

City of Sacramento

Legislation Text

File #: 2018-01555, **Version:** 1

Title:

A Street Annex Building Delisting and Site Modifications (PB18-028) [Noticed 11/30/2018]

File ID: 2018-01555

Location: 131 North 16th Street (002-0053-004-0000) and 121 North 16th Street (002-0053-003-0000), District 3

Recommendation:

Conduct a public hearing and upon conclusion: adopt a Resolution: 1) finding the project exempt from review under the California Environmental Quality Act (CEQA) as CEQA does not apply to projects that are rejected or disapproved by a public agency (Pub. Res. Code section 21080(b)(5); CEQA Guidelines sections 15061(b)(4) and 15270(a)); 2) denying the request to remove the A Street Annex Building at 131 North 16th Street as a contributing resource to the North 16th Street Historic District on the Sacramento Register of Historic and Cultural Resources (Sacramento register) as the building continues to meet the criteria for listing on the register as provided in City Code section 17.604.210.C; and 3) denying Site Plan and Design Review for the project as no environmental review has been conducted for the demolition of a historic resource in accordance with CEQA and the City lacks sufficient information to make any of the findings required by City Code section 17.808.180.A.2. Alternatively, the council could: 1) adopt an Ordinance removing the A Street Annex Building from the Sacramento register as a contributing resource to the North 16th Street Historic District and in lieu of pass for publication publish the ordinance in its entirety within 10-days of adoption in the official newspaper of the City in accordance with section 32(d) of the City Charter; and 2) adopt a Resolution: a) finding the A Street Annex Building is not a historical resource for purposes of CEQA (CEQA Guidelines section 15064.5(a)(3); b) finding the project exempt from CEQA review under CEQA Guidelines section 15332 (related to infill development); c) approving Site Plan and Design Review for the demolition of the A Street Annex Building, asphalt paving, three parking stalls, ornamental fencing, landscaping, and installation of three loading docks with rolling doors on the Cold Storage building at 121 North 16th Street; d) finding the project site is within an area for which the local flood management agency has made adequate progress on the construction of a flood protection system as defined by state law; and e) imposing conditions of approval.

Contact: Carson Anderson, Preservation Director, (916) 808-8259, Community Development Department

Presenter: Sean de Courcy, Associate Preservation Planner, (916) 808-2796, Community

Development Department

Attachments:

- 01-Description/Analysis
- 02-Proposed Denial Resolution
- 03-Project Plans
- 04-Buildings and Features of the North 16th Street Historic District
- 05-Previous Historic Resource Evaluations
- 06-Ordinance 2011-0011
- 07-Preservation Director's Determination
- 08-2018 Dudek Historic Resource Evaluation
- 09-2018 Historic Resource Associates Report
- 10-Proposed Approval Ordinance
- 11-Proposed Approval Resolution
- 12-Applicants Supplemental Information
- 13-Public Comments

Description/Analysis

Issue Detail: The applicant proposes to remove the building at 131 North 16th Street (the "A Street Annex Building") from the Sacramento Register of Historic and Cultural Resources (the "Sacramento register"), demolish the building, and construct the following improvements: asphalt paving, three parking stalls, ornamental fencing, and landscaping. The applicant also proposes to modify the Cold Storage building at 121 North 16th Street by installing three loading docks with rolling doors.

Staff recommends the city council deny the project. The A Street Annex Building is currently listed as a contributing resource to the North 16th Street Historic District (City Ordinance No. 2011-0011, Attachment 6). Staff has reviewed the building and the City Code's requirements for listing on the Sacramento register and has concluded the building should remain listed as a contributing resource to the District. Further, site plan and design review should be denied as no environmental review has been conducted in accordance with CEQA for the demolition of a historic resource and staff lacks sufficient information to make any of the findings required by City Code section 17.808.180.A.2 (related to site plan and design review for the demolition of a contributing resource).

The applicant, however, asserts the building should be removed from the Sacramento register as it lacks historic integrity. According to the applicant (and explained further in the Cultural Resources Report for the Blue Diamond Growers A Street Annex Building Project, prepared by environmental consultant Dudek, attached as Attachment 8, and the Historic Resource Associates report, attached as Attachment 9), the building lacks historic integrity and important historic and architectural worth due to several exterior modifications, documented by the discovery of a historic photograph showing

the original design of the building. The historic photograph shows storefront doors facing 16th Street that have been filled in, altering the orientation of the building, and a series of loading docks that faced north no longer exists due to construction of the Cold Storage building. The applicant argues this lack of integrity also precludes the building from being treated as historic for purposes of CEQA. According to the applicant, consideration of the request for site plan and design review would be appropriate: the demolition of the building and the introduction of a truck-maneuvering area and loading dock into the industrial district is consistent with the features and characteristics of the North 16th Street Historic District and therefore the project would not result in an adverse effect to the historic district. Further, the design, layout, and physical characteristics of the project are consistent with all applicable design guidelines and development standards for the heavy-industrial zone.

