

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
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Th9c

A-2-MAR-24-0036 (SYDRIEL LP MIXED USE PROJECT)

November 14, 2024

CORRESPONDENCE

REUBEN, JUNIUS & ROSE, LLP

John Kevlin
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October 21, 2024

Delivered Via Email (leslie.velasquez@coastal.ca.gov)

Leslie Velasquez
California Coastal Commission
North Central Coast District Office
455 Market Street, Suite 228
San Francisco, CA 94105

**Re: 11401 State Highway 1, Point Reyes Station
Opposition to appeal of Marin County Board of Supervisors Resolution
No. 2024-81 Conditionally Approving a Coastal Development Permit**

Dear Coastal Commission:

Our firm represents the owner of the property at 11401 State Route 1 in Point Reyes Station (the “Property”), which is also the sponsor (“Project Sponsor”) of the five-unit mixed-use residential project at the Property (the “Project”). We write to oppose the appeal of the Project to the Coastal Commission (the “Appeal”) by Point Reyes Station Village Association (“PRSV”). The Project has been approved by both the Marin County Planning Commission and the Marin County Board of Supervisors.

The Project—which proposes a minor expansion of an existing mini-mart and the net addition of three new residential units within an existing building that is mostly vacant for a total of five units, two of which will be affordable—does not raise a “substantial issue” that would warrant the Commission accepting an appeal.

Furthermore, the Coastal Act specifically applies enhanced protections to mixed-income housing projects like the Project, only allowing density reductions if the Project’s density cannot feasibly be accommodated on the site. We ask this Commission to not accept this appeal and allow the Project to move forward.

A. Project Description and Benefits

1. Project Description and Changes Since Original Approval

The Property is located in Point Reyes Station in western Marin County. It is on a 0.60-acre lot that currently houses a fuel station with three fuel dispensers and a single 5,560 sq. ft. building. The building contains a small convenience store, a studio apartment, a one-bedroom

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apartment, and three commercial tenant spaces. The studio and one-bedroom apartments are unpermitted units and existed at the site before the Project Sponsor acquired the Property.

The Project originally proposed expanding the existing building to 5,800 sq. ft. by enclosing a porch area, expanding the convenience store, and redeveloping the remainder of the building to provide five (5) rental units, including two (2) 1-bedroom units and three (3) 2-bedroom units, resulting in a total retail footprint at the Property of 1,930 square feet (2,003 square feet including a utility room), roughly half of the approximately 4,000 square feet of retail that currently exists at the Property. Two of the five housing units will be deed-restricted below-market rate (“BMR”) units, meaning the Project would deliver a five-unit project with 40% affordability. It also included a retail propane tank that would be available to the general public.

The Project was approved by the Marin County Deputy Zoning Administrator in February 2024. Through appeal hearings at the Marin County Planning Commission in April and Board of Supervisors in July, the scope of the Project was modified in two significant ways. First, the retail propane tank was eliminated from the Project. Second, the Project Sponsor modified the plans to avoid any expansion the Property, maintaining the existing porch leading into the building, and reducing the proposed size of the convenience store to 1,718 square feet.

2. Project Benefits

The Project will be a positive addition to Point Reyes Station, delivering new rental housing stock in an infill setting and within an existing building on site, minimizing visual and aesthetic changes to the community. The Project is an integrated development, in that the commercial market proposed by the Project is necessary for it to feasibly deliver the residential units. It will have many benefits for the community and visitors, including:

- **Increased rental housing in West Marin.** The Project proposes five (5) new units of rental housing, in a West Marin County community with both very little housing stock and few appropriate locations for new multifamily housing. Three of those units will have two bedrooms that could be attractive to families. Also, at less than 1,000 square feet in size, the units will rent for less than most new housing in Marin, making even the market rate units comparatively affordable to a wider swath of potential residents. Two of the five units will be deed-restricted BMR units.
- **Maintaining existing building character.** The Project creates these five units and renovates and expands an existing convenience store with minimal impacts. The Project does not expand the existing building, maintains the entry porch, and incorporates design elements and colors that bring the building closer to its original character.
- **Replacing vacant space with residential units and an expanded mart.** The Property currently has three retail spaces totaling approximately 4,000 square feet, two of which are vacant. The Project would convert approximately half of that retail space to housing, with the remainder being used for an expanded convenience store. The larger store will allow it

to offer more items for the convenience of the community and visitors, and also provide a much-needed source of income to offset the costs of the renovation and creation of five new rental units.

B. The Project Does Not Raise a Substantial Issue

The Project—a change of use only project creating five housing units and expanding an existing convenience center to 1,718 square feet—does not raise a substantial issue regarding the Coastal Act. We generally respond to the appellant’s claims here.

1. The Property is Not Historic

The Appeal states several times that the Property is historic, and that the change of use only Project that makes upgrades to the façade would cause a significant and unavoidable impact to a historic resource. This is not supported by a preservation study prepared by a disinterested third party.

Page & Turnbull, a highly-experienced and respected preservation consulting firm, conducted a comprehensive analysis of the existing building at the Property, and concluded that it is not individually eligible for the California Register. Further, it is not even a contributor to the eligible Point Reyes Historic Station District. Page & Turnbull assigns the Property a historic resource status code of 6Z, which means it has been found ineligible for the national, state, or local historic designation through survey evaluation.¹

Regarding the architecture itself, Page & Turnbull concludes:

The building does not demonstrate a high level of craftsmanship such that it would be considered an excellent example of a 1930s agricultural building, and it does not demonstrate the features of a particular architectural style such that it would be considered individually significant for its architectural quality. The building’s relationship to its agricultural history has been additionally obscured through its relocation in 1941 and the various alterations that have been undertaken to adapt the building to its current use.

Regarding the “historic” district, Page & Turnbull notes initially that the historic district has not been listed in the California Office of Historic Preservation’s Building Environment Resource Directory, or in other listings of historic resources in the area, and does not appear to have been formally listed as a historic resource on a local or state register.²

And even assuming for the sake of argument that an historic district is present, the Property is not a contributor based on the criteria identified in the 2001 Point Reyes Station Community Plan. The existing building was constructed outside of the period of significance of 1875-1930, and in a different location. Also, it is not identified as one of the 51 properties in the *Point Reyes*

Station Archaeological and Historic Resource Survey that the Community Plan uses to identify contributing buildings to the potential historic district.³

Because the Property is not historic, the minor Project modifications to the existing structure do not damage any potential historic district, much less cause harm to an individually-significant building. In this respect, the Project does not contradict the LCP's goals and policies relating to historic resources.

A copy of Page & Turnbull's report is included as **Exhibit A**.

2. The Project Complies with the Density Bonus Law

The PRSVA attempts to argue that Marin County's Assistant Zoning Administrator, Planning Commission, and Board of Supervisors all improperly applied California's state density bonus law (Government Code § 65915) (the "DBL"), making identical arguments rejected by the Board of Supervisors. PRSVA misstates the law and how it applies to the Project.

PRSVA's letter devotes a significant amount of time to a position that was overturned by the California State legislature in 2019: the Coastal Act supersedes the Density Bonus Law in all respects and in all situations whenever there is any perceived conflict between the two.

The legislature modified the Density Bonus Law to strike a balance between the two laws with the explicit intent to "harmonize" the two statutes. This is widely understood in the land use legal community; for example, Meyers Nave—a firm that represents many public entities—explained in a 2020 "Guide to the California Density Bonus Law" that the purpose of this legislation was "to strike a balance between the state goals of promoting housing and protecting the coast."⁴ The Project does just that.

