APPENDIX C

Historic Assessment
Proposed Project Analysis Memorandum
603 SUTTER STREET
PROPOSED PROJECT ANALYSIS MEMORANDUM

FOLSOM, CA
[21001]

PREPARED FOR
ENVIRONMENTAL PLANNING PARTNERS, INC.

MARCH 24, 2021
TABLE OF CONTENTS

I. INTRODUCTION .................................................................................................................. 1
   Methodology ..................................................................................................................... 2

II. EXISTING HISTORIC DESIGNATIONS AND HISTORIC SIGNIFICANCE ...................... 3
   Existing Historic Designations ......................................................................................... 3
   Historic Significance ......................................................................................................... 5
   Sutter Street Subarea of Folsom Historic District's Historic Commercial Primary Area ........ 9

III. CEQA PROJECT IMPACT ANALYSIS ........................................................................... 14
   California Environmental Quality Act (CEQA) .................................................................. 14
   Analysis of Proposed Project Impacts and Compatibility .................................................. 16
   Proposed Project Description ......................................................................................... 16
   Project-Specific Impact Analysis .................................................................................... 17
   Compatibility Analysis .................................................................................................... 18
   Sutter Street Subarea Cumulative Impacts Analysis ......................................................... 24

V. CONCLUSION .................................................................................................................... 27

VI. REFERENCES ................................................................................................................... 28
   Published Works & Reports .............................................................................................. 28
   Public Records .................................................................................................................. 28

IX. APPENDIX ........................................................................................................................ 29
I. INTRODUCTION

This Proposed Project Analysis Memorandum has been prepared for Environmental Planning Partners, Inc. at the request of the City of Folsom for the proposed construction of a three-story mixed-use building on an undeveloped lot at 603 Sutter Street (APN 07001110100000). The site is located at the southeast corner of the intersection of Sutter Street and Scott Street in the Sutter Street Subarea of Folsom's Historic District.

Figure 1: Parcel map, showing the location of the proposed project, outlined in red. Source: Sacramento County Assessor's Office. Edited by Page & Turnbull.
The proposed project site is located directly across Scott Street from the National Register-listed Cohn House at 305 Scott Street and immediately adjacent to the historic library building at 605 Sutter Street, both of which are part of Sutter Street Subarea (Figure 2).

METHODOLOGY

This Proposed Project Analysis Memorandum provides a summary of the current historic status and character-defining features of the Sutter Street Subarea, part of the Folsom Historic District’s Historic Commercial Primary Area. This memorandum considers the proposed project in relation to the subarea’s character-defining features. It thereby analyzes the project’s compatibility with surrounding individually listed and individually eligible historic resources, such as the National Register-listed Cohn House at 305 Scott Street and historic library building at 605 Sutter Street, pursuant to the California Environmental Quality Act (CEQA). This memorandum also analyzes project-specific and cumulative impacts of the proposed project to the Sutter Street Subarea of the Folsom Historic District.

For the proposed new development at 603 Sutter Street, Page & Turnbull reviewed the set of drawings prepared by Williams + Paddon, dated December 10, 2020 (as modified through March 5, 2021). These drawings are included in the Appendix. Page & Turnbull also reviewed the Initial Study and Mitigated Negative Declaration for the 603 Sutter Street Commercial Building project (IS/MND) prepared by the City of Folsom in June 2020, Responses to CEQA-Related Comments Received prepared by the City of Folsom Planning Department on July 29, 2020, and Project Description completed in February 2021.
Page & Turnbull staff conducted a site visit to 603 Sutter Street on February 10, 2021 to document character-defining features and existing conditions of the Sutter Street Subarea. All photographs within this report were taken at that time, unless otherwise noted.

II. EXISTING HISTORIC DESIGNATIONS AND HISTORIC SIGNIFICANCE

Existing Historic Designations

The following section examines the national, state, and local historic status currently assigned to two historic resources that are adjacent to the proposed project site: the Cohn House at 305 Scott Street and historic library building at 605 Sutter Street. The site of the proposed project at 603 Sutter Street is an undeveloped lot and has no historic status rating unless otherwise noted below.

NATIONAL REGISTER OF HISTORIC PLACES

The National Register of Historic Places (National Register) is the nation's most comprehensive inventory of historic resources. The National Register is administered by the National Park Service and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

The Cohn House is listed on the National Register of Historic Places. The historic library building at 605 Sutter Street is not listed on the National Register of Historic Places.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places.

Because it is listed on the National Register, the Cohn House is listed on the California Register of Historical Resources. The historic library building at 605 Sutter Street is not listed on the California Register of Historical Resources.
CALIFORNIA HISTORICAL RESOURCE STATUS CODES

Properties listed or under review by the State of California Office of Historic Preservation are listed within the Built Environment Resource Directory (BERD) and are assigned a California Historical Resource Status Code (Status Code) of “1” to “7” to establish their historical significance in relation to the National Register of Historic Places (National Register) or California Register of Historical Resources (California Register). Properties with a Status Code of “1” or “2” are either eligible for listing in the California Register or the National Register, or are already listed in one or both of the registers. Properties assigned Status Codes of “3” or “4” appear to be eligible for listing in either register, but normally require more research to support this rating. Properties assigned a Status Code of “5” have typically been determined to be locally significant or to have contextual importance. Properties with a Status Code of “6” are not eligible for listing in either register. Finally, a Status Code of “7” means that the resource has not been evaluated for the National Register or the California Register, or needs reevaluation.

The Cohn House is listed in the BERD database for Sacramento County with a status code of 1S, meaning an “individual property listed in the NR by the Keeper. Listed in the CR.” The historic library building at 605 Sutter Street is listed in the BERD database for Sacramento County as the Folsom Library with a status code of 6Y, meaning a property “determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or Local Listing.” The most recent update to the BERD database was in March 2020.

