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CULTURAL HERITAGE COMMISSION STAFF REPORT MARCH 12, 2020

AGENDA ITEM 7.A File No. PL18-0212 – **THOMAS EARL HOUSE BED & BREAKFAST**

I. GENERAL INFORMATION

PROJECT SUMMARY: Request for a Certificate of Appropriateness for alterations and additions to the Thomas Earl House, a historic property on the National Register, to convert the existing historic residence to a Bed and Breakfast Inn with 10 rooms and one manager's suite

LOCATION OF PROPERTY: 1221 Seminary Street
APN 003-152-013

GENERAL PLAN: Traditional Residential Infill (TRI-143)

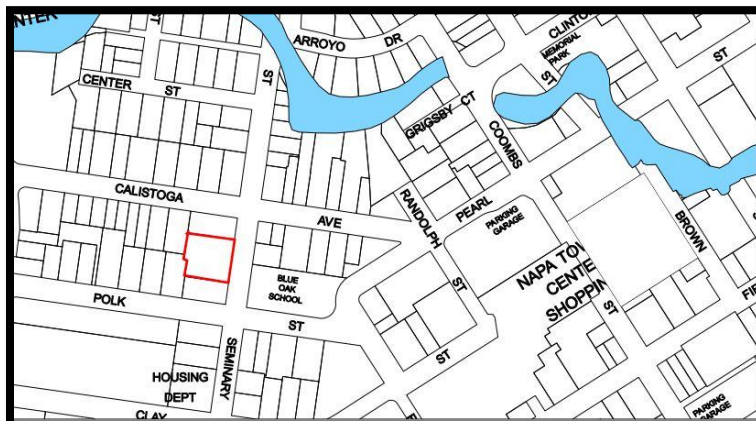
ZONING: Traditional Residential Infill (RT 5)

HISTORIC RATING: Historic Resource Inventory – Local Landmark (LLM);
Contributor to the Calistoga Avenue Historic District;
National Register of Historic Places (Thomas Earl House)

APPLICANT / PROPERTY OWNER: Marc Porat Phone: (650) 815-8105
2866 Pine Street
San Francisco, CA 94115

STAFF PLANNER: Elena Barragan, Assistant Planner Phone: (707) 257-9530

LOCATION MAP



II. PROJECT DESCRIPTION & BACKGROUND

A. PROJECT DESCRIPTION

The Applicant, Marc Porat, requests approval of a Certificate of Appropriateness to authorize major alterations to the Thomas Earl House, a National Register historic property located at 1221 Seminary Street. The proposed alterations would convert the existing single family residence to a Bed & Breakfast and add an addition on the rear of the Thomas Earl House, construct a basement beneath the structure, add accessory structures on either side of the Thomas Earl House, construct a swimming pool and other outdoor amenities, tree removal due to tree rot (ATCH-4) and to support the creation of a parking lot in the front setback. This is not a preservation, restoration, or reconstruction project per the Secretary of Interior Standards for the Treatment of Historic Properties. Rather, this is a Rehabilitation project which is defined as, “the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural and cultural values.”

Rehabilitation includes construction of a new foundation and relocation of the Thomas Earl House 10 feet to the east toward Seminary Street. Parking is proposed between the relocated house and Seminary Street, which requires modification of setback requirements which is proposed as part of the Planned Development overlay request.

The Project plans date stamped as February 18, 2020, show proposed alterations to the property include construction of a 3,803 square foot basement below the existing 1,834 square foot historic residence, a 1,292 square foot addition to the rear of the existing Thomas Earl House, a new elevator for compliance with Americans with Disabilities Act (ADA) requirements, construction of a 432 square foot one-story cottage on the south side of the property, construction of a 2,030 square foot two-story carriage house at the northwest corner of the property, tree removal and the addition of a swimming pool, spa, and other outdoor amenities (ATCH-3, Project Plans). The existing deck along the front elevation will be retained and restored.

The Project includes a Planned Development Overlay, Use Permit, and Certificate of Appropriateness to allow the use and development of a 10 room Bed and Breakfast Inn at 1221 Seminary Street. The Certificate of Appropriateness is the only entitlement subject to the Cultural Heritage Commission review.

The Project includes requests for:

Planned Development Overlay – A Planned Development (PD) overlay to establish reduced development standards (setbacks) for new proposed structures. The PD establishes side and rear yard building setbacks of five feet for the new buildings including the carriage house in the rear. The PD also modifies front setback requirements to allow parking and additional fence height in front of the historic residence along Seminary Street.

