

PC Attachment 4

Findings on the Architectural Report of the Belvedere Hotel at 502 Lincoln Street

In reading the architectural report done by ECORP for Old Roseville LLC in 2019, I find some major issues.

The building was listed as a Major Contributing Building for our (P-31-4240) Old Town Roseville Historical District in 1981. According to this architectural report:

"The classification of the Belvedere Hotel in the District Record as a "Major Contributor" refers, according to the record, to "a building that either by its existing appearance and/or its being the location of an historical commercial enterprise, ownership, etc., related significantly to the Old Town Roseville historic era, 1900-1925" "

Soon after the property was purchased last year, the owner's sister came to the Carnegie Museum to inquire about if the Belvedere was historically significant. They were told by the President of the Roseville Historical Society that the building was not only historically significant, but that we were working on an event/exhibit focused entirely on the importance of the Hotel. The property was listed for sale as a "Historical Property."

To say that this building is not historical because *"the building located at 502 Lincoln Street, known as the Belvedere Hotel, is not identified on the Historic Roseville Walking Tour presented by the Roseville Historical Society"* is to ignore every bit of information that the Historical Society has archived at the Carnegie Museum and every statement that we have made to explain its significance to Roseville history.

This is not a legitimate argument that the building must not matter. The RHS' online walking tour hasn't been used for a long time and is outdated. If you go to any other city's Historical Society webpage, it is not an extensive source of information. You will find that information at the Museum itself, and much was found when Megan Webb with ECORP came to speak with us.

Well-known Roseville Historian, Leonard Davis, even conducted an interview with Dolores Manring and wrote an article about the history of the Hotel Belvedere published in the Roseville Historical Society newsletter in 1992 (not mentioned in the architectural report, though it was shown to Megan Webb, of ECORP). He writes that:

"During the boom period of 1906-1908, when Southern Pacific Railroad was busily engaged in moving its terminal facilities here from nearby Rocklin and for several years thereafter. Roseville's small population steadily increased from a modern two or three hundred to an imposing three or four thousand residents.

Housing was at a premium during those flush years, and numerous boarding and rooming houses sprang up all around the vast railroad yards to accommodate hordes of young "rails" daily streaming into our community and in the process swelling its population. "Homes away from home" was an oft quoted description used to describe such homey places as the

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Rudder Grange, Ramona Hotel, Caldarella Rooming House, Morgan's Boarding House and, of course, the subject of this piece, the Belvedere hotel which catered to these youthful, mostly single railroad workers."

Davis goes on to tell the history of the hotel's construction, different owners, and Dolores' own experience living among the "rails" who she viewed as uncles, more than roomers. She describes receiving souvenirs from the railroad crews when they came back from Dunsuir and other far-off places. Leonard Davis ends the article by saying:

*"Mrs. Manring continued to live on the premises until her passing away at the age of 78 in 1989. Daughter, Dee, who returned to Roseville after the death of her father, now lives in one of the **last remaining "Homes away from home" the historic Belvedere Hotel, in the heart of Roseville's Old Town.**"*

Again, this is just one of many pieces of evidence supporting the Belvedere's local historical importance that was provided to Webb when she visited the Carnegie Museum. She chose to focus on the lack of mention in an old walking tour guide and not address the articles held at the Carnegie and history presented to her in her report.

To say that no one of local importance is associated with the Belvedere is absolutely false.

This report touches only on the 4 owners, and not at all on residents who lived for tens of years at and even passed away at the hotel. They fail to mention that Michael & Stoffels built the Belvedere. John M. Stoffels, one of the most active building contractors in Roseville and Placer County during the 1920s-1940s, also built the Veterans' Memorial Hall in Auburn, The J. C. Penney building on Vernon Street, Cochrane's Chapel of The Roses, and the Citizens' Bank. The Lumber was provided by Adams Lumber Co., managed by Roy Matheny- who lived at the Belvedere in 1925. At one of his company's free annual Rose Theater parties, he vowed "that his company would always be found at the forefront of the upbuilding and boosting of the City of Roses." He went on to operate Matheny Bros. Lumber Co. and became Vice President of our Local Building & Loan Assoc. The Press Tribune stated that he and his brother had "staked their all on Roseville's Future, having recently opened one of the best and most modernly equipped lumber yards in the state." This Lumber Co. was sold to Diamond Match Co. and they ended up purchasing G. W. Lohse's Real Estate & Insurance Business.

