

# KIMBALL HOUSE DEMOLITION PROJECT 544 TUCKER STREET FINAL ENVIRONMENTAL IMPACT REPORT

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SCH NUMBER 2018042074



PREPARED BY M-GROUP FOR:  
THE CITY OF HEALDSBURG  
PLANNING & BUILDING DEPARTMENT  
401 GROVE STREET  
HEALDSBURG, CA 95448



AUGUST 2018



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## APPENDICES

APPENDIX A RESPONSE TO COMMENTS MEMORANDUM FROM HOLLY HOODS

## LIST OF ACRONYMS

|        |   |
|--------|---|
| CEQA   | CALIFORNIA ENVIRONMENTAL QUALITY ACT        |
| APN    | ASSESSOR PARCEL NUMBER                      |
| CRHR   | CALIFORNIA REGISTER OF HISTORICAL RESOURCES |
| DEIR   | DRAFT ENVIRONMENTAL IMPACT REPORT           |
| EIR    | ENVIRONMENTAL IMPACT REPORT                 |
| FEIR   | FINAL ENVIRONMENTAL IMPACT REPORT           |
| HABS   | HISTORIC AMERICAN BUILDINGS SURVEY          |
| NOA    | NOTICE OF AVAILABILITY                      |
| NOP    | NOTICE OF PREPARATION                       |
| R-6000 | RESIDENTIAL DISTRICT                        |

# 1.0 INTRODUCTION

## 1.1 OVERVIEW

In accordance with the City of Healdsburg Local Guidelines and California Environmental Quality Act (CEQA) Sections 15088, 15089, and 15132 of CEQA, the City of Healdsburg has prepared the Final Environmental Impact Report (FEIR) for the “Kimball House Demolition” project. Pursuant to CEQA requirements, the City of Healdsburg must certify the FEIR as complete and adequate prior to approval of the proposed project.

Per CEQA Guidelines Section 15121(a) and 15362, an Environmental Impact Report (EIR) is an informational document meant to inform public agencies, decision makers, and members of the public by disclosing potential significant impacts likely to result from a project and identify methods to avoid or otherwise mitigate those impacts. An EIR must also consider a reasonable range of alternatives to a proposed project to avoid or minimize impacts while still feasibly accomplishing the stated project objectives.

Per CEQA Guidelines Section 15132, the FEIR shall be comprised of the following:

- a. The Draft EIR or revisions of the Draft.
- b. Comments and recommendations received on the Draft EIR, either verbatim or in summary.
- c. A list of persons, organizations, and public agencies commenting on the Draft EIR.
- d. The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- e. Any other information added by the Lead Agency.

## 1.2 PUBLIC PARTICIPATION

The environmental review process for the “Kimball Demolition” project commenced with circulation of the Notice of Preparation (NOP). The NOP was circulated for a thirty-day period from April 25, 2018 to May 25, 2018 and a public scoping meeting we held on May 15, 2018. Subsequently, on June 25, 2018, the City of Healdsburg released a Notice of Availability (NOA) for the Draft EIR. The NOA announced a thirty-day comment period on the DEIR extending from June 25, 2018 until July 25, 2018. The Public Comment period

provided an opportunity for interested parties to provide input regarding the adequacy of the environmental document. On July 24, 2018 the DEIR was considered at a public hearing before the Planning Commission. The Planning Commission received public comments, considered adequacy of the DEIR and directed staff to prepare the Final EIR.

Per CEQA Guidelines Section 15151 the adequacy of an EIR is measured based on the extent to which the analysis provides decision makers with enough information to take into account environmental consequences and make an informed decision. In general, courts have held that an EIR should not be held to a standard of perfection, but rather, should exhibit a good faith effort at full disclosure, and should be adequate and complete.

No substantial revisions that would merit recirculation of the DEIR as defined by CEQA Guidelines Section 15088.5(b) were made to the project or analyses after public comment. All comments received from the public, interested parties and decision makers on the DEIR are identified herein (Chapter 2). Chapter 4 provides a summary of comments received and responses to address comments.

### 1.3 FEIR PROCESS

This Final EIR (FEIR) includes written responses to environmental issues raised in comments received during the public review period in accordance with CEQA Guidelines Section 15088. The FEIR will be presented to the Planning Commission for consideration prior to taking action of the proposed project. Before the Planning Commission can take action on the proposed project, the decision makers must certify that the information presented in the EIR has been reviewed and considered, that the EIR has been completed in a manner that conforms with the requirements of CEQA, and that the City's independent judgment pursuant to CEQA Guidelines Section 15090 is adequately reflected.

In accordance with Section 21002, 21002.1 and 21081 of the Public Resources Code and CEQA Guidelines Sections 15091 and 15093, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects unless one or more of the following findings are made:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have

- been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other consideration including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

When a lead agency approves a project that will result in the occurrence of significant effects that cannot be avoided or substantially lessened, the agency shall state reasons to support the action in a “statement of overriding considerations” that is supported by substantial evidence in the record.

## 1.4 ORGANIZATION OF THE FEIR

The Final EIR document is organized as follows:

**Chapter 1, Introduction** provides an overview of the CEQA process, the public participation process, and organization of the FEIR.

**Chapter 2, Agencies and Individuals Commenting on the Draft EIR** provides a list of all comments received during the public review and comment period.

**Chapter 3, Executive Summary** provides a brief description of the project location, description of the project, alternatives considered, and a summary of the environmental impacts. This information is also provided in the Draft EIR.

**Chapter 4, Written Comments on the Draft EIR and Responses to Comments** provides comment letters and responses to comments. Responses to comments are provided following each letter. A numbering key is used for each comment letter and corresponding response.

**Chapter 5, Amendments to the Draft EIR** provides revisions to the DEIR by section. Additions are shown in underline and deletions are shown in ~~striketrough~~.

**Chapter 6, Mitigation Monitoring and Reporting Program** describes the identified mitigation measure, method of verification, timing of verification, responsible party, and completion of implementation of mitigation measures.



## 2.0 AGENCIES AND INDIVIDUALS COMMENTING ON THE DRAFT EIR

The following agencies, organizations, and individuals submitted verbal comments at the public hearing on July 24<sup>th</sup> and written comments on the Draft EIR during the 30-day public review period from June 25, 2018 to July 25, 2018.

| <b>LETTER/PUBLIC COMMENT</b>     | <b>AGENCY/INDIVIDUAL</b>                       | <b>DATE RECEIVED</b> |
|----------------------------------|--|----------------------|
| Verbal Comment 1                 | Phil Luks, Planning Commission                 | 07/24/2018           |
| Verbal Comment 2                 | Richard Tracy, Planning Commission             | 07/24/2018           |
| Verbal Comment 3                 | Michael Miller, Healdsburg Resident            | 07/24/2018           |
| Verbal Comment 4                 | Mark Alexander, Healdsburg Resident            | 07/24/2018           |
| Comment 1 (on NOP <sup>1</sup> ) | Jannette Ramirez, Caltrans                     | 07/05/2018           |
| Comment 2                        | Marc and Meg Alexander, Healdsburg Residents   | 07/24/2018           |
| Comment 3                        | Jim and Ann Van Noy, Healdsburg Residents      | 07/25/2018           |
| Comment 4                        | Cheryl and Steven Caletti, Healdsburg Resident | 07/25/2018           |
| Comment 5                        | Michael Miller, Healdsburg Resident            | 07/25/2018           |
| Comment 6                        | Karen Miller, Healdsburg Resident              | 07/25/2018           |

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<sup>1</sup> Caltrans submitted a late comment letter on the Notice of Preparation (NOP). Since the Caltrans comment letter on the NOP was received after release of the DEIR, the City has elected to address comments from Caltrans on the NOP as part of the FEIR.

# 3.0 EXECUTIVE SUMMARY

## 3.1 PROJECT LOCATION

The subject residence is located at 544 Tucker Street (APN. 002-281-236), in the southern portion of the City of Healdsburg, Sonoma County, California (see **Figure 1: Regional Location**). The project site is located within an existing residential neighborhood in close proximity to the Russian River (see **Figure 2: Project Vicinity**). The project site has a land use designation of Medium Density Residential and is zoned Residential District (R-6000). It is also located within the boundaries of the Tucker Street Historic District (see **Figure 3: Tucker Street Historic District**) — a District determined eligible for listing on the California Register of Historical Resources based on its significance as Healdsburg’s first exclusively residential street east of Fitch street, outside of the original town plat and because it contains an intact concentration of residential architectural styles dating to Healdsburg’s founding to the present. As detailed in the Tucker Street District survey, the eligible Tucker Street Historic District exhibits a period of significance spanning from 1864-1959.

## 3.2 PROJECT DESCRIPTION

The proposed project comprises a request for a discretionary historic demolition permit to demolish the residence at 544 Tucker Street, a 1872 Greek Revival residence with Queen Anne flourishes, known as “The Kimball House.” No new construction or redevelopment is proposed under this application.

A 2016 District nomination prepared for the “Tucker Street Historic District” by architectural historian, Diana Painter, identified the subject residence as one of 44 contributors to the District, which is eligible for listing on the California Register of Historical Resources (CRHR). The proposed demolition of a contributor to an eligible historic district may cause a substantial adverse change to the integrity of the District, as a historic resource, and therefore is a project that may have a significant effect on the environment.

## 3.3 PROJECT OBJECTIVES

The following are the Applicant's Objectives:

- Removal of the structurally impaired and visually deteriorated residence located on private property at 544 Tucker Street.

The following are the City's Objectives:

- Remove a potential threat to public health and safety by demolishing a building that does not comply with current building codes.
- Remove a structure that could attract criminal activity and other nuisances.
- Encourage and support the efforts of individual homeowners to improve the visual appearance of residential neighborhoods.
- Ensure that the City's values of historic and cultural heritage are considered.

### 3.4 ALTERNATIVES CONSIDERED

CEQA Guidelines section 15126.6(b) specifies that the discussion of alternatives focus on "potentially feasible alternatives" capable of eliminating any significant adverse environmental impacts or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. A relocation alternative was considered but determined to be infeasible due to the condition of the Kimball House, which is structurally compromised and not expected to withstand relocation. Alternatives analyzes include the "no project alternative," under which the proposed demolition of the "Kimball House" would not go forward, and the "Rehabilitation Alternative," under which the subject building would be rehabilitated in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

### 3.5 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

#### **LESS THAN SIGNIFICANT IMPACTS:**

**Impact 4.1-1:** The proposed project would not adversely impact the integrity of an individual historic resource. This would be less than significant.

**Impact 4.1-2:** The proposed project may adversely impact the integrity of the Tucker Street Historic District, which is recognized as an identified historic resource. This would be less

than significant.

**SIGNIFICANT IMPACTS:** None identified other than Impact 4.1-3 below.

**SIGNIFICANT AND UNAVOIDABLE IMPACTS:**

**Impact 4.1-3:** Demolition of 544 Tucker Street would contribute to cumulative impacts to the eligible Tucker Street Historic District, which is a historic resource (i.e., buildings, structures, objects, districts, sites). This impact would be significant and unavoidable.

**MITIGATION MEASURES:**

**MM 4.1-3a:** Prior to issuance of a demolition permit, photographic documentation shall be undertaken by a qualified professional and shall be reviewed and approved by the Planning Department. Photos shall be large format, black and white photos, and printed on archival quality paper. Views and perspectives photographed shall be consistent with those suggested under the Historic American Buildings Survey (HABS) standards. Photographic documentation shall be placed on file at the Healdsburg Museum and Historical Society with digital copies provided to the City of Healdsburg Planning Department.

