

Design Review
Benjamin Franklin Hotel
44 East Third Avenue
San Mateo, California



prepared for the
City of San Mateo
Department of Planning and Community Development

prepared by
Architectural Resources Group
Architects, Planners & Conservators
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25 September 2012

I. Introduction

In response to a request from the City of San Mateo, Architectural Resources Group (ARG) has assessed the proposed project at the Benjamin Franklin Hotel, in order to evaluate its compliance with *The Secretary of the Interior's Standards for Rehabilitation (The Standards)* and the *City of San Mateo Downtown Retail Core & Downtown Historic District Design Guidelines*. The Benjamin Franklin Hotel is located at 44 E. Third Avenue, San Mateo, California, assessor's parcel numbers 034-143-280 and 034-143-290. The Benjamin Franklin Hotel was surveyed as part of San Mateo's Historic Resources Survey in 1989. The property was assigned a National Register of Historic Places (National Register) Status Code of "3/3D" indicating the property appears individually eligible for the National Register and as part of a historic district. The hotel is also a contributor to the San Mateo Downtown Historic District, a locally designated district. Consequently, the building is considered a historic resource for the purposes of the California Environmental Quality Act (CEQA).¹

Under CEQA, a project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment.² Substantial adverse change in the significance of a historic resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.³ The proposed rehabilitation project for the Benjamin Franklin Hotel could potentially cause a substantial adverse change in the significance of the building. However, any proposed project that follows *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings (The Standards)* is considered to have mitigated any potential impacts to a less-than-significant level.⁴ In addition, the Downtown Specific Plan Historic Preservation Policies require that all exterior renovations of individually eligible buildings are consistent with *The Standards*.

II. Building and Site Description



Figure 1: view of the Benjamin Franklin Hotel looking southwest (ARG June 2007).

The Benjamin Franklin Hotel is an eight-story plus penthouse, two-part commercial building fronting Third Avenue between South El Camino Real and San Mateo Drive in the City of San Mateo. At the rear, there is a double-height, one-story, full-width wing, and a second smaller, projecting east wing. At the southwest corner of the lot, there is a fan-shaped pool. For the most part, the elevations are symmetrical. Typical of the Spanish Colonial Revival style, the walls are planar stucco surfaces with elaborate Churrigueresque ornament at the eighth-floor windows, parapet, and penthouse at all elevations, and the second floor of the front elevation. Overall, the building has a high degree of integrity, with the exception of the storefronts on the north (principal) façade, which have been heavily altered. In addition, in the 1960s or 1970s, an addition was built at the west end of the penthouse.

The character-defining features of this building are identified as follows:

General Exterior

- Eight-story block with penthouse
- Stucco finish
- Churrigueresque-style plaster ornament: spandrel panels, elaborate ornament at parapet, and medallions
- Overall vertical emphasis through fenestration, massing, and ornament
- Flat roof with parapet
- Silhouetted plaster ornament projecting above the parapet
- Molded sill course at eighth floor windows
- Molded plaster spandrel panels immediate below eighth floor sill course

- Regularly spaced bays of windows
- Three-over-three, double-hung wood windows (some arched at the seventh floor)
- Beveled building corners that contribute to the overall vertical emphasis of the building

Front (North) Elevation

- Overall symmetrical fenestration (with exception of penthouse addition)
- Stepped cornice line created by original penthouse
- Churrigueresque ornament at penthouse level including central window and flanking blind arches
- Center flag pole on roof
- Horizontally striated plaster at first floor
- Beltcourse, panels, and Churrigueresque ornament around second floor windows
- Second and seventh bays, which project slightly and are emphasized by spandrel panels and elaborate Churrigueresque ornamentation at the eighth floor parapet
- Central placement of main entrance opening (glazed doors, transoms, sidelights, and wing walls are from a 1950s remodel and are not character-defining features)



Figure 2: view of the Benjamin Franklin Hotel looking north (ARG June 2007).

