than significant impact on historical resources under CEQA.

Historic Built Environment Assessment for the 731 West Cutting Boulevard Project, City of Richmond, California (2021). South Environmental was retained by FirstCarbon Solutions to prepare a historic built environment assessment report for the City of Richmond in support of the 731 West Cutting Boulevard Project. One built environment resource over 45 years old was identified within the project study site: a vacant industrial plant constructed c. 1960. The entire property was recorded and evaluated for historical significance in consideration of CRHR and City designation criteria and integrity requirements. The property was found not eligible under all designation criteria due to a lack of significant historical associations and architectural merit. The proposed project was found to have a less than significant impact on historical resources under CEQA.

Historic Built Environment Assessment for the Walnut Creek Mixed-Use Special District Project, City of Walnut Creek, California (2021). South Environmental was retained by FirstCarbon Solutions to prepare a historic built environment assessment report for the Walnut Creek Mixed-Use Special District Project. Seven commercial properties over 45 years old were identified within the project study site. All properties were recorded and evaluated for historical significance in consideration of CRHR designation criteria and integrity requirements, and all were found not eligible due to a lack of significant historical

associations and integrity. The proposed project was found to have a less than significant impact on historical resources under CEQA.

Historic Built Environment Assessment for the Riverwood Project, Unincorporated Madera County, California (2021). South Environmental was retained by FirstCarbon Solutions to prepare a historic built environment assessment report for the Riverwood Project. One built environment resource over 45 years old was identified within the project study site: a farm and orchard with buildings dating to the 1940s. The entire property was recorded and evaluated for historical significance in consideration of CRHR designation criteria and integrity requirements. The property was found not eligible under all designation criteria due to a lack of significant historical associations and integrity. The proposed project was found to have a less than significant impact on historical resources under CEQA.

Gilroy Citywide Historic Resource Inventory, City of Gilroy, Santa Clara County, California (2020). While working for her previous firm, Ms. Murray served as Project Manager, Principal Architectural Historian, co-author of the historic context statement, public outreach, and presented at all public hearings. The City of Gilroy Historic Context Statement and Historic Resources Inventory (HRI) update project was undertaken by the City's Community Development Department to enhance and streamline the City's historic preservation program by bringing consistency to preservation planning efforts. This document presents the history of the City of Gilroy's built environment from pre-history to present, identifies important themes, events, patterns of development, and describes the different property types, styles, builders, and architects associated with these important periods and themes; and also develops registration requirements for resource evaluation that is specific to the City of Gilroy, in consideration of both historical significance and integrity requirements. The project included pedestrian survey of 3,374 properties within the City of Gilroy built in 1974 or earlier. The historical significance and integrity of properties within the survey area was evaluated in consideration of NRHP, CRHR, and City designation criteria, as well as the seven aspects of integrity.

Historic Resource Evaluation Report for 201 Georgia Street, City of Vallejo, Solano County, California (2020). While working for her previous firm, Ms. Murray served as Principal Architectural Historian, co-author, and QA/QC of work products. California State University Maritime Academy (Cal Maritime) required a historical resources evaluation report for a two-story, commercial building located at 201 Georgia Street, in the City of Vallejo, California, prior to purchasing the building. The report included conducting a BERD record search, fieldwork, archival research, historical context development, developing building descriptions, and evaluation of a vacant commercial office building. The building was found ineligible for listing in the NRHP, CRHR, or as a locally significant resource, due to a lack of significant historical associations or architectural merit.

California State University (CSU), Chico Master Plan EIR, City of Chico, Butte County, California (2020). While working for her previous firm, Ms. Murray served as Principal Architectural Historian and QA/QC of the final cultural report. The CSU Chico Master Plan is intended to update the most recent master planning document for CSU Chico from 2005, by planning for student enrollment, faculty and staff expansions, update campus facilities, emphasize open spaces, landscapes, and walkability, and promote student life experience. Additionally the new master plan will provide for the CSU Chico College of Agriculture to provide leadership, basic and applied research opportunities, and a positive work environment for employees and students. The cultural resources study included a records search of the proposed project site plus a 0.5-mile radius; a pedestrian survey of the project site; archival and building development research for buildings located within the project site; evaluation of buildings for the NRHP, CRHR, California Historical Landmark (CHL), and local eligibility criteria and integrity requirements; and an assessment of impacts to historical resources in compliance with CEQA and PRC Sections 5024 and 5024.5 for state-owned resources.