Staff has considered the appropriate CEQA treatment for the applicant's viewpoint as well as the appropriate action required under site plan and design review procedures. See discussions below.

Figure 1: Annex Building - 131 North 16th Street

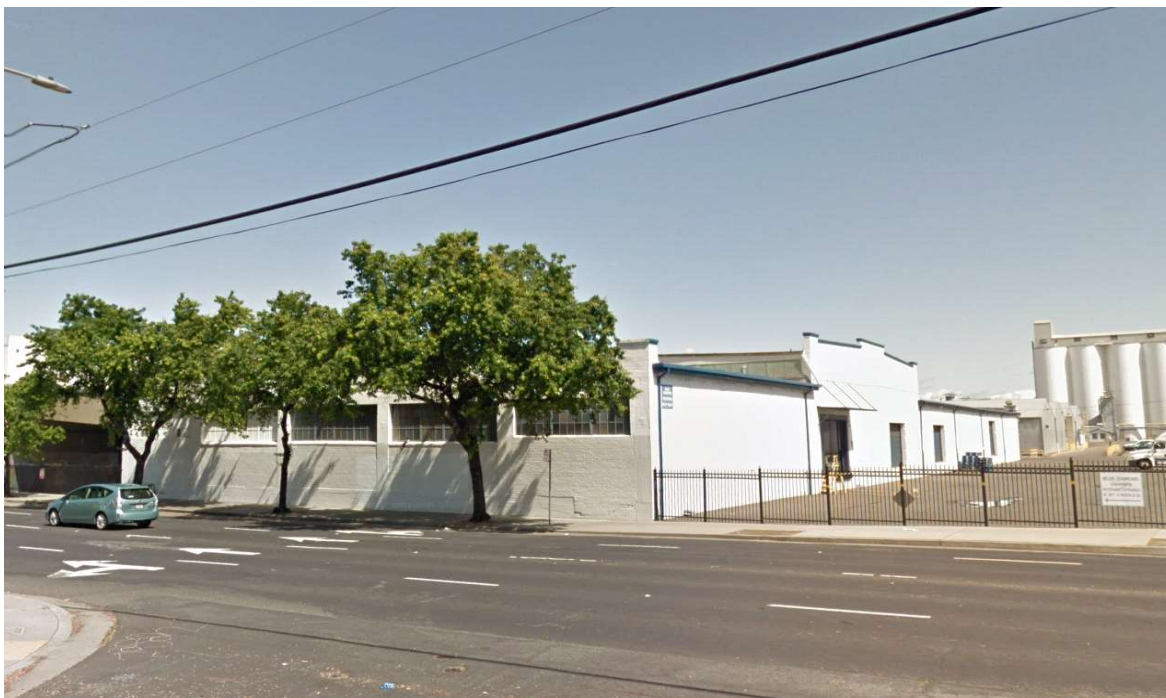
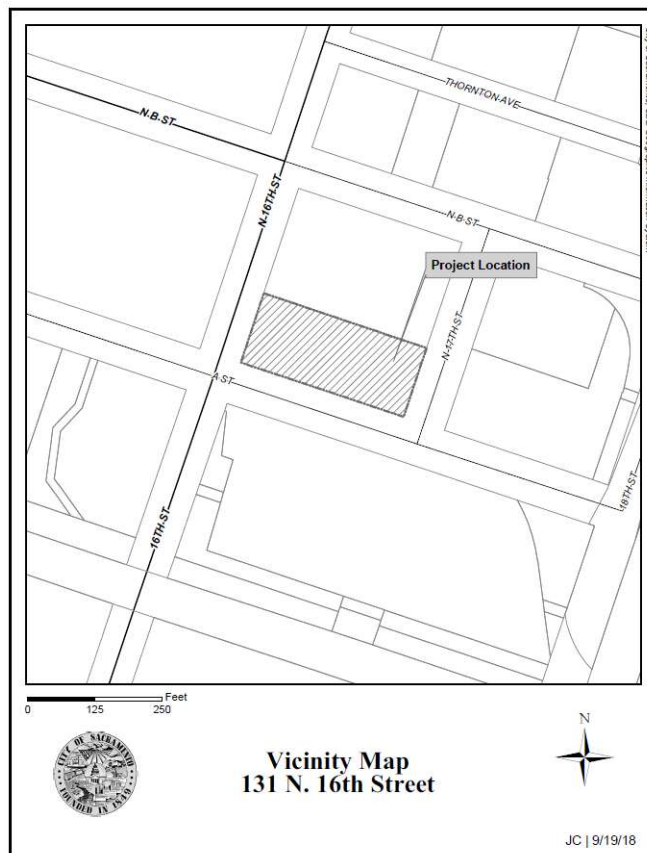