Rear (South) Elevation

- Symmetrical fenestration
- Stepped cornice line created by penthouse
- Octagonal turret at southwest corner
- Six-light windows on rear wing
- Three sets of glazed doors flanked by multilight sidelights and transoms

East and West (Side) Elevations

- Symmetrical fenestration (including blind and small windows on east and west elevations)
- “BENJAMIN FRANKLIN” painted in block letters immediately below cornice (west elevation).
- “BENJAMIN FRANKLIN” painted in block letters immediately below cornice with neon letters (east elevation)
- Open metal fire stair

Interior

- Features and finishes of the Fireside Room including:
 - Overall open massing
 - Arched ceiling form
 - Exposed corbelled woodtrusses, rafters and purlins
 - Clerestory windows on south side and corresponding vents on north side
 - Carved lintels above doorways between lobby and Fireside Room and between Fireside Room and the pool area
 - Stuccoed conical fireplace at west wall with molding
 - Octagonal light fixtures

III. Building History

The B. Getz syndicate built the Benjamin Franklin Hotel in 1927 for \$250,000. The building was designed by W.H. Weeks, a Bay Area architect noted for his school buildings, hotels, public buildings, and residences. The anticipated market for the hotel was San Francisco residents seeking a holiday in the countryside but unable to afford, or not desirous of, a country house. The Peninsula had traditionally served as the location of San Francisco elite’s country houses, a rural retreat from city life and cold San Francisco summers. However, by the 1920s, San Mateo had already begun its transformation into a bedroom suburb of San Francisco. Initially, the hotel was also intended to serve local residents as a place for social events and for a few, with long-term residential arrangements.⁵

IV. Proposed Project

The proposed project involves three buildings: the Benjamin Franklin Hotel, 37 E. 4th Avenue, and The Collective. No exterior work is proposed at 37 E. 4th Avenue or The Collective, and, as a result, the review of changes to these two buildings is not part of this evaluation. The following summarizes the project as presented in a drawing set prepared by TMDA dated 24 September 2012.

Benjamin Franklin Hotel (44 E. Third Avenue)

- rehabilitation of the ground floor storefronts and hotel entrance
- new exterior paint scheme
- installation of exterior lighting
- alterations to the deck of the rear one-story wing
- construction of two exterior stairways at the one-story wing
- replacement of glazed doors and transoms between the Fireside Room and pool area
- demolition and reconstruction of portions of the penthouse and penthouse addition
- introduction of penthouse addition roof deck
- installation of clear, transparent glass guardrails at building's parapet and at the penthouse parapet
- insertion of windows in the blind arches of the north penthouse parapet

37 E. 4th Avenue

- no exterior changes proposed

The Collective (51-65 E. Third Avenue)

- no exterior changes proposed

V. The Secretary of the Interior's Standards for Rehabilitation

According to *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (The Guidelines)*, "If the building requires more extensive repair and replacement, or if alterations or additions are necessary for a new use, then Rehabilitation is probably the most appropriate

treatment.” Because much of the original fabric of the first floor storefronts and the entrance of the Benjamin Franklin Hotel were previously altered significantly, Rehabilitation is the most applicable Standard.

The ten Standards for Rehabilitation are noted below, each followed by ARG’s findings regarding the proposed project.

1. *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*

As part of the proposed project, the Benjamin Franklin Hotel would be converted to a private university including dormitory and classroom space. The hotel’s first floor rooms originally housed commercial spaces, a lobby, and a lounge (the Fireside Room). Under the proposed project, the existing restaurant (commercial) space would remain a restaurant. The commercial space to the west of the Lobby would function as a lounge for students. The Lobby would continue to function as a reception area for the university. The Fireside Room would become a classroom, and the original guest rooms would serve as student dormitory rooms. Although somewhat reconfigured, the proposed project would retain the commercial, lobby, and lounge/gathering space uses at the first floor. The former hotel rooms would also retain their residential use.

It is ARG’s opinion that the proposed project is consistent with Standard 1.