Use Permit – A Use Permit to establish the Bed and Breakfast Inn within an existing historic resource and within new structures and a reduction in the required amount of off-street parking from 11 to 7 spaces.

Certificate of Appropriateness – A Certificate of Appropriateness (COA) for work on a Local Landmark. The COA is subject to Cultural Heritage Commission review and includes review of the proposed rehabilitation to the historic structure and of the new structures on the property.

B. BACKGROUND

The Project site is approximately 0.35 acres and developed with a two-story 1,898 square foot historic residence known as the “Thomas Earl House.” The house, constructed in 1861, is listed in the National Register of Historic Places and identified on the City’s Historic Resources Inventory as a Local Landmark (LLM) that holds contributing status within the Calistoga Avenue Historic District. The structure is known as “The First Concrete Home” in Napa and is notable for its association with Thomas Earl, one of Napa’s leading citizens in the 1860s. The house suffered significant damage from the 2014 South Napa Earthquake and requires substantial repairs to ensure the preservation of the structure.

The application received preliminary review by the Cultural Heritage Commission at their February 14, 2019 meeting (ATCH-5). The Commission reviewed the initial application and project designs and provided the following comments:

- The style of the proposed new structures appears too modern. Consider simplifying the design and differentiating new construction from historic in a more subtle method. Provide simulations that depict the appearance of the proposed board and batten siding.
- Parking in the front setback is not favored.
- Substantial fencing and landscape screening along Seminary Street deter from the view of the home.
- Concern about shadow impacts on the property to the north.

Following this review, the application received preliminary review by the Planning Commission at their April 4, 2019 meeting. At this preliminary review, the Applicant was provided with comments regarding the proposed Use Permit. Since then, the Applicant and his team worked to revise the project design and the associated historic reports to address comments from the Commissions and Staff. The application was deemed complete on February 7, 2020.

Changes from the original proposal include:

- Substantial reduction of the size and scope of the basement.
- The Project proposes six-foot open fencing on the north and south ends of the property along Seminary Street with three-foot fencing proposed on the center section to frame the home. To soften the appearance of the fencing, the landscape plan includes plantings that will cover and block the fence over time.
- Cottages reoriented to face east instead of west.
- Cottages changed from the previously proposed vertical board and batten siding to be similar to the white horizontal siding of the Thomas Earl House.
- Colors of the Carriage House and Cottages have changed to minimize their visual presence.

- Cottage to the north now attached as part of the Carriage House.

Aspects of the original proposal that remain the same after the preliminary review are tree removal and parking in the front setback.

III. PROJECT CONTEXT

The Thomas Earl House, which was added to the National Register of Historic Places on August 18, 1992, was designed in the Late Victorian, Italianate style. The property is within the Calistoga Avenue Historic District, which is a neighborhood historically settled by middle-class residents, and development was likely spurred by the county road that ran along Calistoga Avenue. The area was largely built out with small one-story cottages by the 1890s with some construction that continued into the first decades of the twentieth century. Architectural styles found in the Calistoga Avenue neighborhood include Italianate, Stick/Eastlake, Queen Anne, Colonial Revival, Classical Revival, and craftsman. The area appears to be primarily associated with themes of Victorian-era residential development and early twentieth century residential development. The Project site is within the Traditional Residential Infill (RT-5) Zoning District and is bounded by single-family residences to the south and west and multifamily residential to the north. The adjacent structures are each two stories in height and designated as Local Landmarks within the Calistoga Avenue Historic District. Blue Oak Charter School owns the property to the east across Seminary Street. Existing land uses in the vicinity are primarily residential but include a variety of uses including other bed and breakfast inns and educational facilities.

IV. ANALYSIS

A. GENERAL PLAN & ZONING

The property is located within the TRI-143, Traditional Residential Infill General Plan Designation, which provides for detached and attached single family homes, second units, planned unit and cluster developments, duplexes, triplexes, manufactured housing, live-work housing, and similar compatible uses such as day care and larger group quarters (e.g., residential facilities and nursing homes). Non-residential uses may also be allowed in appropriate locations at the discretion of the City, including bed-and-breakfast inns and public and quasi-public uses of an administrative, educational, recreational, religious, cultural, communications, or public service nature.

The property is also located within the RT, Traditional Residential Infill Zoning District. The RT district implements the Traditional Residential Infill land use category of the General Plan. This district provides for low density detached and attached single-family homes, accessory dwelling units, clustered and planned developments, duplexes, triplexes, manufactured housing, group residential, live-work housing and similar compatible uses. Bed and Breakfast uses may be permitted in the RT district with approval of a Use Permit.