With regard to State Assembly Member Alvarez's AB 1287: it attempted to establish a new legal standard in which the Density Bonus Law would supersede the Coastal Act in all respects. Contrary to PRSVA's claims, we do not suggest the Density Bonus Law currently supersedes the Coastal Act in all respects, but that they be harmonized to promote housing and protect coastal resources and coastal access, the latter two of which are not implicated by the Project. The Coastal Commission should follow the law as it currently exists—not as it did before 2020 and not as proposed by AB 1287—and find that the Project's concession request does not adversely affect coastal resources and coastal access.

Also, despite PRSVA's assertions, the Density Bonus Law provides that a County must grant a waiver when literal application of a zoning regulation would preclude the project as designed with the number of proposed units. It does not require any showing relating to financial feasibility, and as a result the waiver granted by the County should be upheld.⁵ Furthermore, the California Court of Appeal in 2022 clarified that the Density Bonus Law gives project sponsors design discretion: a city or county cannot apply "any development standard that would physically

preclude construction of that project as designed,” unless one of the narrow exceptions to waivers applies.⁶

The Project also qualifies for a concession to exceed the principally permitted use size limit for a convenience store instead of requesting a Conditional Use Permit, because it is providing two deed-restricted affordable units.⁷ A concession is warranted when it would “result in identifiable and actual cost reductions to provide for affordable housing costs” or if it would allow mixed-use zoning in conjunction with the housing development “if commercial ... uses will reduce the cost of the housing development” and the commercial use is compatible with the project.⁸

The concession here meets both. A larger convenience store lowers borrowing costs, reducing the cost of the housing construction itself. It also reduces the time by which the Project’s costs are matched by the revenue it returns, incentivizing the projection of affordable housing by making the entire Project feasible. Furthermore, the burden of proof to show that a concession is not warranted falls on a local agency.⁹ PRSVA’s claim in its brief that the concession should be denied because the “County did not find identifiable and actual cost reductions” is a misstatement of California law and should be disregarded.

Finally, PRSVA takes another position that is legally incorrect and asserts that the Project needs to comply with Marin County’s implementing density bonus ordinance instead of the current state density bonus law. To the extent Marin County’s regulations are inconsistent with the DBL, the DBL governs. Marin County’s ordinance makes this clear, explaining that it is “following California Government Code Sections 65915-65918,”¹⁰ and notes throughout the ordinance that it is meant to be implemented as required by the DBL.¹¹

3. The Project Enhances Community Character

Underlying many of PRSVA’s arguments for why the Project raises a “substantial issue” is that it will fundamentally and irrevocably alter the “community character” of Point Reyes Station. In fact, the Project enhances the community character by not expanding or modifying the exterior of the building, and incorporating community-consistent doors, windows, materials and colors. It does not propose to eliminate the gas station at the site or reduce the number of pumps. It expands an existing convenience store within existing building area and converts the remaining vacant retail space into five residential units, two of which will be affordable. It also rehabilitates two unauthorized dwelling units that existed when the Project Sponsor purchased the Property, bringing these up to current health and life safety standards.

4. Other Grounds for Appeal

Briefly, we respond to several other of the Appeal’s arguments about inconsistencies with the LCP, all of which are generally related to the scope of the project (except for items addressed above like historic resources and density bonus):

- The convenience store is not a chain store, which are identified by uniform signage, logos, color scheme, layout and products. The store will be an independent and not affiliated with any other store or chain. The station has no association with Chevron Oil. It will have product offerings specifically selected for this location, and to serve local and tourist customers.
- The Project provides adequate off-street parking, complying with the applicable zoning regulations and as confirmed by a trip generation study.
- The Project will improve the septic system on the site to meet current code requirements. The Project will also provide two restrooms open to the public – a scarce resource for tourists visiting town.
- The Project proposes to maintain the gas station and expand the convenience store along its frontage on State Highway 1, maintaining the commercial-oriented nature of this portion of Point Reyes Station. The rooms used for back-of-house commercial along Mesa Road are set back from the property line and do not have any direct street access, so they do not contribute to the commercial-oriented nature of the site. Thus, the residential units along this portion of the Property are sited in a way that does not conflict with the continuity of store frontages.

C. Conclusion

The Project will add five new housing units in a part of West Marin County that does not typically produce new housing, much less affordable by design market rate units and two deed restricted BMRs. It accomplishes this and an expansion of the existing convenience store within the existing building, providing another food and beverage option for residents and visitors. The Project will enhance community character by incorporating community-consistent doors, windows, materials and colors.

Allowing the replacement of vacant commercial space and two unpermitted dwelling units with five units constructed pursuant to current life safety standards, and an enlargement of a convenience store—all within an existing building—represents a minor extent and scope of the project.

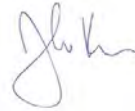
It also does not adversely affect a coastal resource; the Property is not historic or part of any historic district, and an expanded convenience store simply provides an alternative option for food and beverages the same way a new café or coffee shop in the town would. State law clearly provides that a density bonus project—by its nature a project that includes affordable housing—that does not adversely impact coastal resources or coastal access is permitted, including with waivers and concessions. As a result, this does not set a precedent for future density bonus projects in the Coastal Zone throughout the state. And the Appeal is focused on the relatively minor Project’s purported impacts on Point Reyes Station itself, as understood by the town and surrounding West Marin residents; a five-unit project with two permanent BMRs and an expanded

convenience store does not raise issues of regional or statewide significance. Housing should be promoted in the Coastal Zone, and a convenience store simply provides another food and drink option.

We ask you to find that the Project does not raise a “substantial issue,” allowing it to proceed.

Sincerely,

REUBEN, JUNIUS & ROSE, LLP



John Kevlin

¹ Exhibit A, pg. 16, Criterion C/3.

² Exhibit A, pg. 16, Footnote 24.

³ Exhibit A, pgs. 16-17.

⁴ *Guide to the California Density Bonus Law*, Jon Goetz and Tom Sakai, Meyers Nave, revised January 2020, pg. 12.

⁵ California Government Code § 65915(e)(1).

⁶ *Bankers Hill 150 v. City of San Diego* (2022) 74 Cal. App. 5th 755, 775.

⁷ Replacement units also qualify as the on-site affordable units that permit a project to use concessions. California Government Code § 65915(c)(3)(A)(i).

⁸ California Government Code § 65915(k).

⁹ California Government Code § 65915(d)(4).

¹⁰ Marin County Municipal Code, § 22.24.010.

¹¹ Marin County Municipal Code, Chapter 22.24.

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary # _____
HRI # _____
Trinomial _____
NRHP Status Code _____

Other Listings _____
Review Code _____ Reviewer _____ Date _____

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Resource name(s) or number (assigned by recorder) 11401 State Route 1

P1. Other Identifier: _____

***P2. Location:** Not for Publication Unrestricted ***a. County** Marin
***b. USGS 7.5' Quad** Inverness, CA **Date** 2022
***c. Address** 11401 State Route 1 **City** Point Reyes Station, Marin County **Zip** 94956
d. UTM: (Give more than one for large and/or linear resources) Zone _____ mE/ _____ mN
***e. Other Locational Data:** Assessor's Parcel Number 119-198-03

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)
The property at 11401 State Route 1 consists of a rectilinear parcel (APN 119-189-03) with frontages along A Street, Route 1 (also called Shoreline Highway), and Mesa Road in Point Reyes Station, an unincorporated area of Marin County. The parcel is zoned C-VCR-B2 (Village Commercial Residential). The parcel contains a one-story building with a rectangular footprint that serves a mixed-use as a gas station with a small concession, along with two commercial spaces and three residential and storage units. A freestanding gasoline pump canopy structure is located between the building and State Route 1.