CITY OF FOLSOM CULTURAL RESOURCES INVENTORY

In 1998, the City of Folsom adopted the Historic Preservation Master Plan, which created the City of Folsom Cultural Resources Inventory, a list of historic resources in the city that is updated over time. The Cultural Resources Inventory, including registration forms, is kept by the City of Folsom Community Development Department.

The Cohn House at 305 Scott Street and historic library building at 605 Scott Street are listed on the City of Folsom Cultural Resources Inventory.

---

3 Ibid. Page & Turnbull found a discrepancy with the address listed for the library building on Sutter Street. The library is listed in the BERD database as 607 Sutter Street, Folsom Library, but its actual location is at 605 Sutter Street.
Historic Significance

COHN HOUSE

The Cohn House property was listed on the National Register in 1982. The following physical description and summary of its historic significance is excerpted from the resource's National Register nomination form:

The 100' x 140' property contains essentially four structures: the large 1890's house; the original 1860's house and barn, attached to the later house and serving as its kitchen/service area; and a small outbuilding in the garden to the north of the house.

The original house on the property was built in the 1860's along with the barn, which is attached to the rear of the building. The two buildings are one-story wood frame structures with gabled roofs. The house contains windows with four lights over four and is constructed of shiplap siding. Posts with modest molding decoration support the porch. The barn building at its rear is also gabled and surfaced in shiplap. [...]

In the mid-1890's, the large Queen Anne style house was built adjacent to the original house and barn. This new house was consciously designed and built to incorporate the original house which was then remodeled on the interior to serve as the family kitchen. The later building was connected to the original house by a one-story passageway.

The 1890's house is a two and a half story building with a full story basement at the rear and a tower that extends an additional story above the second floor. The building is formed principally of two intersecting gables with the tower projecting from the inside corner of their intersection. A shallow gabled bay projects to the northwest from the facade gable, and a three story wing with a truncated gabled roof extends from the rear of the building. The two story gable on the southeast contains a projecting square bay on the first floor with decorative woodwork at the cornice.

The foundation of granite block extends to one story in height at the rear forming a basement. The porch wraps almost around three sides of the house and contains a delicate spindle work frieze below the canopy, punctuated by small pedimented gables on the west and southwest elevations, and supported by delicately proportioned and turned columns. The first floor of the house is surfaced with shiplap siding while the upper floors employ fish scale shingles. The tower contains different window types and styles including two large arched and multipaned openings, and a
row of smaller rectangular windows that encircle it beneath the pyramidal roof. A finial tops the composition. The asymmetrical design, surface treatment, and essential form of the building derives from the Queen Anne style. However there are influences of Stick, Shingle and Classical Revival styles incorporated into the design as well. The structure is in good condition. [...] 

Built in the mid-1890's, the Cohn House is a particularly fine local representative of late 19th century residential architecture. The complex juxtaposition of forms and the great variety of architectural detail of this Queen Anne style structure establish its fine design qualities. Its large size and impressive siting on a hill overlooking the town and valley below add to its visual importance. Derived from a published architectural "pattern book", the design of the building reflects the widespread and established practice of building according to published designs. The two buildings still incorporated into the larger house represent a rare vestige of working class housing of the city’s earliest decades.

The structure also possesses some historic values through its associations with owner-builder Simon Cohn's son-in-law Phillip, a resident, who served in the California State Senate from 1912-1920. Phillip was a highly prominent local businessman and member of the Jewish community.5

5 Cohn House National Register of Historic Places Registration Form, entered January 21, 1982, 4-5.
Figure 2: The Cohn House, view northwest from Scott Street.

Figure 3: 1860s barn and house at the rear of the Cohn House property, view southwest.

Figure 4: The garden and gazebo at the southwest corner of the Cohn House property. The 1890s house is at the far right.
HISTORIC LIBRARY BUILDING

According to the listing in the Folsom Cultural Resources Inventory, the historic library building at 607 Sutter Street was constructed around 1915. It consists of a one-story wood frame building with a simple rectangular floor plan and a front-facing gable roof with wide overhanging eaves and exposed rafter tails. The front, northwest façade has a full-width porch; both the building and porch supports are clad with painted wood shingles. Non-original windows and doors at the front façade are surrounded by molded wood trim, and modern concrete stairs extend up the steep sloping grade of the site to the front porch from Sutter Street.

Figure 5: The historic library building, view southeast from Sutter Street.
Sutter Street Subarea of Folsom Historic District’s Historic Commercial Primary Area

On February 18, 1964, City of Folsom Ordinance 192 was adopted, establishing the Folsom Historical District and suggesting appropriate land uses and architectural design review of buildings therein. The City Council declared:

...the general welfare and prosperity of this City is in part due to the native style of architecture and unique character of the downtown area; that such a distinctive type of architecture is a valuable resource to tourism and the economic stability of the City; and that it is the intention of the Council to conserve the style, herein called “Frontier Style Architecture,” and to require general conformity to its characteristic elements in new construction, remodeling, and reconstruction within the boundaries of the “Folsom Historical District.”

---

6 City Council of the City of Folsom, Ordinance No. 192, February 18, 1964.
According to the ordinance, the Historical District boundaries were defined as:

Beginning at the intersection of the centerline of Reading Street with the Lake Natoma State Park lands, proceeding thence northeasterly along the boundary of said State Park lands to the easterly line of the Rainbow Bridge Road; thence southerly along the eastern boundary of said road to the projected extension of a line located midway between Scott Street and Bridge Street; thence southeasterly along said line to the centerline of the alley between Sutter Street and Figueroa Street; thence southwesterly along said centerline to the point of the beginning. 

