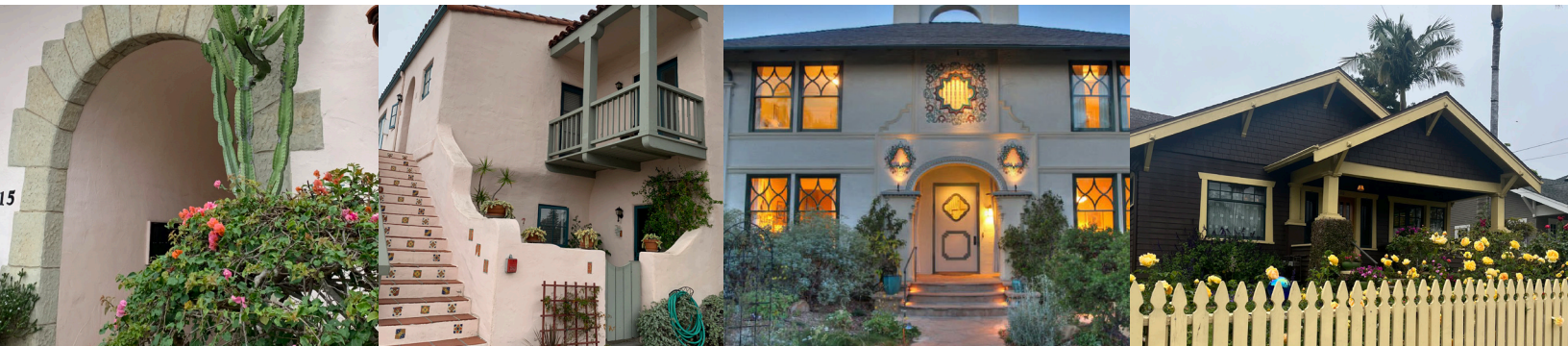




**CITY OF SANTA BARBARA  
MASTER ENVIRONMENTAL ASSESSMENT  
HISTORIC RESOURCES ENVIRONMENTAL  
REVIEW  
HISTORIC SIGNIFICANCE AND PROJECT EVALUATION**



**ADOPTED BY THE CITY COUNCIL OF SANTA BARBARA DATE HERE**

*The Community Development Director is authorized to make revisions as needed to keep the Document up to date.*

## **PREFACE TO REVISED EDITION FOR HISTORIC RESOURCES**

The California Environmental Quality Act (CEQA) Guidelines allow public agencies to prepare a Master Environmental Assessment (MEA) to identify, inventory, and organize environmental information for use in environmental documents (CEQA Guidelines Section 15169). An MEA can highlight regional environmental characteristics and predict potential environmental impacts. The CEQA Guidelines recommend periodic review and revision of MEAs to ensure accuracy.

The City of Santa Barbara (City) adopted a citywide MEA in 1979, a Historic Resources component was added in 2002 when the MEA Guidelines for Historic Resources were adopted separately. Since then, significant case law and updated local ordinances and guidelines for evaluating historical resources under CEQA have been established.

In 2019, the City was certified under Section 101(c) of the National Historic Preservation Act (NHPA), becoming a partner in the Federal Preservation Program. This update to the current MEA Guidelines for Historic Resources aligns with national preservation standards and incorporates changes made to the Historic Resources Sections of the City Zoning Ordinance adopted by City Council in 2021. It defines when reports are required by qualified consultants or the City’s Architectural Historian and clarifies the environmental review process for Historic resources. The update also standardizes the format for evaluations to improve the consistency and quality of reports by professionals and City staff.

Historic Resources referred to in this document exclude Archaeological and Tribal Cultural Resources as those resources are addressed in the MEA Guidelines For Archaeological Resources and MEA Guidelines for Tribal Cultural Resources (dated 2025), respectfully.

Note: The 2002 MEA Guidelines for Historic Structures and Sites required that reports being submitted to the City for review be titled Phase I and Phase II Historical Structures/Sites Reports. Under the revised MEA, reports will be titled Phase I or Phase II Historical Resources Reports. These reports will be prepared and reviewed separately. Additional information on the requirements for these reports is presented below.