**MM 4.1-3b:** Prior to issuance of a demolition permit, the applicant shall engage a historic architect to identify salvageable materials. A salvage plan with materials planned for salvage shall be provided for review and approval to the City's Planning Department and included in demolition plans submitted to the Building Department. Salvaged materials shall be donated to Healdsburg Lumber or other appropriate entity.

**MM4.1-3c:** A plaque shall be erected at the property frontage of 544 Tucker Street that details the history of the Kimball House and its individual significance. Plaque type and language shall be subject to review and approval by the City prior to issuance of demolition permit. The plaque shall be installed 6 months following issuance of a demolition permit.

**MM4.1-3d:** The applicant shall fund the creation of a self-guided walking tour booklet, prepared by a qualified historian or architectural historian and which provides information on the Tucker Street Historic District including the District's boundaries, contributors, and historical significance. The Walking Tour booklet shall be provided to the City for review and approval prior to publication. Once completed, the booklet shall be made available at the City Planning and Building Department, Healdsburg Chamber of Commerce and Visitor's bureau, City of Healdsburg Library, Healdsburg Museum and Historical Society and available online.

# 4.0 COMMENTS ON THE DEIR AND RESPONSES TO COMMENTS

During the thirty-day comment period on the DEIR extending from June 25, 2018 to July 25, 2018, the City of Healdsburg received a total of 4 verbal comments and 6 written comments. The agencies, organizations, and individuals who provided comments are listed, above under Section 2.0. All comments received are paraphrased, below. Paraphrased comments are *italicized* to differentiate from responses provided which follow each comment. Responses that prompt text augments to the DEIR are identified in underline text and are further enumerated in Chapter 5.0, Augments to the DEIR.

Some of the comments received conflate points and opinions relevant to the project's merits with points pertinent to the potentially significant environmental effects of the Project. Detailed responses have only to be provided for those comments that raise substantive environmental issues. Comments that relate only to the merits of the project have been identified and will be considered by the City prior to making a decision on the project, but no response is provided in the FEIR as they do not relate specifically to environmental effects.

## 4.1 RESPONSE TO COMMENTS RECEIVED AT PUBLIC HEARING

VC-1. **Phil Luks, Planning Commissioner** – *questioned legal basis for finding that project would contribute to cumulative impacts.*

**Response:** At the July 24<sup>th</sup> hearing, a question was raised as to whether or not there is a legal basis for finding that the subject project would generate a cumulative impact. Per CEQA Guidelines Section 15130, "An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065(a)(3)." Section 15065(a) states that, "A lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence, in light of the whole record, that the project has possible environmental effects that are individually limited but cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

As detailed on page 4-18 of the Draft EIR, past demolition and alterations in the Tucker Street Historic District and throughout the City have resulted in adverse impacts to historical resources. Present and future development activities will continue to affect both identified and yet to be identified historic resources within the City of Healdsburg. In respect to historic districts, it can be valuable to consider the relative vulnerability of the district and resources therein to identify the potential for cumulative impacts. To determine the overall state of the historic district, recent trends that affect the historic district must be considered, in order to identify whether the historic district is improving, stable, or in decline.

The Tucker Street Historic District is comprised of 68 properties, 44 contributor and 24 non-contributors. Each loss of a contributor becomes relatively more significant as the tipping point approaches a balance between contributors and non-contributors, which would compromise the integrity of the District as a resource.

In response to this comment, the last paragraph on page 4-18 has been revised as follows, to further bolster the determination that the proposed project would result in impacts that are considered cumulatively considerable, significant, and unavoidable:

“The proposed demolition of a contributor to an identified historic district has the potential to cumulatively contribute to impacts to historic resources.” Based on available building permit records, the City has approved the demolition of three homes within the boundaries of the Tucker Street District since 2005. “While there are regulations set forth to encourage protection of historic resources, such regulations do not mandate protection under any and all circumstances. It is reasonable to expect that there will be cases of demolition by neglect whereby deferred maintenance precludes feasible rehabilitation or the presence of health and safety hazards requires removal of a resource, or it is determined that impacts of removing a historic resource is outweighed by the benefits afforded by a new development.”

For example, the Healdsburg Demolition Ordinance findings are broad enough that they allow for approval of demolition in a number of circumstances, including instances where the adaptive reuse of the structure is infeasible or inappropriate due to economic considerations, structural conditions, or land use incompatibility; or where restoration of the building or structure is not feasible using current building codes, or when no public funding is available to finance renovation or purchase the resource, amongst others.

The Healdsburg Land Use Code Section 20.12.085 "Maintenance and repair" specifies that, "Neither the owner nor the person in charge of a designated historic building or of a designated landmark shall permit the structure or landmark to fall into a state of disrepair that could result in the deterioration of any exterior appurtenance or architectural feature so as to produce or tend to produce, in the judgment of the historic committee, a detrimental effect upon the character of the district as a whole or the life and character of the landmark or structure in question . . ." This clause is only applicable to designated historic buildings or landmarks therefore, "eligible" districts, which have not yet been designated, such as the Tucker Street Historic District remain vulnerable to demolition by neglect.

Guidance issued from the National Park Service and California State Office of Historic Preservation does not dictate a specific number of contributing resources that must be retained in order for a District to retain integrity, but a clear majority tends to be expected in most areas. Because each contributor lends itself to conveying significance in a unique way (architectural style, relative prominence, relative rarity, relationship to its neighbors etc.) it is difficult to know when there might be a tipping point which would eliminate the District's overall integrity. Based on review of past and current trends and the fact that, as an undesignated district, it remains vulnerable, relative to its designated counterparts, it is reasonable to conclude that the demolition of the contributing "Kimball House" is "cumulatively considerable."

"There remains potential for current and future demolition projects to occur within the Tucker Street Historic District, which combined with the subject demolition of the Kimball House would result in cumulative impacts to the District. This is particularly relevant when considered in the context of historic districts, which rely on the collective significance of many resources and must maintain a majority of contributors to be able to convey significance."

As supported by the analysis of the EIR and further clarified by the information discussed above, there is a reasonable basis for determining that the subject project may contribute to cumulative impacts within the eligible Tucker Street Historic District and no changes to the conclusions of the Draft EIR are warranted.

VC-2. **Richard Tracy, Planning Commission Chair** – *requested that City respond to Caltrans' comment letter on the NOP.*

**Response:** See responses 1-1 through 1-4, below.

VC-3. **Michael Miller, Healdsburg Resident** – *agreed with cumulative impact findings.*

**Response:** Comment noted.

VC-4. **Mark Alexander, Healdsburg Resident** – *commented on merits of project.*

**Response:** Written transcript of Mr. Alexander’s comments are included below (see Section 4.2.2). Responses to Mr. Alexander’s comments are provided in Section 4.2.2.1.

## 4.2 WRITTEN COMMENTS RECEIVED

| COMMENT LETTER   | FEIR SECTION     | COMMENT #'S |
|--|------------------|-------------|
| 1. Jannette Ramirez, Caltrans<br>Response to Comment Letter 1                      | 4.2.1<br>4.2.1.1 | 1-1 to 1-4  |
| 2. Marc and Meg Alexander, Healdsburg Residents<br>Response to Comment Letter 2    | 4.2.2<br>4.2.2.1 | 2-1 to 2-5  |
| 3. Jim and Ann Van Noy, Healdsburg Residents<br>Response to Comment Letter 3       | 4.2.3<br>4.2.3.1 | 3-1 to 3-4  |
| 4. Cheryl and Steven Caletti, Healdsburg Residents<br>Response to Comment Letter 4 | 4.2.4<br>4.2.4.1 | 4-1 to 4-3  |
| 5. Michael Miller, Healdsburg Resident<br>Response to Comment Letter 5             | 4.2.5<br>4.2.5.1 | 5-1 to 5-4  |
| 6. Karen Miller, Healdsburg Resident<br>Response to Comment Letter 6               | 4.2.6<br>4.2.6.1 | 6-1 to 6-7  |

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life.***4.2.1 COMMENT 1: JANETTE RAMIREZ, CALTRANS**

July 5, 2018

Ms. Maya DeRosa  
Director of Planning & Building Department  
City of Healdsburg  
Planning & Building Department  
401 Grove Street  
Healdsburg, CA 95448

SCH# 2018042074  
04-SON-2018-00269  
GTS ID 10391

**544 Tucker Street – Kimball House Demolition – Notice of Preparation (NOP)**

Dear Ms. DeRosa:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach in evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the NOP.

***Project Understanding***

The applicant request a Historic Demolition Permit to demolish a 1872 Revival residence, known as "The Kimball House" located at 544 Tucker Street, Healdsburg, CA 95448. The Kimball House is associated with significant themes or patterns of events distinctive architectural characteristics. However, the Kimball House lacks sufficient integrity for listing in the California Register and the National Register of Historic Places. The subject residence has been identified as a contributor to the eligible "Tucker Street Historic District." The potential "Tucker Street Historic District" is eligible for listing in the California Register of Historic Resources at the local level. No new construction or redevelopment has been proposed. Access to the project site is provided via an existing driveway on Tucker Street. The project site is located approximately 0.9 miles northeast of the US 101/Mill Street interchange.

***Cultural Resources***

To clarify the NOP's assertions, as the Kimball House is eligible for listing in the California Register as a contributor to the eligible Tucker Street Historic District, the Kimball House is eligible for listing in the California Register. The conclusions in the NOP appear to be based on a problematic Historic Evaluation Report. In reviewing the evaluation of the property, Caltrans'

professionally qualified architectural historians have identified a number of issues. We recommend that as a part of the environmental review, the City of Healdsburg re-evaluate the Kimball House for individual eligibility to California and National Registers.

1-1 The Historic Evaluation Report seems to conflate levels of maintenance with levels of integrity for workmanship and materials. The level of deterioration is not normally a factor in the consideration of integrity. Integrity of materials and workmanship are determined only by the extent to which original materials are present/absent and the extent to which original workmanship has been altered/removed. The evaluation lacks a detailed explanation of why the property lacks integrity for setting, feeling, and association. The report also contradicts itself with regards to setting. It describes that some integrity of setting is present. Yet elsewhere, the report and executive summary state that only location has retained integrity.

1-2 Additionally, stating that the property has no integrity of design, workmanship, and materials is incorrect. As spelled out elsewhere in the report, the property retains many of its original elements in all three of those integrity categories. Furthermore, the evaluation has a singular focus on the design, workmanship, and materials integrity of the resource. Although there are many unsympathetic additions and alterations on the property, this would primarily influence its eligibility under Criterion 3 (California Register) and Criterion C (National Register). It is apparent that this property is individually significant under Criterion 2/B for its association with Dr. Kimball. Therefore, integrity of materials, workmanship, and design are far less important in determining historic significance than feeling, setting, location, and association.

1-3 While a property important for association with an individual would ideally retain some features of all seven aspects of integrity, a basic integrity test for a property associated with an important person is whether a historical contemporary would recognize the property as it exists today. The fact that Dr. Kimball's home and doctor's office addition still exists in their original locations, convey most of their original exterior characteristics and are still situated in a quaint residential neighborhood, one must conclude that it would likely be instantly recognizable to a historical contemporary. Lastly, the National Register evaluation is incomplete as it only documents the shortcomings the property has under Criterion C (architectural integrity), while ignoring Criteria A and B. This is inadequate to determine the eligibility of this property for the National Register, especially since this property seems to draw most of its significance from Criterion B (its association with Dr. Kimball).

1-4

### ***Lead Agency***

As the Lead Agency, the City of Healdsburg is responsible for all project mitigation, including any needed improvements to the STN. The project's financing, scheduling, implementation responsibilities and monitoring should be fully discussed for all proposed mitigation measures.

