Dear Miriam Lim,

On behalf of Preservation Sacramento and its over three hundred members, I would like to thank you for the opportunity to comment on the Director Hearing regarding the proposed 2508 Capitol Avenue Carriage House Project (PB16-067). Preservation Sacramento is dedicated to protecting Sacramento’s historic places and encouraging quality urban design through advocacy, education, and outreach. Preservation Sacramento’s Board of Directors includes cultural resource professionals, who meet the Secretary of the Interior Standards for History, Architectural History, and Archeology, as well as, concerned citizens from other disciplines and backgrounds (credentials available upon request).

The proposed project involves a request to demolish a barn/garage and replace it with a 3-car garage with 1,094 square feet of living space above. The project is located in the Capitol Mansions Historic District and includes site plan and design review for new construction in a historic district. The Director Hearing scheduled for November 10, 2016 makes this a discretionary project for the purposes of the California Environmental Quality Act (CEQA), but was found exempt from environmental review pursuant to Section 15303 of the CEQA Guidelines, an exemption for new construction or conversions of existing buildings.

In May 2016, City of Sacramento staff retained Historic Environment Consultants to prepare a historical resources survey for the property as part of a demolition permit application (Dev. Code Sec. 17.604.600). The survey report prepared by professionals meeting the Secretary of the Interior Standards for History and Architectural History, concluded the resource (barn/garage) was “eligible for listing in the Sacramento Register under criterion iii, ‘embodies the distinctive characteristics of a type, period, or method of construction.’ [and] for listing in the California Register under the same criterion.” The Preservation Commission adopted a recommendation that this resource be listed on the local register; however, in a split decision in June the City Council rejected the Commission’s recommendation for listing. The record from the Council merely states that the barn/garage structure “upon conclusion failed an Ordinance” for listing on the Sacramento Register.

CEQA requires the Lead Agency to review the project in its entirety so that environmental impacts are not minimized by segmenting larger projects into separate parts. The hearing being held on November 10, 2016 is reviewing both demolition and new construction on the site. Relying on a categorical exemption in this instance is not sufficient given the likelihood of impacts to historical resources pursuant to its definition under CEQA. A resource identified as significant in a historical resources survey (see attached) is a presumptive historical resource, regardless if it is approved for listing on a local register or not (see CEQA Guidelines Section 15064.5(a)(2)). Put another way, a resource identified as significant in a historical resources survey has the same status for CEQA consideration as a resource listed on a local register.
Relying on Categorical Exemption in this situation does not constitute sufficient environmental review pursuant to CEQA Guidelines Section 15300.2 Exceptions, which states: “A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.” Given the resource’s current status as a presumptive historical resource, it continues to retain the same legal historical status until substantial evidence in the record can demonstrate it does not merit consideration. Again, the record merely states, barn/garage structure “upon conclusion failed an Ordinance” for listing on the Sacramento Register. This, along with a 15 minute deliberation, by elected officials with no preservation experience, does not meet the substantial evidence test that requires evidence based on facts be used to support the Lead Agency’s conclusions.

In a recent hearing by the City’s Preservation Commission on October 19, 2016, the Commission deliberated the significance of alley carriage houses and garages to the Capitol Mansions Historic District, the very district in which the subject project is located. The Commission supported the notion that these types of resources are likely significant contributing elements to the character of this district. This precedent would also apply to this unique resource, indicating that the barn/garage as a contributing element to the Capitol Mansions Historic District. To this end, we encourage the Community Development Director to reconsider the level of environmental review being undertaken by this project given the status of the resource and the lack of substantial evidence to the contrary.

If the applicant intends to pursue demolition of this resource, the Lead Agency is required conduct a more robust environmental analysis. It is likely that complete demolition of the resource will require preparation of an Environmental Impact Report (EIR), which would mandate a Statement of Overriding Considerations to satisfy the requirements under CEQA. However, a project that meets the Secretary of the Interior Standards, such as adaptive reuse and appropriate rehabilitation of this resource, would likely result in a less than significant impact and not require an EIR. Thank you for considering our comments.

Sincerely,

Garret Root, President
Preservation Sacramento Board of Directors
Attachment 2: Nomination Forms

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Item # 3

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Other Listings

Review Code Reviewer Date

Page 1 of 4 Resource Name or #: 2508-10 Capitol Avenue – Barn / garage
P1. Other Identifier: Barn/Carriage House

a. Address: 2508-10 Capitol Avenue
City: Sacramento Zip: 95816
b. Address: 2508-10 Capitol Avenue
City: Sacramento Zip: 95816
c. USGS 7.5' Quad: Sacramento West
Date: 1992

Date: 1992

a. Other Locational Data: APNH: 007-0164-005

P2. Location: *a. County: Sacramento
b. Address: 2508-10 Capitol Avenue
City: Sacramento Zip: 95816
c. USGS 7.5' Quad: Sacramento West
Date: 1992