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# HISTORIC RESOURCES OVERVIEW AND PROCESS

## California Environmental Quality Act and Environmental Review

The California Environmental Quality Act (CEQA) Statute and Guidelines (§21084.1, and §15064.5) provide the framework for Historical preservation in California for discretionary projects. CEQA considers historical resources to be part of the environment. Therefore, whenever development is proposed, identifying historical resources and assessing any impacts on them is a critical and required part of the environmental review process.

CEQA requires the City to evaluate properties for historical significance upon the submission of a project for discretionary review. This ensures that previously identified and unidentified historical resources are not inappropriately altered, impacted, or demolished without proper evaluation. Evaluation consists of consideration of alternatives to avoid significant impacts, public review by the Historic Landmarks Commission, and, if necessary, mitigation measures. Discretionary projects adjacent to historical resources and within existing historic districts are also evaluated to ensure there are no potential impacts to neighboring historical resources and their setting.

The City is typically the Lead Agency for the CEQA analysis and is charged with reviewing required technical reports including Historical Resource Reports. The City's Architectural Historian and the Historic Landmarks Commission conduct reviews of these reports to ensure the reports comply with the standards for discretionary review and all applicable local ordinances.

## Historic Resource Environmental Review Process

1

### Contact the City's Architectural Historian:

Early consultation is recommended to assess a resource's potential or already determined historical significance and determine the type of review needed for the proposed project.

2

### Project Submittal by Applicant

3

### Professional Evaluation for Historic Significance:

Evaluations are conducted either by the City's Architectural Historian or a qualified consultant from the City's Qualified Consultant List.

- The City's Architectural Historian completes an initial evaluation for structures 50 years or older that have not yet been assessed for historical significance. If the resource is deemed eligible, it will be added to the historic resources inventory, and the project will be sent to the Historic Landmarks Commission for design review.
- The City's Architectural Historian also decides if a Historic Resource Report from a qualified consultant is required and informs the applicant of the report's requirements. Projects with a complex history of alterations, plans to remove character-defining features, or to demolish a historic resource typically require a qualified consultant evaluation.

4

**Qualified Consultant Reports:**

If a consultant is required, the applicant must hire a qualified consultant from the City’s Qualified Consultant List. All qualified consultants must meet the Secretary of the Interior’s Professional Qualifications Standards in history or architectural history to complete a Historic Resources Report. Reports prepared by consultants not on the qualified consultants list may be rejected for non-compliance.

The chosen qualified consultant must contact the City’s Architectural Historian to discuss the scope of work, understand the purpose of the report, and review any existing research. This helps avoid unnecessary research or work and ensures alignment with the Historic Landmarks Commission’s direction.

As projects may change and become more complex, a qualified consultant may be required later in the process. For instance, the Historic Landmarks Commission may require more information than provided by the City’s Architectural Historian and require a qualified consultant to complete additional research.

**To avoid unnecessary costs and delays, the City will only accept Phase I or II Historic Resource Reports if required by the Architectural Historian or the California Office of Historic Preservation.**

5

**Draft Historic Resource Report Review:**

The applicant must submit an electronic copy of the Draft Historic Resource Report to the City’s Architectural Historian, along with the associated review fee, via the City’s current document submittal portal. The City’s Architectural Historian will review the Draft Historic Resources Report for compliance with MEA Guidelines and provide feedback within 30 days. The qualified historian must then incorporate any recommended changes or provide a written explanation for not doing so. The Final Historic Resource Report should be submitted electronically using the City’s current document submittal portal.

6

**Historic Landmarks Commission Public Hearing and Review:**

Upon submission of the Final Historic Resource Report, City staff will schedule it for review at an Historic Landmarks Commission public hearing. The Historic Landmarks Commission will decide whether to accept, accept with conditions, or reject the Historic Resource Report. The consulting historian shall attend the hearing to provide a presentation summarizing the report and conclusions and answer questions.