Ms. Maya DeRosa, Director of Planning & Building Department  
City of Healdsburg  
July 5, 2018  
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Should you have any questions regarding this letter, please contact Stephen Conteh at (510) 286-5534 or [stephen.conteh@dot.ca.gov](mailto:stephen.conteh@dot.ca.gov).

Sincerely,

  
for Jannett Ramirez

PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse

### 4.2.1.1 RESPONSE TO COMMENT 1

It should be noted that this comment letter was received on July 5, 2018 in response to the Notice of Preparation (NOP). The 30-day NOP review period extended from April 25, 2018 to May 25, 2018. The City of Healdsburg, as the lead agency, has chosen to provide responses to this late letter received on the NOP.

1-1 *The commenter notes that the evaluation lacks a detailed explanation as to why the property lacks integrity of setting, feeling, and association. The comment also points out a contradiction in the "Hood's Evaluation" related to the integrity finding for setting.*

**Response:** The contradiction of the HRE, pointed out by the commenter, was noted and considered in the body of the Draft EIR. Page 4-14 of the DEIR details that the subject resource was found to, "retain integrity of location and some setting, but lacks integrity of feeling, design, materials, workmanship, and association." To provide clarification on the integrity findings, the author of the Historic Resource Evaluation, Holly Hoods, Architectural Historian, prepared a Response to Comments Memorandum, dated August 7, 2018. The Memorandum, included as Appendix A to this FEIR, specifically addresses the comments raised regarding the integrity findings. The following clarification is provided regarding each of the seven aspects of integrity as they relate to the Kimball House and augments language included on page 4-14 of the DEIR:

**Location:** Location is the place where the historic property was constructed or the place where the historic event occurred.

The Kimball house has not been moved. It retains integrity of location.

**Design:** Design is the combination of elements that create the form, plan, space, structure, and style of a property.

The integrity of design has been compromised. The massing, form, style and structure of the original single family residence have been altered by multiple additions of poor quality and inferior materials, particularly on the south and west elevations. The north elevation (façade) had a half-width wooden front porch, which has since been remodeled and replaced. The wooden porch floor, railings and supports have been replaced by a concrete porch and railings and supports and a ramp. The original single-family dwelling has also been reconfigured into

apartments with new openings cut into the building, including the front façade. The Kimball House does not retain integrity of design.

**Setting:** Setting is the physical environment of a historic property.

The original Kimball property was a small farmstead with an orchard and barn to the south, according to 1890s Sanborn maps and tax records. The Kimballs had three houses within view on this quiet street when they lived here: one to the west, one to northwest and one to the northeast. They originally owned more undeveloped land to the north and east. The rural historical setting has been impacted by contemporary construction on the south and west sides. The Kimball House has lost integrity of setting.

**Materials:** Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. A property must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved. The property must also be an actual historic resource, not a recreation; a recent structure fabricated to look historic is not eligible. Likewise, a property whose historic features and materials have been lost and then reconstructed is usually not eligible.

The alterations to the building between the 1930s-1970s have been made with a variety of materials, many of them substandard and without permits. The use of T-111 siding and aluminum windows in the repairs and additions during the 1960s is especially unfortunate. The 1980s residential fire at the northwest corner of the façade and east elevation caused great damage to the exterior siding, quoins, porch, roof and windows. The 1980s replacement porch and reconstructed quoins on the northwest corner of the building are credible substitutions, but are not original. The wooden porch was changed to concrete and a ramp was installed. The Kimball house lacks integrity of materials.

**Workmanship:** Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. Examples of workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery.

The workmanship of the original building was not continued in the alterations. This relates to the quality of materials used in the construction. Many of the additions appear to have been made in the 1930s-1970s by unskilled labor using salvaged or scrap materials without permits. The Kimball house does not retain integrity of workmanship.

**Feeling:** Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.

The rural farmstead feeling of the 19th century single family residence is not completely lost, but it has substantially changed. The setback and the mature trees help retain some of the historical feeling that the house otherwise lacks. The porch and ramp and division into apartments detract from the historical appearance at the NW side of the façade; the NE side of the façade retains the few remaining character elements. The well-kept appearance of the Kimball Residence when it was single family included a tidy fence and decorative trim in good repair. In the absence of these elements, the subject resource does not retain integrity of feeling. In its altered state, the Kimball House has lost much of the integrity of feeling.

**Association:** Association is the direct link between an important historic event or person and a historic property. A property important for association with an event, historical pattern, or person(s) ideally might retain some features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance, and would not be relevant if the property were a site. A basic integrity test is if a historical contemporary would recognize the property as it exists today.

Historically the Kimball property was a single family residence with an office wing. It lost that association decades ago when it was converted for use as multi-family residential apartments. The appearance of this building has been badly compromised on 3 ½ of the four elevations as detailed herein and on pages 4-8 to 4-14 of the DEIR. Only one-fourth of the house consists of original materials in their original placement. The Kimball House lacks integrity of association.

~~“As such. Based on the above, when considered individually, the building retains integrity of location and some setting, but lacks integrity of setting, feeling, design, materials, workmanship, and association.”~~

1-2 *This comment states that the Historic Resource Evaluation incorrectly concludes that the subject resource lacks integrity of design, workmanship, and materials.*

**Response:** As detailed on page 4-12 of the DEIR, the subject resource was determined to be individually significant under California Register of Historic Resources (CRHR) Criterion 2 based on its association with an important person, Dr. Margaret Viola Covey Doane Kimball and significant under CRHR Criterion 3, based on its embodiment of distinctive architectural characteristics. As detailed in Appendix A and discussed on Pages 4-13 and 4-14 of the DEIR, for a building to retain integrity it should typically possess most if not all of the seven aspects of integrity. However, depending on the reason for its significance, certain aspects may hold more weight than others.

As detailed on page 4-13 and 4-14, in order for a resource to be considered a historic resource, it must retain enough of those essential features to be able to convey its historic significance, and this is understood in terms of integrity. There are seven aspects of integrity, and while a resource need not retain all aspects it should retain a majority, or at the very least, those most important to convey the resources specific type of significance. See response provided to Comment 1-1 above, which clarifies findings for each of the seven aspects of integrity and Appendix A, Memorandum from Holly Hoods, which clarifies the integrity findings of the Historic Resource Evaluation.

As stated on page 4-13, the Kimball House has undergone multiple alterations, which have served to undermine its original design, workmanship, and materials. Such inappropriate changes have included replacement of original siding and windows with unlike materials, loss of decorative materials, including removal of roof cresting, second story porch railing, decorative doors, as well as incompatible additions which have served to compromise the building’s integrity of design, materials, and workmanship and its ability to serve as a good representative of a particular style of architecture. Specifically, as detailed on DEIR pages 4-8 to 4-10, the front elevation has been subject to alterations including the addition of a secondary door, added when the property was divided into three apartments in the 1920s. Also, on the first story of the gable front, is a canted bay window with a hipped roof and recessed panels. The original lights of the bay window have been replaced with aluminum louvers.

On the east elevation all of the original 2 over 2 double hung windows have been replaced with louvered aluminum windows. On the southeast corner of the east elevation is a one-story wood frame rectangular addition with moderately pitched gable roof. This addition was constructed in the 1890s to serve as an office for Dr. Margaret Kimball. The addition retains the original drop siding and decorative fish scale shingles; however, the original door which featured an ornate mantle, multiple lights and stained glass transom window has been replaced by a plywood door.

On the west elevation, the first story is punctuated with two windows, but the original 2 over 2 double hung windows have been replaced with wooden sliders. Also, a new doorway has been added between the windows. Likewise, the original 2 over 2 double-hung window has been replaced by an aluminum louvered window.

Finally, the rear elevation features plywood siding and original windows have been replaced with aluminum windows with simple surrounds (likely dating to the 1960s). The rear elevation features four distinct additions, two flat roofed, and two with gable roofs, some of the additions are clad in T-111 siding which are incompatible with the original design of the house. Based on the number of alterations, it was concluded that the Kimball House has lost integrity as an individual resource. To more clearly address the current state of each aspect of integrity, the revisions to the EIR, detailed above, under Response 1-1 will be added to page 4-14 of the DEIR.

It should further be noted that in rendering a decision on a project where there is disagreement among experts, the decision-makers are not obligated to select the most environmentally preferable viewpoint. Decision-makers are vested with the responsibility to choose whichever viewpoint is preferable, based on substantial evidence, and need not resolve a dispute among experts. In their proceedings, decision-makers must consider comments received concerning the adequacy of the environmental document and address any objections raised in these comments. However, decision-makers are not obligated to follow any directives, recommendations, or suggestions presented in comments received, and can certify the Final EIR without needing to resolve disagreements among experts.

1-3 *This comment notes that, while a property important for association with an individual would ideally retain some features of all seven aspects of integrity, that a basic integrity test for a property associated with an important person is whether a historical contemporary would recognize the property as it exists today. The comment goes on to*

*state that, under the circumstances, the subject property would in fact be recognizable to a historic contemporary.*

**Response:** The design, materials, workmanship, feeling, association, and setting have been compromised to such a degree that the Kimball House would likely not be immediately recognizable by a historic contemporary. The appearance of the subject building has been badly compromised on three and a half of the four elevations. While the basic form of the building can be observed, only one-fourth of the house consists of original materials in their original placement. In addition, the setting has been altered through removal of historic vegetation, orchards, and loss of open space. The introduction of modern homes and intensification of uses proximate to the subject property has further resulted in changes to the feeling and diminished the likelihood that a historical contemporary would in fact be able to immediately recognize the subject residence. As described above in responses 1-1 and 1-2, the additions and modifications to the building have substantially degraded the integrity to such an extent that only one-fourth of the building consists of original materials. As such, when taken together, the building and its surroundings have in fact been altered to such a degree that it would be difficult to recognize by a historical contemporary.

1-4 *The comment notes that the National Register Evaluation included in the Historic Resource Evaluation is incomplete because it only documents the shortcomings of the property under Criterion C (architectural integrity), while ignoring Criteria A and B. The comment goes on to state that the National Register Evaluation is inadequate, and that because of its inadequacy, the eligibility of this property for the National Register cannot be determined.*

**Response:** Per CEQA Guidelines, in general, a building may qualify as historic resource for the purposes of CEQA if it is determined to be eligible for the California Register of Historic Resources (CRHR). Accordingly, the evaluation of the property for listing on the National Register of Historic Places (NRHP) is not necessary. Nevertheless, a response is provided to clarify the findings.

In respect to NRHP Criterion A (association with significant themes or patterns of events), the resource is associated with the Tucker Street Historic District which was determined eligible for listing on the CRHR, not the NR, accordingly, as a contributor, the subject resource's significance would be at the state level and it therefore is determined not be eligible under NRHP Criterion A. To elaborate on the resource's potential eligibility under

CRHR Criterion 2 and NRHP Criterion B (association with significant persons), page 4-12 of the EIR will be augmented with the following language, which is informed by Appendix B hereto:

CRHR Criterion 2: Association With Life of (Locally) Important Person

National Register Criterion B and California Register Criterion 2 apply to properties associated with individuals whose specific contributions to history can be identified and documented. "Persons significant in our past" refers to individuals whose activities are demonstrably important within a local, state, or national historic context.

"The residence is significant for its association with Dr. Margaret Viola Covey Doane Kimball, a notable early Healdsburg resident, one of the first licensed female doctors in late 19th century Sonoma County, California. Not only was her medical office located in the subject building, she also lived at this home during her productive professional life. Her husband, Captain Charles Kimball, owner of Healdsburg Lumber Company, was also a respected business man in the community, but he does not rise to the same level of individual prominence. Dr. Margaret Kimball is locally significant because of her profession, the relative rarity of licensed women physicians practicing medicine during this era." Dr. Margaret Kimball was a locally notable individual; however her medical practice was modest.