The subject building was constructed in 1932 at a different location to serve an agricultural use. It was moved to its current site in 1941 to serve as a gas station and feed store. The building consists of wood framing clad in a mixture of corrugated metal siding, lapped wood siding, and stucco cladding, and features a gable roof clad in corrugated metal. A mixture of window and door types are present, including wood sash and aluminum sash windows. The property is not aligned to cardinal directions, but for the ease and clarity of this building description, the primary façade that faces Route 1 will be described as the south façade, and so on. (Continued on page 2)

***P3b. Resource Attributes:** HP6. 1-3 story commercial building

***P4. Resources Present:** Building Structure Object Site District Element of District Other

P5a. Photo



P5b. Photo: Oblique view of primary (south) façade and east façade (at left), looking northwest, on May 21, 2024.

***P6. Date Constructed/Age and Sources:** Historic Prehistoric Both

***P7. Owner and Address:**
Redwood Oil Co LLC
50 Professional Center, Ste 100,
Rohnert Park, CA 94928

***P8. Recorded by:**
Page & Turnbull, Inc.
170 Maiden Lane, 5th Floor
San Francisco, CA 94108

***P9. Date Recorded:**
July 2, 2024

***P10. Survey Type:** Intensive

***P11. Report Citation:** None

***Attachments:** None Location Map Sketch Map Continuation Sheet Building, Structure, and Object Record
 Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record
 Artifact Record Photograph Record Other (list)

***P3a. Description (Continued)**

The primary (south) façade features an addition at its west side and a wood-frame covered porch along the remainder of the façade (refer to **P5a** and **Figure 1**). The addition is clad in painted lapped wood siding and features two roll-up garage doors at the west side, and a grouping of three single-lite windows of various sizes at its east end. The east-facing wall of the addition contains a fully glazed single-leaf door and a single-lite window (**Figure 2**). To the immediate east of the addition is an enclosed section that is also clad in painted lapped wood siding and contains two single-leaf wood panel doors beneath pairs of transom windows. The remainder of the façade is defined by the elevated covered porch with wood posts and braces supporting the extension of the gable roof, as well as wood plank flooring and wood railings. The original floor level of the building is elevated from grade, and the covered porch is raised and accessed via several steps at the east end of the building (**Figure 3**). The east-facing wall at the west end of the covered porch is clad in painted, v-groove wood siding, while the south-facing wall is clad in painted corrugated metal cladding. Periodic screened sections are located at the top of the exterior wall to provide ventilation to the interior. Openings within the covered porch include, from west to east, a partially glazed interior wood door with a partially screened exterior wood Dutch door, a pair of double-leaf wood doors with two lites, a two-over-two wood frame window with ogee lugs, a wood frame door with multi-lite glazing and a partial-height wood exterior gate, and a two-over-two wood frame window with ogee lugs (**Figure 4 and Figure 5**).



Figure 1: Oblique view of primary façade showing addition at west end of the façade. Looking northeast.



Figure 2: Oblique view of primary façade, looking northwest.



Figure 3: Oblique view of primary façade as seen from east end of building, looking northwest.



Figure 4: Interior of covered porch, looking west. Note that the far western door is hidden from view by gate.



Figure 5: Openings at east end of covered porch, looking northeast.

The east façade of the building is clad in painted corrugated metal siding and features a gable end with projecting eaves supported by three wood knee braces evenly spaced along the peak and north slope of the roofline (**Figure 6**). The base of this façade features a horizontal wood bandcourse (in line with the building's interior floor level) and short vertical wood boards that screen the area beneath the building. Openings at the east façade consist, from south to north, of three pairs of two-over-two wood frame windows with ogee lugs and three small single two-over-two wood frame windows with ogee lugs. The middle window of the three small windows is missing its bottom sash. A set of wood steps at the north edge of the east façade provides access to the rear porch at the north façade (**Figure 7**).



Figure 6: East façade, looking west.

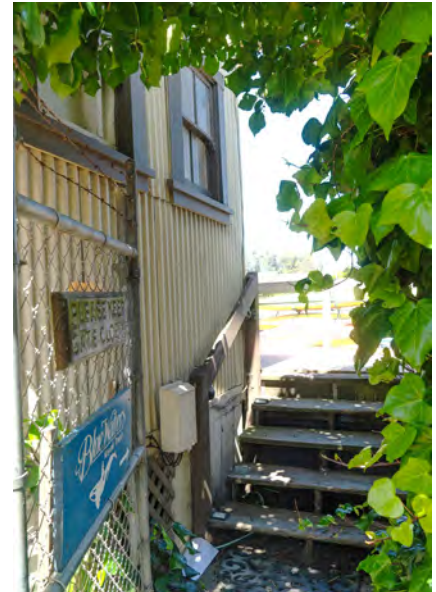


Figure 7: North edge of east façade showing two windows not visible in Figure 6, and wood steps at north end of façade. Looking north.

The rear (north) façade of the building is clad in painted corrugated metal cladding and has a variety of non-original openings (**Figure 8 to Figure 11**). The roof has wide eaves with exposed rafter tails. The periodic ventilation areas along the top edge of the façade have been covered and patched with painted plywood panels at the east half of the building, while those at the west half feature a mix of screening, covering, and infill with plywood. An elevated rear deck that corresponds to the interior floor height spans the length of the north façade and is narrower at the east end and wider at the west end. Wood steps with and without wood railings are located in three places along the north side of the rear deck.



Figure 8: East end of rear (north) façade. Looking south.



Figure 9: Central portion of rear (north) façade. Looking south.

Openings, from east to west, consist of a partially glazed single leaf wood panel door, a narrow fixed window, a paneled single leaf wood door, a pair of mismatched doors (one paneled and one glazed), a double-hung aluminum frame window, two pairs of vinyl slider windows to the west of a plywood panel covering an unknown opening, two pairs of multi-lite double leaf doors, a fixed two-lite wood frame window, and a two-over-two wood frame window with ogee lugs (**Figure 8 to Figure 11**).



Figure 10: Oblique view of central portion of rear (north) façade. Looking southeast.



Figure 11: West end of rear (north) façade. Looking slightly southwest.

The west façade is clad in painted corrugated metal siding at its north end and stucco cladding for the remainder of the façade (**Figure 12**). Openings within the north portion of the façade consist of a pair of vinyl slider windows within the gable end, and a fixed two-lite wood frame window at the first-floor level. Openings within the stucco-clad portion of the west façade consist of three pairs of aluminum frame slider windows and a single leaf metal door.



Figure 12: West façade of building, looking east.

Additional features of the site include the freestanding metal frame structure with gable roof over the gas station's three gasoline pumping stations, a freestanding metal signpost with sign at the southwest corner of the building, and a low signboard at the southeast edge of the property advertising current gasoline rates.

The surrounding area is mixed in its use with a variety of residential, commercial, institutional, and light industrial properties constructed over many decades, from ca. 1890 to the 1970s (**Figure 13 to Figure 16**). Just southwest of the subject building is the main business district of Point Reyes Station, which includes the historic Point Reyes Railroad Station building and several other of the town's earliest commercial and residential buildings.



Figure 13: Wells Fargo Bank branch location at 11400 Route 1, built in the 1970s.



Figure 14: Residential building at 125 A Street, built ca. 1906.



Figure 15: Foresters Hall, built in 1914, located at 505 Mesa Road.



Figure 16: Old railroad barn at 510 Mesa Road, built ca. 1920.