The Historic District Zoning set up a Historical Committee that made recommendations to the Planning Commission on any plans for construction within the Historic District zone and made design review decisions on signs on Sutter and Leidesdorff Streets. The design guidance called for the use of “frontier style architecture” on these streets.

In 1966, the City of Folsom General Plan mapped a list of sites of historical interest in Folsom. In 1985, the General Plan was being updated and a proposal was made to give local historic status to the original 98-block area of Folsom surveyed by Theodore Judah in 1855. The General Plan of 1985 called for the preparation of a Historic District Specific plan for this 98-block historic area.

A committee consisting of representatives of stakeholder organizations was formed to create a Historic District Specific Plan for the 98-block historic area. The first meeting of the Historic District Specific Plan Committee was held on February 10, 1992. After approximately six years, the draft Historic District Specific Plan was presented at public hearings. Due to public concern over the introduction of required design review for historic properties, the Historic District Specific Plan was not adopted. A compromise was made which transformed the Specific Plan into the Folsom Municipal Code (H-D) Historic District Ordinance (Chapter 17.52) and the City of Folsom Historic District Design and Development Guidelines (October 1, 1998). The Historic District Ordinance adopted in 1998 effectively updated the original Historic District zoning dating from 1964.

The Historic District Ordinance also further divided the Folsom Historic District into primary areas and subareas. The proposed project is located within the Sutter Street Subarea of the Historic Commercial Primary Area. The Sutter Street Subarea encompasses the original historic district around Folsom’s central business district that was first established in 1964. The geographic boundaries of the Sutter Street Subarea are described in section 17.52.160 of the Historic District Ordinance:

---

7 Ibid.
Beginning at the intersection of the centerline of Scott Street with the west boundary of the Riley Street right-of-way, proceeding south along the west boundary of the Riley Street right-of-way to its intersection with Leidesdorff St.; thence northerly and westerly along the southern boundary lines of state park lands to the eastern boundary of the railroad/Folsom Boulevard transportation corridor right-of-way line; thence southerly along said boundary to and including the deck structure above the railroad/Folsom Boulevard transportation corridor right-of-way at Leidesdorff Street; thence southerly to the intersection of the western boundary of the railroad/Folsom Boulevard transportation corridor right-of-way with the center-line of the alley lying between and parallel to Sutter and Figueroa Streets, proceeding along the alley to a point between APN 070-0113-003 and APN 070-0113-004; thence northerly along the boundary line to the centerline of Sutter Street; thence northerly along the boundary line between APN 070-0062-014 and APN 070-0062-013 to the center line of the alley lying between and parallel to Sutter and Leidesdorff Streets; thence northerly along the boundary line between APN 070-0062-003 and APN 070-0062-004 across Leidesdorff Street to the boundaries of state park lands and Riley Street; and thence northerly along the east boundary of the Riley Street right-of-way to the point of beginning.9

In March 2008, Page & Turnbull prepared a Historic Assessment and Project Evaluation report for City of Folsom Streetscape Improvements. Page & Turnbull evaluated the Sutter Street Subarea (called the Sutter Street Historic District in the report) for listing on the California Register. The report found that the Sutter Street Subarea “is significant under Criterion 1 (Events) as the commercial downtown of Folsom which served as the City’s commercial, social, and cultural center between the 1860s and 1950s, and under Criterion 3 (Architecture) as a group of representative buildings that exemplify the vernacular commercial building styles popular in Folsom between the 1860s and 1950s. However, the Sutter Street Historic District does not retain integrity of design, materials, and workmanship, and does not retain sufficient integrity to portray its historic significance. Therefore, the district is not eligible for listing in the California or National Registers.”10

The Sutter Street Subarea is listed in the Folsom Cultural Resources Inventory as the Sutter Street Commercial District.

---

Figure 7: 1855 map of Folsom by Theodore Judah. The proposed project site is marked with a red star. Source: California State Library. edited by Page & Turnbull.

Figure 8: Map of the Folsom Historic District and subareas. The approximate location of the proposed project is marked with a white star. Source: City of Folsom. Edited by Page & Turnbull.
The Historic District Design and Development Guidelines do not list the character-defining features of the Folsom Historic District or any of its subareas, including the Sutter Street Subarea. For the purpose of this Proposed Project Analysis, Page & Turnbull has developed the following list of character-defining features of the Sutter Street Subarea, based on the Folsom Streetscape Improvements Historic Assessment Report (dated March 2008) and a site visit on February 10, 2021.

The character-defining features of the Sutter Street Subarea include, but are not limited to:

**Buildings**

**Massing and Form**
- Commercial and mixed-use building footprints typically fill the width of the parcel and have tall, narrow massing
- Commercial and mixed-use buildings typically with flat, stepped, or Mission style parapets or false fronts in front of flat or gabled roofs
- Residential buildings with gabled or hipped roofs

**Size, Scale, and Proportion**
- Typically one- or two-story buildings with regular, rectangular floor plans
- Frontages of commercial and mixed-use buildings typically between 25 and 50 feet wide

**Materials**
- Buildings clad with traditional materials – such as wood siding, brick, stone, plaster, or stucco – with the highest quality materials and ornamentation facing Sutter Street
- One primary cladding material used on facades facing Sutter Street

**Fenestration**
- Traditional commercial storefront elements, such as fixed ground-floor display windows, arched or rectangular transom windows, and some recessed entries and bulkheads
- Pedestrian-scaled entries
- Wood panel front doors with integrated glass
- Operable tall, narrow wood sash windows, some with arched or segmentally arched profiles, especially at upper floors

**Design Features & Architectural Details**
- Coverings (i.e. awnings, canopies, or balconies) with narrow wood supports or columns; coverings at commercial and mixed-use buildings along Sutter Street typically cover the majority if not all of the sidewalk
- Details consistent with architectural style of the individual building, such as wood spindlework, brackets, and molded window trim on Italianate and Queen Anne style buildings; red clay tile roofs and decorative inlaid tiles on Spanish Colonial Revival buildings;
pilasters and dentilled cornices on Neoclassical buildings, and wide eaves with exposed rafter tails on Craftsman style buildings