The building isn't only associated with the historic commercial success of Roseville, but the success of the Southern Pacific Railroad. Countless Southern Pacific Train Conductors such as Charles H. Brown, S.P. Engineers like Austin M. Carter, 48-year S.P. Brakeman George K Martin, and 38-year S.P. employee, Chairman of the Legislative Board of and Legislative Advocate for the Brotherhood of Locomotive Engineers, Delmar H. Brey. J.J. Barnes, who owned a successful shipyard in San Francisco and was a Fireman for the Southern Pacific Railroad. The list of important Machinists, Conductors, and Engineers who lived there is overwhelming. If you have a long history of Roseville Railroad workers in your family, there's a good chance one of your ancestors stayed at the Belvedere. The Hotel Belvedere was built in response to the Railroad's move from Rocklin to Roseville. How much more significant to Roseville history could it be?

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The Architectural Report admits that, "*Overall, the building retains integrity of location, materials, and setting*" and even that, based on historic photographs provided by the Roseville Historical Society, "*the building has virtually remained the same with the exception of the removal of the front balcony, front awnings, and one second-story window.*"

Keep this in mind, as I address this report's reasons for lowering the Belvedere's Contributing Listing.

The reasons for lowering the Major Contributing Listing to a Supportive Contributing Listing are extremely weak.

1. The report states that "*Additional trees planted in the front yard have diminished the visibility of the building from the street which also detracts from its sense of time and place, related to feeling and association.*"

According to the most recent Arborist Report, these trees are not protected in any way and should/could of course be removed. Regardless, these trees were there in 1981, when it was listed as a Major Contributing Building. How has a property that hasn't been altered since then, lost its merit due to trees that were there when it was first given its Major Contributor Listing?

2. "*The construction of the Moose Lodge to the north has also impaired the visibility of the building.*"

The Moose Lodge was constructed in the 1960s, long before the Hotel Belvedere was listed as a Major Contributing building to our Old Town Historic District. And the Hotel is much taller than it. Does every historical building lose its importance if something is built beside it? Where's the logic in that?

3. "*Also, the Belvedere Hotel signage, which used to be present on the building as seen from several historical photographs, have been removed*"

Now, this is really upsetting. The Hotel Belvedere signage was on the building when it was sold to Old Town Roseville LLC in 2019. We have photographic proof of that. The new owner allowed a family friend of his to remove the signs and sell them. Members of the Moose Lodge took photos of the signs being removed. I was informed that the city actually had a case against the new owner for doing this without a permit. To say that this is now a reason, in his favor, to take away the Major Contributing Listing is ridiculous. I personally tracked down and bought one of the signs. I donated it to the Roseville Historical Society and it could be reused or replicated easily. There is no argument there.

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The idea of possible mitigation for the loss of this significant building by making an architectural report is **not acceptable**. This report doesn't even have the right construction year on it. The Belvedere was built in 1917.

The fact that the owner is including a site monument, acknowledging the historical importance of the Belvedere in his plan, is further proof that they are fully aware of its local significance.

The report says:

"Generally speaking, the Specific Plan identifies HABS-like documentation as a mitigation measure to be implemented in the case that it is not feasible to retain a building and demolition is the only option"

Demolition is NOT the only option.

Many others who were outbid, had plans to restore and reuse this building. They still do. I have spoken to several of them, along with a historical building inspector who had just reviewed the property. It's a project, just as much younger buildings can be, but it is definitely doable. The structure is sound, the roofing is new, the asbestos is contained to a small area and easily removed.

Concerning the building's architectural style:

Scott T. Hanson, author of "Restoring Your Historic House, The Comprehensive Guide for Homeowners" confirmed, based on listing photos of the outside and interior, that the Belvedere is clearly a Craftsman Style building, with square pillar columns and tell-tale covered porch. The inside of the building isn't spoken about in this report, but it exemplifies every Craftsman style characteristic: built in cabinetry, exposed wood beams, wooden windowsills and frames, thick baseboards and extensive use of stained woodworking.