BUILDING, STRUCTURE, AND OBJECT RECORD

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*NRHP Status Code 6Z

*Resource Name or # 11401 State Route 1

B1. Historic name: _____

B2. Common name: 11401 State Route 1

B3. Original Use: Agricultural

B4. Present use: Mixed-use

*B5. Architectural Style: Utilitarian

*B6. Construction History: (Construction date, alterations, and date of alterations)

The subject building was constructed in July 1932 as a pea and vegetable packing shed located along the now removed rail lines of the Northwestern Pacific Railroad. At the time of the building's completion, a dance was held and it was reported as "one of the largest business buildings in Point Reyes."¹ A photograph that was taken soon after the subject building's construction in 1932 shows its approximate location in relation to the Point Reyes railroad station building. It was located east of the station (now the Post Office at 11260 Route 1), and west of the current intersection between Mesa Road and Toby Street (**Figure 17**). (Refer to continuation sheet, page 8)

*B7. Moved? No Yes Unknown Date: 1941

Original Location: Between Route 1 and Mesa Road along the former railroad tracks, approximately in line with Toby Street

*B8. Related Features: None

B9a. Architect: Not known b. Builder: Not known

*B10. Significance: Theme N/A Area N/A

Period of Significance N/A Property Type _____ Applicable Criteria N/A

Historic Context:

The following brief history of Point Reyes Station has been excerpted from the *Point Reyes Station Community Plan* of 2001:

Point Reyes Station is located in the southwestern corner of the vast Rancho Nicasio, granted by the Mexican governor in 1845 to Pablo de la Guerra and Juan Cooper. This corner of the grant then passed to Jasper O'Farrell, and again in 1851 to James Black, whose family continued to own land in the area for more than a century. In 1873 the rolling hills and level mesa of land at the head of Tomales Bay was a dairy ranch, rented from landowner Mary Black Burdell by Marin County Sheriff James Stocker.

The North Pacific Coast Railroad [...] constructed its tracks through the area in 1874; the train would run from Sausalito to the Russian River area where timber could be transported to market. [...] As historian Jack Mason wrote, "The town's birth can be pinpointed: January 7, 1875, the day the first train came through on its way to Tomales." The first passengers departed the train at a platform and found their way to Olema, two miles south and the only town in the vicinity. Soon the railroad built a depot, and Mrs. Burdell's husband Galen constructed a hotel and saloon.

(Refer to continuation sheet, page 12)

B11. Additional Resource Attributes: N/A

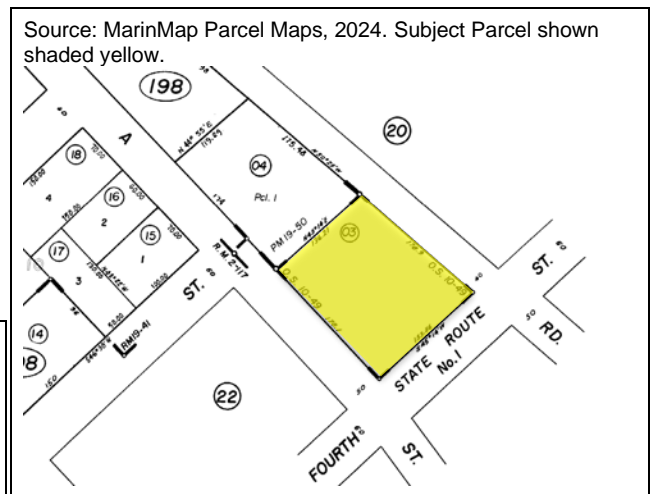
*B12. References: Refer to footnotes

B13. Remarks: N/A

*B14. Evaluator: Barrett Reiter, Page & Turnbull, Inc.

*Date of Evaluation: July 2, 2024

(This space reserved for official comments.)



¹ "Plans have been completed..." *Petaluma Argus-Courier*, Evening Edition, July 11, 1932.

***B6. Construction History (continued):**



Figure 17: Looking north from A Street (State Route 1) near 2nd Street circa 1932. Subject building, at its original location, indicated with red arrow. The long side appears to be the current north (rear) façade of the building based on the arrangement of openings, while the partial side façade would be the current west façade. Source: Jack Mason Museum of West Marin History.

While the ca. 1932 photograph shows only one and a half façades, the façades shown are presumed to be the existing north façade, and the north half of the existing west façade (the visible window is presumed to be the location of the northernmost window opening at the first story of the west façade, although the window has since been replaced). As a two-over-two double-hung window is visible at the west façade in this photograph, two-over-two double-hung windows are presumed to be original to the building (**Figure 17**). This would indicate that the nine two-over-two wood windows at the existing east façade and the two two-over-two wood windows at the east end of the existing south façade would be original to the building's 1931 construction, although not visible in the ca. 1932 photograph. While no known early photographs show the existing south façade of the building, it is likely that the covered porch would have been original to the building. It would have spanned the full length of the building but has been partially removed through two subsequent additions.

By March 1941, the building had been relocated to its current location, where it was turned approximately 90 degrees (clockwise) and was put in use as a feed company with a small gasoline and service station.² In order to accommodate the service station, the addition at the west end of the now primary (south) façade was constructed to include a wide garage door with an automotive service station and a small commercial store associated with the gas station. This ca. 1941 addition removed the west portion of the attached wood porch and elevated decking. An attached canopy structure provided coverage for the gasoline pumps located to the south of the building (**Figure 18 and Figure 19**).

² "Pt. Reyes Firm Occupying New Building," *Petaluma Argus-Courier*, March 24, 1941.



Figure 18: View of the primary façade of the subject building, looking northeast, circa 1948, showing the addition that housed a service station and gasoline station. Area outlined in blue shows area of addition. Source: Jack Mason Museum of West Marin History.

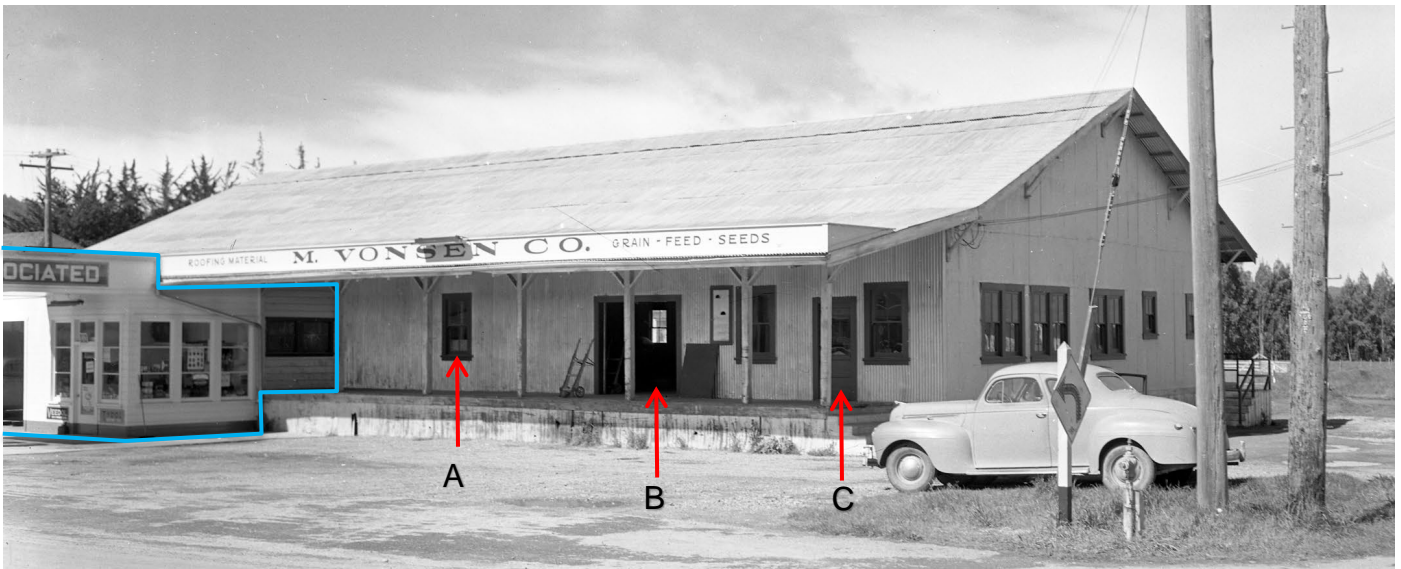


Figure 19: View of the primary façade of the subject building, looking northwest, circa 1948. Area of the addition is outlined in blue. Source: Jack Mason Museum of West Marin History.