Figure 2: Project Location



Public/Neighborhood Outreach and Comments: Notice of the City Council hearing has been provided to all property owners within 300 feet of the project site, and the site was posted with a notice of the hearing in accordance with City Code. Staff sent hearing notices to The River District, Marshall-New Era Neighborhood Association, Boulevard Park Neighborhood Association, and Preservation Sacramento. Staff has received two comment letters: one opposing the project from Preservation Sacramento, and one supporting the project from The River District (included in Attachment 5).

Policy Considerations: General Plan: The 2035 General Plan update was adopted by City Council on March 3, 2015. The 2035 General Plan's goals, policies, and implementation programs establish a roadmap to achieving Sacramento's vision to be the most livable city in America. Sacramento's 2035 General Plan contains a range of goals, policies, and implementation programs related to supporting business/employment and supporting historic preservation.

The subject site is designated Employment Center Low Rise on the 2035 General Plan's Land Use Diagram. The Employment Center Low Rise (business parks) designation plays an important role in

the city by supporting businesses and providing employment. Additional support uses are anticipated to occur in this zone.

The project is a support use for the Blue Diamond Campus, which supports the following goals and policies of the 2035 General Plan.

Goal ED 1.1 Business Climate - Maintain a supportive business climate that increases the City's ability to retain and expand existing business and attract businesses.

Policy ED 1.1.2 City Image - The City shall maintain and implement the Economic Development Strategy to identify priorities, support prosperity, and improve long-term fiscal competitiveness.

Goal ED 3.1 Land, Sites, and Opportunity Areas - Retain, attract, expand, and develop businesses by providing readily available and suitable sites with appropriate zoning and access.

Policy ED 3.1.1 Land Supply Inventory - The City shall maintain adequate developable sites to meet projected employment needs, including land to satisfy retail, office, and industrial demands.

Goal ED 4.1 Leadership - Provide leadership locally and regionally to achieve the region's economic goals.

Policy ED 4.1.2 Strong City and Business Relationship - The City shall project a helpful, positive and courteous customer service attitude and approach toward businesses.

The above goals relate to supporting businesses that create jobs in Sacramento. The project would be a supportive function of this important employer and therefore consistent with these goals and policies.

The project competes, however, with the following General Plan goals related to historic preservation.

Goal HCR2.1 Identification and Preservation - Identification and Preservation of Historic and Cultural Resources. Identify and preserve the city's historic and cultural resources to enrich our sense of place and our understanding of the city's prehistory and history.

Policy HCR 2.1.11 Compatibility with Historic Context - The City shall review proposed new development, alterations, and rehabilitation/remodels for compatibility with the surrounding historic context. The City shall pay special attention to the scale, massing, and relationship of proposed new development to surrounding historic resources.

Policy HCR 2.1.17 Preservation Project Review - The City shall review and evaluate proposed development projects to minimize impacts on identified historic and cultural resources, including projects on Landmark parcels and parcels within Historic Districts, based on applicable adopted

criteria and standards.

The proposed project is inconsistent with the 2035 General Plan goals and policies listed above related to historic and cultural resource preservation because the project would demolish a contributing resource to the North 16th Street Historic District.

The project also competes with the following goal and policy in the River District Specific Plan:

River District Goal HR1 - Preserve and protect the River District's historic resources and properties.

Policy HR1a - Ensure that historic properties help to enhance and provide a valuable special sense of place in the River District.

Economic Impacts: Not applicable.