The architectural report says that:

"The Craftsman style is evidenced in this building by triangular knee braces and exposed rafters under the deep eave and gable roof, full-length front porch, extended columns from the ground level, and the wood-framed single-hung original windows that remain on the building." and "It's architectural style is a product of the period of popularity of that style during the 1900s to 1920s"

Yet, comes to the conclusion that *"The residence does not embody the distinctive characteristics of a type, period, or method of construction..."*

What a contradiction.

The architectural report does not include the fact that The Belvedere's construction was praised in local newspapers.

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In the Roseville Press Tribune on May 31, 1917, on the week of the building's opening, it was written:

"BELVEDERE APARTMENTS OPEN TO THE PUBLIC:

The Belvedere apartments are completed and the beautiful new building was thrown open to the public the fore part of this week. The building is modern in every respect and is the work of Frank Michael who was the contractor. Mr. Bell, the owner and proprietor has something to be truly proud of and he will no doubt find a ready response on the part of the public.

Belvedere apartments are an ornament to Lincoln street. The city is to be congratulated upon having the good fortune of inducing Mr. Bell to build in its limits."

The Belvedere even made a photo appearance in the Roseville Register's first ever "Build A Home Edition," in July of 1919.

The title of the page is "*Some Splendid Buildings Recently Completed in the City of Roses*" and the photo caption reads:

"Belvedere Apartments, Lincoln Street, Built by Michaels & Stoffels, material furnished by Adam's Lumber Company"

The architectural report concludes that "*The techniques employed for construction and maintenance of the residential building were not unique and were in existence prior to construction of the building, and therefore are not historically significant. The residence does not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values, or possess any significant distinguishable components.*"

This building, referred to as "modern", "splendid", "an ornament to Lincoln Street," and "something truly to be proud of" by local news, was clearly thought of as a unique and exciting new building in Roseville. The "Build A Home Edition" of The Roseville Register, took pride in featuring the most up-to-date trends in home-building. I don't know how the writer of this report came to the conclusion that it doesn't embody the period, other than their research must have been inadequate.

I've heard from a couple people at the City that they "heard it was a mess inside." Maybe you looked at the property when it hadn't been cleaned out, but I've been inside the property since it has sold, and it's absolutely beautiful. I see buildings in much worse shape renovated every day. Buildings completely covered in asbestos or tilting over. I understand that there is no one currently employed with the city who has knowledge of historical buildings. **Please take the Roseville Historical Society's knowledge and concern seriously.**

This architectural report has not proven, in any way, that the Hotel Belvedere is no longer meeting requirements to be a Major Contributing Building for this Historical District.

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It also doesn't prove that the building is ineligible to be evaluated for the National or State Register, as it is associated with the important historic context of the local railroad, retains historic integrity of its architectural features, exemplifies the architectural style of the time and place it is built in, retains its original materials, location, and design, and is associated with important local people and events.

If, as the architectural report vaguely states, it has lost "feeling," why are there almost 5,500 signatures urging you not to approve this plan? The building is virtually unchanged, as this report, itself, admits. Why, even after the owner allowed the signs to be torn down and sold, do people consistently contact the Historical Society wanting to know more about this building, telling me about their family history there, and wanting to see this building protected?

This new architectural report has the 1981 "Old Town Roseville Historic District, Historic District Program" attached at the end of it. The introduction of this document states their concerns:

"The Old Town Roseville Association is comprised of property owners in the area and they are concerned about the future. There is great interest in seeing the area recycled, but there is a concern. The concern is that enthusiasm for the recycling will be reflected in changes to the physical environment that are unrestrained, uncontrolled, and generally incompatible with design standards, regulations and controls that are consistent with the historical setting."

The "Recommended Preservation/Rehabilitation Planning Policies" read:

It is recommended that every effort be made to rehabilitate the historic area of Roseville, utilizing whatever sources of revenue are now and which may be available for this purpose. The historic downtown can be one of Roseville's major environmental resources.

1. The architectural and historic resources of Roseville have been recognized locally and measures should be taken to preserve and protect them. Resources of architectural and historical value are scarce, and the ethics of responsible resource conservation place the owners, the City, and its public officials in a position of stewardship.