B. HISTORIC PRESERVATION ORDINANCE

NMC Chapter 15.52 (Historic Preservation) establishes regulations applicable to properties designated as Local Landmarks. Per Section 15.52.070.D.2, a Commission-level Certificate of Appropriateness is required for work on a Local Landmark when major

alterations involve construction, additions greater than 120 square feet, construction of accessory structures greater than 120 square feet that are visible from a public way, and/or substantial exterior rehabilitation.

The proposed project work must be found consistent with the requirements outlined in NMC Chapter 15.52 for Local Landmarks and for work within Local Landmark Districts. In order to evaluate the project's consistency with local and state requirements, the Applicant hired a preservation architect to evaluate the project based on various standards. The report was prepared by Bruce Judd and is titled "Historical Evaluation Rehabilitation of the Thomas Earl House" and dated December 20, 2019 (see ATCH-2). This report incorporated the previous work of preservation architect Sarah Van Giesen (on behalf of the Applicant) and implemented the suggestions of the City's peer reviewer, Architectural Resources Group (ARG).

To approve a Certificate of Appropriateness for the work, the Cultural Heritage Commission must make a variety of findings. Below, Staff has listed each finding and provided summary analysis of how the project may be found consistent with the finding.

1. *The Project preserves, enhances or restores the exterior architectural features of the local landmark.*

The Project enhances the exterior architectural features of the Local Landmark in several ways. The Project proposes to rehabilitate the original east- and south-facing bay windows, maintaining the windows in their original locations. The porch roof or balcony wall on the east-facing façade will be restored to its original height consistent with historical 1874 photos. The balcony and balustrade on the east facing façade will be restored using the 1880 and 1960 photos as models. The balustrade will be constructed to 42 inches, meeting current building code height. In addition, exterior period detailing that was saved, such as the corbels, trim, and eaves, will be re-installed where feasible to further enhance the Italianate style of the home.

2. *The Project will not result in a substantial adverse change to the integrity of the local landmark or its major exterior character-defining features.*

The Department of Parks & Recreation (DPR) survey referenced in the designation of the building as a Local Landmark identifies the structure as "Italianate in character with a low hip roof supported by an elaborately bracketed cornice." The Project scope does not include any changes to the roof line. Work to the structure includes maintenance and re-installation of character-defining features such as the elaborate bracketed cornices. The survey further describes the structure's "...very fine veranda with a turned second story balustrade encircling the front and sides of the house." The proposed rehabilitation includes re-creation of the second story balustrade which will further restore the appearance of the Italianate style home.

3. *The Project will not adversely affect the special character or special historic architectural, or aesthetic interest or value of the local landmark.*

The Thomas Earl House was damaged in the 2014 South Napa Earthquake which destroyed the unreinforced concrete exterior walls, a key defining feature of the

only historic structure in Napa to utilize this construction method. The Applicant has indicated that the concrete has been removed and will be replaced with drywall. The extra space from where the slurry was removed will be translated to additional floor area. To document the history of the home and early materials used, the Project is conditioned to require that the Applicant provide a copy of the Historical Evaluation within the historic residence for visitors and guests of the B&B, and to provide a copy to the Planning Division (ATCH -2). Elements of the Italianate style that remain unchanged with this project include maintaining the columns on the east façade, continuing the characteristic flat roofline, and preserving the horizontal siding (ATCH-3 Sheet 4-03).

4. *The Project is consistent with the applicable Secretary of the Interior's Standards.*

According to the Judd report (ATCH-2), the Project is consistent with the Secretary of the Interior's Standards for Rehabilitation of Historic Properties in that the property will undergo repair and alteration of the historic building that is necessary to provide for a contemporary use, while not damaging or destroying character-defining features of the historic property. Further analysis is provided in Section D of this report.

5. *The Project is consistent with the applicable historic design guidelines.*

The property is located within the Calistoga Avenue Historic District, and the Project has been reviewed against the universally applicable Napa Abajo/Fuller Park Historic District Design Guidelines. The following are applicable design principles from the Guidelines followed by Staff's analysis of the Project's compliance.

1. *Place an addition at the rear of a building or set it back from the front to minimize visual impacts.*

The Thomas Earl House currently has a rear addition that was constructed in approximately 1893. The new addition will be located in the same area so as to avoid visual impacts. The two new structures on the north and south of the historic residence are designed to be subservient to the original structure to minimize visual impacts.

