

**DRC No. 4933-17 Northern Gateway Commercial
September 2, 2020**

Comments pertain to Cultural Resources Assessment dated May 2020.

Completed (Staff Use)	Comment #	Page #	DRC/Staff Comment	Response
	1	NA	Previous evaluations found the gas station eligible for the National Register and the California Register, but the current CRA finds it eligible only for the California Register. The reasoning for this is not clear.	Previous surveys do not include much historical research. When LSA conducted in-depth research it became apparent that the building and site have been altered, although the full extent could not be ascertained. Because of the questions surrounding its integrity, LSA does not believe it meets the National Register threshold. However, because the California Register allows more flexibility in terms of integrity, LSA is recommending it as eligible for the California Register at the local level. The CRA has been revised to explain this more clearly.
	2	NA	The National Register generally does not accept historic properties that have been moved. If the gas station is National Register-eligible, how will its relocation impact its significance? Relocation is also problematic in terms of the California Register, unless the building is in danger of being demolished. Please address this issue.	LSA does not recommend this resource as National Register eligible. LSA does recommend this resource as California Register eligible. The property is being considered for redevelopment, which would result in the demolition of the resource. This is discussed in the CRA.
	3	NA	There are inconsistencies/contradictions regarding the character-defining features (CDFs) and possible alterations. Were Sanborn maps used? Please address.	LSA has revised the CRA to eliminate the inconsistencies and contradictions regarding the CDFs and alterations. No Sanborn map coverage for the project area was found.
	4	NA	The discussion regarding how the proposed orientation of the building impacts its historic significance needs to be	The CRA has been revised to include a much more rigorous analysis of the proposed

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			more robust. Why is the change in orientation not a significant adverse impact?	orientation and discussion regarding why LSA does not consider it a substantial adverse change.
	5	NA	Please address changes to the setting more fully.	The CRA has been revised to include more information regarding the setting.
	6	NA	Are there any other photographs of the building, especially historic photographs, that could be included in the CRA?	Research did not find any other historic-period photographs of the building.
	7	NA	Is there any more information about the siding? The report notes that there is wood siding under the plaster. Do we know what the original siding is?	We do not know what the original siding was.

In addition to changes made to address the DRC comments, the following revisions were made to the CRA.

CRA Section	Page #	Change
Management Summary	i-iv	<ul style="list-style-type: none"> Information added regarding threat of demolition. Discussion regarding integrity and significance evaluation was expanded. The discussion about previous evaluations was completely revised. Additional information about the purpose of the SOIS was added. Additional information about Technical Bulletin 6 was added. Changes were made to some of the mitigation measures. The order of the mitigation measures was changed. Regulatory language for the standard conditions was added.
Methods	10	<ul style="list-style-type: none"> Minor changes were made mostly relating to dates when work occurred.
Results/Archival Research/ Project Area	12-16	<ul style="list-style-type: none"> Information regarding the lack of Sanborn coverage was added.

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		<ul style="list-style-type: none"> 1931 aerial photograph was added.
Results/Archival Research/ Properties Adjacent to 305 South Main Street	16–17	Minor changes for clarification purposes.
Results/Archival Research/ Previous Studies	17	This section was reworked to better explain the previous studies and their evaluations. Additionally, information from the OHP BERD (2020) was included.
Results/Architectural Survey	20–25	Modifications were made to this section to address more fully changes to the building and site that have occurred since the historic period. For example, it now addresses the pump islands and the circulation pattern and provides information about the current setting.
Significance Evaluation/ Evaluation	26–29	<ul style="list-style-type: none"> The summary at the beginning of this section has been revised to include information about the setting and alterations. Criteria A/1 has been revised extensively. Criteria C/3 has been revised. The paragraph after criteria D/4 has been revised to state clearly the different periods of significance under Criteria 1 and 3. A new section addressing the CR consideration for moved buildings has been added.
Impacts Assessment	30	<ul style="list-style-type: none"> Two new paragraphs have been added to explain the intent and purpose of the SOIS.
Impacts Assessment/Character- Defining Features	30–31	<ul style="list-style-type: none"> Information was added regarding the significance under Criteria 1 and 3 and the periods of significance. The list of CDFs was revised.
Impacts Assessment/Project Description	31	The description of the project has been expanded.
Impacts Assessment/Standards for Rehabilitation/Standard 1	33–35	The analysis under this Standard has been extensively revised. It now addresses the relocation in terms of how it impacts the site and environment, including the setting, orientation change, and spatial relationships. Revisions to the mitigation measures recommended under this Standard were also made.

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Impacts Assessment/Standards for Rehabilitation/Standard 2	35	The analysis under this Standard has been extensively revised. The mitigation measure has been revised.
Impacts Assessment/Standards for Rehabilitation/Standard 3	35	The analysis under this Standard has been augmented to address the pump islands, windows, and doors. Minor revisions were made to the mitigation measure.
Impacts Assessment/Standards for Rehabilitation/Standard 4	35–36	The analysis under this Standard has been replaced.
Impacts Assessment/Standards for Rehabilitation/Standard 5	36	The analysis under this Standard has been reworded, but is substantially the same information.
Impacts Assessment/Standards for Rehabilitation/Standard 6	36	No changes.
Impacts Assessment/Standards for Rehabilitation/Standard 7	36	References to the exterior finish were removed from the discussion under this Standard.
Impacts Assessment/Standards for Rehabilitation/Standard 8	36–37	No changes.
Impacts Assessment/Standards for Rehabilitation/Standard 9	37	The analysis under this Standard has been extensively revised.
Impacts Assessment/Standards for Rehabilitation/Standard 10	37	Minor changes have been made to the discussion under this Standard.
Recommendations	38–39	Minor changes were made to this section, some of the mitigation measures were revised, and the order of the mitigation measures was changed.
DPR forms		These have been updated to be consistent with the revised report.