Environmental Considerations: The application seeks to delist the A Street Annex Building (131 North 16th Street) as a contributing resource from the Sacramento Register of Historic and Cultural Resources (Sacramento register). The A Street Annex building is currently listed as a contributing resource to the North 16th Street Historic District. The project also includes site plan and design review to demolish 131 North 16th Street and modify the Blue Dimond Growers (BDG) Cold Storage building (121 North 16th Street) by installing three loading docks and rolling doors. Post-demolition improvements to the site of 131 North 16th Street include asphalt paving, parking stalls, ornamental fencing, and landscaping. The site is within the Heavy Industrial (M-2) zone and designated Employment Center Low Rise in the Sacramento 2035 General Plan.

Preservation staff has reviewed the site and relevant reports and concluded that the structure in question should remain a contributing resource to the historic district.

Prior to taking action to approve a project, the lead agency must complete the review required by the California Environmental Quality Act (CEQA). In this case, staff determination that the structure proposed for demolition qualifies as a historic resource (because the building is properly listed on the Sacramento Register) leads to a determination by environmental staff that demolition of the structure would have a substantial adverse effect on the significance of a historic resource, and prior to project approval the City would be required to evaluate this as a significant effect. See CEQA Guidelines section 15064.5(b). This would require preparation of an environmental impact report (EIR). If the mitigation identified in the EIR would not reduce the impact to a less-than-significant level, the City, prior to project approval, would be required under CEQA to identify the "...specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project [that] outweigh the unavoidable adverse environmental effects..." and that make the adverse environmental effects acceptable to the City.

This review is not required if the project is disapproved or rejected. Thus, if the City Council accepts

staff recommendation and denies the request for de-listing, the project request for demolition and site plan and design review could not be approved because the required CEQA review has not been completed. CEQA review is not required for a project that is disapproved or rejected. (PRC section 21080(b)(5); CEQA Guidelines sections 15061(b)(4) and 15270(a); *Las Lomas Land Co., v. City of Los Angeles* (2009) 177 Cal.App.4th 837.)

In the event the City Council disagrees with staff and concurs with the applicant's position that the building should not be listed on the Sacramento Register and is not a historical resource for purposes of CEQA, environmental staff has evaluated the proposed project, as called for in CEQA, to first determine whether the project would qualify for an exemption from CEQA review. (CEQA Guidelines section 15061.)

The proposed project would include demolition of the A Street Annex Building (131 N. 16th Street) and installation of three loading docks at the existing Cold Storage Building (located on the north side of the Annex Building) to improve the ability for trucks to safely maneuver and access the loading docks. The single-story, approximately 38,400 square foot unreinforced masonry building is currently used by the applicant for storing out-of-date packaging.

The City's 2035 General Plan Land Use Map designates the project site as within the Employment Center Low Rise District (FAR: 0.15 - 1.0) (City of Sacramento 2017). The project site is zoned Heavy Industrial (M-2) (City of Sacramento 2014). The project site is bounded by North B Street to the north, North A Street to the south, North 17th Street to the east, and North 16th Street to the west. The current and proposed uses of the structures/site are consistent with the general plan and zoning requirements.

PRC section 21084 called for the Office of Planning and research to identify classes of projects that would not have a significant effect on the environmental and which would, therefore, be exempt from the provisions of CEQA. These "categorical exemptions" include CEQA Guidelines section 15332, covering "infill development" projects, defined as follows:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

Environmental staff has concluded that the proposed project would satisfy the requirements of section 15332:

- a) The City's General Plan designates the project site as Employment Center Low Rise District (FAR: 0.15 - 1.0) and the site is zoned Heavy Industrial (M-2), which permits the manufacture or treatment of goods from raw materials (City of Sacramento 2017, 2014). The proposed project would be consistent with the underlying land use and zoning designation for the project site and development would not require a general plan amendment or rezone.
- b) The proposed project site, including both the area associated with the proposed A Street Annex Building demolition and exterior modifications to the Cold Storage Building, consists of approximately 44,400 square feet, slightly more than one acre. The project site is located within a developed area of the City of Sacramento and is surrounded by urban uses, including industrial, warehouse, and distribution facilities, along with nearby residences, commercial buildings, and a major roadway.
- c) The project site is located in an urbanized area of the city and is surrounded primarily by industrial uses. The majority of the site is paved, with the remainder of the site consisting of gravel/compacted soil areas. Based on a review of aerial maps, vegetation on the project site is limited to eleven mature trees located along the western border of the site adjacent to North 16th Street. The site supports the existing single-story A Street Annex Building, Cold Storage Building, a mechanical equipment staging area, and an associated paved surface parking lot. The site does not contain any significant natural resources, including habitat for special-status plants or animals or wetlands or other waters of the U.S. or state that would be adversely affected by the proposed project. Due to the developed industrial nature of the site and its surroundings, the project site has no value as habitat for endangered, rare or threatened species.
- d) The proposed project would demolish an existing building and construct three recessed loading docks within an existing building to accommodate delivery trucks. During project demolition and construction activities, construction vehicles would add traffic to city streets surrounding the project site, but this increase would be minimal and temporary. Truck trips once the project is completed would not increase; one of the primary purposes of the project is to avoid queuing of trucks at the A Street gate.