Kimball was an early doctor, but not a leading figure in American, California or Sonoma County medicine. Thirty-one years earlier in New York, Elizabeth Blackwell became the first female doctor in the U.S. with a degree from Geneva Medical School, according to National Library of Medicine records. Other women soon followed. By 1860, there were 54,543 doctors in the United States; 300 of whom were (white) women. Rebecca Crumple became the first American black woman to earn a medical degree in 1864, practicing in Virginia. Margaret Kimball obtained her medical degree from the University of Michigan Dept. of Medicine and Surgery in 1880. She moved to Healdsburg in 1889, 32 years after the town was founded; 39 years after California statehood.

Margaret Kimball's medical career is primarily reflected in the archives of the Healdsburg Museum and Historical Society through ads she placed in the historic newspapers of her day. Her biography was researched within the context of 19th

century medical history in Sonoma County, California. Dr. Elisha Ely of Geyserville and Dr. John Boyce of Santa Rosa were the first (non-Native American) doctors in pioneer Sonoma County, practicing in the mid 1850s. The first to hold the title of “Sonoma County Physician” was R. Press Smith, appointed in 1869. The Sonoma County Medical Association was formed the following year, but it was an all-male organization. By 1877 there were 18 physicians licensed to perform medicine and surgery in Sonoma County: Elisha Ely, A.W. Gamble, Q.C. Smith, James Shephard, B.B. Allen, I.O. Boggs, T.E.R. Gildersleeve, J.H. Crane, J.B. Christie, S.H. Rupe, T.W. Seawell, W.D. Harrison, G.W. Wells, G.W. Graves, E. Von Hasslocker, W.W. Carpenter, James Forsman and Charles Van Geldern.

Dr. M.V. Kimball joined the medical community as a local practitioner of “women’s medicine” (obstetrics and gynecology), but was not the first or only woman to practice medicine in Healdsburg at the turn of the 20th century. Ella Barrett distinguished herself as the first woman doctor in Healdsburg (1859). Anabel McG. Stuart was the first female doctor in Santa Rosa (1878). Women physicians are included in the Official Register of Physician and Surgeons in the State of California Who Hold Certificates from the Board of Medical Examiners of the Medical Society of the State of California. Third Edition, 1 January 1887. Dr. Kimball joined the ranks of Lucy Wanzer (1874), Charlotte Blake Brown (1874), Alice Higgins (1877), Anabel McG. Stuart (1878), Martha Bucknall (1858), Sarah E. Browne (1874), Elizabeth Follansbee (1877), C. Annette Buckal (1858), Mary B. Ritter (1886), Mary E. Botsford (1896), Edna Sutro Merritt (1887). Margaret Kimball of Healdsburg was not listed among the cadre of influential early medical women of California profiled in Adelaide Brown, M.D.’s 1925 article, “The History of the Development of Women in Medicine in California,” published in California and Western Medicine.

At the time she practiced, Dr. Kimball was one of approximately 1,100 residents in Healdsburg. In addition to her 19th century medical degree and her gender, she was known for her benevolence toward the less fortunate in the community. Dr. Kimball had a small, devoted clientele. The construction of a tasteful medical office addition on the east side of her Tucker Street residence came after at least a decade of renting office space downtown; it seemed to reflect the downsizing of her practice in its later years. “Therefore, the property is individually significant under CRHR Criterion 2, based on its association with an important person, Dr. Margaret Viola

Covey Doane Kimball," but does not rise to the level of significance required for listing on the National Register of Historic Resources.

The Historic Resource Evaluation of the Kimball Residence at 544 Tucker Street was based on all available relevant property-specific research: deeds, newspaper articles, historical photographs, Sanborn Fire Insurance maps, tax records, census records, city directories, Museum subject files, building permits, assessor records, prior historical research, home inspection and structural engineering reports. Biographical research was conducted on all of the historical residents, with special focus on Margaret Kimball, M.D. Further research would not bolster Dr. Kimball's significance under National Register Criterion B and/or California Register Criterion 2. Therefore, the conclusion of the Historic Resource Evaluation remains, that the Kimball House does not meet the level of significance to be individually eligible for inclusion in the National Register of Historic Places and/or California Register of Historical Resources under one or more criterion. No further changes to the EIR are warranted.

## 4.2.2 COMMENT 2: MARC AND MEG ALEXANDER, HEALDSBURG RESIDENTS

Comment — 2

**4.2.2 COMMENT 2: MARC AND MEG ALEXANDER, HEALDSBURG RESIDENTS**

Marc and Meg Alexander  
 538 Tucker Street  
 Healdsburg  
 July 24, 2018

Re: Proposal to Demolish 544 Tucker Street

To Whom It May Concern:

- 2-1 As next door neighbors of the property in question, we want to add our voice in response to the proposal to demolish the structure at 544 Tucker Street. The very particular location of the house opposite Tilley Grove establishes it as a particularly special place. We have so many people tell us that our block is their favorite block in Healdsburg, and the many bikers and walkers both with and without dogs are a testimony to that.
- 2-2 The historic home on this site has been on under the same ownership for close to 40 years. It has been hard to watch the house fall into disrepair despite being owned by a contractor who sits on the planning commission. The fact that it has now been declared unfit for habitation culminates decades of non-maintenance--a disturbing aspect of the request for demolition.
- 2-3 Although the house might now be a candidate for demolition, many houses in the older section of Healdsburg have been radically renovated to maintain the character of the house and the neighborhood. The Kimball House is one that could very well attract a buyer of that sort. We understand that one might be waiting in the wings.
- 2-4 Given Healdsburg's commitment to protecting the character of our older neighborhoods, it is disturbing to us to have a demolition permit granted without establishing the guidelines and restrictions for what might be developed on the lot and consideration of how the neighborhood would be impacted.
- 2-5 In summation, we would ask the city not to approve a demolition permit without a plan for reconstruction.

### 4.2.2.1 RESPONSE TO COMMENT 2

2-1 *This comment states that the “Kimball House” is located directly across from Tilley Grove, and that the Kimball House, in combination with Tilley Grove, provide a special place for people that reside, walk, or bike through the neighborhood.*

**Response:** As described in the DEIR, the proposed project includes the removal of a single-family home from the project site. The proposed project does not in any way affect Tilley Grove, its historic trees or the ability of people to walk or bike through the neighborhood. There is no new construction proposed at this time, but when construction is proposed it will be subject to Healdsburg’s Design Guidelines, which will ensure compatibility of style, design and architecture with surrounding properties. Although the subject property is located across the street from Tilley Grove, there would be no direct impact to the park and Tilley Grove would continue to be preserved in it’s current undeveloped state.

2-2 *The commenter expresses displeasure in that the house has not been maintained and that it is now declared unfit for habitation. The commenter finds that the request for demolition is disturbing.*

**Response:** This comment is acknowledged. This comment related to the merits of the project and does not address the adequacy of the EIR. No further response is required.

2-3 *The commenter notes that the house could attract a buyer who wants to renovate the home, as that has been the case with many other homes in Healdsburg.*

**Response:** This comment is acknowledged. Alternatives to the proposed project (demolition of the Kimball House) were considered and evaluated in Chapter 6 of the Draft EIR. As stated on page 6-1, and in accordance with CEQA Guidelines Section 15126.6(a), an EIR need not consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. As demonstrated in Chapter 6, the Draft EIR considered a reasonable range of potentially feasible alternatives, which included the Kimball House Relocation Alternative, No Project Alternative, and the Rehabilitation Alternative. These alternatives were selected for evaluation because they could potentially attain most of the basic objectives of the project but would avoid or substantially lessen the significant effects of the project.

Although, the property owner is not proposing to renovate the home, the DEIR includes the Rehabilitation Alternative, which aligns with the commenter's suggestion that the house be renovated by a willing party. The conclusion for the Rehabilitation Alternative, as stated on page 6-5 of the Draft EIR, was that the alternative would not achieve the applicant's objectives because it would not allow for removal of the building. However, this alternative would address the structural issues and safety hazards that the building currently presents. The Rehabilitation Alternative would achieve the City's objective of ensuring that the City's values of historic and cultural heritage are considered. The DEIR identified the Rehabilitation Alternative as the environmentally superior alternative as stated on page 6-5.

2-4 *The commenter expresses concern that a demolition permit is being considered without having established guidelines and restrictions for what might be developed on the lot, and consideration of the how the neighborhood would be impacted from the new development on the lot.*

**Response:** This comment is acknowledged. The City of Healdsburg has received an application for a Historic Demolition Permit from the property owner. No other applications have been received at this time for any proposed new development on the subject property. There is no requirement that a development proposal be submitted prior to consideration of a Demolition Permit. Rather, Section 20.24.235 states that a condition of approval "**may be adopted** (emphasis added) in approving a demolition permit" that requires approval of a design review application prior to approving a demolition permit. Since no future development is currently proposed and no conceptual design has been contemplated for 544 Tucker, an analysis of the potential environmental impacts from future development on the subject property would be speculative.

However, the subject property has a General Plan Designation of Medium Density Residential (MR), which allows for the construction of three to six dwelling units per acre. The subject property has a zoning designation of Residential District (R-1-6,000 square feet minimum lot size). Given the existing General Plan and Zoning designations, the subject property could be developed with residential units in the future. If and when an application is received for development on the subject property, the proposed development would be required to undergo environmental review in accordance with CEQA and would further be subject to the City's adopted Design Guidelines, which would provide guidance to ensure that any new development would be compatible with the established character of the neighborhood.

2-5 *The commenter asks that the City not approve a demolition permit without a plan for reconstruction.*

**Response:** This comment is acknowledged. Please see Response 2-4, above.

### 4.2.3 COMMENT 3: JIM AND ANN VAN NOY, HEALDSBURG RESIDENTS

To: City of Healdsburg Planning & Building Department

From: Jim and Ann Van Noy, 539 Tucker St. Healdsburg

#### **Re: Comments on DEIR Kimball House Demolition 7/25/2018**

3-1

As owners ourselves of the historic Coffman house which sits directly across Tucker Street from the Kimball House, we reject the claim in the Draft EIR that demolition of the Kimball house will significantly impact the integrity of the proposed Tucker Street Historical District. This claim seems to be the primary driver of a decision to deny the demolition... but in our opinion, the loss of one very deteriorated and highly compromised dwelling, retaining only “a modicum of its original character” does not pose a threat to the “district” when 43 other historic homes have been identified as viable contributors. And one of these is representative of the Greek Revival style already... not to mention that, as of this date, the REALITY of a Tucker Street Historic District has YET TO BE DETERMINED!

3-2

No other house on Tucker Street, historic or newer construction, constitutes such a blight on the neighborhood as the Kimball House. Sadly the level of neglect coupled with a disregard for architectural integrity as evidenced by the shabby rear additions amounting to not much more than sheds has rendered the house beyond rehabilitation. The tipping point for a rehab effort has passed with the dereliction now representing a safety hazard to those who live nearby. Besides the significant fire danger, the uninhabited structure is attracting vagrants and undesirables. Despite what the EIR claims about the 2017 Building Official's requirement of securing the dwelling from unauthorized entry, some doors and windows remain accessible. The grounds are not maintained and there is evidence of vermin infestation.

3-3

Lastly, the neighbors who do maintain and take pride in their homes surrounding the Kimball house have had to accept the deplorable state of this property for quite some time now. In fact, the house has been uninhabited since before the end of last year. To think that this situation will continue with either Alternative 1, waiting for the house to fall down or Alternative 2, waiting for a prospective buyer to come forward with the will and financial resources to “restore” the house to the “the Secretary of the Interior's Standards for the Treatment of Historic Resources”, (an ominous phrase if ever there was one), constitutes an unreasonable burden on the neighborhood and the current owners. All this for a vague, unsubstantiated threat to the “eligible” Tucker Street Historic District? Really??