2. *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.*

The proposed project would remove some distinctive materials and features:

- The molded panels in the blind arches at the penthouse’s north façade would be removed and replaced with windows. *The Guidelines* do not recommend, “Installing new windows, including frames, sash, and muntin configuration that are incompatible with the building’s historic appearance or obscure, damage, or destroy character-defining features.” Additionally, *The Guidelines* recommend “Designing and installing additional windows on rear or other non-character-defining elevations if required for the new use.” Inserting new windows at the penthouse level of the north (principal) façade would change the fenestration pattern of this central character-defining feature. In addition, it would alter the architect’s design intent for this element by replacing the blind arches with windows. As a result, this aspect of the project would not be consistent with *The Standards*.
- One window on the rear wing will be removed, the opening enlarged, and the window replaced. Because this alteration is on a secondary elevation and is only visible from the pool area, it is not inconsistent with *The Standards*.

It is ARG's opinion that the proposed project is not consistent with Standard 2.

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

The proposed project uses modern materials and detailing that are clearly distinct from the building's historic fabric. Conjectural features or elements from other historic properties are not part of the proposed project.

It is ARG's opinion that the proposed property is consistent with Standard 3.



Figure 3: view of the Benjamin Franklin Hotel sign from El Camino Real (ARG, August 2012).

4. *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

Exterior changes to the Benjamin Franklin have occurred primarily at the building's storefronts, the Banquet Room, and the ninth-floor penthouse. The storefront alterations appear to have occurred piecemeal over the last fifty years. The hotel's banquet room was remodeled in 1954. As part of this project, brick columns, an awning, and paired hollow-core doors were added to the first floor of the south façade. The penthouse addition appears to have been built in the 1960s or 1970s. The project proposes alterations to the

storefronts, banquet room entrance, and the penthouse addition. None of these past alterations are architecturally significant or represent important themes, events, or people in the hotel's history; therefore these changes are not significant in their own right.



Figure 4: view of the Benjamin Franklin Hotel sign from E. Third Avenue and S. San Mateo Drive c. 1947 (Downtown San Mateo <http://dsma.org/history>).

The proposed project would remove the “Benjamin Franklin” painted and neon signs at the east and west facades. The signs were installed c. 1947 and have been important character-defining features of the building. The signs have been in place 65 years and are strongly associated with the historic building and its historic use: the Benjamin Franklin Hotel. In addition, because the building is significantly taller than the surrounding structures, the signs are highly visible from the downtown and surrounding streets and neighborhoods. As a result, although they are located on what would usually be considered secondary facades, the signs are an important part of the public's view of the building and its identity.

It is ARG's opinion that the proposed property is not consistent with Standard 4.

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

The proposed project would remove the blind arches at the central element of the penthouse's north façade. These blind arches are part of the design intent of this distinctive feature, and removing them would not be consistent with this Standard.

It is ARG's opinion that the proposed property is not consistent with Standard 5.

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

The proposed project does not include the repair or replacement of historic features.

It is ARG's opinion that the proposed project is consistent with this Standard 6.

7. *Chemicals or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

Chemical or physical treatments are not proposed. If, as the project develops, it is determined that such treatments are necessary, these should be evaluated to determine if they meet *The Standards*.

It is ARG's opinion that the proposed property is consistent with Standard 7.

8. *Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

ARG's scope of work does not include the analysis of archeological resources.

9. *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.*

At the exterior, the proposed project is focused on changes to the storefronts, the rear one-story wing roof deck, addition of stairways at the one-story wing, exterior doors on the south façade, reconstruction of the penthouse, and paint scheme.