**Streetscape and Other Features**

- Commercial and mixed-use development south of Scott Street; residential development north of Scott Street
- Commercial and mixed-use building footprints are set with minimal or no setback from the sidewalk, creating a continuous wall frontage along Sutter Street
- Single-family residential buildings typically have landscaped set back from the sidewalk
- Width of street right of way
- Ascending slope of Sutter Street from the southwest to northeast
- Approximate 10-foot sidewalk width
- Change in grade from the street level to raised sidewalk level
- Granite curbs
- Granite stair at the northeast corner of Sutter Street and Wool Street
- Concrete sidewalks with concrete stamps, used by concrete contractors as a means of advertising and dating their work
- Railroad turntable
- Railroad tracks and alignments

**III. CEQA PROJECT IMPACT ANALYSIS**

**CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

The California Environmental Quality Act (CEQA) is state legislation (Pub. Res. Code §21000 et seq.) that provides for the development and maintenance of a high-quality environment for the present-day and future through the identification of significant environmental effects. CEQA applies to "projects" proposed to be undertaken or requiring approval from state or local government agencies. “Projects” are defined as “activities which have the potential to have a physical impact on the environment and may include the enactment of zoning ordinances, the issuance of conditional use permits and the approval of tentative subdivision maps.” Historic and cultural resources are considered to be part of the environment. In general, the lead agency must complete the environmental review process as required by CEQA. In the case of the proposed project at 603 Sutter Street, the City of Folsom will act as the lead agency.

---


12 Ibid.
According to CEQA, a “project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment.”\(^{13}\) Substantial adverse change is defined as: “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired.”\(^ {14}\) The significance of an historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance” and that justify or account for its inclusion in, or eligibility for inclusion in, the California Register.\(^ {15}\) Thus, a project may cause a substantial change in a historic resource but still not have a significant adverse effect on the environment as defined by CEQA as long as the impact of the change on the historic resource is determined to be less-than-significant, negligible, neutral or even beneficial.

In completing an analysis of a project under CEQA, it must first be determined if the project site possesses a historical resource. A site may qualify as a historical resource if it falls within at least one of four categories listed in CEQA Guidelines Section 15064.5(a). The four categories are:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.).

2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1 (g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource

---

\(^ {13}\) CEQA Guidelines subsection 15064.5(b).

\(^ {14}\) CEQA Guidelines subsection 15064.5(b)(1).

\(^ {15}\) CEQA Guidelines subsection 15064.5(b)(2).
meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Pub. Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Pub. Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Pub. Resources Code sections 5020.1(j) or 5024.1.

In general, a resource that meets any of the four criteria listed in CEQA Guidelines Section 15064.5(a) is considered to be a historical resource unless “the preponderance of evidence demonstrates” that the resource “is not historically or culturally significant.”

The existing property at 603 Sutter Street does not qualify as a historic resource under any of the above categories. The Sutter Street Subarea does qualify as a historic resource, as described under Category 2, because it is listed in a local register of historical resources, the Folsom Cultural Resources Inventory.

ANALYSIS OF PROPOSED PROJECT IMPACTS AND COMPATIBILITY

This section analyzes the proposed project impacts, as required by the CEQA. Because the project site at 603 Sutter Street is an undeveloped lot and is, therefore, a non-contributing resource within a historic district, the project site itself is not considered a historic resource. Consequently, the analysis will focus on potential impacts to the surrounding individual historic resources and the Sutter Street Subarea. Subarea-wide cumulative impacts, which include the proposed project as well as any other recently completed or known future projects, will also be evaluated.

Proposed Project Description

The following description of the proposed project is based on architectural drawings prepared by Williams + Paddon Architects dated December 10, 2020 (as modified through March 5, 2021). These architectural drawings are included in the Appendix.

The proposed project plans to develop a 7,408-square-foot undeveloped lot at the southwest corner of Sutter Street and Scott Street in the Sutter Street Subarea of the Folsom Historic District into a

---

16 CEQA Guidelines subsection 15064.5(a)(2).
three-story, mixed-use building with retail and office space. The total square footage of the new building, including decks, is 13,009 square feet.

The site of the proposed project slopes down from Scott Street toward Riley Street. To address this sloping grade, a lightwell with a concrete retaining wall and decorative iron railing will be excavated around the northeast side of the proposed new building, where the slope is at its highest point. As a result, while the building will appear to be three stories tall facing Sutter Street, only two stories will be visible above grade facing Scott Street, and only one story will be visible facing an adjacent single-family residence to the southeast.

The proposed new building will have a generally rectangular floor plan with a curved corner facing the intersection of Sutter Street and Scott Street and a flat roof with a stepped parapet. The southwest and northeast corners of the facades facing adjacent properties along Sutter Street and Scott Street are set slightly back from the street. At the third-floor level, the north and east facades step back almost six feet from the facades of the floors below.

The building will have a concrete base. The first and second floors of the north façade, facing Sutter Street, will feature brick veneer cladding and a dentilled brick cornice that wraps around to the north half of the east and west facades. The third floor, south half of the east and west facades, and the rear (south) façade will be clad with horizontal cement fiber siding made to look like wood and will feature a profiled wood cornice. Upper-story windows consist of operable single-hung, multi-lite painted aluminum windows of a variety of configurations with painted wood trim. Windows at the second-floor level have concrete sills.