3-4

We ask the Planning and Building Department to make the rational decision regarding this house, in and of itself, and approve its removal as expeditiously as possible.

### 4.2.3.1 RESPONSE TO COMMENT 3

3-1 *The commenter rejects the claim of the EIR that the demolition of the Kimball House would significantly impact the integrity of the eligible Tucker Street District. The comment letter highlights the dilapidated condition of the structure and concludes with a request that the City allow for the removal of it as expeditiously as possible.*

**Response:** This comment has been acknowledged. See Response to Verbal Comment 1 (VC-1), presented above under Comments Received at Public Hearing.

3-2 *Commenter notes that no other building in the neighborhood constitutes such a blight and notes that the tipping point for rehab has passed. It further notes that despite the building official's recommendations to secure the structure, some doors and windows remain accessible. Also, grounds are not maintained and there is evidence of vermin infestation.*

**Response:** This comment is acknowledged. This comment relates to the merits of the project and does not address the adequacy of the EIR. No further response is required.

3-3 *Commenter notes that neighbors have had to accept the deplorable state of the Kimball House property for some time now. To think this situation will continue constitutes an unreasonable burden on the neighborhood and the current owners, all for a vague unsubstantiated threat to the eligible Tucker Street Historic District.*

**Response:** This comment is acknowledged. This comment relates to the merits of the project. Regarding the claim of a “vague unsubstantiated threat,” see response to VC-1 regarding determination on cumulative impacts to the Tucker Street Historic District.

3-4 *Commenter asks that the Planning and Building Department approve removal of the house as expeditiously as possible.*

**Response:** This comment is acknowledged. This comment relates to the merits of the project and does not address the adequacy of the EIR. No further response is required.

## 4.2.4 COMMENT 4: CHERYL AND STEVEN CALETTI, HEALDSBURG RESIDENTS

**From:** Maya DeRosa  
**To:** [Lilly Bianco](#); [Olivia Ervin](#)  
**Cc:** [Kartiganer, Deborah L.](#); [Shawn Sumpster](#)  
**Subject:** FW: 544 Tucker Draft EIR APN: 002-281-023  
**Date:** Wednesday, July 25, 2018 4:37:30 PM

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Please see comment below for the FEIR.

### MAYA DEROSA, AICP | Planning and Building Director

City of Healdsburg

401 Grove Street, Healdsburg, CA 95448

707.473.4463 | [cityofhealdsburg.org](http://cityofhealdsburg.org)

*Building Inspection service is available Monday-Friday 8:30 to 3:00 (except City holidays)*

*City Hall Hours are Monday-Thursday 7:30am-5:30pm, Friday 8:00am-5:00pm, closed every other Friday*

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**From:** cheryl caletti [mailto:[cherylcaletti@gmail.com](mailto:cherylcaletti@gmail.com)]  
**Sent:** Wednesday, July 25, 2018 4:33 PM  
**To:** Maya DeRosa  
**Subject:** 544 Tucker Draft EIR APN: 002-281-023

My husband, Steven Caletti, and I attended the City Council meeting last night and are responding to the Draft EIR for 544 Tucker street. We reside at 512 Tucker street, and own four other properties nearby. We believe in the immeasurable character and unique charm that Victorian homes add to our city.

We have restored six homes in Sonoma County, five within Healdsburg City limits over the past few decades. Two would not qualify for bank loans due to disrepair, and one was condemned by the City of Healdsburg many years prior to our purchase.

We are examples of Healdsburg citizens who speak from experience. Our comments below:

**4-1** Impact 4.1-2 Adverse effect on the Tucker Street Historical District: less than significant.  
**"Due to past alterations the home retains only a modicum of its original character."**

We disagree with this statement as the house viewed from a photo dated 1899 shows window detail, trim, gables, decorative applications, and quoins that match today's view. There is a door visible on the second story, though the iron work has been removed. Much of the later additions at the back of the house could easily be removed and rebuilt in a compatible style to compliment the north elevation.

**4-2** Section 4.4 pg 4-18 states: **"The Demolition of the Kimball House, in and of itself, would not result in an adverse change to the significance of the Tucker Street Historic District."**

We disagree with this statement as the Kimball House is one of the most important and significant homes in our neighborhood, and possesses strong historical ties to an esteemed female physician in Healdsburg. We have lost approximately four houses on our street already, that can only be viewed in photographs at the museum.

**Impact 4.1-3: “Demolition of 544 Tucker street would contribute to cumulation impacts to the Tucker Street Historical District.”**

We strongly agree with this statement. The Tucker Street Historical District was founded in response to demolition of two 1871 Gothic revival homes on our street, replaced by modern architecture. Destroying 544 Tucker would have a similar negative impact for the Historical District.

It may set a precedent for owners to neglect their property to facilitate removal of the historic structure.

There are at least five other homes on our street that are historically significant, currently being rented, and would be liable to fall into the same predicament as 544 Tucker.

Thank you for considering our opinions, as once this treasure is gone, like a rare species, it can never be replaced.

Sincerely,

Cheryl and Steven Caletti

512 Tucker Street  
Healdsburg, CA 95448  
(707) 433-6344  
[cherylcaletti@gmail.com](mailto:cherylcaletti@gmail.com)

#### 4.2.4.1 RESPONSE TO COMMENT 4

4-1 *The commenter disagrees with the DEIR determination that the demolition of the Kimball House would have a less than significant impact on a historic resource. The commenter notes that a number of features of the home remain today and further notes that the inappropriate additions at the property rear could easily be removed.*

**Response:** Please see Response 1-1 and 1-2, above, for a discussion of the subject building's individual integrity.

4-2 *The commenter disagrees with the determination that the demolition of the Kimball house would not, in and of itself, result in an adverse change to the significance of the Tucker Street Historic District. The reason being that the Kimball House is one of the most important and significant homes in the neighborhood and possess strong historical ties to an esteemed female physician. The commenter notes that they have lost approximately four houses on the street already.*

**Response:** As detailed on page 4-17 of the DEIR, demolition of the building at 544 Tucker Street would not preclude the Tucker Street Historic District from retaining integrity overall and eligibility for listing as a local historic district. Integrity is understood in absolute terms, a resource either has integrity or it does not. For a District to lose integrity, it would have to be substantially altered or contain so many intrusions (i.e., non-contributors) that it no longer had the ability to convey its historic character or relationships between the collective resources. The eligible Tucker Street Historic District is significant under CRHR Eligibility Criterion 1 for its place in the history of Healdsburg's urban development, as Healdsburg's first exclusively residential street east of Fitch Street outside of the Original Town Plat. It was also the most densely developed residential street of its era. The Tucker Street Historic District is also eligible under Criterion 3 for its excellent representation of residential architectural styles from Healdsburg's founding through the present.

Recognizing this, it is determined that even with the removal of the building at 544 Tucker Street, the District would continue to contain a majority of contributors (43 contributing versus 24 non-contributing), as well as, retain the basic relationships between the resources and, as whole, the District would continue to retain integrity and continue to convey it's significance under Criterion 1 and 3.

Because the Tucker Street Historic District is significant based on residential development trends in Healdsburg and as a representation of 19th and 20th century architectural styles,

the home's association with Margaret Kimball, while important at the individual level, is not as relevant when considering its ability to contribute to the significance of the larger District; its architectural significance is more relevant when considering it in the context of the District and its ability to contribute. Therefore, the demolition of the Kimball House, in and of itself, would not result in an adverse change in the significance (integrity) of the eligible Tucker Street Historic District, as a historic resource, and impacts would be less than significant as concluded in Impact Statement 4.1-2 of the DEIR (page 4-16). No changes to the EIR are warranted.

4-3 *The commenter agrees with the determination of the DEIR that the demolition of 544 Tucker Street would contribute to cumulative impacts to the Tucker Street Historic District. The commenter goes on to note concern of the precedent setting nature should the entitlement request be approved and highlighted the fact that approximately five other homes on the street seem like demolition by neglect candidates.*

**Response:** All historic demolition applications are reviewed on a case by case basis based on the merits of the particular project. It is typically the case that the circumstances under which a demolition application is requested will be unique and not so similar in nature that a demolition application would be approved merely because one was previously approved. Additionally, municipal code section 20.24.230 requires findings to be made for each Historic Demolition Permit prior to consideration. For that reason, and given the nature of discretionary review, there is no expectation that the decision ultimately made on this project would create a precedent that would affect the outcome of future demolition applications. No changes to the EIR are warranted.

## 4.2.5 COMMENT 5: MICHAEL MILLER, HEALDSBURG RESIDENT

**From:** Maya DeRosa  
**To:** [Olivia Ervin](#); [Lilly Bianco](#)  
**Cc:** [Shawn Sumpter](#); [Kartiganer, Deborah L.](#)  
**Subject:** FW: Comments on DEIR for 544 Tucker Street  
**Date:** Wednesday, July 25, 2018 6:49:55 PM

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FYI

Shawn please replace prior email in file with this version.

### MAYA DEROSA, AICP | Planning and Building Director

City of Healdsburg

401 Grove Street, Healdsburg, CA 95448

707.473.4463 | [cityofhealdsburg.org](http://cityofhealdsburg.org)

*Building Inspection service is available Monday-Friday 8:30 to 3:00 (except City holidays)*

*City Hall Hours are Monday-Thursday 7:30am-5:30pm, Friday 8:00am-5:00pm, closed every other Friday*

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**From:** Michael Miller (Geysers) [mailto:Michael.Miller@calpine.com]  
**Sent:** Wednesday, July 25, 2018 4:39 PM  
**To:** Maya DeRosa  
**Subject:** FW: Comments on DEIR for 544 Tucker Street

Due to addition research on the subject I wish to update my previous statements, as will be seen in Yellow below. Thanks,

Michael Miller

---

**From:** Michael Miller (Geysers)  
**Sent:** Wednesday, July 25, 2018 9:17 AM  
**To:** 'Maya DeRosa'  
**Subject:** Comments on DEIR for 544 Tucker Street

Ms. DeRosa I have comments on the DEIR Impacts 4.1-2 and 4.1-3

**Impact 4.1-2:** “Adverse Effect on the Tucker Street Historical District: **Less than Significant.**”

5-1

P 4-17 “ Due to past alterations, the home retains only a modicum of its original character” I strongly disagree with this statement. The existing elevation viewed from the street retains most of its original character. The building shape, gables, massing are intact. Original details are

intact except for the obvious new front door, windows and iron work on the porch roof which was originally accessed from a 2<sup>nd</sup> story door (also changed into a window). All of these items are easily reproduced, as I did with my own home on 301 Tucker and 514 Johnson Street. An example of an incorrect statement on the originality of the Quoin details states that they were a later addition in the early 20<sup>th</sup> century. Identical Quoin details also exist on 532 Tucker Street, 2 houses west of 544, dated at 1874. I feel it is very unlikely that both these homes “just happened to” employ an unusual detail decades after original construction. Most likely that these 2 homes, built 2 years apart, both used these elements in their original construction. I am unable to view the bulls-eye details in the gable in the 1899 photograph but hope to research. I have spoken with a neighbor who is well-informed on the history of Tucker and she says she has seen a photo showing the Bulls-Eye details in the front from a very early photo. I cannot prove this. One “Alteration” was the Obstetrical Office for Dr. Kimball, which is an important historical element. Many cheap shed additions to the rear add nothing, in fact they detract from the original character and should be removed.

Comments to the final paragraph in Section 4.4, page 4-18 concludes “The demolition of the Kimball House, in and of itself, would not result in an adverse change to the significance of the Tucker Street Historic District.”