If the Historic Landmarks Commission disagrees with the consulting historian’s conclusions and the consulting historian refuses to amend the Historic Resource Report based on their professional opinion, the disagreement is classified as a “disagreement among experts.” According to State CEQA Guidelines §15064(g), if experts disagree on the environmental impact, the Lead Agency must treat the effect as significant and prepare an Environmental Impact Report (EIR). Thus, the Historic Landmarks Commission’s decision on the report is not appealable.

7

**Final Submittal:**

After the Historic Landmarks Commission accepts the Final Historic Resource Report, the qualified consultant must submit a final electronic copy to the City’s Planning Division via the City Portal, the Gledhill Library of the Santa Barbara Historical Society, and the Central Coast Information Center (CCIC).

8

**Historic Listing:**

If the Historic Resource Report and the Historic Landmarks Commission determine that the resource is historic, it will be added to the City’s Historic Resources Inventory, and the project will be routed to the Historic Landmarks Commission for design review.

9

**Project Completion:**

The project application can be deemed complete after the Historic Landmarks Commission accepts the Final Historic Resource Report. The CEQA determination will be made after application completeness.

**National Environmental Protection Act (NEPA) and Section 106 Compliance:**  
 Projects that use federal funding sources such as grants, federal permits, or require approval from a federal agency, may require environmental review under NEPA. Part of the NEPA review process may involve demonstrating compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966. If the project requires NEPA compliance and Section 106, and the California Office of Historic Preservation (SHPO or OHP) requires local review, please contact the City’s Architectural Historian for consultation. In almost all cases a qualified consultant is required for these projects.



## PHASE I AND II OVERVIEW

Evaluating historic resources and project impacts is completed in two phases. Consultation with the City's Architectural Historian is a critical component of the review process and ensures that all stages of review and documentation are completed. The following presents the general process, but this is not a substitution for consultation with the City's Architectural Historian.

### PHASE I: DETERMINATION OF HISTORIC SIGNIFICANCE

Phase I involves investigating the historic context, integrity and architectural merit of a property to determine if it qualifies as a historic resource. Typically, the City's Architectural Historian will provide a historic significance report evaluating whether a resource meets the eligibility criteria to qualify as a historic resource based on substantial evidence. If the history and significance are complex, at any point the City's Architectural Historian or the Historic Landmarks Commission can require a qualified consultant to complete a Historic Resource Report as outlined in this document.

The CEQA Guidelines §15064.5 base historic significance upon substantial evidence. The evidence can be through a survey or other means. A resource does not have to be formally designated to be a historic resource under CEQA. If more information is required to evaluate the significance, the City requires that this substantial evidence of historical significance be presented in a Phase I Historic Resource Report. If a Phase I Historic Resource Report finds a resource meets the criteria to qualify as a historic resource, the resource is considered historic and will be added to the City's Historic Resources Inventory and is considered a historic resource for the purposes of CEQA. As such, any proposed projects with the potential to impact the exterior of the building or site will be reviewed by the HLC to ensure compliance to the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Historic Landmarks Commission members are the City's appointed experts in the treatment of historic resources.

If a resource is determined to have historic significance, project impacts must be assessed for conformance with the Secretary of the Interior's Standard's for the Treatment of Historic Resources Standards in a Phase II Historic Resource Report. Depending on the complexity of the project, the City's Architectural Historian or a qualified consultant would then assess the project impacts. If the Phase I Historic Resource Report concludes that the property does not meet the criteria to be considered a historic resource, then a Phase II Historic Resource Report is not necessary.