2. *Design a new addition such that the historic character of the original building can still be interpreted.*

The building addition to the 3,592 square foot historic residence will not detract from the historic character of the original building. It is located in the same position as the previous addition and will not be readily visible from the public right of way. Further the above-ground addition will be distinguishable on the north by the new elevator and door and north side. The new 3,803 square foot basement below the historic residence will not be visible from the street. As stated above, the new structures on the north (2,030 square feet) and south (432 square feet) of the historic residence are designed to be subservient to the original historic structure to minimize visual impacts.

3. *When constructing a new building, locate it to fit within the range of yard dimensions seen in the block.*

The Thomas Earl House currently sits approximately 60 feet back from the front property line making it a unique property within the Historic District. The proposal includes moving the structure ten feet east, towards the front property line, and constructing the new structures at about that same location. Locating the structures closer to the front property line supports the range of yard dimensions that currently exist while maintaining a larger front yard that the Thomas Earl House has historically maintained.

4. *Clearly define the primary entrance by using a front porch.*

The current porch is a wrap-around style. The current porch was once a balcony that was accessed through a previous door and what is now the second story middle window. At one point, the balcony was removed, and a new porch roof was built slanting downward for drainage. Due to this, the porch roof dropped by three feet. The Project proposes to restore the porch grade height to its historic position, and to provide the east facing portion of the porch an additional two feet to meet accessibility requirements. In addition, the current location of the entry door has been recessed two feet. The Project will revert the door to its original location. Through this rehabilitation of the front porch, the primary entrance will be restored for compliance with building code and provide the continued use of the historic porch.

5. *Use roof forms that are similar to those seen traditionally in the block.*

The cottages that flank the Thomas Earl Home propose gable roof forms that are evident within the Calistoga Avenue Historic District. The carriage house proposes to have an Italianate style flat roof similar to the Thomas Earl House but with simplistic detailing. These roof forms will complement those that are traditionally seen in the block.

6. *Preserve the position, number and arrangement of historic windows in a building wall.*

The Applicant has determined that all windows on the structures are in various levels of disrepair and damage. Due to these current conditions most windows will require significant rehabilitation or replacement. As highlighted, the Thomas Earl House was the first home to be made of unreinforced concrete. This construction method provided unusually thick walls where windows were installed. The existing depth of windows as measured from siding to glass is 9-3/8". The proposed depth is the same. The depth of the bay windows approximately 4 1/4" which will also remain the same. (ATCH-3, Sheet 3-03)

7. *Match a replacement window to the original in its design.*

The existing double hung windows on the eastern façade are not original. Historic photos demonstrate that the windows were originally 4 over 4 windows. The materials for replacement windows will be wood. Original window shutters have

deteriorated or been removed. New shutters will be installed using salvaged materials when available to match the original shutters.

8. *Use a storm window to enhance energy conservation rather than replace a historic window.*

For Title 24 compliance, the Applicant proposes to install interior storm windows in wood frames in the east and south facades. These windows will look like operable double hung windows but will be rendered inoperable to achieve the required energy standards.

9. *When a historic door is damaged, repair it and maintain its general historic appearance.*

The front entry retains the original decorative etched glass transom window above the door and two sidelight windows on either side. The sidelight windows are each divided into three panels, with one of the panels retaining the original etched glass decorative panel. The others have been replaced with plain glass. The entry door retains the original glass doorknob and key escutcheon. The door will be rehabilitated and restored back to its original location.

10. *Preserve the original roof form.*

The alterations involved in this rehabilitation do not alter the historic Italianate roof form. The Italianate style flat roof is maintained, and while the house is moving 10 feet closer to the street, the perceived line and orientation of the roof will remain visible from the street unchanged. No roof top additions are proposed as part of this project.

11. *Parking areas should not be visually obtrusive.*

As stated in the Napa Abajo/Fuller Park Historic District Design Guidelines, large parking areas should be screened from view from the street. The Project proposes six-foot open fencing on the north and south ends of the property along Seminary Street with three-foot fencing proposed on the center section to frame the home. To soften the appearance of the fencing, the landscape plan includes plantings that will cover and block the fence over time.