Proposed project demolition and construction activities would occur between the hours of seven a.m. and six p.m., Monday through Saturday, and between nine a.m. and six p.m. on Sunday, in accordance with the City's exterior noise standards specified in Chapter 8.68, Noise Control, of the City Code. Construction equipment for project demolition and construction would have suitable exhaust and intake silencers which would further reduce construction noise. The closest sensitive receptors (residences) are located at 1500 North A Street, across North 16th Street

south of the project site. The proposed project is anticipated to result in a small reduction in operational noise levels as compared to existing conditions because the proposed project would improve access to the loading dock area thereby reducing the amount of backing up necessary for trucks to enter and exit the site. As a result, noise associated with existing use of back-up beepers would be reduced due to the proposed project. Thus, the proposed project would not result in noise impacts.

The proposed project would be subject to Chapter 13.16, the Stormwater Management and Discharge Control Code, of the City Code, which includes measures to protect water quality from discharges into the storm water conveyance system. These measures include employee training and best management practices (BMP's) to reduce accidental spills and discharges into the storm water system, source control measures to prevent storm water pollution, and treatment controls to remove stormwater pollutants. The proposed project would comply with the City's Stormwater Management and Discharge Control Code during project demolition. In addition, the removal of the building would not increase the impervious surface area of the site and would not increase the quantity of storm water runoff. Therefore, it would not result in impacts to water quality.

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has established rules and regulations to protect air quality within the region. These include Rule 402 (Nuisance), which restricts discharge of air contaminants that can cause a public nuisance or endangerment, Rule 403 (Fugitive Dust), which regulates fugitive dust emissions from non-combustion sources, Rule 404 (Particulate Matter), which establishes particulate matter emission concentration limits, and Rule 405 (Dust and Condensed Fumes), which limits discharge of dust and condensed fumes through emission rates based on process weight (SMAQMD 2018). The proposed project would be required to comply with the City of Sacramento building demolition permit requirements and all applicable SMAQMD rules and regulations associated with building demolition; therefore, impacts to air quality during project construction, demolition, and operation would be less than significant. As the proposed project would not change or intensify the use of the project site, approval of the proposed project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e) The project site is located in an urbanized, developed area of the city that is currently served by water, wastewater, storm drain, electrical and natural gas facilities. In addition, this area of the city is also served by police and fire services, solid waste removal, schools, libraries and parks. The purpose of the project is not to increase capacity, which could result in an increase in demand on public services. The project site is adequately served by all required utilities and public services and would continue to be so served following project implementation.

The categorical exemptions, including section 15332, are subject to several exceptions:

Cumulative Impact. All exemptions for these are inapplicable when the cumulative impact of

successive projects of the same type in the same place, over time is significant. The proposed project is not combined with other projects at the same location. By improving access to the BDG loading dock area the proposed project is anticipated to reduce noise, air quality, and related impacts associated with the existing truck maneuvering conditions at the project site. Therefore, the proposed project would not contribute to any cumulative impact of successive projects of the same type over time.

Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstance. As discussed above, the project would not result in significant effects for traffic, air quality, noise, air quality or any other technical impact area reviewed under CEQA.

Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. There are no state-eligible or designated scenic highways within the view shed of the proposed project or in the project vicinity (Caltrans 2018). The proposed project is not located near a scenic highway or other feature with aesthetic resources and would have no effect in this regard.

Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. Based on a review of the California Department of Toxic Substances Control (DTSC) EnviroStar database, the proposed project is not located on a site that contains hazardous materials (DTSC 2018).

Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. According to the applicant, the A Street Annex Building should not be treated as a historical resource for purposes of CEQA. The argument is as follows: 1) the building should be removed from the Sacramento register as it lacks historic integrity due to alterations, including alterations done outside the historic district's period of significance, such that the building no longer conveys its historical associations, as explained in the Dudek report (Attachment 8) and the Historic Resource Associates report (Attachment 9); 2) the building is not listed on either the state or national registers; 3) the building should not be treated as historic for purposes of CEQA as it does not meet the criteria for listing under the California Register of Historical Resources due to the lack of historic integrity and therefore the city council should decline to exercise its discretion to treat it as such. As the building is not a historical resource for purposes of CEQA, its demolition cannot result in a substantial adverse change in the significance of a historical resource.

Further, according to the applicant, demolition of the A Street Annex Building will not result in a substantial adverse change in the significance of the North 16th Street Historic District as the project is consistent with the Secretary of the Interior Standards for the Treatment of Historic Properties in

that the introduction of a truck-maneuvering area and loading dock into the industrial historic district is consistent with the features and characteristics identified as significant to the historic district. The proposed design is respectful of the North 16th Street Historic District's character and would complement the industrial context of the district. As the project is consistent with the Secretary of the Interior Standards the project would not result in the substantial adverse change to the significance of a historical resource. (CEQA Guidelines section 15064.5(b)(3).)

Regarding the "piecemealing argument," Preservation Sacramento, in its comment letter (Attachment 12), asserts the project is part of a larger project-the Blue Diamond "Sacramento Campus Plan"-and review of this small portion of the larger campus plan results in improper "segmentation" or "piecemealing" under CEQA. Under CEQA, a public agency may not subdivide a single project into smaller individual subprojects to avoid considering the environmental impact of the project as a whole.

The applicant asserts that review of this project-demolition of the A Street Annex Building and the other site modifications-is not improper segmentation or piecemealing. According to the applicant, the project has independent utility for Blue Diamond operations (increase safety and efficiency in the moving and shipping of products) and it would proceed with this project regardless of whether it eventually chooses to pursue any other activity identified in the campus plan. The applicant has informed staff that the campus plan is a staff planning document that has yet to be approved by Blue Diamond's board of directors and environmental review of the items listed in the document would be premature and speculative. The applicant has not submitted any other component of the campus plan to the City for review and therefore the City has nothing else to review.

Sustainability: Not applicable.

Commission/Committee Action: On August 12, 2018, the Preservation Director issued a determination which found the A Street Annex Building continued to retain enough historic integrity and significance to remain a contributing resource to the North 16th Street Historic District.

On October 17, 2018, the Preservation Commission held a public hearing and passed a motion recommending the city council deny the project. Specifically, the Commission concluded it was inappropriate to delist the Annex Building from the Sacramento register as it continues to meet the criteria for listing as a contributing resource to the North 16th Street Historic District. The Commission further concluded it could not reach a conclusion regarding site plan and design review on the underlying project-the demolition and site improvements-as it lacked sufficient information to make the required findings under City Code section 17.808.180.A.2, related to projects involving the demolition or relocation of a landmark or contributing resource. Further, staff notes that demolition of a historic resource could not be authorized without the preparation and consideration of an environmental impact report.

The Preservation Commission also raised concerns about processing a delisting or site plan and design review application that includes demolition of a contributing resource, unless staff possesses sufficient evidence to support delisting and/or demolishing the building pursuant to City Code section 17.808.180.A.2.

Rationale for Staff Recommendation:

As explained below, staff recommends the city council deny the project. In sum, the A Street Annex Building is currently listed as a contributing resource to the North 16th Street Historic District. Staff has reviewed the building and the City Code's requirements for listing on the Sacramento register and has concluded the building should remain listed as a contributing resource to the district.

1. The City Council should deny the applicant's request to delete the Annex Building from the Sacramento register as a contributing resource to the North 16th Street Historic District.

There are five criteria for listing contributing resources in the Sacramento register, which are provided in City Code section 17.604.210.C. Staff has analyzed each of the five criteria below and determined the resource continues to meet all five of the requirements. Therefore, staff recommends the City Council deny the request to delist the resource. This analysis is based largely on the determination by the Preservation Director provided in Attachment 7.

A. The nominated resource is within a historic district. (City Code section 17.604.210.C.1)

The A Street Annex Building is within the boundaries of the North 16th Historic District. A map of the district boundaries along with images of several of the historic district's contributing resources is provided in Attachment 4. The A Street Annex Building is roughly in the center of the district.