### PHASE II: DETERMINATION OF IMPACTS TO HISTORIC RESOURCES

A Phase II assessment involves evaluating a project's design conformance to the Secretary of the Interior's Standards for the Treatment of Historic Resources. A proposed project that meets the Standards may qualify for a CEQA exemption. If the project does not qualify for a CEQA exemption, the project will require preparation of a CEQA Initial Study and potentially an Environmental Impact Report, which will add considerable time and cost to a project (See Page 14). **Not all projects require a qualified consultant to complete the analysis, the City's Architectural Historian can evaluate minor projects while major projects are completed by a qualified consultant. Consult with the City's Architectural Historian for direction on the level of review required.**

## Minor and Major Project Evaluation

### Minor Projects: City's Architectural Historian Evaluation

Minor alterations to historic resources are evaluated by the City's Architectural Historian. Minor alterations are defined in the Santa Barbara Municipal Code (SBMC) (§30.300.080 "H" Historic Resources Related Definitions) as any physical modification or change to insignificant exterior features of a Historic Resource, including additions, windows, doors, and exterior siding material that is non-original or otherwise lacking in historic integrity. In addition, small, minimally visible additions may also be evaluated by the City's Architectural Historian.

### Major projects: Qualified Consultant Evaluation

For major projects, a qualified consultant is required to complete a Phase II Historic Resources Report. The qualified consultant must consult with the City's Architectural Historian on the scope of work before starting work. Major alterations to historic resources are defined in the SBMC (§30.300.080 "H" Historic Resources Related Definitions) as any physical modification or change to the exterior of a building, structure, site, object or designated interior that may have a significant effect on character-defining features of a Historic Resource. Major alterations include of additions to a historic building.

In some cases, a Phase II Historic Resource Report will be required for major infill projects that are adjacent to a historic resource.

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# PHASE I HISTORIC RESOURCES REPORT: SUBMITTAL STANDARDS

## PHASE I HISTORIC RESOURCE REPORT: EVALUATING HISTORIC SIGNIFICANCE

The Phase I Historic Resource Report serves to document, identify, record, and evaluate eligible historic resources, including buildings, structures, objects, districts, and landscape features (excluding archaeological and Tribal Cultural Resources). The following format is mandatory for all projects requiring a Phase I Historic Resource Report. In assessing whether a building or site is historically significant, the City applies local designation criteria and integrity requirements that are consistent with NRHP and CRHR designation and integrity requirements.

The City of Santa Barbara defines significant historic resources as structures, sites, cultural landscapes, or features that are either designated or eligible for designation as historically significant based on the criteria established in SBMC Section 30.157.025. See Santa Barbara Municipal Code Section 30.300.080 “H” for the list of all levels of designations that qualify as a historic resource. The purpose of the Phase I Historic Resource Report is to evaluate the historic significance of a property when its eligibility as a historic resource is uncertain.

The City adheres to a strict format for the Historic Resource Report to ensure consistency in the review process.

## FORMAT AND CONTENT OF PHASE I HISTORIC RESOURCE REPORTS: EVALUATING HISTORIC SIGNIFICANCE

### COVER PAGE

**Include the following:**

- Report title
- Property address and Assessor’s Parcel Number(s) of the site(s) under investigation.
- Owner’s name and e-mail address.
- Applicant’s name and e-mail address.
- Qualified Consultant’s name, address, telephone number, and e-mail address.
- Date the report was prepared.

### TABLE OF CONTENTS

Provide a Table of Contents directing to each of the required sections.



## RESOURCE SUMMARY

Summarize the most critical details about the resource, including but not limited to:

- Historic status based on current evaluation
- Construction date
- Architectural Style
- Original Architect/Designer (if known)
- Original Significant Owner (if known)
- Local name of building (if applicable)
- Period of Significance
- Photograph of the front of the building

## INTRODUCTION

Provide an introduction paragraph explaining why the report is being prepared.

## PREVIOUS STUDIES AND ASSESSMENTS

Reference any previous historic surveys or evaluations and why a new evaluation is required.

## ENVIRONMENTAL AND NEIGHBORHOOD SETTING

Describe the physical characteristics of the environment and/or neighborhood. For purposes of Historic Resource Reports, a neighborhood is defined as an area possessing a sense of cohesiveness due to of physical features suggesting boundaries or concentrations of shared architectural, historic, or cultural characteristics. (It does not have to be official designated city neighborhood).