5-2

I strongly disagree with this statement. 544 is one of the most historically significant houses in the T St. Hist. Dist. This incorrect conclusion may be extended to ALL homes within the TSHD, with the exceptions of the McMinn/George Alexander home on 419 Tucker and the Snook House/Sarah Cole House, the Italianate Mansion on 204 2<sup>nd</sup>

Street. If “the loss of one Greek Revival home is not significant because one other GR home still exists within the TSHD” then the obvious next statement would have to be “Removal of the 1903 Parris Ferguson Queen Anne on 512 Tucker Street or removal of the large 1903 Victorian at 313 Tucker” would NOT “**preclude the District from retaining its integrity overall**” I feel that this argument is not supported by any fact or reasonable interpretation.

5-3

**Impact 4.1-3:** “Demolition of 544 Tucker Street would contribute to cumulative impacts to the TSHD”. This impact would be “**Significant and Unavoidable**” I strongly agree with this statement.

The TSHD has been significantly and negatively impacted by the demolition of the two 1871 Gothic revival homes at 307 and 308 Tucker, as well as the large garage addition with apartment above which ruined the street view front elevation of the 1948 Cape Cod Saltbox home at 398 Tucker. These were allowed, I assume, due to the absence of the adoption of the new Building Guidelines.

The demolition of 544 would have the same type of negative impact. I was told by Planning Commission members that “there are really no other houses on Tucker which are run down and likely to qualify for demolition”. I strongly disagree. As far as Contributors to the TSHD I think that the tiny home build far back on the lot at 422 Tucker, built in 1909 by H.O. Ferguson, would be a very likely target for demolition, as well as 436 Tucker, 521 Tucker (1954 Luzzi home), 526 Tucker and even 532 Tucker (1874) would be very likely targets for demolition in the future, especially if the 544 Demolition is granted.

Beautiful restoration jobs employing very significant additions have been performed at 317 Tucker, the Thompson house built in 1864,

while maintaining all of the original house.

5-4

I believe that the issuance of a demolition permit at 544 Tucker would set a precedent, and would be used as an example of “It would cost too much to repair” for significant Historic homes throughout Healdsburg.

Not all dilapidated homes in Healdsburg may be restored. Some may simply need to be demolished. Many others need assistance from the planning commission to approve significant additions easily. But this is the first test of the integrity of the new Planning Guidelines within the TSHD (to my knowledge). If this type of demolition is allowed it will render the Planning Guidelines as irrelevant.

Thank you for your consideration.

Michael Miller

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### 4.2.5.1 RESPONSE TO COMMENT 5

5-1 *The commenter disagrees with the DEIR finding that the home only retains “a modicum of its original character.” The commenter notes that original details are, for the most part intact, with the exception of new front door, windows, and iron work- all of which can easily be reproduced. It also notes an inaccurate statement that the quoin details were a later addition. The commenter notes that while not entirely certain, he believes that they may have been original.*

**Response:** Please see Response 1-1 and 1-2, above, for a discussion of the subject building’s individual integrity. Regarding the replacement of the quoin detail it should be clarified that the quoins at the northwestern corner of the façade and east elevations were damaged in a circa 1980’s fire. The quoins at this location are not original (Hoods Memorandum, 2018).

5-2 *The commenter strongly disagrees with the finding of the DEIR that the demolition of the Kimball house, in and of itself, would not result in an adverse change to the significance of the Tucker Street Historic District. The commenter feels that this argument is not supported by any fact or reasonable interpretation.*

**Response:** Please see Response 4-2 above, for a discussion of the project’s impacts to the integrity of the eligible Tucker Street Historic District.

5-3 *The comment states agreement with the finding of the DEIR that the demolition of 544 Tucker Street would contribute to cumulative impacts to the Tucker Street Historic District. The comment goes on to note that the District has been negatively impacted by the demolition of two 1871 gothic revival homes at 307 and 308 Tucker Street as well as an incompatible addition to 398 Tucker.*

**Response:** This comment is acknowledged. No changes to the EIR are warranted.

5-4 *The commenter expresses concern that there are several candidates for demolition within the District Boundaries and is concerned that approval of the demolition entitlement may set a precedent for the approval of future demolitions.*

**Response:** Please see Response 4-3 above, for a response regarding the project setting a precedent for demolition.

## 4.2.6 COMMENT 6: KAREN MILLER, HEALDSBURG RESIDENT

### Comments On “Kimball House Demolition Project”

- 6-1** Tucker Street neighbors, led by my husband Michael Miller, overwhelmingly supported our efforts to protect the historic nature of our neighborhood in 2014-15. More than 70% of us agreed that we should be in a historic district like those applied to Johnson St and portions of Matheson St. This project is the first Tucker St. demolition application to be considered since the City of Healdsburg has instituted new planning guidelines in response to our discussions on this subject. Kimball House is a perfect example of the kind of house we wish to preserve.
- 6-2** If the City allows this demolition, the entire purpose of these new regulations will be negated and will not be responsive to the feelings of the majority of the neighbors on Tucker Street.
- 6-3** Several options are discussed in the EIR: I feel that only one is a good choice, that is the option to rehabilitate the structure. It is also the only option that is reversible (if rehabilitation proves infeasible, then demolition could again be considered).
- 6-4** The property owners have owned 544 Tucker St since 1980. The report states an estimate to rehabilitate the house at \$2.485 Million. That appears to be an estimate by the structural engineers. As a structural engineer myself, I would take that estimate with a grain of salt. That is a lot, admittedly, but it appears to be a cost that is self-inflicted. The owner could have maintained the structure over the 38 years they owned it, but apparently chose not to do so. If the rehabilitation option is chosen, the owners could then either do the rehab themselves or sell to someone else that is willing to do the work.
- 6-5** The latter choice may require selling at a lower price, but again, that is a self-inflicted outcome. The owners discussed selling us this property in 1990. At that time the selling price was in the neighborhood of \$200-300K, so I would guess that their purchase price a decade earlier was something less than that. Whatever they choose to do with this property, they will still make a profit. The amount of that profit should not be a consideration in whether to allow demolition or not. Neither should the cost of rehabilitation be an acceptable reason to allow demolition -particularly since it is the current owner that could have mitigated the cost of rehabilitation in the first place.
- 6-6** The Kimball House has significance to the historic nature of this classic middle-class Victorian neighborhood. Allowing its demolition is an irreversible decision that should not be made lightly. The brick house at 308 was demolished a number of years ago. What were the reasons? (1) It had severe widespread mortar deterioration which would have been much harder to repair. (2) Multiple owners over the years had allowed the deterioration and (3) there was no COH planning regulations in place at the time. Kimball House, unlike that one, could and should be preserved.
- 6-7** I object vehemently to allowing the demolition of the Kimball House at 544 Tucker Street.

Karen Miller  
301 Tucker Street  
Resident since 1990

#### 4.2.6.1 RESPONSE TO COMMENT 6

6-1 *Commenter notes that neighbors overwhelmingly supported efforts to recognize Tucker Street neighborhood as Historic District and states that the Kimball House is a perfect example of the kind of house they wish to preserve.*

**Response:** This comment is acknowledged. This comment relates to the merits of the project and does not address the adequacy of the EIR. No further response is required.

6-2 *Commenter states that if the City allows this demolition, the entire purposes of these new regulations (design guidelines) will be negated.*

**Response:** This comment is acknowledged. This comment relates to the merits of the project and does not address the adequacy of the EIR. No further response is required.

6-3 *Commenter states that, of the alternatives analyzed in the EIR, there is only one good choice, which is the rehabilitation alternative.*

**Response:** As stated on page 6-5 of the DEIR, the Rehabilitation Alternative was identified as the environmentally superior alternative. See also response provided above to comment 2-3.

6-4 *The commenter states that the high cost to rehabilitate the structure is self-inflicted as the owners could have maintained the resource over the 38 years they owned it. The commenter further notes that if rehabilitation option is chosen, then the owners could do the rehab themselves or sell to someone else who is willing to do it.*

**Response:** This comment is acknowledged. As stated on page 6-5 of the DEIR, the Rehabilitation Alternative was identified as the environmentally superior alternative. See also response provided above to comment 2-3. No further response is required.

6-5 *The commenter states that the amount of profit from the sale of the property should not be a consideration in whether to allow demolition and neither should the cost of rehabilitation be an acceptable reason to allow demolition - particularly since it is the current owner that could have mitigated the cost of rehabilitation in the first place.*

**Response:** This comment is acknowledged. This comment does not address the adequacy of the EIR. It should be noted that any cost differences between the project alternatives presented in the DEIR were not taken into consideration when identifying the

environmentally superior alternative, which is the Rehabilitation Alternative as determined on page 6-5 of the DEIR. However, cost and economic considerations may be factored in per the City's Demolition Permit findings enumerated in Land Use Code Section 20.24.230.

6-6 *Commenter notes that the Kimball House has significance to the historic nature of this classic middle-class Victorian neighborhood. Allowing its demolition is an irreversible decision that should not be made lightly. The Kimball House, unlike 308 Tucker, which was demolished, could and should be preserved.*

**Response:** This comment is acknowledged. As detailed on page 4-18 of the DEIR, the demolition of 544 Tucker Street would contribute to cumulative impacts to the eligible Tucker Street Historic District, which is a historic resource and this impact would be significant and unavoidable.

6-7 *Commenter states that she objects vehemently to allowing the demolition of the Kimball House at 544 Tucker Street.*

**Response:** This comment is acknowledged. This comment relates to the merits of the project and does not address the adequacy of the EIR. No further response is required.

# 5.0 AMENDMENTS TO THE DEIR

In the revised text below, please note that additions are underlined and deletions shown in ~~strikeout~~.

In preparing the responses to comments, information was clarified and disclosed including revisions to the DEIR. The City carefully reviewed the information developed through the response to comments process and determined that it does not constitute “significant new information” for the purposes of CEQA Guidelines Section 1508835 and no recirculation of a revised DEIR is warranted. Consistent with CEQA Guidelines, the additional information clarifies the information and analysis in the DEIR.

## 5.1 AMENDMENTS TO SECTION 4.0, ENVIRONMENTAL ANALYSIS

Page 1-2 Revision as follows:

“As detailed in the Tucker Street District survey, the eligible Tucker Street Historic District exhibits a period of significance spanning from ~~1986~~1959-1959.

Page 4-12 Revision to paragraph as follows:

CRHR Criterion 2: Association With Life of (Locally) Important Person

National Register Criterion B and California Register Criterion 2 apply to properties associated with individuals whose specific contributions to history can be identified and documented. “Persons significant in our past” refers to individuals whose activities are demonstrably important within a local, state, or national historic context.

“The residence is significant for its association with Dr. Margaret Viola Covey Doane Kimball, a notable early Healdsburg resident, one of the first licensed female doctors in late 19th century Sonoma County, California. Not only was her medical office located in the subject building, she also lived at this home during her productive professional life. Her husband, Captain Charles Kimball, owner of Healdsburg Lumber Company, was also a respected business man in the community, but he does not rise to the same level of individual prominence. Dr. Margaret Kimball is locally significant because of her profession, the relative rarity of

licensed women physicians practicing medicine during this era.” Dr. Margaret Kimball was a locally notable individual; however her medical practice was modest.

Kimball was an early doctor, but not a leading figure in American, California or Sonoma County medicine. Thirty-one years earlier in New York, Elizabeth Blackwell became the first female doctor in the U.S. with a degree from Geneva Medical School, according to National Library of Medicine records. Other women soon followed. By 1860, there were 54,543 doctors in the United States; 300 of whom were (white) women. Rebecca Crumple became the first American black woman to earn a medical degree in 1864, practicing in Virginia. Margaret Kimball obtained her medical degree from the University of Michigan Dept. of Medicine and Surgery in 1880. She moved to Healdsburg in 1889, 32 years after the town was founded; 39 years after California statehood.