B. The nominated resource either embodies the significant features and characteristics of the historic district or adds to the historical association, historical architectural qualities or archaeological values identified for the historic district. (City Code section 17.604.210.C.2)

The A Street Annex Building is a contributing resource to the North 16th Historic District, which contains several industrial buildings clustered around North 16th Street, north of the Central City. The district was listed on the Sacramento register on February 15, 2011 (Ordinance No. 2011-011, Attachment 6). The original ordinance listing the district stated:

Character-defining features include but are not limited to: Various sized 1 to 2-1/2 story (with high floor to ceiling dimensions) structures, from large footprint warehouse/distribution/manufacturing structures to smaller accessory structures and commercial structures; primarily industrial type with large truck bays and several with concrete loading docks and truck ramps with are primarily located along the east west

streets in the district; also commercial type structures with showroom windows, generally along N. 16th St.; most structures built to property lines and oriented to transportation alignments, whether streets or rail lines, for car, truck and rail related operations, with some exterior walls curving along the rail spur alignments; most east/west streets and rail spur alignments are not developed with standard curbs/gutters/sidewalks/planter strips/street trees since were given over to support uses' transport/loading/unloading functions; many structures exhibit brick exteriors with various types of brickwork and decorative cornices, parapets, blind arches, etc., and while most unpainted, some are painted brick. Buildings with parapets surrounding flat/bowed roofs exhibit various parapet shapes, including stepped, arched and other. Other exterior materials include corrugated metal, reinforced concrete, concrete block, plaster, and wood siding, and several exhibit corrugated metal and Spanish tile roofs. Many with industrial metal sash windows. Interiors of many are large open areas; wood timber truss or metal support structures.

The A Street Annex Building continues to embody the significant features and characteristics of the North 16th Street Historic District. Including many of the features listed above, such as-

- Large footprint warehouse/distribution/manufacturing structure
- Industrial type with large truck bays and several with concrete loading docks
- Built to property lines and oriented to transportation alignments
- Painted Brick exterior with various types of brickwork
- Flat roofs with stepped parapet
- Other exterior materials include corrugated metal, reinforced concrete, concrete block, plaster
- Industrial metal sash windows.
- Interior with large open areas, wood timber truss structures.

C. The nominated resource was present during the period of historical significance of the historic district and relates to the documented historical significance of the historic district. (City Code section 17.604.210.C.3)

According to Ordinance No. 2011-011 (Attachment 6), the period of significance of the North 16th Historic District is 1921 to 1959. The Annex building was constructed in 1926 and therefore was present during the district's period of significance. The building is related to the agricultural product manufacturing and distribution, which relates to the documented historical significance of the North 16th Street Historic District.

D. The nominated resource either possesses historic integrity or is capable of yielding important information about the period of historical significance of the historic district. (City Code section 17.604.210.C.4)

The A Street Annex Building retains historic integrity. Although design alterations to the building have obscured the original design features associated with its early retail produce use prior to the late 1940s, the building retains numerous architectural elements associated with the second quarter of the 20th century when it was constructed. The changes to its design serve to illustrate the association with the food processing, warehousing, and distribution industries documented as part of the district's historic significance.

E. The nominated resource has important historic or architectural worth, and its designation as a contributing resource is reasonable, appropriate and necessary to protect, promote and further the goals and purposes of this chapter. (City Code section 17.604.210.C.5)

As demonstrated above, the A Street Annex Building continues to retain its eligibility for listing on the Sacramento register for the reasons it was originally listed as a contributing resource in 2011 as part of the River District Specific Plan (See River District Specific Plan Historic Resources Survey included in Attachment 5). Specifically, the building is significant for its role in the agricultural processing, warehousing, and distribution industries documented as part of the original district nomination. Keeping the building on the Sacramento register is reasonable, appropriate, and necessary to protect, promote and further goals and purposes of chapter 17.604 of the City Code (related to historic preservation) because the resource continues to meet all of the criteria for designation as described above, the resource is located in the heart of the historic district, and its deletion would create a hole at the center of the district that could potentially jeopardize the documented eligibility criteria of the entire district pursuant to City Code section 17.604.210.B which requires this district be a significant concentration or continuity of buildings unified by past events, and listing the building will ensure any planned renovations will undergo preservation review.

2. The City Council should deny site plan and design review for the demolition of the A Street Annex Building and additional site modifications.