2. it is not the intent of historic preservation/rehabilitation policies, plans, and programs in Roseville to return the town to a bygone era or to turn the town into a museum. The intent is not to create an artificial or forced atmosphere to invite historical fakery that can only caricature the past and mock the present. Nor is the intent to encourage a collection of undesirable and unnecessary exterior "themes" that will quickly become dated and reveal their transient nature. The intent is to preserve and protect the special character and identity of Old Roseville.

3. The architectural and historic resources of Roseville contribute to the overall environment and quality of life. They are equally important because the collective effect is more valuable than the individual contribution. Because each significant building makes not only an individual impact but adds substantially to the overall town

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fabric or townscape, demolition or unsympathetic alteration of significant buildings should be discouraged.

A further intent is to avoid adverse impacts on the historic environment or to minimize the effect of inevitable impacts by preventing insensitive, incompatible, incongruous, or detrimental change. The intent is to encourage sensitive, successful rehabilitation, restoration, and adaptive use of buildings to serve contemporary needs and to encourage sympathetic yet modern design in new development to perpetuate the architectural integrity.

4. A building permit for alteration of buildings that are designated historic buildings should be granted only on finding that the proposed plans meet the performance standards contained in the guidelines provided in this policy. Sympathetic modern design should be encouraged, and the design criteria for new design in historic environments included in this document should serve as a basic reference when reviewing proposals for new construction.

Adherence to design standards will encourage creativity, not stifle individual initiative. Property owners are encouraged to seek professional advice in architectural restoration, rehabilitation, and adaptive use.

5. The following official historic preservation policy should be adopted by the City of Roseville: It is better to repair than to restore, better to restore than to reconstruct. In general, it is better to do less than more. In all cases, as much original fabric and existing detailing should be retained as is possible in any work on a significant structure.

6. Capital improvements planning should complement and support historic preservation/rehabilitation goals. Such planning includes public development of open space, public amenities, such as street lighting and street furniture, public facilities, and others.

7. A thorough inventory of architectural and historic resources and an historic preservation plan are important and needed part of the comprehensive planning process of Roseville and a comprehensive historic preservation ordinance should be adopted.

8. An amendment to the existing City Site Review Ordinance should be adopted to provide for the review of any plan that affects the exterior appearance of any structure in the historic area.

In this document, I see some guidelines that this current plan is in violation of:

GENERAL
(pg 17)

4. Deteriorated architectural features shall be repaired rather than replaced wherever possible. In the event replacement is necessary, the new material should match the

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material being replaced in the composition, design, color, texture, and other visual qualities. Repair or replacement of missing architectural features should be based on accurate duplications of original features, substantiated by physical or pictorial evidence rather than on conjectural designs or the availability of different architectural features from other buildings.

5. Changes which may have taken place in the course of time are evidence of the history and development of a structure and its environment. These changes may have acquired significance in their own right, and this significance shall be recognized and respected.

CRITERIA FOR NEW CONSTRUCTION

(pg 26)

2. New construction should maintain the continuity of existing rows of buildings or help to establish such continuity. Facades should be constructed at the property line (s) facing the street (s)

3. The front and side walls of new construction should be parallel to the property lines. Polygonal and circular shaped buildings should be prohibited.

4. New buildings should be constructed to **within ten percent of the average height of existing adjacent buildings. The maximum height of any new building should be 35 feet.** The minimum height should be 20 feet. Sidewalk level, commercial spaces should have a minimum ceiling height of ten feet from the floor.

5. Brick is the preferred exterior material for new construction. The color and texture should be similar to that of brick historically used. Stuccoed surfaces may be permitted on a limited basis. The use of wood, synthetic, and metal sidings should be prohibited.

12. The scale of new construction should be harmonious with that of adjacent buildings. Materials, signs, and other elements of new construction should be consistent with the scale of similar elements found in adjacent historic buildings.

This document, accomplished as a result of a grant from the National Trust for Historic Preservation, is attached to the very end of ECORP's evaluation.

I encourage you to read it through, as its guidelines pertain to all buildings within the Historical District. That includes our Hotel Belvedere.

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Is the Old Town Historical District legitimate to you? Are you being responsible in your "position of stewardship," as this 1981 document words it?