The first floor of the building will contain a trash room and three retail units with entries facing Sutter Street. A small patio or dining area will be located in the lightwell at the northeast corner of the site. An entry located in the recessed west end of the façade will be covered with a wood balcony structure that extends over the sidewalk. Entries to the retail units to the east will be covered by a corrugated metal awning with a painted steel structure. The second floor of the building will contain an open office area and a 300-square-foot balcony at the northwest corner, facing Sutter Street. The third floor will contain additional office space, a rear mechanical equipment well, and a 1,528-square-foot rooftop deck. The northwest corner of this deck will be covered by a corrugated metal awning. Mechanical equipment and an elevator enclosure will be located on the roof.

**Project-Specific Impact Analysis**

The proposed project includes the construction of a new mixed-use building at the northeast end of the locally designated Sutter Street Subarea of the Folsom Historic District. The proposed project will
occur on an undeveloped lot and, thus, does not include the demolition or physical alteration of any individual historic resources. Therefore, the construction of a new building does not represent a direct project-specific impact to a historic resource.

Compatibility Analysis

COMPATIBILITY OF PROPOSED PROJECT WITH NEARBY INDIVIDUAL HISTORIC RESOURCES

The following section analyzes the impacts of the proposed project on nearby identified individual historic resources. The proposed project is evaluated in terms of its compatibility with the nearby historic resources using Standard 9 of the Secretary of the Interior’s Standards for Rehabilitation as a guiding principle, which reads: “New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.”

The proposed project differs in scale, massing, materials, and design from those of the Cohn House and historic library building. Unlike the Cohn House and library building, which have generous setbacks and greenspace, the proposed new building has a much larger footprint that fills nearly the entirety of the parcel and is minimally set back from the public right-of-way. The three-story building exhibits wide, horizontal massing and a flat roof in contrast to the tall, narrow massing and gabled roofs of the Cohn House and smaller, boxy massing of the library building. Subtle setbacks at the northwest end of the north façade and southeast end of the east façade provide some visual relief between the minimal setback and larger massing of the proposed new building and the deeper setbacks and one-story massing of the library building and an adjacent house at 305 Scott Street. Although this massing is inconsistent with the individual massing of the Cohn House and library building, it is consistent with the larger massing, continuous wall faces, and lack of front or side setbacks that are typical of the historic commercial and mixed-use buildings that characterize the majority of the Sutter Street Subarea to the southwest. The design of the proposed new building, thus, reflects the historic character of its immediate setting along the primarily commercial Sutter Street corridor where the street begins to transition to smaller historic residential development at the north end of the Sutter Street Subarea and into the adjacent Figueroa Subarea. Therefore, the difference in massing between the proposed new building, Cohn House, and library building, does not detract from the integrity of the historic setting of the adjacent historic resources.

At three stories tall and tucked into the sloping grade of the project site, the proposed building’s height provides a smooth transition from the small, one-story height of the library building to the
essentially three-story Cohn House at the top of the hill with its tall, visually dominant turret. The first two stories of the proposed new building roughly align with the ridge height of the adjacent library building; the setback of the third story from Sutter Street and Scott Street and its increased step back immediately adjacent to the library building minimize the appearance of the building's third story and give the impression of a smaller two-story building from the street level. Due to the sloping grade of the side, the building appears as a two-story building at its east façade, facing the Cohn House, and as a one-story building at its south façade, facing an adjacent, non-historic residence at 306 Scott Street. Thus, the building's height is compatible with the height of the neighboring historic resources and their immediately surrounding setting.

The materials of the proposed new building, while different from those of the Cohn House and library building, are compatible with the mix of materials that are displayed on historic commercial and residential buildings along this section of the Sutter Street Subarea. The Cohn House and library building are both wood framed buildings with wood cladding, wood window and door trim, wood porch supports, wood ornamentation, and shingled roofs. The proposed new building, on the other hand, features brick veneer cladding on the first two floors; horizontal cement fiber siding on the set-back third story; a mix of steel and wood balcony and awning structural systems; and corrugated metal roofing. The use of wood balcony supports at the northwest corner of the building is compatible with the wood cladding and materials of the Cohn House and historic library building. Although it is not made of wood, the use of horizontal cement fiber siding on the recessed third story will be designed to visually appear like wood. Thus, this material will be compatible with the historic materials in the subarea while being clearly differentiated from them. This horizontal cement fiber siding will also cover the entirety of the south façade that faces an adjacent residential property at 306 Scott Street and roughly three-quarters of the east façade facing the Cohn House, softening the transition between the new building and the primarily wood materiality of the adjacent historic resources. Although the brick veneer cladding on the first two stories of the new building is inconsistent with materials of the immediately adjacent historic resources, it reflects similar masonry facades of several historic commercial and mixed-use buildings on blocks of the Sutter Street Subarea to the southwest of the project site. Thus, similar to the discussion on massing, the use of varied materials on the proposed new building is compatible with the mixed commercial and residential character of the immediately surrounding block and does not detract from the integrity of the neighboring individual historic resources' setting.

Perched on a large, elevated parcel on a hill at the corner of Sutter and Scott streets, overlooking the rest of the Sutter Street Subarea to the southwest, the tall 1890s house at the Cohn House property is a visual landmark that characterizes views at the northeast end of the Sutter Street Subarea as it transitions to the primarily residential Figueroa Subarea to the north and east. The library building, which is diminutive in size and generously set back from the street, generally recedes into the
background and does not present a prominent visual focal point of the streetscape. Although the proposed project will obstruct some views of the Cohn House from the far south end of Sutter Street closer to Riley Street, other taller new developments at 604 and 607 Sutter Street have already affected views of the property as well as the historic library building. Both resources will remain visible from the middle of the block as one travels north along Sutter Street and when looking from Scott Street to the north and south. The three-story height of the new building and its siting into the sloped grade of the lot, as well as the unimpacted garden at the northwest side of the Cohn House property, allow the Cohn House to maintain its visual dominance at the top of Sutter Street.