Demolition of a historic resource (here, a contributing resource on the Sacramento register) cannot occur without the preparation and consideration of an environmental impact report. If the council concurs with staff recommendation and agrees that there's not a preponderance of evidence demonstrating that the building is not historically or culturally significant, an environmental impact report (EIR) must be prepared prior to council's consideration of the demolition and additional site modifications. Once an EIR has been prepared, the project and the findings set forth in section 17.808.180.A.2, related to the demolition of a contributing resource, can be considered.

Applicant Recommendation:

According to the applicant, the A Street Annex Building lacks historic integrity and therefore should be removed from the Sacramento Register and the City Council should decline to treat it as a historical resource for purposes of CEQA. The basis of the applicant's argument is the Dudek report

(Attachment 8) and the Historic Resource Associates report (Attachment 9). Specifically, the applicant argues the city council should-

1. Adopt an Ordinance removing the A Street Annex Building from the Sacramento register as a contributing resource to the North 16th Street Historic District and direct the City Clerk to publish the ordinance in full in the official newspaper of the City in accordance with section 32 (d) of the City Charter; and
2. Adopt a Resolution:
 - a. Finding the A Street Annex Building is not a historical resource for purposes of CEQA (CEQA Guidelines section 15064.5(a)(3);
 - b. Finding the project exempt from CEQA review under CEQA Guidelines section 15332 (related to infill development);
 - c. Approving Site Plan and Design Review for the demolition of the A Street Annex Building, asphalt paving, three parking stalls, ornamental fencing, landscaping, and installation of three loading docks with rolling doors on the Cold Storage building at 121 North 16th Street;
 - d. Finding the project site is within an area for which the local flood management agency has made adequate progress on the construction of a flood protection system as defined by state law; and
 - e. Imposing conditions of approval.

With respect to removing the building from the Sacramento Register, the applicant argues the building fails to satisfy two criteria for listing (City Code sections 17.604.210.C.4 and 17.604.210.C.5) as follows:

1. The building lacks historic integrity and is not capable of yielding important information about the period of historical significance of the historic district. (City Code section 17.604.210.C.4.)

According to the applicant, the Dudek report (Attachment 8) and Historic Resource Associates report (Attachment 9) demonstrates the building lacks historic integrity and is incapable of yielding important information about the period of historical significance of the historic district due to alterations, including alterations done outside the period of significance (1921-1959). Among other things, the front elevation has been significantly altered. As originally designed, the front elevation was used as open storefront bays to sell produce. These bays were infilled and the building was reoriented away from 16th Street, which was a significant impact the building's integrity of setting, design, materials, workmanship, feeling, and association, such that it no longer conveys its early associations or original design. Other alterations include the removal of original doors and windows, reconfiguration of fenestration, removal of original awnings, and additions to the northeast elevation. (Dudek report, p. 36.)

2. The building lacks historic and architectural worth, and its designation as a contributing resource is not reasonable, appropriate, or necessary to protect, promote and further the goals and purposes of chapter 17.604 of the City Code. (City Code section 17.604.210.C.5.)

The building is not associated with significant persons, does not constitute a significant example of the work of the architecture firm that designed the warehouse, and it is unlikely to yield any important historical information. Due to the alterations to the building and lack of historic and architectural worth, designating the building as a contributing resource is not reasonable, appropriate, or necessary to protect, promote, and further the goals of chapter 17.604 of the City Code.

Further, the loss of integrity was not the result of any illegal act or willful neglect by the owner or agent of the owner. (City Code section 17.604.210.D.) The modifications were not the result of an illegal act and the building does not suffer from neglect that can be attributed to the owner. The building is in fair condition and alterations to the building occurred prior to its listing as a contributing resource and therefore were largely unregulated and allowed to occur without design review.

The building's lack of integrity, according to the applicant, also precludes the City Council from concluding the building is a historical resource for purposes of CEQA as the building does not meet the criteria for listing on the California Register.

The applicant also asserts the project is consistent with the Secretary of the Interior Standards for the Treatment of Historic Properties and title 17 of the City Code as the introduction of a truck-maneuvering area and loading dock into the industrial historic district is consistent with the features and characteristics identified as significant to the historic district. Further, the proposed design is respectful of the North 16th Street Historic District's character and would complement the industrial context of the district. Finally, the design, layout, and physical characteristics of the proposed development are consistent with all applicable design guidelines and with all applicable development standards for the heavy industrial (M-2) zone.

Financial Considerations: Not applicable.

Local Business Enterprise (LBE): Not applicable.