

COVER LETTER TO CITY COUNCIL

Date: []

To: Placerville City Council: Mayor Gotberg, Vice Mayor Neau, Councilmembers Clerici, Yarbrough and Carter

From: Placerville Planning Commission

Subject: Update to Recommendation 4, Historic District Preservation and Proposed Framework for Review

In this memo we report progress on direction given by the City Council via memo from City Manager Cleve Morris dated January 7, 2025 regarding Recommendation 4 (*Systematic Examination of the Current Standard for Review*). This progress report includes a proposed framework to guide decision making for historic preservation, as requested by the Council in the January 2025 memo.

Background: For Recommendation 4, the Commission reviewed the Secretary of the Interior (SOI) standards, updates to those standards, technical bulletins issued by the National Park Service, and an extensive list compiled by Commissioner Silvester (2025) of documents from other jurisdictions outlining procedures for historic preservation. Practical experience of the members of the Commission in these matters was also taken into account to form the proposed framework. It is important to note that the SOI standards express a hierarchy for preservation, recommending maintenance and repair over replacement, it is acknowledged in the standards that in certain instances replacement of certain elements is the only reasonable option in order to rehabilitate a structure and extend its useable lifetime.

The Planning Commission proposes to use the following Framework in the SPR process for Historic Districts to ensure that each project is judged on its merits, resulting in consistent and fair decisions. The Commission shall continue to include substantive findings with each decision that show either conformance with the City's ordinances and standards or sound reasoning for rejecting an application in order to best defend the interests of the City.

Historic District Site Plan Review Framework

Framework Element 1. Determine date of original construction by accessing existing Historic Inventory and note status on historic registries in project descriptions.

Background: Council requested that the age of structures be reflected in the proposed framework and that a cutoff date for historic designation be established. This is difficult to do because the City has not developed a context statement that accurately describes a period of significance for the historic districts, as is routinely done in other jurisdictions which have created historic districts for preservation. Furthermore, designating a building to be historic or non-historic exceeds the expertise of the Planning Commission. (Please see Further Recommendations given below.)

In order to determine dates of construction, we are able to utilize the current Historic Inventory maintained by the City, available on the website

<https://evogov.s3.amazonaws.com/media/17/media/114402.pdf>. Structures listed on this inventory date from approximately 1851-1940. For structures not on the inventory, availability of information on original date of construction varies, however City staff routinely reports this information when available.

There are comparatively few structures in the historic districts that are listed either on a state or federal registry. These designations currently are noted in SPR project descriptions in staff reports and this practice should continue. The City maintains a list of designated historic resources within the city (<https://www.cityofplacerville.org/city-historic-resources>).

Framework Element 2. Determine if subject structure is Contributing vs. Non-contributing

Background: A “contributing” structure is generally considered to be one that is historically significant and that has maintained the integrity of its original design (2026). “Non-contributing” structures can and do often occur within historic districts in any jurisdiction. These structures fall outside the defined period of significance, have been previously altered or both. Their importance to a historic district is to help maintain or enhance the overall aesthetic of the district. (For additional information, please see Note 1, below, from the National Park Service CFP 67.5, available at <https://www.ecfr.gov/current/title-36/chapter-I/part-67/section-67.5>.)

Designations of contributing versus non-contributing structure are important for evaluating SPRs. For contributing properties within the historic districts, the primary goal is preservation of the property to the highest degree possible while maintaining the historic character.

For non-contributing properties within the historic districts, preservation is not the primary objective but maintaining the aesthetic of the district is important.

Even though the City does not have context statements for the historic districts, the City could reasonably say at this time that if a structure under review is listed in the City Historic Inventory, it is considered to be a “contributing” structure in the historic district. If it is not on the inventory, it is considered to be a “non-contributing” structure.

As projects are submitted for consideration by the City, structures can be added to the City as a practical matter, using current photos and descriptions.

Framework Element 3. Evaluate suitability of proposed substitute materials for in kind materials using consistent standards.

Background: SPRs for a structure in a historic district may approve the use of substitute materials rather than requiring the use of in kind materials. Such allowances are clearly explained in Technical Bulletin 16 (2023) from the National Park Service:

While the use of matching materials to replace historic ones is always preferred under the Standards for Rehabilitation, the Standards also purposely recognize that flexibility may sometimes be needed when it comes to new and replacement materials as part of a historic rehabilitation project. Substitute materials that closely match the visual and physical properties of historic materials can be successfully used on many rehabilitation projects in ways that are consistent with the Standards.

The use of substitute materials is further justified by the fact that Placerville is surrounded by High to Very High Fire Hazard Severity zones which pose extreme risk for damage from wildfire.

When considering an SPR for a non-contributing structure, evaluation of the proposed modifications shall focus on maintaining the aesthetic of the historic district and ensuring that proposed alterations of such structures are compatible with the overall character of the district, and therefore, evaluation of proposed materials does not require detailed assessment but rather confirmation that they do not negatively impact the historic district.