## PROPERTY DESCRIPTION

Description of all buildings, structures, and landscaping (historic and non-historic). Identify and describe the property from the area and vicinity, narrowing the focus to the historic resource(s) on the property and identifying character defining features including, but not limited to the following:

- Area and Vicinity
- Physical Setting
- Significant features, walls, significant trees, or planned landscaping features on the site
- Massing, shape, plan, and footprint
- Roof shape and material
- Cornice/eaves
- Wall material (wood weatherboards, shingles, stucco, etc.)
- Porch/front entrance/door description
- Window description, material, configuration, and details
- Chimney or tower details including material and location
- Significant accessory structures (guest house, garage, etc.)

## PHOTOGRAPHS, MAPS, AND ARCHITECTURAL/LANDSCAPE DRAWINGS

Embed all photographs, maps, and other images within the body of the report to directly illustrate the relevant text. This integrated format enhances clarity and makes it easier for reviewers to understand the context and significance of the resource. Grouping photographs at the end of the report is discouraged, as it is less effective for reviewers. Proper placement of visual aids next to the corresponding analysis or description is crucial for providing a clear and comprehensive understanding of the resource.

### Provide all the following items if available:

- Historic photographs of site and resource, labeled with the date the photograph was taken (if known) and the point of view of the photographer and photo credit.
- Contemporary photographs of the site and resource from front, side and rear angles are required, including details of character-defining features and surrounding streetscape, labeled with date the photograph was taken, and the point of view of the photographer and photo credit. Label each page and photo with a number and include cardinal directions (north, south, east, west) to identify photo directions. Internet photos (i.e. Google Streetview) may only be used in a supplemental manner for determining alterations to the property.
- Sanborn Fire Insurance Maps or other maps to illustrate development of the site/resource.
- Original architectural/landscape drawings of the resource or architectural/landscape drawings that illustrate the history of the resource. The photos of the original drawings can be imbedded in the text.

## HISTORIC CONTEXT

Provide substantial history of the neighborhood and site, including themes, historic events, persons associated with the site and how they are associated with the resource.

## ARCHITECTURAL HISTORY

Architectural history of resource to include the following if available:

- Reference to craftsmen, builders, engineers, and architects associated with the resource and list of any significant exterior alterations and dates (if known).
- Discussion of the architectural style in relation to broader importance in local, state, national, or world at the time. How the resource reflects the patterns of development; how the architectural style was part of an architectural movement; and why the style is important to Santa Barbara's architectural repertoire. Indicate if the building is unique and/or rare to the City or key to the identity of the City (like a Spanish Colonial Revival/Mediterranean style).
- Identify contributing and non-contributing features of the resource and site.

## SIGNIFICANT ARCHITECT

Determine if the architect associated with the building is of historical significance. If so, provide a comprehensive biography of the architect, highlighting their education, career, and major accomplishments. Include a list of other notable buildings or projects designed by the architect to showcase their body of work. Additionally, assess whether the architect is recognized as a "master" in the field, based on their influence, innovation, and contributions to architectural history. This evaluation should consider whether the architect's work exemplifies a particular architectural style, whether they introduced groundbreaking techniques, or if they have been widely recognized within architectural circles or by historic preservation entities.

## SIGNIFICANT PEOPLE

Determine if the building is connected to any historically significant individuals. If such associations exist, provide a detailed biography of those individuals, outlining their major accomplishments and contributions. This could include their role in local, state, national, or world history, their influence on the community or industry, or any notable achievements during their residency in the building. Emphasize how their association with the property adds to its historic significance, considering whether their actions had a lasting impact on the area or contributed to broader historical movements.

## SIGNIFICANT EVENTS

Describe any significant events associated with the site.

## DESIGNATION CRITERIA ANALYSIS

Analyze if the property meets the national, state, and local criteria to qualify as a historic resource. Note: The City’s criteria match those of the Local, State and National criteria for consistency.