I call for the Roseville Planning Committee and City Council not to approve the Belvedere Townhome plan and require a plan that does not demolish an important building in our Old Town Historical District.

Please include this in the report of public commentary on this plan for 502 Lincoln Street.

A response would be appreciated,

Alexa Roberts
Roseville Historical Society
916-223-7575



July 29, 2020

Ms. Charity Gold, Associate Planner
City of Roseville
311 Vernon Street
Roseville, California 95678

RE: *Response to comments regarding "Findings on the Architectural Report of the Belvedere Hotel at 502 Lincoln Street"*

Dear Ms. Charity Gold,

Below is a response to the July 20, 2020 comment letter from Roseville Historical Society member Alexa Roberts regarding the report we submitted for the Belvedere Hotel, located at 502 Lincoln Street in Roseville.

Comment 1. *To say that this building is not historical because "the building located at 502 Lincoln Street, known as the Belvedere Hotel, is not identified on the Historic Roseville Walking Tour presented by the Roseville Historical Society" is to ignore every bit of information that the Historical Society has archived at the Carnegie Museum and every statement that we have made to explain its significance to Roseville history. This is not a legitimate argument that the building must not matter. The RHS' online walking tour hasn't been used for a long time and is outdated. If you go to any other city's Historical Society webpage, it is not an extensive source of information. You will find that information at the Museum itself, and much was found when Megan Webb with ECORP came to speak with us.*

Response to 1. The architectural history evaluation considered numerous sources of information that are referenced in Sections 3.3 and 4.1 of the report. A reference to the walking tour at the bottom of Section 4.1 was made within the context of the results of the archival research. The evaluation was not based solely on this fact, but took into account multiple lines of evidence that are required to evaluate the building relative to the National and State registers.

Comment 2. *Well-known Roseville Historian, Leonard Davis, even conducted an interview with Dolores Manning and wrote an article about the history of the Hotel Belvedere published in the Roseville Historical Society newsletter in 1992 (not mentioned in the architectural report, though it was shown to Megan Webb, of ECORP). He writes that:*

"During the boom period of 1906-1908, when Southern Pacific Railroad was busily engaged in moving its terminal facilities here from nearby Rocklin and for several years thereafter. Roseville's small

population steadily increased from a modern two or three hundred to an imposing three or four thousand residents.

Housing was at a premium during those flush years, and numerous boarding and rooming houses sprang up all around the vast railroad yards to accommodate hordes of young "rails" daily streaming into our community and in the process swelling its population. "Homes away from home" was an oft quoted description used to describe such homey places as the Rudder Grange, Ramona Hotel, Caldarella Rooming House, Morgan's Boarding House and, of course, the subject of this piece, the Belvedere hotel which catered to these youthful, mostly single railroad workers."

Davis goes on to tell the history of the hotel's construction, different owners, and Dolores' own experience living among the "rails" who she viewed as uncles, more than roomers. She describes receiving souvenirs from the railroad crews when they came back from Dunsmuir and other far-off places. Leonard Davis ends the article by saying:

"Mrs. Manring continued to live on the premises until her passing away at the age of 78 in 1989. Daughter, Dee, who returned to Roseville after the death of her father, now lives in one of the last remaining "Homes away from home" the historic Belvedere Hotel, in the heart of Roseville's Old Town."

Again, this is just one of many pieces of evidence supporting the Belvedere's local historical importance that was provided to Webb when she visited the Carnegie Museum. She chose to focus on the lack of mention in an old walking tour guide and not address the articles held at the Carnegie and history presented to her in her report.

Response to 2. The architectural history evaluation reviewed numerous sources of information, which yielded considerable information on the Manring family. This information is summarized in Section 4.3 of the report and in the Department of Parks and Recreation 523 Record forms for the building. Attachment A to the report includes copies of correspondence from the Roseville Historical Society, Carnegie Museum, Placer County Museum, which includes information provided on the Manring family. All relevant information gathered from the Roseville Historical Society, among other sources, was included in Sections 2.1, 2.2, 4.1, 4.3, and 4.4. Section 2.1 includes reference to Davis' 1993 article, as well as a brief outline of the railroad depot.