A comparison between the circa 1948 photographs and the building as it exists today illustrates some of the changes to openings that were made at the primary façade since ca. 1948, including the expansion of the westernmost window opening into a door opening (location labelled “A” in **Figure 19**), the expansion of the double-door opening to fit taller double doors (location labelled “B” in **Figure 19**), and the replacement of the single-leaf wood door at the east end of the primary façade with a wood door with additional glazing (location labelled “C” in **Figure 19**).³

An aerial photograph taken in 1960 shows that the west façade was altered to include a pair of large barn doors at an unknown date between circa 1948 and 1960, and indicates that the service station had been expanded to its current footprint within the interior (**Figure 20**). This opening was removed when the gas station and service center were renovated in 1971. Permits on file

³ A comparison of Figure 19 with Figure 3 to Figure 5 illustrates that the existing double doors at the south façade are taller than those shown in the ca. 1948 photograph and the existing door frame is taller than the adjacent window opening, which is presumed to be original.

with the Marin County Building Department indicate that in 1971 the previous connected canopy was removed and the existing “pump island” and metal frame canopy structure was erected.⁴ It is unclear whether the openings to the commercial space were altered at this time, although an addition to the east of the commercial store—which infilled a portion of the covered porch—appears to have been completed prior to 1971.⁵ It is likely that the existing aluminum windows and metal door at the west façade were installed at this time, and faux stone cladding (removed ca. 2014) was also installed at this time.



Figure 20: Detail of aerial photograph, showing the west façade of the subject building in 1960. Source: Caltrans.

Alterations that are known to have occurred at the subject building are listed in the table below. This table includes activities that were undertaken at the subject property that are supported by permits on file at Marin County Planning and Building Departments or are substantiated through the written record in historic newspaper articles.

Permit #	Date	Owner	Architect/Contractor	Description
N/A	July 1932	Leland Murphy	N/A	Construction of large packing plant building for packing peas, artichokes, and other vegetables completed. ⁶
N/A	ca. March 1941	Lewis--Simas-Jones Company	N/A	Building relocation to current site completed and building ready for new occupancy as gas station and feed store. ⁷
A11959	April 1971	Harold Mahoney	Swallow Construction Co.	Refurbish existing service station building
A12171	June 1971	Harold Mahoney	Swallow Construction Co.	Regrade drainage ditch at side of building and install new pump island and canopy
CP-15-05; DC 245	August 2007	Mark and Jayne Reano	N/A	Gas tank to be installed along west façade (facing A Street).
132062	October 2011	Mark Reano	Agape All American Roofing	Reroofing of building
153454	September 2016	Mark Reano	Stroupe Petroleum	Replace fuel dispensers and complete some ADA compliance measures for entrance and access.

Other known alterations supported by the permit record include reroofing the building in 2011. Additional alterations that have been identified through a review of historic photographs include relocation of the door from the south-facing wall to the east-facing wall of the commercial shop at the primary façade sometime between January 2008 and June 2011, and the removal of the faux-stone cladding at the primary façade and replacement of all windows at the commercial unit sometime between April 2013 and April 2015.⁸ Two of the five wood brackets at the east façade were removed between April 2008 and June 2011.⁹ Alterations that have

⁴ Permit A11959 and A12171, filed April and June 1971. On file with the Marin County Building Department.
⁵ Drawings of alterations undertaken in 1971 show the area of this addition already enclosed and do not appear to indicate changes to the previously established door openings to the commercial space. However, drawings were scanned at low quality and have significant noise that makes additional conclusions about the scope of alterations unclear.
⁶ “Plans have been completed...” *Petaluma Argus-Courier*, Evening Edition, July 11, 1932.
⁷ “Pt. Reyes Firm Occupying New Building,” *Petaluma Argus-Courier*, March 24, 1941.
⁸ The dates that these alterations were completed have been narrowed down through a review of Google Maps Street View images.
⁹ The dates that these alterations were completed have been narrowed down through a review of Google Maps Street View images.

occurred at unknown dates include installation of a staircase with wood handrail near the west end of the covered porch at the south façade, and subdivision of the interior of the building to accommodate several small units that have served a mixture of storage and residential or live-work spaces.



Figure 21: Subject building in 2007, showing faux stone cladding on primary façade and entry door location to commercial unit prior to its relocation and the replacement of this commercial unit's windows. Source: Marin County Building Department.

Alterations to openings at the rear of the building have been numerous and are not detailed in the permit history for the building. Based on a 1982 photograph that shows the rear façade, several additional openings were installed since that time, including a mixture of four single and double doors, as well as approximately four window openings (**Figure 22**).



Figure 22: Rear (north) façade in 1982. Looking slightly southeast. Source: Jack Mason Museum of West Marin History.

***B10. Significance:**
Historic Context (continued)

Galen Burdell received 950 acres surrounding the depot from his wife as a present, and he controlled the growth of the town until his death in 1906. The new town had as its pattern the right-of-way controlled by the railroad. Town fathers built a school up the hill in 1879, and a post office was established in 1882. As the town grew, its name changed several times: Olema Station, Burdell's, Marin and Point Reyes. On August 10, 1891, the Federal government finalized the name of the post office: Point Reyes Station. The [...] first town tract map was filed in 1908.

A. P. Whitney and Co. opened a mercantile on the main street in 1883, which was taken over by merchants Salvatore Grandi and Wilford Darneal in 1887. Grandi soon became the sole proprietor and his store remained the dominant commercial force in town for decades. [...] Numerous other businesses opened around the turn of the century, such as a bank, sample room, and blacksmith shop, but the railroad dominated the scene. Daily trains brought visitors, salesmen and workers, and hauled out dairy products, fish and lumber from the north. The main street took on the look of a thriving western town served by [the] railroad.

[...] New owners renamed the line the North Shore Railroad in 1902, and the company was reorganized as the Northwestern Pacific in 1907. Between 1906 and 1920 a number of improvements were undertaken, such as a new downtown depot and a large engine house on the north end. The railroad ended service in 1933, shortly after two modern highways to West Marin were built, one a state highway (today's Highway 1 [State Route 1]) and the other named Sir Francis Drake Highway [...].

The Depression affected the economy of Point Reyes Station, as it did the rest of the country, and brought in an era of humbleness which lasted into the 1960s. A major event was the loss of the railroad in 1933, as the Northwestern Pacific cut back its routes. Businesses struggled through the hard times, even the seemingly invincible West Marin dairy industry. World War II practically emptied the town of its young men, but brought hundreds of men engaged in military defense activities to the surrounding coast.