**Local Designation Analysis:** The property must meet one or more of the criteria outlined in the Santa Barbara Municipal Code to qualify as a Santa Barbara Historic Resource. Evaluate if the resource meets each of the criteria of significance outlined in Santa Barbara Municipal Code Section §30.157.025.

**California Register of Historic Resources Analysis:** Evaluate the resource to the criteria for the California Register of Historical Resources.

**National Register of Historic Places Analysis:** Evaluate the resource to the criteria for the National Register of Historic Places.

## HISTORIC INTEGRITY ANALYSIS

Evaluate if the resource retains each of the following aspects of historic integrity in accordance with the most recent “National Register of Historic Places Bulletin How to Apply the National Register Criteria for Evaluation.” By analyzing each of these aspects, the evaluation will determine the extent to which the resource retains its historic integrity and its eligibility for designation or listing in historic registers. Integrity aspects include: Location, Design, Setting, Materials, Workmanship, Feeling, Association

## INTEGRITY CONCLUSION STATEMENT

Summarize if the property conveys its historic significance/original appearance or period of significance.

Note: If the property is found to be exceptionally rare or has an overlying historic importance, some compromised historical integrity may be considered.

**If inappropriate alterations were completed without required permits and/or the project is a result of an enforcement case on work that sacrificed the historic integrity, the analysis should be to the condition prior to the alteration. Thus, non-permitted work will not become a means to inappropriately alter eligible historic buildings without a proper analysis.**

## CONCLUSION

If the property is deemed historically significant, the conclusion should summarize the specific criteria under which it qualifies for such recognition. Additionally, the conclusion should provide recommendations on the potential designation levels the property could achieve, such as eligibility for listing on the National Register of Historic Places, the California Register of Historical Resources, and/or designation as a City Landmark or Structure of Merit or contributing building to a historic district within the city.

## WORKS CITED

List all sources used for the report and foot note references throughout the document using the Chicago style.

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## PHASE II HISTORIC RESOURCES REPORT: SUBMITTAL STANDARDS

### PHASE II HISTORIC RESOURCE REPORT: DETERMINING IMPACTS TO HISTORIC RESOURCES

The City's Architectural Historian maintains the most up-to-date list of historic resources, which can also be found on the City's on-line Historic Treasures Map. Once a resource is determined to qualify as historic, the next step is to assess the proposed project's impact on the resource, through a Phase II Historic Resource Report prepared by the City's Architectural Historian or a qualified consultant.

It is recommended to complete the Phase II Historic Resource Report after the project undergoes Concept Review by the Historic Landmarks Commission. This avoids unnecessary time and costs for reviewing a project that the Historic Landmarks Commission may not support. During Concept Review, the Historic Landmarks Commission provides design guidance and determines whether the project is appropriate to proceed to the Project Design Approval phase. The Phase II Historic Resource Report must be accepted by the Historic Landmarks Commission before the project can receive Project Design Approval.

For projects involving historic resources, CEQA requires the City to analyze any potentially significant impacts to those resources and develop ways to mitigate any significant impacts to protect those resources. Below are the classifications of impacts based on the most recent CEQA Guidelines:

#### Levels of Impacts:

- **Class I: Significant Unavoidable:** Demolition of a property or complete exterior renovation eliminating the property's ability to convey historical significance.
- **Class II: Potentially Significant Unless Mitigated:** Relocation or Reconstruction of a resource
- **Class III:** Less than Significant – Project meets the National Park Service's Secretary of the Interior's Standards for Treatment of Historic Properties
- **Class IV:** No Impact or Beneficial – Project restores the historic integrity of a resource

#### CEQA Exemption:

A project may qualify for a CEQA exemption if it falls under Class III or Class IV, typically when the project complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties. For the exemption to be granted, the Historic Landmarks Commission must concur with the report's analysis.

**Note:** Case Law has found that demolition of a historic resource, no matter what level of designation, is not eligible for a CEQA exemption, as it constitutes a significant, unavoidable impact.