Comment 3. *To say that no one of local importance is associated with the Belvedere is absolutely false.*

This report touches only on the 4 owners, and not at all on residents who lived for tens of years at and even passed away at the hotel. They fail to mention that Michael & Stoffels built the Belvedere. John M. Stoffels, one of the most active building contractors in Roseville and Placer County during the 1920s-1940s, also built the Veterans' Memorial Hall in Auburn, The J. C. Penney building on Vernon Street, Cochrane's Chapel of The Roses, and the Citizens' Bank. The Lumber was provided by Adams Lumber Co., managed by Roy Matheny- who lived at the Belvedere in 1925. At one of his company's free

annual Rose Theater parties, he vowed "that his company would always be found at the forefront of the upbuilding and boosting of the City of Roses." He went on to operate Matheny Bros. Lumber Co. and became Vice President of our Local Building & Loan Assoc. The Press Tribune stated that he and his brother had "staked their all on Roseville's Future, having recently opened one of the best and most modernly equipped lumber yards in the state." This Lumber Co. was sold to Diamond Match Co. and they ended up purchasing G. W. Lohse's Real Estate & Insurance Business.

The building isn't only associated with the historic commercial success of Roseville, but the success of the Southern Pacific Railroad. Countless Southern Pacific Train Conductors such as Charles H. Brown, S.P. Engineers like Austin M. Carter, 48-year S.P. Brakeman George K Martin, and 38-year S.P. employee, Chairman of the Legislative Board of and Legislative Advocate for the Brotherhood of locomotive Engineers, Delmar H. Brey. J.J. Barnes, who owned a successful shipyard in San Francisco and was a Fireman for the Southern Pacific Railroad. The list of important Machinists, Conductors, and Engineers who lived there is overwhelming. If you have a long history of Roseville Railroad workers in your family, there's a good chance one of your ancestors stayed at the Belvedere. The Hotel Belvedere was built in response to the Railroad's move from Rocklin to Roseville. How much more significant to Roseville history could it be?

Response to 3. The statements of significance are in relation to the criteria of eligibility for the California Register of Historical Resources (CRHR) and National Register of Historic Places (NRHP). The criteria each have specific thresholds of significance. The guiding framework for assessing resource significance against the criteria (for both NRHP and CRHR as advised by California Office of Historic Preservation) is outlined in National Parks Service Bulletin 15 "How to Apply the National Register Criteria for Evaluation." The specific criteria in question is CRHR criterion 2/NRHP criterion B, for association with the lives of persons significant to the past or important to local, California, or national history. The evaluation utilized Bulletin 15 when applying the criteria. According to Bulletin 15, page 15, "Properties eligible under Criterion B [Criterion 2 for CRHR] are usually those associated with a person's *productive life*". In other words, in order to meet the thresholds for this criterion, the building should be representative of the factors that made the person significant in history. The fact that an important person is associated or lived in a building does not, in and of itself, render the building eligible under this criterion. As the Belvedere Hotel relates to the individuals and companies mentioned in the comment above, the Hotel does not meet the threshold of significant association to their productive lives (what made them important). The historical importance of Michael & Stoffels and Adams Lumber Co., may be better represented through the businesses that they operated, rather than one building they helped construct. The conductors, chairman, shipyard owners, machinists, and engineers are most certainly better associated with the Southern Pacific Railroad, as it is the primary reason they may hold historical significance, rather than the Hotel for which they at one point resided. The question of significance in accordance with CEQA, as outlined in the report, is tied to the CRHR and NRHP eligibility criteria and the thresholds within.

Comment 4. *The reasons for lowering the Major Contributing Listing to a Supportive Contributing Listing are extremely weak.*

1. *The report states that "Additional trees planted in the front yard have diminished the visibility of the building from the street which also detracts from its sense of time and place, related to feeling and association. "*

According to the most recent Arborist Report, these trees are not protected in any way and should/could of course be removed. Regardless, these trees were there in 1981, when it was listed as a Major Contributing Building. How has a property that hasn't been altered since then, lost its merit due to trees that were there when it was first given its Major Contributor Listing?