P3a. Description:
The building is an ancillary utilitarian structure located on the alley at the back of the principal residence on Capitol Avenue. The small wood frame building is two stories in height on the west, angling down to one on the east end. The taller rectangular portion is gabled (barn section) and the roof slants down from its eastern wall to a shed roof covering the one story east end (garage section). The building is surfaced with wood shiplap siding on the west and south elevations. The combination gable and shed roof is covered in composition material. The south elevation contains a projecting beam above a closed second floor opening, apparently used to load and store hay. There is a covered joint in the south elevation siding at the east end of the gabled portion, probably where the siding of the barn is butt end against the garage siding on the east. There are door-height openings all along the alley elevation that are covered with corrugated metal doors, all alike. The north elevation contains three windows and two pedestrian doors. There is a window beneath the gable peak, one at the second floor on the east edge of the gabled building, and another taller one just east of that one. There is a man-door beneath the east edge window and another just east of that. The siding of the gabled section, probably the barn and built first, is shiplap. The remaining siding on the north elevation is narrower rustic drop siding. This latter section served as a garage and may have been built just after the barn.

Other than the probable replacement of the alley doors, there are no other visible alterations.

P3b. Resource Attributes: HP2, HP3

P4. Resources Present: Building, Structure, Object, Site, District, Element of District, Other (isolates, etc.)

P5a. Description of Photo:
View to the north

P6. Date Constructed/Age and Source: Historic, Prehistoric, Both

P7. Owner and Address:
Sacramento, CA

P8. Recorded by:
Paula Boghosian, Historic Environment Consultants
5420 Home Court
Carmichael, CA 95608

P9. Date Recorded:
April 2016

P10. Survey Type:
Intensive

P11. Report Citation*: n/a

*These terms consist of required information.

Item # 3
**Building, Structure, and Object Record**

<table>
<thead>
<tr>
<th>Item #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>Barn, garage, storage</td>
</tr>
</tbody>
</table>

*NRHP Status Code: * 5D1

**Resource Address:** 2508-10 Capitol Avenue, Barn/garage

**B1. Historic Name:** n/a

**B2. Common Name:** Barn

**B3. Original Use:** Barn

**B4. Present Use:** Auto garage/storage

**B5. Architectural Style:** Vernacular

**B6. Construction History:** The barn was depicted on the 1915 Sanborn Map and at that time it was designated for both storage and as an auto garage. However, the presence of a hayloft and the associated extended beam, and pulley hook indicate the building was originally constructed as a barn. This would put construction of the barn close to the construction of the house in 1901-03. The garage addition to the barn was built a little later, by 1915.

**B7. Moved?** No

**B8. Related Features:** Residence at 2508-10 Capitol Avenue. Residence was originally built as a single family home in 1901-03 and was converted to a duplex in 1919.

**B9a. Architect:** None

**B9b. Builder:** Unknown

**B10. Significance:**

<table>
<thead>
<tr>
<th>Theme</th>
<th>Area</th>
<th>Period of Significance</th>
<th>Property Type</th>
<th>Applicable Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early 20th Century Residential Construction</td>
<td>Capitol Mansion Historic District</td>
<td>1901-03</td>
<td>Residential</td>
<td>5D1</td>
</tr>
</tbody>
</table>

The house was constructed about 1901-03 and the barn was built around that time, when horses were still the primary means of transportation.

The house and barn were built by Dennis Mannix in 1901-03. Mannix was a well-known plastering contractor who worked on such notable buildings as the federal Post Office (8th and E Sts) and Sacramento’s City Hall. He operated his contracting business from 1880 until he retired in 1911. Starting around 1913 Mannix became the Chief Custodian of Sacramento’s City Hall. He was still working in that capacity when he died in 1916.

Mannix was an important leader in the Sacramento County Democratic party. Although he never held elective office he was appointed Superintendent of Cemeteries, Superintendent of City Streets, and as City Hall Custodian.

From the early 1920s onward the house was occupied by its owner, Antonio Leon, who owned a men’s clothing store at 506 J Street for many years. When Antonio died, his two daughters, Frances and Louise, occupied the dwelling well past 1981.

By the mid-teens, the automobile had mostly eclipsed horse transportation and we can see in the 1915 Sanborn drawing that the barn was then in use for storage and as an auto garage. However, as a reasonably intact former horse barn, the building is a very rare building type to still be found in the Mid-town and the Central District of Sacramento. The building appears relatively intact and is a rare surviving representative of its type. It appears to be eligible for listing in the Sacramento Register under criterion III, “It embodies the distinctive characteristics of a type, period, or method of construction.” It appears to also be eligible for listing in the California Register under the same criterion.

The structure is also a contributor to the Capitol Mansions Historic District.

**B11. Additional Resource Attributes:** HP2, HP4 The barn was an ancillary building to a single family home.

**B12. References:**
- Sacramento Bee, 9-12-1947, p4; 10-19-1926, p1;
- Sacramento City Building Permits
- Sacramento City Directories
- Sacramento Assessor’s Data
- Sanborn Insurance Map 1915

**B13. Remarks:**

**B14. Evaluator:** Paula Bogdanov, Historic Environment Cons.

**Date of Evaluation:** April, 2016
The residence at 2508-10 Capitol Avenue was built in 1901-03 as a single family residence. In 1919 the Leoni family had the house converted into two flats.

The 1915 Sanborn shows the barn/garage in place and half of it is for storage and half for an auto.
Owner provided picture of north elevation of barn.