- The storefronts have very little original fabric left intact. The possible exception is a divided-light clerestory above the western storefront, which may be original. Removal of the clerestory, the last piece of historic fabric at the storefront, would not be problematic since it is only a portion of the clerestory and does not represent enough of the feature to understand its relationship to the other missing elements of the storefront system.
- The sports court above the Peninsula Banquet Room would not destroy historic fabric and would be easily reversible in the future.
- The proposed project would remove an exterior stairways at the west façade of the one-story rear wing and add stairways at the south and east facades of the one-story wing. The new stairways do not cover or require the removal of any character-defining features. In addition, the stairways are at side and rear facades.
- The proposed project would replace the three sets of exterior doors between the

Fireside Lounge and the pool area. Currently, the openings have single glazed doors, sidelights, and multilight transoms. The project would install pairs of taller glazed doors with a smaller transom. Their replacement is consistent with *The Standards* because the doorways are on a secondary façade, and the openings would be retained in their current dimensions.

- At the penthouse level, the proposed project calls for the removal of the existing pipe hand railing and its replacement with glass guardrails. The guardrails would be clear, transparent glass according to the project drawings and correspondence with the project architect. The glass guardrail would be mounted on the back side of the parapet, and, as a result, the guardrails would not read as extensions of walls of the building, and the massing of the building would be retained to a sufficient degree. The clear and transparent nature of the glass would further assist in making the glass guardrail less visually intrusive. A tinted glass guardrail at this location would not be consistent with *The Standards*.
- As proposed in the project drawings, the penthouse addition would be rebuilt to match the existing addition in footprint, height, and roof form (flat).
- The exterior walls of the hotel are currently painted; however, neither the paint itself nor its application represents a distinctive material, finish, or example of craftsmanship. The original paint scheme has not been investigated. The proposed project would paint the north, east and west facades in a tan and warm gray scheme. These colors are consistent with the Spanish Colonial Revival style of the building.

At the south elevation, the first and second floors would be painted in a warm gray, yellow, blue, and green scheme. Floors three through eight would be painted in a warm gray and yellow scheme. *The Standards* do not recommend “Radically changing the type of paint or coating or its color.” The bright “crayola” colors proposed at this elevation are not consistent with the Spanish Colonial Revival style of the building. Because the upper floors of this facade are easily visible from E. 4th Avenue, a public right-of-way, introducing bright colors in this portion of the façade would not be consistent with Standard 9.

It is ARG’s opinion that the proposed property is not consistent with Standard 9.

10. New additions and adjacent or related new construction will 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 proposed project calls for the addition of signage reading “Draper University” to the front of the building above the first-floor beltcourse. In addition, the painted and neon “Benjamin Franklin” sign on the east elevation and painted “Benjamin Franklin” sign on the west elevation would be retained in place and encased in fascia with “Draper University” signs mounted to the exterior. The “Draper University” signage and fascia could be removed in the future, and the “Benjamin Franklin” sign would be intact.

Surface-mounted lighting, banners, and a new canopy would be installed on the building. When details for the attachment of these items are developed, they should be reviewed to

ensure that the method of mounting the new lighting and signage would not damage historic materials.

As described above under Standard 9, at the south elevation, the proposed project would paint the first and second floors in a warm gray, yellow, blue, and green scheme. Floors three through eight would be painted in a warm gray and yellow scheme. *The Standards* do not recommend “Radically changing the type of paint or coating or its color,” and the bright “crayola” colors proposed at this elevation are not consistent with the Spanish Colonial Revival style of the building. However, if this alteration were reversed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

It is ARG’s opinion that the proposed property is not consistent with Standard 10.

VI. City of San Mateo Downtown Retail Core & Downtown Historic District Design Guidelines

Downtown Design Guidelines

The Downtown Design Guideline section of the *City of San Mateo Downtown Retail Core and Downtown Historic District Design Guidelines (the Downtown Historic District Design Guidelines)* applies primarily to new construction; however, there are several sections that are relevant to the proposed project at the Benjamin Franklin Hotel. ARG’s findings for each design objective are noted below.

G) Awnings/Canopies

According to the Downtown Design Guidelines, “Awnings and canopies add depth to the appearance of a storefront, provide a location for signage and shield pedestrians from sun and rain. They also can improve the look of a building when the size, location and color reflect the architecture and geometry of the building. Installation requires an encroachment permit from the Public Works Department if over the public right-of-way, must maintain eight feet of clearance above the sidewalk, and should not conflict with street trees or other public improvements.”