2. *"The construction of the Moose Lodge to the north has also impaired the visibility of the building."*

The Moose Lodge was constructed in the 1960s, long before the Hotel Belvedere was listed as a Major Contributing building to our Old Town Historic District. And the Hotel is much taller than it. Does every historical building lose its importance if something is built beside it? Where's the logic in that?

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Response to 4. The three reasons identified in the comment above were included on Page 27 in the discussion regarding Integrity. Integrity is the ability of a property to convey its significance, and includes seven aspects: Location, Design, Setting, Materials, Workmanship, Feeling, and Association. Retention of the specific aspects of integrity that convey the property's significance is paramount to eligibility, and includes determining which aspects are most important to a particular property. The evaluation assessed integrity of the property as it was recorded in person September 26, 2019. As stated on page 28 of the report, *"The Belvedere Hotel...still retains the essential qualities to remain a contributor to the Old Town Roseville Historic District. The Belvedere Hotel, constructed within the Period of Significance for the District that ranges from 1900 to 1925, continues to be recognized through its physical appearance and location among similarly purposed buildings as a historical commercial enterprise. Despite the loss of integrity of association, feeling, and workmanship as an individual resource; the Belvedere Hotel retains the essential aspects of integrity that were established for the Old Town Roseville Historic District, which are the contributing buildings' location, physical recognizability as a historical commercial enterprise, and association to the commercial development of Old Roseville. As such, the Belvedere Hotel retains sufficient integrity to remain a contributor to the District."* In other words, the assessment still concluded that the building should

remain a contributor to the District and the loss of integrity was not a reason to lower the contributing status of the building.

With regard to the Hotel's contributing status to the District, the report states *"ECORP believes the classification of the hotel in the District Record as a "Major Contributor" should be adjusted to be considered a "Supporting Contributor" based on the definitions provided in the record. The Belvedere Hotel building is not a primary focal point within the District and does not represent the architectural value for which the District is aesthetically formulated; rather, it contributes to the overall framework of the District and its presence and historical association supports the other major contributors to the District."*

Comment 5. *Concerning the building's architectural style:*

Scott T. Hanson, author of "Restoring Your Historic House, The Comprehensive Guide for Homeowners" confirmed, based on listing photos of the outside and interior, that the Belvedere is clearly a Craftsman Style building, with square pillar columns and tell-tale covered porch. The inside of the building isn't spoken about in this report, but it exemplifies every Craftsman style characteristic: built in cabinetry, exposed wood beams, wooden windowsills and frames, thick baseboards and extensive use of stained woodworking.

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The architectural report concludes that "The techniques employed for construction and maintenance of the residential building were not unique and were in existence prior to construction of the building, and therefore are not historically significant. The residence does not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values, or possess any significant distinguishable components."

This building, referred to as "modern", "splendid", "an ornament to Lincoln Street," and "something truly to be proud of" by local news, was clearly thought of as a unique and exciting new building in Roseville. The "Build A Home Edition" of The Roseville Register, took pride in featuring the most up-to-date trends in home-building. I don't know how the writer of this report came to the conclusion that it doesn't embody the period, other than their research must have been inadequate.

Response to 5. The statements of significance are in relation to the criteria of eligibility for the CRHR and NRHP for which each have thresholds of significance, with guiding framework in NPS Bulletin 15. The specific criterion in question is CRHR criterion 3/NRHP Criterion C, for resources that embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction. According to Bulletin 15, "To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction." The report concludes that the building does contain Craftsman elements; however, as an individual resource as it relates to variation and evolution of commercial Craftsman buildings, it is not an exceptional representative example of Craftsman architecture in design or technique as compared to others. Merely being identified as a clear Craftsman style building does not mean that the building meets the threshold of significance for that criterion. Further, the notations in newspapers identified in the comment also do not directly translate to significance in accordance with the criterion. Being referred to in newspapers as "beautiful," "modern," and "splendid" do not reflect a comprehensive analysis of this building in relation to its historical context or architectural value among others of its kind. Rather, those statements in newspapers reflect the subjective opinion of the newspaper author in regard to its appearance only.

The remaining comments on the July 20, 2020 letter simply state policy recommendations from the 1981 Old Town Roseville Historic District Program report, which is already attached to the ECORP architectural history report.

Best regards,



Cultural Resources Manager