However, when considering an SPR for a contributing structure that proposes the use of substitute materials, the Commission must remember the hierarchy recommended in the SOI standards:

- (1) preservation and maintenance
- (2) replacement in kind
- (3) replacement with substitute material when in kind materials are not feasible

Therefore, the applicant shall first adequately demonstrate the infeasibility of using in kind materials. Applicant shall also provide samples of the materials proposed for use (as is currently

required). The following standards shall be used to evaluate the SPR and the proposed materials.

Standards for evaluating substitute materials

1. Determine the Character-defining feature(s) of the structure. Each SPR applicant shall provide photos of the subject home, as is currently required, and a description of the character defining features so that features that have the greatest impact on the historic character are evaluated appropriately. Character-defining features can be those which comprise a large percentage of the area of the structure visible from a city street or are distinctive in design and include:
 - Wood siding and trim
 - Historic windows and doors
 - Porches and columns
 - Decorative millwork
 - Roof forms and visible roofing materials
 - Masonry walls and chimneys
2. Substitute materials shall replicate the historic appearance in design, dimensions, surface texture, finish, light reflectivity, and detailing. Proposed substitute materials will be evaluated as follows:
 - a. For façade elements, including porches, steps, railings and decorative elements, replacements should be similar in character to the original.
 - b. Siding: Substitute siding materials must replicate the following elements of the material being replaced:
 - Dimensions
 - Thickness
 - Shadow lines
 - c. Roofing: Modern residential roofing materials currently emphasize energy efficiency ("Cool Roofing") and fire safety ("Class A" fire rating). Substitute roofing materials must strive to replicate the following elements of the material being replaced:
 - Dimensions
 - Thickness
 - Texture
 - Tile size

Typically, asphalt or composition tile type roofing materials are acceptable substitute materials.

- d. Windows and Doors. Substitute windows and doors must maintain the existing pattern, proportions and finish of existing window sash style or existing door style.

Note: Construction materials are constantly innovating. Such changes reflect the increasing need for historically accurate substitutes as more communities address the need to balance preservation with energy efficiency and safety. The Planning Commission has discussed the possibility of creating a list of suitable materials for historic homes but realized that such a list would need regular updating by City staff, which would create an additional burden on staff time. Instead, the Commission should apply the standards described herewith to evaluate proposed materials in an SPR. This approach not only facilitates consistent review, but also allows options for homeowners and avoids burdening staff with continual updates.

Recommendations for consideration by City Council

SPR evaluations by the Commissions have been hindered somewhat by a lack of supporting documentation on the historic districts themselves. At this time, the only official supporting documentation is the historical inventory maintained by the City and the list of designated historic resources.

Historic preservation in Placerville would benefit by the development of context statement(s) for the historic districts. Context statements define the era(s) of significance and the elements which the City intends to preserve. Using the context statements, the historic inventory could then be updated to identify structures in each district that are considered contributing or non-contributing. These efforts would bolster the stated goals of the City for historic preservation and would provide further clarity to property owners as they undertake maintenance and renovation activities in the historic districts. Furthermore, the historic context and updated inventory would provide the City with a solid foundation from which more comprehensive guidelines could be developed. This work would require the guidance of a preservation specialist, as it is beyond the level of expertise of the members of the planning commission and requires evaluation by an unbiased expert to create a robust document on which the City can rely.

Some jurisdictions apply a priority rating system to their contributing buildings which correspond with a tiered approach to the degree of preservation that is required. To achieve more specificity in Placerville's approach to the evaluation of contributing vs. non-contributing properties within the historic districts, an evaluation by a professional would be required.

NOTES

1. Under the National Park Service's CFP Section 67.5, a building is considered contributing if it adds to the district's sense of time and place and historical development through its location, design, setting, materials, workmanship, feeling and association. "Non-contributing" structures can and do often occur within historic districts in any jurisdiction. These structures do not add to the district's sense of time and place and historical development; or they are where the location, design, setting, materials, workmanship, feeling and association have been so altered or have so deteriorated that the overall integrity of the building has been irretrievably lost. Ordinarily buildings built within the past 50 years are not considered to be contributing unless a strong justification is given or the historical attributes of the district are less than 50 years old.

REFERENCES

2001. [ITS NUMBER 23: Selecting New Windows to Replace Non-Historic Windows](#)

2011. The Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines on Sustainability for Rehabilitation Historic Buildings. US Dept. of the Interior National Park Service Technical Preservation Services.

2023. The Use of Substitute Materials of Historic Building Exteriors. Preservation Brief No. 16. US Department of the Interior National Park Service.

<https://www.nps.gov/orgs/1739/upload/preservation-brief-16-substitute-materials-2023.pdf>

2025. https://evogov.s3.us-west-2.amazonaws.com/meetings/17/staff_reports/1443.pdf List compiled by Catherine Silvester.

2026. Los Angeles Conservancy. Definition of contributing structures.

<https://www.laconservancy.org/wp-content/uploads/2022/11/About-Historic-Districts.pdf>