Design Objective:

Awnings shall:

- *Fit the dimensions of the storefront openings to emphasize building proportions;*
- *Maintain views of important architectural details;*
- *Be aligned with other awnings on the block where appropriate;*
- *Coordinate with the color scheme of the entire building front;*
- *Be constructed with quality materials that maintain their integrity over the years.*

The canopy design should be reviewed against the Downtown Design Guidelines once more detailed plans are available.

H) Maintain visually interesting activity at the sidewalk edge.

“In areas where retail frontage is required, new buildings must have 75% of the width along the street devoted to pedestrian entrances or transparent windows. In areas where retail frontage is not required, building should continue to provide interest along the sidewalk. This may be accomplished with transparent windows, display windows at least two foot deep, landscaping where appropriate, or architectural detailing.”

Design Objective:

- *Provide visual interest to all facades fronting on a street.*

The proposed project would restore glazing to the north elevation's western storefront and replace the glazing on the eastern storefront. As a result, as proposed, the frontage would be composed almost entirely of glazed entrances and windows with structural piers between.

It is ARG's opinion that the proposed project is consistent with this objective.

Downtown Historic District Design Guidelines

The *Downtown Historic District Design Guidelines* state that all downtown buildings that are individually eligible for the National Register of Historic Places and all buildings that are contributors to the Downtown Historic District are governed by the following Downtown Specific Plan Policy:

HP-5 Individually Eligible Buildings. *Prohibit partial or complete demolition of individually eligible buildings unless health and safety requirements cannot be met. Provide for continued maintenance of individually eligible building. All exterior remodels shall conform with the Secretary of the Interior's Standards for Rehabilitation and the Guidelines for Rehabilitating Historic Structures.*

AA) Retain and preserve storefronts of historic buildings

According to the *Downtown Historic District Design Guidelines*, San Mateo “storefronts are generally the focus of historic buildings and are therefore important in defining the overall historic character. As described in the *Secretary of the Interior's Standards and Guidelines*, particular care is required in accomplishing work on storefronts so that the building's historic character is preserved in the rehabilitation process.”

Design Objective #1. Storefront Openings:

- *Maintain the original size and shape of the storefront openings;*

- *Restore openings to their original shape if altered;*
- *Original windows should be preserved and replacement windows when necessary, should match the size, style, and configuration of the original;*

The Benjamin Franklin Hotel's storefronts have been substantially altered over the years. Although a comprehensive chronology of changes is outside the scope of this review and has not been developed, building permits indicate the storefront at 36 Third Avenue was altered in 1941. Drawings for alterations to the main entrance and 50 Third Street were issued in 1950. At the east storefront (50 Third Street), the overall window and entrance openings as well as a clerestory divided-light window have been maintained, but the windows themselves have been changed. The west storefront (44 Third Street) has been completely altered; in 1960 or 1970s the single storefront was divided into two. All glazing from the original storefront, with the exception of some clerestory windows, was removed or covered. The alterations to the west storefront interrupted the symmetry of the historic façade.

The project would demolish the existing storefront openings and doorways on the north (principal) facade. With the possible exception of a transom over the western storefront, no original storefront windows or doors remain. While the proposed project would not "restore the openings to their original shape," the proposed project would reinstate the overall symmetry of the first floor storefronts. Although detailed drawings have not been provided, it appears that the storefront window and door systems would be modern in character and would not replicate the historic.

It is ARG's opinion that the proposed project is consistent with this objective.

Design Objective #2. Storefront Components:

- *Protect original components through appropriate treatments such as cleaning, rust removal, limited paint removal, and reapplication of protective coating systems.*

The Benjamin Franklin Hotel's storefronts have been substantially altered. Only one section of transom may be original. The storefronts are maintained.

It is ARG's opinion that the proposed project is consistent with this objective.

Design Objective #3 Repair Storefronts:

- *Repair storefronts by reinforcing the historic materials.*

Little historic storefront material remains on the front elevation. As a result, there is little historic material to repair.