6. *The Project will not negatively impact the integrity of a cultural landscape through alteration of spatial organization, landscape features, circulation patterns, or small scale features that are character defining features of the resource.*

The Project will not negatively impact a cultural landscape in that it will not change a street layout, sidewalk configuration, or any other elements of the built environment surrounding the property. The structure where it is currently located is closer to the rear of the property. The property was once located on a large lot that covered most of the block facing Seminary Street between Calistoga Avenue and Polk Street. Over time, the site was reduced as the property was deeded to members of their family. Today the Thomas Earl House sits further back than the rest of the homes on the block. The Project proposes to locate the home 10 feet

east, toward the front property line, and will locate accessory structures on either side of the home.

C. Local Landmark District

1. *The Project is compatible with the character of the local landmark district as described in the designating resolution.*

The Calistoga Avenue Historic District is the only locally- designated historic district in the City of Napa. The district is noted to be largely built out with small one-story cottages and a few larger homes located near the intersection of Seminary Street and Calistoga Avenue. Architectural styles found in the Calistoga Avenue neighborhood include Italianate, Stick/Eastlake, Queen Anne, Colonial and Classical Revival and Craftsman. There is no proposed change to the existing architectural style and the historic residence once rehabilitated will remain an example of an Italianate Style home in the Calistoga Avenue Historic District. In accordance with the designating resolution, Resolution No. 88-67, all new construction, alteration or demolition of any building in the historic district shall be required to receive a Certificate of Appropriateness. The Project scope includes the request of a Commission-level Certificate of Appropriateness for demolition of a rear shed structure, demolition of rear addition on the existing home, construction of new accessory structures, and alteration of the rear addition.

2. *The Project does not adversely affect the special character of historic, architectural, or aesthetic interest or value of the local landmark district.*

The Project includes substantial rehabilitation in order to return the property to a state of utility while being historically sensitive to the significance of the residence and site. The Calistoga Avenue Historic District is home to a mix of uses including commercial uses at the corner of Jefferson Street and Calistoga Avenue, Bed and Breakfast Inns located at the corner of Seminary Street and Calistoga Avenue, and single family residential located throughout the District. The Project does propose removal of trees, but new tree installation is designed in a manner to screen the parking, in compliance with the Napa Abajo/Fuller Park Historic Design Guidelines. The new use and proposed alterations do not change the special character of historic, architectural or aesthetic interest of the Local Landmark in that it keeps the Thomas Earl House on its historic lot, provides a new use that is similar to established Bed and Breakfast uses in the District, and provides the necessary rehabilitation to ensure the Landmark's continued existence in the neighborhood.

3. *The Project is consistent with the applicable Secretary of the Interior's Standards.*

The Project is consistent with the Secretary of the Interior's Standards for Rehabilitation of Historic Properties in that the property will undergo repair and alteration of the historic building that is necessary to provide for a contemporary use, while not damaging or destroying character-defining features of the historic property. Further analysis is provided in Section D of this report.

4. *The Project is consistent with applicable historic design guidelines.*

This project is consistent with the universally applicable Napa Abajo/Fuller Park Historic District Design Guidelines. Further analysis is provided in Section IV.B.5 of this report.

D. SECRETARY OF THE INTERIOR STANDARDS

The Secretary of the Interior has established standards for the rehabilitation of historic properties. The following is a listing of the standards followed by Staff's analysis of how the standards have been satisfied based on the Applicant's historic report (ATCH-2).

1. *A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.*

The Project proposes to change the historical use of a single-family home to a 10-room Bed and Breakfast Inn. The Project does not propose to change the defining characteristics of the Italianate home such as the flat roof, elaborate cornices, horizontal siding, porch columns, and bay windows. The Project does include rehabilitation to other significant features such as:

- Concrete walls to be replaced with drywall.
 - Entry door will be restored to its original location.
 - Historic balustrade will be reconstructed to 42" code height while maintaining its historic street presentation.
 - The second floor balcony will be restored including the original placement of the balcony door which was converted to a window.
 - Number of buildings on site will increase to three buildings, the Thomas Earl House, the carriage house, and the south cottage.
 - Relocation of the Thomas Earl House 10 feet to the east and re-centered on the property.
2. *The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*

Missing elements that have been removed will be replaced in kind. The historic balustrade that was removed from the Thomas Earl House will be rebuilt using existing historic balusters and newel posts with infill elements duplicating the historic material as templates.

3. *Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historic development such as adding conjectural feature or architectural elements from other buildings, shall not be undertaken.*

No features from other buildings will be added to the Thomas Earl House and no conjectural features are proposed. The new construction on the site is limited and designed to be subservient to the Thomas Earl House.

4. *Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.*

Existing alterations and additions that have become part of the historic fabric of the building will remain and be rehabilitated. These include the functional second floor balcony and the three bay windows on the first floor.