Although the proposed project is larger in scale than these two specific buildings and differs in its use, massing, materials, and design, these differences reflect the mixed commercial and residential character and variety of historic and non-historic buildings of the immediately surrounding blocks of the Sutter Street Subarea. Based on the above review, the proposed project would not cause a significant impact that would affect the ability of the two individual historic resources to convey their historic significance.

COMPATIBILITY OF PROPOSED PROJECT WITH THE SUTTER STREET SUBAREA OF THE FOLSOM HISTORIC DISTRICT

The proposed project would be located within the boundaries of the Sutter Street Subarea of the Folsom Historic District. The proposed project is located at the southeast corner of Sutter Street and Scott Street at the northeast periphery of the subarea. At this peripheral location, the character of the subarea shifts from predominately commercial development along Sutter Street to the southwest to predominately residential development to the north and west. As described in the previous section, the National Register-listed Cohn House is situated to the northeast of the project site across Scott Street, and the locally listed historic library building is located immediately adjacent to the project site at 605 Sutter Street. Recent mixed-use infill buildings have been constructed directly across from the project site at 604 Sutter Street and next to the library building at 607 Sutter Street. Thus, the proposed building will be located at the edge of the district, surrounded by a mix of historic and non-historic buildings and result in the replacement of an undeveloped lot in the subarea with a new infill building. Due to the peripheral location of the proposed project, the effect of moderate incompatibility issues on the overall historic character of the district would be expected to be minimal.

The following discussion analyzes the proposed project’s compatibility with the character-defining features of the district, as described in Section II, as well as Standard 9 of the Secretary of the Interior’s Standards for Rehabilitation.
Massing and Form:
The proposed building at 603 Sutter Street will adhere to some characteristics of form and overall continuity of the surrounding Sutter Street Subarea. Like the majority of historic buildings in the subarea, the proposed new building has a flat roof with a stepped parapet wall; however, its wide horizontal massing contrasts with the tall, narrow massing that is typical of historic buildings in the subarea. Brick pilasters and the use of subtle setbacks at the northwest end of the north façade and southeast end of the east façade break this larger massing into narrower volumes that are more consistent with the narrow massing of subarea's historic buildings. A curved corner at the intersection of Sutter and Scott streets is a departure from the regular, rectilinear forms of the surrounding historic buildings that subtly differentiates the new building from the old. The height of the building is discussed in the following section.

Size, Scale, and Proportion:
The proposed project shares some elements of scale and proportion with the Sutter Street Subarea. The building will have approximately 94' of frontage on Sutter Street. While this is much wider than the typical 25- or 50-foot frontages of historic buildings in the subarea, the use of a setback at the northwest corner of the north façade along Sutter Street and slight variation in the detailing of the brick veneer cladding breaks the façade into a roughly 30-foot frontage and 64-foot frontage, more in line with the scale of frontages at historic buildings.

The building will be composed of three stories and will be 35 feet tall to the roof surface and 39 feet tall to the rooftop parapet. While most of the historic buildings within the subarea are one or two stories tall, the prevalence of parapet walls and taller floor-to-ceiling heights create the appearance of buildings that are taller than two stories. The height of the proposed building meets the 35-foot maximum allowable zoning height for buildings in the Sutter Street Subarea, as well as the 15-foot maximum height allowance for architectural features above the building height. The visual impact of the height of the new building is minimized by setting back the third story volume and using a different exterior cladding that is of a lighter color and material than the heavy brick masonry veneer of the first two floors. This makes the building appear as a two-story building from Sutter Street, even though it is taller. The size of the building is further mitigated by setting it down into the sloping grade of the site, which allows the building to appear as a two-story building at its east façade, facing Scott Street, and as a one-story building at its south façade, facing an adjacent property at 306 Scott Street. In summary, despite the difference between the wide, horizontal massing and slightly taller height of the proposed building from historic buildings in the subarea, the proposed project will be generally compatible in scale and proportion to the overall character of the surrounding historic district and one- to two-story heights of historic buildings in the subarea.
Materials:

The proposed building will be clad in a mix of brick veneer and horizontal cement fiber siding. Brick veneer will cover the first and second floors of the north façade and north portions of the east and west facades, while horizontal cement fiber siding that is made to look like wood will be used on the third floor, south façade, and south portions of the east and west facades. Windows will have aluminum sashes painted to match painted wood trim. An awning across the north façade will be supported by a painted steel structure and corrugated metal covering, while a balcony at the west end of the north façade will be supported by a wood structure. The balcony and third-story deck will have iron railings.

Though historic buildings in the Sutter Street Subarea typically display one primary cladding material facing the street, the use of brick veneer and horizontal cement fiber cladding that imitates the appearance of wood reflects the use of brick or wood siding on the majority of commercial and mixed-use buildings in the subarea. Historic residential buildings directly to the north and west of the project site are predominately clad with wood siding, and the use of horizontal cement fiber siding that looks like wood on secondary and rear facades presents a compatible but differentiated solution that softens the transition from the masonry construction of buildings along Sutter Street to the adjacent residential buildings and neighborhood. Although the fenestration, awnings, railings, and balconies display a mixture of contemporary and traditional historic materials, because the overall form, scale, function, placement, and configuration of these features is generally in keeping with those of historic buildings in the subarea, they reflect a compatible but differentiated interpretation of these characteristic features.