At the war's end, local merchant Waldo Giacomini bought the tiny 50-cow Fillippini dairy on the east edge of town and transformed it into one of the largest dairy ranches in the area, creating feed and grazing lands by reclaiming much of the head of Tomales Bay through a system of levees. [...]

The Grandi Hotel and many of its associated businesses folded in the 1950s, but a small shopping center brought new business to the north end of town. By this time a local newspaper, *The Baywood Press*, covered local events; today it is the *Point Reyes Light*. Modest grocery stores, restaurants, bakeries and gift shops made an imprint during the 1960s, as the establishment of Point Reyes National Seashore brought a new breed of visitors beginning in 1963. At this time, West Marin boosters promoted state plans for new highways to the area, with large developments planned for many ranches in the vicinity. The creation of the Golden Gate National Recreation Area in 1972 and a new wave of environmental activism leading to restrictive county zoning held the large development plans at bay.

The 1970s brought an influx of young families and retirees, mostly from urban areas, and tourists attracted to Point Reyes National Seashore and other local parks. Most of the home building of the last two decades occurred on the Point Reyes Mesa and east of Highway 1, north of town. Coast Guard housing, Campolindo Estates, Los Reyes, and the Ecumenical housing project were planned subdivisions, while numerous new single-family homes were built along Mesa and Cypress Roads, McDonald Lane and Viento/Knob Hill. No new houses have been built downtown.

In the business district of Point Reyes Station, the 1970s saw the beginnings of the transformation towards a tourist economy. The Grandi building closed under county orders for need of code upgrades, causing the Post Office to move to the old train station and Building Supply to its new building. The Bank of America opened a new bank, slowed by an arson attack which destroyed the first new building and spurred a redesign more sensitive to the western character of the town. Toby's Feed Barn moved to the old Diamond Match building and attracted a wider clientele. Small shops appeared, including a bookstore and a natural foods store. A group of young arrivals opened a thriving community center they called The Dance Palace in the vacant old Palace Market building.

The 1980s brought new building on the back streets of town, including a new firehouse, storage facility, the Farm Bureau/MALT building, the sweat equity housing project, a senior housing facility called Walnut Place,

and an apartment building uphill from the creamery. Remodeling and changing uses occurred with greater frequency, including dividing the Old Creamery Building into varied commercial spaces, remodeling the Palace Market, turning the Sandcastle (Forester's Hall) into a private residence, and moving the Station House Café. Bed & Breakfasts and galleries began a trend which continues [in 2001]. Trees were planted on Main Street, and the 248-acre Martinelli Ranch just north of town was purchased as parkland by the Federal government, saving that land from a planned subdivision.

In the 1990s, the new Dance Palace and preschool, medical clinic and social services building brought a new look to the northern commercial area. Downtown, the Point Reyes Emporium and old Cheda buildings were rehabilitated, the old Toby's haybarn was remodeled into modern commercial and office spaces, and the old Scilacci livery stable was razed and rebuilt as commercial space in a style matching the original. Galleries, cafes and bakeries, Bed & Breakfasts and visitor bureaus continued to appear in and around town. With the closure of the Giacomini dairy and phaseout of ranching in the surrounding park lands in upcoming years, Point Reyes Station will surely continue its progression towards a tourist and home-office economy, a transition that began with the coming of parklands and changing demographics of the 1960s and 1970s.¹⁰

Agricultural Trends in Point Reyes Station in the 1930s

As the subject building was first constructed as a "pea shed" and agricultural packing facility, information about the trends in farming in Point Reyes and Point Reyes Station provide additional context for the construction of the building in 1932. The following information on Japanese pea farmers in Point Reyes is excerpted from "Issei and Nisei Pea Farmers on Point Reyes" by historian Dewey Livingston.

Following the First World War, many dairy ranchers at Point Reyes leased pastureland to immigrant Italian and Japanese farmers, who grew artichokes and peas. The foggy coast made ideal conditions for those crops, as well as having soils and topography beneficial to crop farming. [...]

It appears that Japanese Issei (first generation) and Nisei farmers came to Point Reyes starting in 1931. Leland Murphy, the new owner of the 10,000-acre Home Ranch overlooking Drakes and Limantour esteros, had an interest in diversifying land uses on his property, no doubt influenced by the success of Italian-run artichoke farms on the ranch whose leases he inherited.

In March of 1932 the Petaluma Argus-Courier reported that Japanese farmers were preparing land for artichokes on the Murphy ranch, although the Italians had been the dominant force in that crop. The article claimed that 5,000 acres "are now ready for the planting of the vegetable, which thrives in the coast section." Soon, the Japanese farmers would focus on peas, which also thrived in the foggy Point Reyes environs.

"By 1934, Murphy's great tract had become the world's foggiest pea patch," wrote Marin historian Jack Mason. The new residents moved into abandoned tenant ranch houses and meager sheds and barns scattered across the ranch. Murphy hired John Hisao Kimura to manage the clearing, planting, cultivation, and sale of peas on the ranch. Murphy would get half the crop, and to strengthen his investment he bought Caterpillar tractors and built a barn-like pea warehouse [the subject building at its original location] in the rail yards at Point Reyes Station. Kimura's Filipino and Mexican laborers cleared coyote brush by hand and planted 200 acres in peas in 1932.

"Nothing went according to plan," wrote Mason. "The railroad pulled out, even before the first crop matured. The crop itself looked to be a beauty, only to wither within days — a 90 per cent loss." In a footnote, Mason explained that an expert blamed the initial land clearing as the culprit: "hand stripping the brush had left air pockets which dried out the pea roots." Murphy, with debt from his ranch purchase made worse by the farming investment, wangled a new loan and persevered, bringing new techniques such as ring rollers and thus allowing the pea industry to advance.¹¹

Ownership and Occupancy Summary

The following table outlines the ownership history of the building currently located at 11401 Route 1 from its construction in 1932. This information was compiled from Marin County Assessor records, building permit applications, newspaper articles, and public records available through Ancestry.com.

¹⁰ Point Reyes Station Community Plan Update Committee, *Point Reyes Station Community Plan* (2001), 7-10.

¹¹ Dewey Livingston "Issei and Nisei Pea Farmers on Point Reyes," Medium, reproduced from the Anne T. Kent California Room Newsletter. Accessed June 28, 2024, <https://medium.com/anne-t-kent-california-room-community-newsletter/issei-and-nisei-pea-farmers-on-point-reyes-cd36a2c65a80>

**State of California — The Resources Agency
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Year of Ownership	Known Owners	Occupation
1932-ca. 1941	Leland S. Murphy	Farmer
ca. March 1941-1942	Lewis-Simas-Jones Company	Feed company
1942-1956	M. Vonsen Company	Feed company
1956-ca. 1968	Vonsen Feed & Milling Company	Feed company
ca. 1971-1977	Herold Mahoney	Tire company owner
1977-1986	Herold Mahoney Co.	Tire company
1986-1988	Alan Mahoney, John Mahoney, Colleen Mahoney, Kerry Mahoney Davidson	--
1988-1990	Anne R. Dick	--
1990-2017	Jayne and Mark Reano	--
2017-2018	Mark Reano	--
2018-Present	Redwood Oil Co. Inc.	--

As previously mentioned, the subject building was built in 1932 by Leland S. Murphy, a prominent local farmer and landowner in Point Reyes, to serve as a packing facility for the peas, artichokes, and other vegetables that were grown by the Italian and Japanese tenants on his farms. The building had been built immediately next to the rail lines and across from the Point Reyes train station to serve as a staging and packing area for produce that would then be transported to Bay Area markets by railroad freight cars. However, the Northwestern Pacific Railroad ended service to Point Reyes in 1933 and the building was not ultimately used as it was intended.¹² It is likely that it served as storage space for several years, but the location would not have been as useful for the assembly of produce given the ability of trucks to directly transport produce from farms to the market. Leland Murphy continued to farm in Point Reyes until the 1960s and resided at the Home Ranch for many decades.¹³

In 1939, the land that previously held the rail lines and rail yard of the Northwestern Pacific Railroad were sold. An article in the *Petaluma Argus-Courier* noted that while most of the land was sold to Henry Grandi, "the site of Murphy's packing shed" was not included in the deal.¹⁴ It is not clear whether the land was sold to Murphy or another interested party. If the land was sold to another, this may have necessitated the need to relocate the building.