## Mitigated Negative Declaration or Environmental Impact Report:

If the Phase II Historic Resource Report identifies a significant unavoidable or potentially significant impact (Class I or Class II), a Mitigated Negative Declaration or Environmental Impact Report will be required. If there is a significant and unavoidable impact, a Mitigated Negative Declaration cannot be prepared - the project must be analyzed in an Environmental Impact Report. Mitigated Negative Declarations are only to be prepared when the impacts can be mitigated below a level of significance. City staff may request a CEQA Initial Study checklist to determine the appropriate level of CEQA documentation. The City's Environmental Analyst or Case Planner will inform the applicant of the next steps. See page 17 for recommended mitigation measures for Class I or Class II impacts.

## FORMAT AND CONTENT OF PHASE II HISTORIC RESOURCE REPORTS: EVALUATING PROJECT IMPACTS TO HISTORIC RESOURCES

### COVER PAGE

Include the following details:

- Report title
- Site address and Assessor's Parcel Number(s)
- Owner: Name, email
- Applicant: Name, email
- Qualified Consultant: Name, address, phone, email
- Date the report was prepared

### TABLE OF CONTENTS

Provide a Table of Contents directing to each required section.

### Historic Resource Summary

Summarize key details about the historic resource, including:

- Historic status (as determined in Phase I Historical Resource Report)
- Construction date
- Architectural style
- Original architect/designer (if known)
- Significant original owner (if known)
- Local building name (if applicable)
- Period of significance
- Photograph of the front of the building

### PROJECT DESCRIPTION AND PLANS

Include the following:

- Written project description
- Site plan and elevations, showing existing and proposed side by side for comparison
- Streetscape elevations showing the project in relation to adjacent historic resources to assess scale and compatibility



## **ANALYSIS OF PROJECT MEETING TO THE STANDARDS**

Analyze how the project complies or does not comply with each of the Secretary of the Interior's Standards for the Treatment of Historic Resources.

## **IMPACTS ON NEARBY HISTORIC RESOURCES**

Evaluate potential impacts on adjacent historic resources, specifically addressing whether the project:

- Alters significant spatial relationships
- Obscures or overwhelms a historic resource as the dominant feature
- Impairs the historic integrity of setting, feeling, or association

## **CUMULATIVE IMPACTS ON HISTORIC RESOURCES**

Assess the project's direct, indirect, and cumulative effects on the overall site integrity.

## **DETERMINATION OF PROJECT IMPACTS**

Summarize the findings, stating the Class of Project Impacts (per CEQA) and how the project affects the historic resource.

Note: Mitigation measures should not be included in the Phase II Report. If a project requires mitigation, the conclusion of the report will need to be the project does not meet the Secretary of the Interior's Standards and will result in a Class I or II impact. Consequently, the project does not qualify for a CEQA exemption and must go through a Mitigated Negative Declaration or Environmental Impact Report process.

### **Project Changes**

If the project changes after the Phase II Report is complete, submit an addendum to evaluate the revisions to the above requirements of a Phase II report. Minor changes may be accepted by the Architectural Historian. Significant changes will require review and approval by the Historic Landmarks Commission.

## DIRECTION FOR CEQA DOCUMENTS

If the project is classified as Class I (significant unavoidable, mitigation measures shall be discussed in an Environmental Impact Report. If a project is classified as a Class II (potentially significant unless mitigated), mitigation measures shall be discussed in a Mitigated Negative Declaration or an Environmental Impact Report.

**Note: Documenting a historic resource—whether through narrative, photographs, or architectural drawings—as a form of mitigation for demolition will not reduce the adverse effects enough to eliminate significant environmental impacts and necessity for an Environmental Impact Report.**

### Alternatives Analysis in a CEQA Document:

The following mitigation measures will be analyzed in the Mitigated Negative Declaration or Environmental Impact Report when in-situ preservation or incorporation of historical resources is not feasible. Depending on the project's impacts, one or a combination of these mitigation measures may be required to reduce significant impacts or recommended to further reduce less-than-significant impacts. However, implementing any combination of the listed mitigation measures, or those tailored to the project, may not fully mitigate the project's significant impact on historical resources. The measures are generally listed in preferential order, and documentation explaining why each alternative is not feasible for preservation is required.