The texture of materials in the Sutter Street Subarea is generally rough and varied, consisting of raw and painted brick, wood, granite, and decorative wood embellishments that introduce additional texture to wall surfaces and architectural features. These surfaces are periodically broken up by smooth panes of glass windows. The brick veneer cladding of the proposed new building maintains the rough texture of the Sutter Street Subarea. While the unpainted brick veneer cladding reflects this roughness, the painted steel structural elements, iron balcony railings, and aluminum windows have a smoother texture than their historic counterparts. Overall, however, these smoother textures are limited to a small proportion of the exterior of the building and do not detract from the rich and varied texture that characterizes the Sutter Street Subarea. Rather, this smoothness of these features provides a subtle differentiation between the new building and surrounding historic buildings.
Fenestration:
The fenestration of the proposed project is generally compatible with the fenestration of historic buildings in the Sutter Street Subarea, though there are some differences. Historic commercial and mixed-use buildings along Sutter Street typically have ground-floor storefronts with fixed wood or steel frame display windows, glazed wood doors, and transom windows; some have bulkheads or recessed entries. Fenestration on the upper floors of these buildings, as well as all floors of historic residential buildings in the subarea, primarily consist of regularly spaced tall, narrow windows with operable wood sashes and molded wood trim.

Fenestration of the proposed project differs somewhat in material from the fenestration of historic buildings in the Sutter Street Subarea but is generally compatible in overall form, pattern, and scale. The new building will have a system of aluminum windows with painted wood trim. Windows on the first floor of the new building's north façade will be aluminum, but they include many traditional storefront features – such as glazed doors, fixed display windows with bulkheads, and transom windows – thus reflecting a contemporary interpretation of historic commercial storefronts in the subarea. Upper-story windows will also be aluminum and will have operable single-hung sashes that are tall and narrow in form, consistent with the operability, form, and scale of windows in the subarea. As such, although the sash material and detailing of fenestration at the proposed project differ from those of historic buildings, in general, they are compatible with the fenestration that characterizes the Sutter Street Subarea.

Design Features & Architectural Detail:
The proposed building offers a contemporary interpretation of the design of historic commercial and mixed-use buildings that were constructed along Sutter Street during the mid- to late nineteenth century. The brick veneer cladding is ornamented with a dentilled brick cornice that references similar brick cornices on historic buildings in the subarea and other Gold Rush-period towns. The building also has a simple, stepped parapet, similar to the false fronted buildings with street-facing parapet walls that line Sutter Street. Covered awnings that extend over the sidewalk, some of which also act as second-story balconies, are characteristic of the Sutter Street Subarea. The proposed new building features an awning, balcony, and rooftop deck that are similar in function, scale, and design to those of historic buildings, though, as previously discussed, they differ in materials. The curved corner at the intersection of Scott and Sutter streets, meanwhile, introduces a more modern element to the building's design; however, because it is only visible from secondary vantage points, it does not detract from the overall appearance and continuity of Sutter Street's streetscape. The new building has an otherwise minimal design that is reflective of its time. The combination of modern interpretations of historic design features add visual detail and richness to
the design of the proposed new building that enhance its compatibility with the surrounding historic subarea.

Streetscape and Other Features:
The proposed building’s design is consistent with the historic streetscape elements of the Sutter Street Subarea. The proposed building’s footprint is set back a few feet from the sidewalk along Sutter Street to accommodate a lightwell and entries at the north façade and has no setback from the property line along Scott Street. This is consistent with the typical minimal or zero lot line setbacks of historic commercial and mixed-use buildings from the sidewalk within the Sutter Street Subarea. Characteristic street and sidewalk widths of the district will be retained. Although the project proposes to excavate a portion of the site to construct the building on a level grade, this will be limited to the project site and will not impact the characteristic ascending slope of Sutter Street.

Summary of District Compatibility
In summary, the proposed new building at 603 Sutter Street is compatible with the character-defining features of the Sutter Street Subarea, including its flat roof and minimal setback from the sidewalk; ground-floor storefront and tall, narrow upper-story windows; use of brick exterior cladding; and incorporation of characteristic architectural features such as a covered awning, stepped parapet wall, and decorated brick cornice. The building’s broad horizontal massing and large scale have been addressed through the use of side and rooftop setbacks and the articulation of the facades into more compatible volumes. Some aspects of the proposed project are not strictly compatible with the characteristics of the historic district, including the rounded corner design at Sutter and Scott streets and the use of contemporary materials and features, such as horizontal cement fiber siding, divided-lite aluminum windows and French doors, corrugated metal roofing, and steel structural supports. These differences generally represent modern interpretations of historic programmatic needs and construction technology that characterize the subarea. Overall, these differences serve to distinguish the building from historic fabric, per Standard 9 of the Secretary of the Interior’s Standards for Rehabilitation.

Overall, while a few aspects of compatibility could be improved, these considerations do not appear to represent a significant impact to the surrounding historic district such that the subarea would no longer be able to convey its historic significance. Additionally, the minor elements of incompatibility of the proposed project are tempered by the location of the proposed project, at the subarea’s northeast periphery.

Sutter Street Subarea Cumulative Impacts Analysis
The California Environmental Quality Act defines cumulative impacts as follows:
“Cumulative impacts” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

a) The individual effects may be changes resulting from a single project or a number of separate projects.

b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.17

Several projects have been completed near the proposed project and within the Sutter Street Subarea over the last few years. On the same block as the proposed project, two new buildings have been recently constructed. In 2011, a height variance was approved to construct a 59-foot-high, three-story, mixed-use building at 602 and 604 Sutter Street. In 2013, a three-story, 8,313-square-foot mixed-use building was approved for construction at 607 Sutter Street, directly across from the proposed project site. Both buildings have been completed.

Since the approval of the Railroad Block 2004 Implementation Plan in January 2006, several projects have been completed at the south end of the Sutter Street Subarea as part of a planned effort to redevelop the area into a mixed-use, civic-oriented development that preserves and enhances the historic railroad buildings and features in the area. Completed projects have included the construction of a multi-story parking garage, public plaza, landscaped amphitheater, restaurant, and two mixed-use buildings at 905 and 916 Sutter Street; renovation of the Southern Pacific Depot and interpretive center; commemorative paving and landscaping; and the creation of new interpretive displays.