By early 1941, the building had been relocated and appears to have been owned and operated by the Lewis-Simas-Jones Company, a local feed company, owned by "Buzz" and Marion Muscio and Joseph G. Lewis, Jr. The building was used as both a feed company and a gas station. In 1942, the Lewis-Simas-Jones Company was acquired by the M. Vonsen Co., a larger feed company based out of Petaluma, and remained a branch of the M. Vonsen Co. until 1956.¹⁵ In 1956, the M. Vonsen Company was liquidated, and existing staff members established the Vonsen Feed & Milling Company, which acquired the primary Petaluma locations and facilities as well as the Point Reyes Station location.¹⁶ The Vonsen Feed & Milling Company was active in Point Reyes until 1965.¹⁷ Both iterations of the Vonsen companies hired local resident Ralph Cheda as their branch manager; Cheda remained at the Vonsen company for approximately 25 years, retiring just prior to the company's closure of this location.¹⁸ Throughout this time, the building also served as a gasoline station—operating under various names and with various affiliations including as an Associated Service Station (ca. 1942-1948), Standard Oil Company (ca. 1955-1971), Phillips 66 Petroleum Station (ca. 1971-1976), and Alliance Oil Company (ca. 1977).¹⁹ The property also continued to operate an automotive service station which underwent various name changes, both in connection with or separately from the gasoline supplier.²⁰ The manager of the gasoline service pumps, small connected commercial space, and the automotive service station was typically a local Point Reyes Station resident, including Joseph Horick and James Alberigi.²¹

It is unclear when the property was sold, but by 1971 the building was owned by Herold Mahoney, who owned and operated a tire company in Petaluma.²² The Mahoney family owned the property until 1988, when it was sold to Anne R. Dick. Dick transferred the

¹² "Pt. Reyes Train Makes Last Run," *Petaluma Argus-Courier*, August 1, 1933.

¹³ Guerneville Pioneer Dies at Age 87," *The Press Democrat*, August 11, 1978.

¹⁴ "N.W.P.R.R. Sells Pt. Reyes Land," *Petaluma Argus-Courier*, February 21, 1939.

¹⁵ "Local Company Takes Over Pt. Reyes Store," *Petaluma Argus-Courier*, September 1, 1942.

¹⁶ "Hazlett to Manage New Vonsen Firm," *Petaluma Argus-Courier*, May 31, 1956.

¹⁷ "Obituary: Ralph M. Cheda," *Petaluma Argus-Courier*, January 9, 1975; "Coast News," *Petaluma Argus-Courier*, June 12, 1965.

¹⁸ "Obituary: Ralph M. Cheda," *Petaluma Argus-Courier*, January 9, 1975; "Local Company Takes Over Pt. Reyes Store," *Petaluma Argus-Courier*, September 1, 1942.

¹⁹ "Standard Oil Company of California," advertisement. *Point Reyes Light*, August 5, 1971; Building Permit A11959. June 1971; "Phillips 66" Advertisement. *Petaluma Argus-Courier*, July 2, 1971; "Phillips 66" advertisement, *Petaluma Argus Courier*, July 3, 1972.

²⁰ Advertisement, *Point Reyes Light*, December 1977.

²¹ Advertisement. *Point Reyes Light*, August 5, 1971; Advertisement. *Point Reyes Light*, March 2, 1978; Advertisement. *Point Reyes Light*, December 22, 1977.

²² Marin County Planning Department, *Community Plan of Point Reyes Station*, 1976, 49.

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property to Jayne and Mark Reano, her daughter and son-in-law, in 1990. The property remained in ownership by the Reanos until it was acquired by Redwood Oil Co. Inc. in 2018.

Statement of Significance:

In order for a property to be considered eligible for the National Register of Historic Places (National Register) and/or the California Register of Historical Resources (California Register), the property must possess significance and retain integrity to convey that significance.²³ The criteria for significance are:

Criterion A/1 (Events): Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of the state or the United States.

The subject building was constructed as an agricultural packing facility in 1932 to serve the farms owned by Leland S. Murphy, which were increasing their production in peas and artichokes. The building was intended to serve as a major collection location for the crops to be packed and loaded onto the adjacent freight cars of the Northwestern Pacific Railroad. However, the removal of rail service in 1933, prior to the first pea crop being ready for market, ended this approach. While the building appears to have been used for storage in the years between its construction and its subsequent relocation in 1941, it did not become the busy packing shed for vegetables that Murphy had planned. Given the short-lived original purpose and use of the building, it does not appear to have a strong association with the development or the success of crop farming in Point Reyes and would not be considered individually eligible for the California Register for its agricultural use. Other properties in the region are likely to have a more significant association with the growth of pea farming and the agricultural history of Japanese and Italian immigrant farmers along the coast of Marin County. Establishing the building at 11401 State Route 1 as the last or only remaining building with an association to Japanese and Italian farmers would require additional research into patterns of crop farming in the region and appears unlikely given the short-lived use of this building as a packing facility.

Once the building was moved to its current location in 1941, it was owned and occupied by several businesses including three feed and supply companies and several gasoline station operators and automotive service stations. The local Lewis-Simas-Jones Company occupied the building for a single year, while the M. Vonsen Company and then the Vonsen Feed & Milling Company occupied the building from 1942 to 1968. Both iterations of the Vonsen companies were based in Petaluma and any significant events, professional achievements, or innovations in the feed and grain business that are associated with either company would be more clearly represented by their primary facilities in Petaluma.

The various gasoline stations that operated branches at the subject building were branches of larger regional and national companies, and the Point Reyes Station location was not known to have been the site of significant events in the history of gasoline stations. While the establishment of a local gasoline station benefited Point Reyes Station by providing a reliable source for gasoline and likely enticing travelers to stop in the area, the development of a gas station has not been shown to have altered the development patterns of the area such that the presence of a gasoline station at the subject building would be considered significant for the property to be individually eligible for the National Register under Criterion A or the California Register under Criterion 1.

The property at 11401 State Route 1 does not appear to be individually eligible for either the National Register or the California Register under Criterion A/1.

Criterion B/2 (Persons): Associated with the lives of persons important to local, state or national history.

11401 State Route 1 was constructed by Leland S. Murphy, a local landowner, rancher, and farmer, who features prominently in the history of Point Reyes and Point Reyes Station. However, Murphy's association with the building—while at its original location—was limited to a period of less than a decade (1932 to ca. 1941), and it is unclear to what extent Murphy was involved with the property given that its original purpose as a collection and packing shed to support the transportation of vegetables by freight train was undermined by the halting of all train service to Point Reyes Station in 1933. The building is believed to have been used as a storage building for several years, but does not appear to have a significant connection to Murphy's professional accomplishments as a local landowner and rancher. Any significant association with Murphy would be more clearly expressed by his own ranch and residence.