5. *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.*

Distinctive features and finishes will not be removed. The windows, doors, siding, trim, cornices and brackets will all be rehabilitated where possible.

6. *Deteriorated historic features shall be repaired rather than replaced. Where severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical or pictorial evidence.*

The functional balcony and balustrade that was removed will be restored using existing materials from the historic balustrade stored on site. The original exit door on the balcony will be restored. Because all windows are determined to have some level of disrepair, the Course of Action identified in the Historic Evaluation (ATCH 2) identifies what level of rehabilitation will occur for the existing windows.

7. *Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.*

No sand blasting or chemical treatments are proposed for the Project. The original ash flooring on the ground level is damaged in places and is covered with many coats of paint that are peeling. The proposed plan is to restore the floor using known methods that are the least chemically corrosive.

8. *Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures must be taken.*

An exploratory dig in the shed and the excavation of the existing basement did not reveal any evidence of archeologically important materials. All archeological monitoring practices will be followed for all ground disturbing activities on site.

9. *New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, scale, and*

architectural features to protect the historic integrity of the property and its environment.

The new addition on the rear of the Thomas Earl House has been designed to minimize impacts to the original portion of the home. As the guidelines suggest, this building addition was designed so that character defining features of the historic building are not altered. The addition on the rear will be lesser in height than the original home and will not be readily visible from the public way.

The new construction of the cottages and carriage house have been designed to be similar out-buildings that would be on a rural residential property. The new cottages will have a gable roof, different from the Thomas Earl House Italianate style, so as to not create a false sense of historic significance. The carriage house has been located at the northwest rear corner of the property and is similar to the Italianate style of the Thomas Earl House, yet detailing is simplified to differentiate the building from the original home.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The Thomas Earl House as designed could be used as a single-family home with no changes. It will have an accessible restroom and elevator which are not required of residential homes but are consistent with a residential use. The rear addition to the Thomas Earl House would not alter the historic portion of the original home and would not negatively impact the original structure if the addition were removed. Accessory structures could be removed without any damage to the original historic home but would be unlikely to be removed due to the scope and cost of the structures.

These alterations are intended to rehabilitate and preserve the historic structure. The proposed use is intended to return the property to a state of utility through repair and alteration.

VI. ENVIRONMENTAL REVIEW

Staff recommends that the Cultural Heritage Commission determine that the Project is exempt from the requirements of the California Environmental Quality Act (CEQA) in accordance with the following:

1. Section 15301 of the CEQA Guidelines (Categorical Exemptions; Class1) which exempts minor alterations to existing residential structures, including additions that do not exceed 50 percent of the floor area of the structure before the addition, or 2500 square feet, whichever is less.
2. Section 15303 (Categorical Exemptions; Class 3) which exempts in urbanized areas buildings not exceeding 10,000 square feet in floor area on sites zoned for such use.

3. Section 15331 (Categorical Exemptions; Class 31), which exempts interior and exterior alterations to existing structures and additions to existing structures, and the rehabilitation of historic resources which are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Property.

VII. REQUIRED FINDINGS

The City Council's approval of this project is subject to the required findings in NMC subsection 15.52.070.F. These findings are provided in the draft resolution attached to Staff report. These findings relate to consistency of the Project with the Secretary of the Interior's Standards, the Historic Preservation ordinance, and Historic Design Guidelines. Staff believes that the proposed project complies with these findings and the attached Resolution (see ATCH 1) contains the basis for this recommendation.

VIII. STAFF RECOMMENDATION

Staff recommends that the Cultural Heritage Commission forward a recommendation to the City Council to approve the requested Certificate of Appropriateness.

IX. ALTERNATIVES TO RECOMMENDATION

1. Continue the application with direction for project modifications.
2. Recommend that the application be denied by the City Council.

X. REQUIRED ACTIONS

Forward a recommendation to the City Council to adopt:

1. A resolution approving a Certificate of Appropriateness alterations and additions to a historic property to convert the existing historic residence to a Bed and Breakfast Inn with 10 rooms and one manager's suite and determining that the actions authorized by this resolution are exempt from CEQA.

XI. DOCUMENTS ATTACHED

ATCH 1 – Resolution
ATCH 2 – Historical Evaluation Rehabilitation of the Thomas Earl House
ATCH 3 – Project Plans
ATCH 4 – Arborist Report
ATCH 5 – Cultural Heritage Commission Meeting Minutes, February 14, 2019