

Date: January 28, 2025

From: Kris Kiehne, Planning Commission Chair

To: Members of the Placerville Planning Commission

Subject: Placerville Historic District Guidelines for Planning Commission Use during Project Review

We are currently working on our initial phase to enhance historic preservation work in our city. In this phase, we are following the direction from City Council to complete Recommendation 4 (from Oct. 22, 2024 Memo from Planning Commission to Council, and January 7, 2025 response from City Manager's Office) which is to complete a "Systematic Examination of the Current Standard for Review" of the Secretary of the Interior's (SOI) Standards and to create a framework to more clearly guide this Commission in its decision-making process

Background:

1. City of Placerville resources

City Staff have done a tremendous job in compiling information to assist in evaluating historic district projects. The Historic Structure Inventory has been digitized and links to the inventory, relevant ordinances, maps and the SOI Standards all can be found at <https://www.cityofplacerville.org/historic-districts-residential>

2. SOI Standards

When reviewing the current standard of review it is important to keep in mind that the SOI Standards describe a hierarchy of preferences for rehabilitation of historic structures, which is preservation, rehabilitation, restoration and reconstruction. The SOI Standards have always explicitly allowed flexibility in approaches to each level.

Updates and technical briefs regarding the SOI Standards are made from time to time by the Department of the Interior. One technical brief particularly relevant to our work, No. 16, describes the use of substitute materials (<https://www.nps.gov/orgs/1739/upload/preservation-brief-16-substitute-materials-2023.pdf>)

Recommendations:

The introductory paragraph of Technical Brief 16 states in part:

While the use of matching materials to replace historic ones is always preferred under the Standards for Rehabilitation, the Standards also purposely recognize that flexibility may sometimes be needed when it comes to new and replacement materials as part of a historic rehabilitation project. Substitute materials that closely match the visual and physical properties of historic materials can be successfully used on many rehabilitation projects in ways that are consistent with the Standards. [emphasis added.]

Given the information regarding the appropriate use of substitutes and the extensive historic record of using substitute materials which is described in Technical Brief No. 16 (see page 2), it is clearly permissible for the Planning Commission to approve the use of substitute materials for projects in the

residential historic districts of the City. Decisions that were made in the past by the Planning Commission for such projects were correct and justified under the SOI Standards.

To further improve the review and approval process for modifications to structures in the residential historic district, the Planning Commission could draft several standard findings of fact to apply to applications under consideration. These would be similar to other standard findings, for example the finding of exemption from further review under CEQA that is commonly used. The standard findings for historic projects could then be consistently used for approvals, assuring that all applicants are treated fairly. The standard findings could also be readily tailored for projects depending on the context, and other appropriate findings could also be written as needed.

I have drafted some examples of standard findings for your consideration. They incorporate language found in the SOI Standards to bolster confidence in their application.

- The SOI Standards are to be applied in a reasonable manner, taking into account economic and technical feasibility. [Subject Application] replaces [Subject Item] with material which conveys the physical and visual compatibility with the existing materials/context and preserves the distinctive visual features of the existing structure [or the historic feature].
- The overall effect of the project as proposed [or amended if necessary] is consistent with the historic context of the property and the surrounding area.
- The project as proposed is a minimal change to the overall property.
- Placerville is located in a Very High Fire Hazard Severity Zone. The project as proposed uses material(s) which convey(s) the physical and visual attributes of the existing, but is(are) superior in terms of fire resistance.

As the review of the updated SOI Standards proceeds, along with comparison with what other communities in California are doing for historic districts, additional standard findings no doubt will be drafted and all will be refined.

In addition to using consistent findings, the Planning Commission should require that applicants provide high-quality photos of materials that are proposed for use, or better still, actual samples. High-quality photos of current conditions should also be provided for accurate comparison. While some applicants do provide photos, the importance of historic district review requires that the bar be set somewhat higher than what is routinely used.

Additional Considerations

The City Council has also requested that the Planning Commission consider and comment on five specific items (see January 7, 2025 Memo, p2):

- Age of the Structure
- Historic Designation
- Year to Establish cutoff for historic designation
- Wildfire Safety
- Common Concerns of Windows and Siding

Here are my preliminary thoughts on these five elements:

1. Age of Structure

I was not able to identify a range of dates for an era or period of significance for the inventory that was completed for the Placerville historic residential districts. Establishing this era is important so that the Planning Commission knows if an application pertains to what is termed a “Contributing” or alternatively a “Non-contributing” structure. Typically SOI Standards are applied more strictly to Contributing structures than Non-contributing ones, even though the latter do impact the overall feel and aesthetic of a district.

A review of the dates of construction in the current inventory shows a range from 1860 to 1930 in the residential historic districts. Until there is further refinement or a formal definition made for the period of significance, 1860-1930 could be the “working” era that the Planning Commission uses to consider if a structure is Contributing or Non-contributing to a particular district.

2. Historic Designation.

Properties that have been listed as Historic at either the State or Federal level are identified as such in the City’s inventory. Should a project concerning one of these properties come to the Planning Commission, Staff will note that in the report provided for the public hearing.

3. Year to establish cut-off for historic designation.

If the City chooses to conduct another historic inventory, then structures built more recently than 1930 (See “Age” above) could be considered historic but any new inventory must be done by qualified, independent evaluators to ensure accuracy and it should be based on a clearly defined era of significance for the inventory. The best practice is to continue to work with the dates of construction of the existing inventory. Structures that are newer than 1930 but are within the boundary of an existing residential historic district should be considered Non-contributing, which is to say that standards for rehabilitation may be applied in a more lenient manner.

4. Wildfire Safety

As mentioned above, Placerville is located in a Very High Fire Hazard Severity Zone. Roofs, siding, windows, soffits, decks, screening for decks and other architectural features are vulnerable to ignition from embers from wildfires. Suitable findings should be crafted to support the use of materials that are considered more wildfire resilient based on the context of the proposal.

5. Common Concerns

It is true that most proposed projects are for windows and siding replacement. However, rather than develop a checklist of approved materials, I feel that the Planning Commission should evaluate each project in context. This also leaves open the possibility for using improved materials that could be developed in the near future.

There are many other details regarding historic district review that require our attention which the Planning Commission needs to consider in due course. What is presented here is intended to address the first priority identified by the City Council, the review of our current standards.

Thank you for your time and attention. I look forward to hearing your thoughts and continuing to improve our process.