Once the building was moved to its current location in 1941, it was owned and occupied by several businesses including three feed and supply companies and several gasoline station operators and automotive service stations. The potential professional accomplishments and/or significant events or patterns of development related to these companies are discussed within the Criterion A/1 significance evaluation above. The various businesses at the subject building were managed and operated by local residents of Point Reyes Station including Ralph Cheda, Joseph Horick, and James Alberigi. No personal or professional

²³ Note that the National Register and California Register use nearly the same language for the definitions of their criteria of significance, however, the National Register criteria use letters (A, B, C, and D), while the California Register uses numbers (1, 2, 3, and 4).

accomplishments by these local residents were uncovered through research that would have a significant association with the subject property such that it would be individually eligible under Criterion B/2 for an association with these individuals.

The property at 11401 State Route 1 does not appear to be individually eligible for the National Register under Criterion B or the California Register under Criterion 2.

Criterion C/3 (Architecture): Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.

The building at 11401 State Route 1 was originally built as an agricultural packing shed on a nearby parcel in 1932 and was moved to its current location in 1941 when it was adapted for use as a commercial building with a gas station. As originally constructed, the building was designed in a utilitarian style with wood framing and corrugated metal cladding. The building was elevated above grade for the purpose of ventilation and pest control, in keeping with the agricultural use of the building. No architect or significant local builder has been identified as involved in the design or construction of the building such that it would be considered significant as the work of a design professional. The building does not demonstrate a high level of craftsmanship such that it would be considered an excellent example of a 1930s agricultural building, and it does not demonstrate the features of a particular architectural style such that it would be considered individually significant for its architectural quality. The building's relationship to its agricultural history has been additionally obscured through its relocation in 1941 and the various alterations that have been undertaken to adapt the building to its current use.

Alterations to the building include its relocation, which rotated the building by ninety degrees, the construction of two additions to support the establishment of a gas station and service station at the southwest corner of the building (in 1941 and at an unknown later date), alteration of most of the building's original openings at the south, west, and north facades through infill, enlargement, and replacement, creation of additional openings on the south, west, and north facades, and the installation of stucco cladding at the west façade. Overall, the building generally retains its modest utilitarian character, and a portion of its distinctive covered porch; however, the building does not demonstrate the distinctive characteristics of a type, period, region or method of construction, such that it would be individually eligible for listing in the National Register under Criterion C or the California Register under Criterion 3.

Criterion D/4 (Information Potential): Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The property at 11401 State Route 1 does not appear to be individually eligible for listing in the National Register under Criterion D or the California Register under Criterion 4 as a building or property that has the potential to provide information important to the prehistory or history of Point Reyes Station, the state, or nation. It does not feature construction or material types, or embody engineering practices that would, with additional study, provide important information. Evaluation of this property was limited to age-eligible resources above ground and did not involve survey or evaluation of the subject property for the purposes of archaeological information.

As a Potential Contributor to the Point Reyes Station Historic District

The subject building at 11401 State Route 1 is located within the boundaries of a previously identified eligible historic district, the Point Reyes Station Historic District.²⁴ The establishment of a "Historic Area" that covers the downtown of Point Reyes Station was also established in 2001 as part of the Community Plan. This document established some planning and design controls to ensure the long-term retention of Point Reyes Station's historic character; however, the Historic Area is not a designated historic district.²⁵ As described in the *Point Reyes Station Community Plan* (2001), a historic district was identified in 1976 and encompasses the entire downtown area, inclusive of the location of the subject building:

²⁴ While some sources state that the Point Reyes Station Historic District was listed as a local historic district by the Marin County Board of Supervisors in 2001, the historic district has not been listed in the California Office of Historic Preservation's Built Environment Resource Directory (BERD) (last updated September 2022), or in other listings of historic resources in the area, and does not appear to have been formally listed as a historic resource on a local or state register. Section 106 reports conducted in the region since 2001 have presumed the historic significance of the Point Reyes Station Historic District to interpret potential impacts or mitigations related to a proposed project. This evaluation also presumes that the Point Reyes Station Historic District is eligible as a historic resource and that the documentation provided in the *Point Reyes Station Archaeological and Historic Resource Survey* (August 1976) forms the basis of that finding. Refer to: Caltrans, *Marin Station Route 1 Capital Preventative Maintenance Project: Initial Study with Mitigated Negative Declaration*, (August 2020), 67.

²⁵ The Community Plan of 2001 defined the Planning Area as the "Downtown Area" or, alternatively, as the "Historic Area," and included design considerations for the entire downtown area that aim to retain the historic fabric and overall character of Point Reyes Station. The creation of a "historic area" relates to establishing protections for areas that demonstrate the architectural heritage of Marin County's coastal communities through Local Coastal Program 2. This approach establishes planning and design guidance for buildings located within a designated historic area and/or constructed prior to 1930. A designated "Historic Area" is not a designated historic district. Point Reyes Station Community Plan Update Committee, *Point Reyes Station Community Plan*, (2001), 43.

The *Point Reyes Station Archaeological and Historic Resource Survey* prepared by the North Marin County Water District in 1976 (hereafter referred to as the “Historic Survey”) identifies 51 historic buildings in the downtown area. The Historic Survey evaluates the Town’s architectural heritage as follows: “None of the structures in Point Reyes Station are on the National Register of Historic Places. The architectural quality of the community is in the historic integrity of the buildings as a whole and not in the architectural significance of any single building. The loss of any one of the buildings discussed could have a significant impact since there are only a few examples of the various eras, and because Point Reyes Station’s architectural history (1875-1930) unfolds within the confines of a small area.”²⁶

As described above, the eligible historic district is intended to recognize the early architectural history of Point Reyes Station and includes a presumed period of significance of 1875 to 1930. The *Point Reyes Station Archaeological and Historic Resource Survey* stated that “a portion of Point Reyes Station could qualify for placement on the National Register of Historic Places as a district at a local level of significance.”²⁷ While the location of the subject property was indicated in the map of surveyed historic properties as property “14”, the written description of property 14 is for the Point Reyes Coop Creamery (built ca. 1914) at 11431 Route 1, just east of the subject property.²⁸ None of the other 51 properties described in the *Point Reyes Station Archaeological and Historic Resource Survey* correspond to the subject building. As the subject building was constructed outside the period of significance, it would not be considered a contributing resource to the historic district. Without an update to the documentation originally provided by the 1976 *Point Reyes Station Archaeological and Historic Resource Survey*, 11401 State Route 1 would be considered a noncontributing resource to the identified historic district.

Conclusion

The property at 11401 State Route 1 does not appear to be individually eligible for listing in the National Register of Historic Places or the California Register of Historical Resources under any criteria. The property appears to be a non-contributing property to the eligible Point Reyes Station Historic District. The California Historical Resource Status Code (CHRSC) of “6Z” is assigned to the property through the process of this evaluation, meaning “Found ineligible for National Register, California Register, or Local Designation through survey evaluation.”²⁹

²⁶ Point Reyes Station Community Plan Update Committee, *Point Reyes Station Community Plan*, (2001), 42-43.

²⁷ North Marin County Water District, *Point Reyes Station Archaeological and Historic Resource Survey*, August 1976, 24.

²⁸ North Marin County Water District, *Point Reyes Station Archaeological and Historic Resource Survey*, August 1976, 5 and 13.

²⁹ California State Office of Historic Preservation Department of Parks and Recreation, *Technical Assistance Bulletin #8: User’s Guide to the California Historical Resource Status Codes & Historical Resource Inventory Directory*, Sacramento, November 2004.