Margaret Kimball’s medical career is primarily reflected in the archives of the Healdsburg Museum and Historical Society through ads she placed in the historic newspapers of her day. Her biography was researched within the context of 19th century medical history in Sonoma County, California. Dr. Elisha Ely of Geyserville and Dr. John Boyce of Santa Rosa were the first (non-Native American) doctors in pioneer Sonoma County, practicing in the mid 1850s. The first to hold the title of “Sonoma County Physician” was R. Press Smith, appointed in 1869. The Sonoma County Medical Association was formed the following year, but it was an all-male organization. By 1877 there were 18 physicians licensed to perform medicine and surgery in Sonoma County: Elisha Ely, A.W. Gamble, Q.C. Smith, James Shephard, B.B. Allen, I.O. Boggs, T.E.R. Gildersleeve, J.H. Crane, J.B. Christie, S.H. Rupe, T.W. Seawell, W.D. Harrison, G.W. Wells, G.W. Graves, E. Von Hasslocker, W.W. Carpenter, James Forsman and Charles Van Geldern.

Dr. M.V. Kimball joined the medical community as a local practitioner of “women’s medicine” (obstetrics and gynecology), but was not the first or only woman to practice medicine in Healdsburg at the turn of the 20th century. Ella Barrett distinguished herself as the first woman doctor in Healdsburg (1859). Anabel McG. Stuart was the first female doctor in Santa Rosa (1878). Women physicians are included in the Official Register of Physician and Surgeons in the State of California Who Hold Certificates from the Board of Medical Examiners of the Medical Society of the State of California. Third Edition, 1 January 1887. Dr. Kimball joined the ranks of Lucy Wanzer (1874), Charlotte Blake Brown (1874), Alice Higgins (1877), Anabel

McG. Stuart (1878), Martha Bucknall (1858), Sarah E. Browne (1874), Elizabeth Follansbee (1877), C. Annette Buckal (1858), Mary B. Ritter (1886), Mary E. Botsford (1896), Edna Sutro Merritt (1887). Margaret Kimball of Healdsburg was not listed among the cadre of influential early medical women of California profiled in Adelaide Brown, M.D.'s 1925 article, "The History of the Development of Women in Medicine in California," published in California and Western Medicine.

At the time she practiced, Dr. Kimball was one of approximately 1,100 residents in Healdsburg. In addition to her 19th century medical degree and her gender, she was known for her benevolence toward the less fortunate in the community. Dr. Kimball had a small, devoted clientele. The construction of a tasteful medical office addition on the east side of her Tucker Street residence came after at least a decade of renting office space downtown; it seemed to reflect the downsizing of her practice in its later years. "Therefore, the property is individually significant under CRHR Criterion 2, based on its association with an important person, Dr. Margaret Viola Covey Doane Kimball," but does not rise to the level of significance required for listing on the National Register of Historic Resources.

Page 4-14      Revision to paragraph as follows:

". . . , additions, which have served to compromise the building's individual historic integrity." Specifically, the status of integrity for each of the seven aspects is as follows:

**Location:** Location is the place where the historic property was constructed or the place where the historic event occurred.

The Kimball house has not been moved. It retains integrity of location.

**Design:** Design is the combination of elements that create the form, plan, space, structure, and style of a property.

The integrity of design has been compromised. The massing, form, style and structure of the original single family residence have been altered by multiple additions of poor quality and inferior materials, particularly on the south and west elevations. The north elevation (façade) had a half-width wooden front porch, which has since been remodeled and replaced. The wooden porch floor, railings and supports have been replaced by a concrete porch and railings and supports and a

ramp. The original single-family dwelling has also been reconfigured into apartments with new openings cut into the building, including the front façade. The Kimball House does not retain integrity of design.

**Setting:** Setting is the physical environment of a historic property.

The original Kimball property was a small farmstead with an orchard and barn to the south, according to 1890s Sanborn maps and tax records. The Kimballs had three houses within view on this quiet street when they lived here: one to the west, one to northwest and one to the northeast. They originally owned more undeveloped land to the north and east. The rural historical setting has been impacted by contemporary construction on the south and west sides. The Kimball House has lost integrity of setting.

**Materials:** Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. A property must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved. The property must also be an actual historic resource, not a recreation; a recent structure fabricated to look historic is not eligible. Likewise, a property whose historic features and materials have been lost and then reconstructed is usually not eligible.

The alterations to the building between the 1930s-1970s have been made with a variety of materials, many of them substandard and without permits. The use of T-111 siding and aluminum windows in the repairs and additions during the 1960s is especially unfortunate. The 1980s residential fire at the northwest corner of the façade and east elevation caused great damage to the exterior siding, quoins, porch, roof and windows. The 1980s replacement porch and reconstructed quoins on the northwest corner of the building are credible substitutions, but are not original. The wooden porch was changed to concrete and a ramp was installed. The Kimball house lacks integrity of materials.

**Workmanship:** Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. Examples of

workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery.

The workmanship of the original building was not continued in the alterations. This relates to the quality of materials used in the construction. Many of the additions appear to have been made in the 1930s-1970s by unskilled labor using salvaged or scrap materials without permits. The Kimball house does not retain integrity of workmanship.

**Feeling:** Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.

The rural farmstead feeling of the 19th century single family residence is not completely lost, but it has substantially changed. The setback and the mature trees help retain some of the historical feeling that the house otherwise lacks. The porch and ramp and division into apartments detract from the historical appearance at the NW side of the façade; the NE side of the façade retains the few remaining character elements. The well-kept appearance of the Kimball Residence when it was single family included a tidy fence and decorative trim in good repair. In the absence of these elements, the subject resource does not retain integrity of feeling. In it's altered state, the Kimball House has lost much of the integrity of feeling.

**Association:** Association is the direct link between an important historic event or person and a historic property. A property important for association with an event, historical pattern, or person(s) ideally might retain some features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance, and would not be relevant if the property were a site. A basic integrity test for is consider if a historical contemporary would recognize the property as it exists today.

Historically the Kimball property was a single family residence with an office wing. It lost that association decades ago when it was converted for use as multi-family residential apartments. The appearance of this building has been badly compromised on 3 ½ of the four elevations as detailed herein and on pages 4-8 to 4-14 of the EIR. Only one-fourth of the house consists of original materials in their original placement. The Kimball House lacks integrity of association.

~~“As such, Based on the above, when considered individually, the building retains integrity of location and some setting, but lacks integrity of setting, feeling, design, materials, workmanship, and association.”~~

Page 4-18 Revision to paragraph as follows:

“The proposed demolition of a contributor to an identified historic district has the potential to cumulatively contribute to impacts to historic resources.” Based on available building permit records, the City has approved the demolition of three homes within the boundaries of the Tucker Street District since 2005. “While there are regulations set forth to encourage protection of historic resources, such regulations do not mandate protection under any and all circumstances. It is reasonable to expect that there will be cases of demolition by neglect whereby deferred maintenance precludes feasible rehabilitation or the presence of health and safety hazards requires removal of a resource, or it is determined that impacts of removing a historic resource is outweighed by the benefits afforded by a new development.”

For example, the Healdsburg Demolition Ordinance findings are broad enough that they allow for approval of demolition in a number of circumstances, including instances where the adaptive reuse of the structure is infeasible or inappropriate due to economic considerations, structural conditions, or land use incompatibility; or where restoration of the building or structure is not feasible using current building codes, or when no public funding is available to finance renovation or purchase the resource, amongst others.

The Healdsburg Land Use Code Section 20.12.085 “Maintenance and repair” specifies that, “Neither the owner nor the person in charge of a designated historic building or of a designated landmark shall permit the structure or landmark to fall into a state of disrepair that could result in the deterioration of any exterior appurtenance or architectural feature so as to produce or tend to produce, in the judgment of the historic committee, a detrimental effect upon the character of the district as a whole or the life and character of the landmark or structure in question...” This clause is only applicable to designated historic buildings or landmarks therefore, “eligible” districts, which have not yet been designated, such as the Tucker Street Historic District, remain vulnerable to demolition by neglect.

Guidance issued from the National Park Service and California State Office of Historic Preservation does not dictate a specific number of contributing resources that must be retained in order for a District to retain integrity, but a clear majority tends to be expected in most areas. Because each contributor lends itself to conveying significance in a unique way (architectural style, relative prominence, relative rarity, relationship to its neighbors etc.) it is difficult to know when there might be a tipping point which would eliminate the District's overall integrity. Based on review of past and current trends and the fact that, as an undesignated district, it remains vulnerable, relative to its designated counterparts, it is reasonable to conclude that the demolition of the contributing "Kimball House" is "cumulatively considerable."

"There remains potential for current and future demolition projects to occur within the Tucker Street Historic District, which combined with the subject demolition of the Kimball House would result in cumulative impacts to the District. This is particularly relevant when considered in the context of historic districts, which rely on the collective significance of many resources and must maintain a majority of contributors to be able to convey significance."

Page 4-19      Revision to Mitigation Measure 4.1-3b as follows:

**MM 4.1-3b:** Prior to issuance of a demolition permit, the applicant shall engage a historic architect to identify salvageable materials. A salvage plan with materials planned for salvage shall be provided for review and approval to the City's Planning Department and included in demolition plans submitted to the Building Department. Salvaged materials shall be donated to ~~the~~ Healdsburg Lumber Museum and Historical Society or other appropriate entity.



# 6.0 MITIGATION MONITORING AND REPORTING PROGRAM

## KIMBALL HOUSE DEMOLITION MITIGATION MONITORING AND REPORTING PROGRAM

| Mitigation Measure   | METHOD OF VERIFICATION  | TIMING OF VERIFICATION   | RESPONSIBLE PARTY   | COMPLETION OF IMPLEMENTATION |         |
|--|---|--|---|------------------------------|---------|
|  |   |  |   | DATE                         | INITIAL |
| <b>CULTURAL RESOURCES</b>  |   |  |   |                              |         |
| <p><b>MM 4.1-3a:</b> Prior to issuance of a demolition permit, photographic documentation shall be undertaken by a qualified professional and shall be reviewed and approved by the Planning Department. Photos shall be large format, black and white photos, and printed on archival quality paper. Views and perspectives photographed shall be consistent with those suggested under the Historic American Buildings Survey (HABS) standards. Photographic documentation shall be placed on file at the Healdsburg Museum and Historical Society with digital copies provided to the City of Healdsburg Planning Department.</p> | <ul style="list-style-type: none"> <li>• Proof of completion to be provided to Planning Department</li> </ul> | <ul style="list-style-type: none"> <li>• Prior to issuance of demolition permit</li> </ul> | <ul style="list-style-type: none"> <li>• Applicant</li> <li>• Planning and Building Department</li> </ul> |                              |         |

|  |  |  |  |
|--|--|--|--|
| <p><b>MM 4.1-3b:</b> Prior to issuance of a demolition permit, the applicant shall engage a historic architect to identify salvageable materials. A salvage plan with materials planned for salvage shall be provided for review and approval to the City's Planning Department and included in demolition plans submitted to the Building Department. Salvaged materials shall be donated to Healdsburg Lumber or other appropriate entity.</p> | <ul style="list-style-type: none"> <li>• Review and approval by Planning Department</li> </ul> | <ul style="list-style-type: none"> <li>• Prior to issuance of demolition permit</li> </ul>   | <ul style="list-style-type: none"> <li>• Applicant</li> <li>• Planning &amp; Building Departments</li> </ul> |
| <p><b>MM 4.1-3c:</b> A plaque shall be erected at the property frontage that details the history of the Kimball House and its individual significance. Plaque type and language shall be subject to review and approval by the City prior to issuance of a demolition permit. The plaque shall be installed within 6 months following issuance of a demolition permit.</p>   | <ul style="list-style-type: none"> <li>• Review and approval by Planning Department</li> </ul> | <ul style="list-style-type: none"> <li>• Prior to issuance of demolition permit and within six months following issuance of demolition permit</li> </ul> | <ul style="list-style-type: none"> <li>• Applicant</li> <li>• Planning Department</li> </ul>                 |

**MM4.1-3d:** The applicant shall fund the creation of a self-guided walking tour booklet, prepared by a qualified historian or architectural historian and which provides information on the Tucker Street Historic District including the District's boundaries, contributors, and historical significance. Walking Tour booklet shall be provided to City for review and approval prior to finalization. Once completed, the booklet shall be made available at the City Planning and Building Department, Healdsburg Chamber of Commerce and Visitor's bureau, City of Healdsburg Library, Healdsburg Museum and Historical Society and available online.