Taken together, these projects combined with the proposed project at 603 Sutter Street would not detrimentally affect the integrity of the Sutter Street Subarea. The subarea includes a variety of buildings types and uses. Historic buildings include restaurants, bars, stores, hotels, residences, and other types of buildings dating from roughly 1850 to 1950. Reflecting this long period of development, the subarea broadly displays a variety of styles, size, ornament, and forms. The large-scale new buildings and redevelopment projects in the Railroad Block area reference the railroad-related development that historically characterized the area and preserve surviving historic railroad

17 CEQA Statutes & Guidelines, Article 20, Subsection 15355.
features, thus allowing the redeveloped area to continue to convey its association with Folsom's railroad history.

Meanwhile, the projects on the 600 block of Sutter Street, including the proposed project at 603 Sutter Street, continue the historic pattern of continuous commercial facades and storefronts along Sutter Street. Although the other recently completed projects on the 600 block are of a larger scale and more contemporary design and are not entirely compatible with the characteristics of the subarea, the block as a whole has a less cohesive character than the blocks to the south that allows for a greater variety of development. The proposed project is more compatible in scale and design than other recently completed buildings and reinforces the block's connection to the more cohesive collection of historic commercial and mixed-use buildings that are concentrated on the 700 and 800 blocks of Sutter Street. Due to the peripheral location of the 600 block, the proposed project and other recent projects in the area do not directly impact the core area of the Sutter Street Subarea to the south. The Sutter Street Subarea is a large district that continues to retain the vast majority of its contributing resources. The proposed project at 603 Sutter Street, in combination with other recently completed projects in the area, will not detract from the Sutter Street Subarea's ability to convey its historic significance as the historic commercial center of Folsom. It does not appear, therefore, that the proposed new building and other recent projects would represent a cumulative impact on the Sutter Street Subarea or the setting of identified individual historic resources (the Cohn House and historic library building) pursuant to CEQA.
V. CONCLUSION

The proposed project site is an undeveloped lot within the boundaries of the locally listed Sutter Street Subarea and is located near additional historic resources that are either already listed in the California Register and National Register (the Cohn House) or are individually listed on the Folsom Cultural Resources Inventory (the historic library building).

A proposed project for new construction at 603 Sutter Street was evaluated for its compatibility with surrounding historic resources, taking into account the Sutter Street Subarea’s character-defining features and guidance provided in Standard 9 of the Secretary of the Interior’s Standards for Rehabilitation.

Based on this analysis, the proposed project at 603 Sutter Street does not represent a project-specific impact, nor does it contribute to a subarea-wide cumulative impact. The project will occur on an undeveloped lot and, thus, will not directly impact a historic resource. Furthermore, the proposed project at 603 Sutter Street does not affect the ability of nearby identified individual historic resources to convey their historic significance. Although some aspects of the proposed project are not strictly compatible with the characteristics of the Sutter Street Subarea, these differences generally represent contemporary interpretations of historic architectural styles and features that characterize the district. Overall, these differences serve to distinguish the building from historic fabric, per Standard 9 of the Secretary of the Interior’s Standards for Rehabilitation. Additionally, the moderately incompatible elements of the proposed project are minimized by its peripheral location at the northeast boundary of the Sutter Street Subarea. Lastly, the proposed project at 603 Sutter Street, in combination with other recent and known ongoing construction in the area, does not appear to contribute to a cumulative impact on the Sutter Street Subarea. In sum, the proposed project would likely not have a significant effect on any nearby historic resources and would not require a further analysis of cultural resource impacts under CEQA.
VI. REFERENCES

Published Works & Reports


Public Records


IX. APPENDIX

CONTENTS:

- Proposed project drawings by Williams + Paddon, dated December 10, 2020 (as modified through March 5, 2021)
HISTORICAL REFERENCES

- HISTORICAL SUTTER STREET (700 BLOCK) - 1914
- SUTTER ST. COMMERCIAL ARCHITECTURE - HISTORICAL PHOTOS
- SUTTER ST. COMMERCIAL ARCHITECTURE - CURRENT REFERENCE
- PILLASTER - BRICK OR WOOD
- BRACKETS AT CORNICE
- GOOSE-NECK DOWN LIGHT
- EXPRESSED SCUPPER BOX AND DOWN SPOUT
- DEEP SET AWNING OR COVERED WALKWAY
- UPPER STORY WINDOWS WITH SOLDIER COURSE LINTEL
- HANGING BLADE SIGN
- TRANSOM WINDOW W/ SIGN PAINTING BASE PANEL
- DENTILS OR BRACKETS
- BRICK DENTILS @ CORNICE
- PARAPET FRIEZE OR BRACKETS CORNICE
- TRANSOM WINDOWS CURVED OR RECTANGULAR

REFERENCE - 3 STORY BLDG. - OLD SACRAMENTO
REFERENCE - CORNICE DETAILS
REFERENCE - CORNER EMPHASIS
REFERENCE - UPPER WINDOWS

CALIFORNIA GOLD RUSH
COMMERCIAL ARCHITECTURE (circa 1850-1900)

SUTTER STREET STOREFRONT - 1880
ENTERPRISE HOTEL (SUTTER ST) - 1893
CALIFORNIA GOLD RUSH
COMMERCIAL ARCHITECTURE (circa 1850-1900)

REFERENCE - 3 STORY BLDG. - OLD SACRAMENTO
REFERENCE - CORNICE DETAILS
REFERENCE - CORNER EMPHASIS
REFERENCE - UPPER WINDOWS
STREET VIEW RENDERING - VIEW FROM SUTTER ST. LOOKING SOUTHWEST

STREET VIEW RENDERING - VIEW FROM SCOTT ST. / RILEY ST. INTERSECTION