It is ARG's opinion that the proposed project is consistent with this objective.

BB) Retain existing character when altering historic buildings.

According to the *Downtown Historic District Design Guidelines*, “alterations or construction of an exterior addition to a historic building may be needed to assure its continued use. It is most important, however, that alterations or new additions are constructed so that there is the least possible loss of historic materials and so that character-defining features are not obscured, damaged or destroyed. Alterations may include cutting new entrances or windows on secondary elevations, or floor area additions on secondary and non-streetwall elevations. New construction or additional stories required for a new use shall be set back from the wall plane, as inconspicuous as possible, and shall not alter the perceived street wall height of the existing building. New work should be compatible with the historic character of the district or alterations should be somewhat different from the historic construction so as not to confuse the viewer into believing the new construction is actually historic.”

Design Objective:

Alterations/additions to historic building shall:

- *Be compatible with the historic character of the district or neighborhood in terms of size, scale, design, material, color and texture;*
- *Be clearly differentiated so that a false historical appearance is not created; and*
- *Shall not radically change, obscure, or destroy character-defining materials, features, or finishes.*

Inserting new window at the penthouse level of the north (principal) façade would change the fenestration pattern of the central Spanish Colonial Revival style element. In addition, it would change the architect’s design intent for this feature by replacing the blind arches with windows. As a result, this aspect of the proposed project would not be consistent this design objective.

Additionally, the proposed project would add glass guardrails to the building’s parapet. Because they are set behind the parapet, they will not read as a continuation of the wall plane, and the addition of these features would alter the perceived street wall height of the existing building. This aspect of the project is consistent with this design objective.

VII. Conclusions/Recommendations

Some aspects of the proposed project are not consistent with *The Secretary of the Interior’s Standards for Rehabilitation (The Standards)* or the *City of San Mateo Downtown Retail Core & Downtown Historic District Design Guidelines*. These include:

- Introducing windows into the blind arches of the penthouse level of the north facade
- Introducing a “crayola” color scheme at floors three through eight of the south (rear) façade

ARG has concluded that two aspects of the project—introducing windows into the blind arches of the penthouse and the “crayola” color scheme at floors three through eight of the south (rear) façade—are not consistent with *The Standards*. However, it is not necessary for a project to be consistent with all ten of *The Standards* to be considered to have a less-than-significant impact on a historic resource. If a historic resource is still able to convey its historical significance that justifies its inclusion in, or eligibility for, the California Register, the impact is considered less than significant under CEQA. ARG evaluated the impact of the proposed project on the integrity of the historic resource and found that while the integrity of the Benjamin Franklin Hotel would be slightly diminished by the proposed project, overall, the historic resource would retain the physical characteristics that convey its historical significance and that justify its potential eligibility for the California Register. Similarly, ARG found that the integrity of the San Mateo Downtown Historic District would only be minimally impacted by the proposed project. As defined by CEQA, the proposed project would not result in substantial adverse change, material impairment, or cumulative impacts to the individual resource, the Benjamin Franklin Hotel, or the San Mateo Downtown Historic District.

As the project develops, there are some aspects of the project that should be reviewed in more detail in order to evaluate their consistency with *The Secretary of the Interior’s Standards for Rehabilitation (The Standards)* and the *City of San Mateo Downtown Retail Core & Downtown Historic District Design Guidelines*. The building permit drawing set should address the following items in detail:

- Details on entrance canopy and storefront systems
- Details on the encasement of the Benjamin Franklin signs and installation of the new Draper University signs
- Details on methods for mounting signage, lighting, and banners
- Protection specifications for the historic walls that surround the new window openings at the penthouse’s blind arches

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¹ CEQA Guidelines §15064.5(a).

² CEQA Guidelines §15064.5(b).

³ CEQA Guidelines §15064.5(b)(1).

⁴ CEQA Guidelines §15064.5 (b)(3).

⁵ For the purposes of completing this review, ARG relied on existing documentation and did not conduct additional research on the building.