- **Relocation:** Relocation of a historic resource may constitute a significant impact. However, in situations where relocation is the only feasible alternative to demolition, relocation may mitigate the impact to less than significant, provided the new location is compatible with the original character of the historic resource, and the resource retains its eligibility for formal recognition as a historic resource. A project may require advertising for acquisition and relocation of the structure, with its subsequent rehabilitation at its new site. The Secretary of the Interior's Standards for Rehabilitation shall be employed for any rehabilitation of a significant historic resource once relocated.
- **Façade Retention:** Compatible incorporation of the historic façade only into the design of the new building on-site.
- **Demolition:** Demolition of a historic structure with recordation according to the Community Development Department's "Required Documentation Prior to Demolition" standards.
- **Commemoration:** Commemoration of the demolished structure with a display of text and photographs, designed by a qualified consultant and approved by the Historic Landmarks Commission, in a publicly visible location on the perimeter of the property at the primary entrance.
- **Physical Conservation/Salvage Programs:** Physical conservation or salvage programs aim to mitigate impacts on Class I and II Projects by recovering material from historical resources valued for their information content.

Physical conservation programs must be designed on a project-specific basis to meet the particular needs of each case. All physical conservation program reports shall be written by the qualified consultant performing or supervising the physical conservation work. General guidelines for physical conservation are provided below:

- **Proposals:** A proposal for a physical conservation program, including a work plan and discussion of techniques for physical conservation, must be submitted for approval. The proposal must be forwarded to the Historic Landmarks Commission for its review and approval. Fieldwork cannot begin until approval is obtained.
- **Physical Conservation:** Physical conservation is directed at salvaging significant materials from a historical resource prior to its damage or destruction. Large-format photographs and measured architectural drawings may be prepared to provide a permanent record of structures/sites subject to project effects.
- **Incorporating Historic Materials:** Physical conservation plans can include incorporating salvaged material into the new project, use in a historical display, or for donation and use at another historical site. Physical materials conserved from a demolished historic structure or site shall be adaptively reused in public view on the historic site. Storage of such physical materials is not adequate. The City's Architectural Historian or qualified consultant shall be present at the construction site to monitor the salvage of materials to ensure they are not damaged.
- **Other Measures:** Any other measures deemed appropriate by the Historic Landmarks Commission.
- **Adjacent Buildings to Historical Resources:** New construction adjacent to historic resource must ensure the historic resource is not damaged during construction. Measures may include:
  - The project's qualified consultant shall prepare a pre-construction project briefing report entailing precautions to be taken based on the constraints of the site.
  - It shall be emphasized at this briefing that the qualified consultant has the authority to stop construction and redirect construction equipment to comply with all historic resource mitigation measures

## CONSULTANT QUALIFICATIONS

The Community Development Department maintains a list of qualified consultants who can prepare Historic Resource Reports in compliance with CEQA. The qualified consultants on this list are required to meet the Secretary of the Interior's Professional Qualifications Standards in history or architectural history. Qualified consultants must be willing to follow the required format for the Historic Resource Report as outlined above and should understand Santa Barbara's history, and the City's architectural heritage and resource types. It is important that qualified consultants become familiar with the City's Historic and Landmark Districts, Historic Resources Inventory, Structures of Merit and Landmarks, Historic Preservation Ordinance (adopted in 2021), and General Plan, Historic Resources Element policies. **Prior to beginning a Historic Resource Report, the qualified consultant is required to contact the City's Architectural Historian to review the scope of work.** To be considered for qualification, please send a curriculum vitae or statement of qualifications, which describes the academic credentials and work experience of all principal investigators to the City's Architectural Historian.

### Removal from the Qualified Consultant List:

If a consultant is not willing to follow the above report format and procedures, the consultant will be removed from the qualified consultant list. Qualified consultants shall provide current contact information to maintain an up-to-date, reliable list for applicants.

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