- Review and approval by Planning Department

- Within three months following issuance of demolition permit

- Applicant
- Planning Department





Holly L. Hoods, MA  
Healdsburg Museum and Historical Society  
P.O. Box 952  
Healdsburg, CA 95448

**Re: Historic Resource Evaluation, 544 Tucker Street  
Healdsburg, CA 95448  
APN 002-281-023**

7 August 2018

**Response to Comments:**

This letter is prepared in response to a July 5 comment letter submitted to the City by Stephan Conteh, an architectural historian at CALTRANS. Mr. Conteh agreed with the Historic Resource Evaluation that the Kimball House should be considered a contributing building to the proposed Tucker Street Historic District. Mr. Conteh questioned the finding that the Kimball House does not retain sufficient historic integrity to be listed in the California Register of Historical Resources or the National Register of Historic Places on its own merits. He contended that Dr. Margaret Kimball could be further evaluated to be found a significant person under National Register Criterion B or California Register Criterion 2.

**Dr. Kimball as Significant Person:** National Register Criterion B and California Register Criterion 2 apply to properties associated with individuals whose specific contributions to history can be identified and documented. "Persons significant in our past" refers to individuals whose activities are demonstrably important within a local, state, or national historic context. Dr. Margaret Kimball was indeed a locally notable individual; however her medical practice was modest. Previous descriptions had erroneously characterized Dr. Kimball as the first woman doctor in Healdsburg or first woman to practice medicine in California. She was an early doctor, but not a leading figure in American, California or Sonoma County medicine. Thirty-one years earlier in New York, Elizabeth Blackwell became the first female doctor in the U.S. with a degree from Geneva Medical School, according to National Library of Medicine records. Other women soon followed. By 1860, there were 54,543 doctors in the United States; 300 of whom were (white) women. Rebecca Crumple became the first American black woman to earn a medical degree in 1864, practicing in Virginia. Margaret Kimball

obtained her medical degree from the University of Michigan Dept. of Medicine and Surgery in 1880. She moved to Healdsburg in 1889, 32 years after the town was founded; 39 years after California statehood.

Margaret Kimball's medical career is primarily reflected in the archives of the Healdsburg Museum and Historical Society through ads she placed in the historic newspapers of her day. Her biography was researched within the context of 19<sup>th</sup> century medical history in Sonoma County, California. Dr. Elisha Ely of Geyserville and Dr. John Boyce of Santa Rosa were the first (non-Native American) doctors in pioneer Sonoma County, practicing in the mid 1850s. The first to hold the title of "Sonoma County Physician" was R. Press Smith, appointed in 1869. The Sonoma County Medical Association was formed the following year, but it was an all-male organization. By 1877 there were 18 physicians licensed to perform medicine and surgery in Sonoma County: Elisha Ely, A.W. Gamble, Q.C. Smith, James Shephard, B.B. Allen, I.O. Boggs, T.E.R. Gildersleeve, J.H. Crane, J.B. Christie, S.H. Rupe, T.W. Seawell, W.D. Harrison, G.W. Wells, G.W. Graves, E. Von Hasslocker, W.W. Carpenter, James Forsman and Charles Van Geldern.

Dr. M.V. Kimball joined the medical community as a local practitioner of "women's medicine" (obstetrics and gynecology), but was not the first or only woman to practice medicine in Healdsburg at the turn of the 20<sup>th</sup> century. Ella Barrett distinguished herself as the first woman doctor in Healdsburg (1859). Anabel McG. Stuart was the first female doctor in Santa Rosa (1878). Women physicians are included in the *Official Register of Physician and Surgeons in the State of California Who Hold Certificates from the Board of Medical Examiners of the Medical Society of the State of California*. Third Edition, 1 January 1887. Dr. Kimball joined the ranks of Lucy Wanzer (1874), Charlotte Blake Brown (1874), Alice Higgins (1877), Anabel McG. Stuart (1878), Martha Bucknall (1858), Sarah E. Browne (1874), Elizabeth Follansbee (1877), C. Annette Buckal (1858), Mary B. Ritter (1886), Mary E. Botsford (1896), Edna Sutro Merritt (1887). Margaret Kimball of Healdsburg was not listed among the cadre of influential early medical women of California profiled in Adelaide Brown, M.D.'s 1925 article, "The History of the Development of Women in Medicine in California," published in *California and Western Medicine*.

Earlier this year Margaret Kimball was selected as one of several memorable women of Healdsburg to be featured in a Women's History exhibition at the Healdsburg Museum and Historical Society. At the time she practiced, Dr. Kimball was one of approximately 1,100 residents in Healdsburg. In addition to her 19<sup>th</sup> century medical degree and her gender, she was known for her benevolence toward the less fortunate in the community. Dr. Kimball had a small, devoted clientele. The construction of a tasteful medical office addition on the east side of her Tucker Street residence came after at least a decade of renting office space downtown; it seemed to reflect the downsizing of her practice in its later years.

The Historic Resource Evaluation of the Kimball Residence at 544 Tucker Street was based on all available relevant property-specific research: deeds, newspaper articles, historical photographs, Sanborn Fire Insurance maps, tax records, census records, city directories, Museum subject files, building permits, assessor records, prior historical research, home

inspection and structural engineering reports. Biographical research was conducted on all of the historical residents, with special focus on Margaret Kimball, M.D. Further research would not bolster Dr. Kimball's significance under National Register Criterion B and/or California Register Criterion 2. Therefore the conclusion of the Historic Resource Evaluation remains applicable that the Kimball House does not meet the level of significance to be individually eligible for inclusion in the National Register of Historic Places and/or California Register of Historical Resources.

**Assessing Historic Integrity:** Finding individual historical significance for the National Register or California Register requires that the building not only be shown to be significant according to the established criteria, it also must retain integrity. Integrity is the ability of a property to convey its significance. The guidelines by which integrity should be assessed in historic resource evaluation are found in National Park Service Bulletin 15 "How to Apply the National Register Criteria for Evaluation," published by the U.S. Dept of the Interior. The quality of significance in American history, architecture, archaeology, engineering or culture is present in districts, sites, buildings, structures and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association. Integrity speaks to the ability of a potentially significant building to convey its historical significance by retention of the majority of these essential characteristics.

◆**Location:** Location is the place where the historic property was constructed or the place where the historic event occurred.

The Kimball house has not been moved. It retains integrity of location.

◆**Design:** Design is the combination of elements that create the form, plan, space, structure, and style of a property.

The integrity of design has been compromised. The massing, form, style and structure of the original single family residence have been altered by multiple additions of poor quality and inferior materials, particularly on the south and west elevations. The north elevation (façade) had a half-width wooden front porch, which has since been remodeled and replaced. The wooden porch floor, railings and supports have been replaced by a concrete porch and railings and supports and a ramp. The original single-family dwelling has also been reconfigured into apartments with new openings cut into the building, including the front façade. The Kimball House does not retain integrity of design.

◆**Setting:** Setting is the physical environment of a historic property.

The original Kimball property was a small farmstead with an orchard and barn to the south, according to 1890s Sanborn maps and tax records. The Kimballs had three houses within view on this quiet street when they lived here: one to the west, one to northwest and one to the northeast. They originally owned more undeveloped land to the north and east. The rural historical setting has been impacted by contemporary construction on the south and west sides. The Kimball House has lost integrity of setting.

◆**Materials:** Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. A property must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved. The property must also be an actual historic resource, not a recreation; a recent structure fabricated to look historic is not eligible. Likewise, a property whose historic features and materials have been lost and then reconstructed is usually not eligible.

The alterations to the building between the 1930s-1970s have been made with a variety of materials, many of them substandard and without permits. The use of T-111 siding and aluminum windows in the repairs and additions during the 1960s is especially unfortunate. The 1980s residential fire at the northwest corner of the façade and east elevation caused great damage to the exterior siding, quoins, porch, roof and windows. The 1980s replacement porch and reconstructed quoins on the northwest corner of the building are credible substitutions, but are not original. The wooden porch was changed to concrete and a ramp was installed. The Kimball house lacks integrity of materials.

◆**Workmanship:** Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. Examples of workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery.

The workmanship of the original building was not continued in the alterations. This relates to the quality of materials used in the construction. Many of the additions appear to have been made in the 1930s-1970s by unskilled labor using salvaged or scrap materials without permits. The Kimball house does not retain integrity of workmanship.

◆**Feeling:** Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.

The rural farmstead feeling of the 19<sup>th</sup> century single family residence is not completely lost, but it has substantially changed. The setback and the mature trees help retain some of the historical feeling that the house otherwise lacks. The porch and ramp and division into apartments detract from the historical appearance at the NW side of the façade; the NE side of the façade retains the few remaining character elements. The well-kept appearance of the Kimball Residence when it was single family included a tidy fence and decorative trim in good repair. Altered, shabby and now vacant, the Kimball House has lost much of the integrity of feeling.

◆**Association:** Association is the direct link between an important historic event or person and a historic property. A property important for association with an event, historical pattern, or person(s) ideally might retain some features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance, and would not

be relevant if the property were a site. A basic integrity test for is consider if a historical contemporary would recognize the property as it exists today.

Historically the Kimball property was a single family residence with an office wing. It lost that association decades ago when it was converted for use as multi-family residential apartments. The appearance of this building has been badly compromised on 3 ½ of the four elevations. Because of the location and some remaining elements, Dr. Kimball would recognize the building as having once been her house, but greatly changed for the worse in its design, materials, workmanship and setting. Only one-fourth of the house consists of original materials in their original placement; and they are in poor condition and would need replacement. The Kimball House lacks integrity of association.

Prior to conducting intensive research on 544 Tucker Street to prepare the Historic Resource Evaluation, the record suggested that the property was potentially individually eligible for listing in the California Register or National Register. Closer inspection and extensive research revealed that the historic building fabric is not intact, much of it being either altered or compromised by lesser quality replacements.

Because of the sensitivity of a potential demolition of a 19<sup>th</sup> century residence in a proposed Historic District, the Kimball property was examined inside and out in consultation with two experienced historic restoration professionals. The findings of the Historic Resource Evaluation were also discussed with two Sonoma County architectural historians. These colleagues concurred that there was little to save in the old house and supported the findings of the Historic Resource Evaluation. A "restoration" would be an entirely new house constructed in the image and shape of the old one.

Therefore, having further reviewed the conclusions in the Historic Resource Evaluation, the assessment remains that the former Kimball residence is not individually eligible for the National Register and/or the California Register.

Sincerely,

A handwritten signature in blue ink that reads "Holly Hoods". The signature is written in a cursive, flowing style.

---Holly Hoods, MA, Executive Director/Curator,  
Healdsburg Museum and Historical Society