



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.

March 2025 Draft

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 historic 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.

For the purposes of this document, the Santa Barbara Municipal Code (SBMC) defines the following:

- **Historic Resources:** structures, sites, cultural landscapes, or features that are designated or eligible for designation as historically significant.
- **Cultural Landscape:** A geographic area—encompassing both cultural and natural resources, as well as the wildlife or domestic animals within it—that is associated with a historic event, activity, or person, or that exhibits cultural or aesthetic values. For further clarification, refer to the Secretary of the Interior’s Standards for the Treatment of Cultural Landscapes.
- **Cultural Resource:** Districts, streetscapes, neighborhoods, sites, buildings, structures, view corridors, vistas, and objects that have acquired significant associations with human activities or historical events.

Historic resources referred to in this document exclude Archeological and Tribal Cultural Resources as those resources are addressed in separate MEA Guidelines.

Note:The 2002 MEA Guidelines for Historic Structures and Sites required that reports being submitted to the City for review be titled Phase 1 and Phase 2 Historic Structures/Sites Reports. Under this revised MEA, reports will be titled Phase 1 or Phase 2 Historic Resources Reports. These reports will be prepared and reviewed separately. Additional information on the requirements for these reports is presented below.

TABLE OF CONTENTS

1. Historical Resources Overview and Process	1
2. Phase I and II Overview	4
3. Phase I Historical Resources Report: Submittal Standards	6
4. Phase II Historical Resources Report: Submittal Standards.....	11
5. Direction for CEQA Documents	14
6. Consultant Qualifications	16

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 historic 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. The Historic Landmarks Commission serves as the City's appointed experts in the treatment and preservation of historic resources. 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 historic 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 Historic 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 historic significance and determine the type of review needed for the proposed project.

2

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 historic significance – either upon a project submittal or upon request by owner in early planning phases of a project. 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. Properties with a complex history of alterations, or a project that plans to remove character-defining features, or to demolish a potentially eligible historic resource typically require a qualified consultant evaluation.

3**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 for additional evaluation or Historic Resources Report addendum 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 minimize costs and delays, the City will accept a Phase I or II Historic Resource Report only if required by the City's Architectural Historian or the California Office of Historic Preservation.

4**Draft Historical 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 consultant 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.

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

Upon submission of the Final Historic Resource Report, City staff will schedule it for a noticed Historic Landmarks Commission hearing. The Historic Landmarks Commission will decide whether to accept, accept with conditions, or reject the Historic Resource Report. The qualified consultant is expected to attend the hearing, present a visual and oral summary of the conclusions of the report, to answer questions and address any revisions or additional information requested by the Historic Landmarks Commission.

If the Historic Landmarks Commission disagrees with the qualified consultant's conclusions and the qualified consultant refuses to amend the Historic Resource Report based on 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, Historic Landmarks Commission's decision on the report is not appealable.

*CEQA evaluation hearings are statutorily exempt from any mandated limits on the number of hearings a project may be subject to prior to approval.

6

Final Submittal:

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

7

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.

8

Project Completion:

The project application can be deemed complete after the Historic Landmarks Commission accepts the Final Phase II 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 report is required for these projects.

PHASES I AND II OVERVIEW

Evaluating historic resources and project impacts entails 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) establish that historic significance must be based on substantial evidence, which may be provided through a survey, a historic significance report, a Historic Resource Report, or other means. Properties determined to be eligible for designation based on substantial evidence are considered historic resources under CEQA. A property does not need to be formally designated as historic by a local, state, or national agency to be considered a historic resource under CEQA.

If a historic evaluation finds a property meets the criteria for historic designation, it will be added to the City's Historic Resources Inventory and considered a historic resource for CEQA purposes. As such, any proposed projects that may impact the exterior of the historic resource, cultural landscape, or cultural resource will be reviewed by the Historic Landmarks Commission to ensure compliance with 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. Depending on the complexity of the project, the City's Architectural Historian or a qualified consultant would then assess the project impacts in a Phase II Historic Resource Report. Until a Phase I is accepted by the Historic Landmarks Commission, a Phase II shall not be prepared. A Phase II shall not be submitted concurrently with a Phase I.

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 Secretary of the Interior's 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 17). **Not all projects require a qualified consultant to complete the analysis; the City's Architectural Historian can evaluate minor projects, while major projects shall be completed by a qualified consultant. Applicants must consult with the City's Architectural Historian to determine whether a consultant is required to complete the Phase II report.**

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, cultural landscapes, or cultural resources that is non-original or otherwise lacking in historic integrity. In addition, small, minimally visible additions or alterations may also be considered minor and 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 the project. Major alterations to historic resources, cultural landscapes or cultural 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 also include additions.

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

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 potential 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 SBMC 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 Phase I Historic Resource Report to ensure consistency in the review process.

FORMAT AND CONTENT OF PHASE I HISTORICAL RESOURCE REPORTS: EVALUATING HISTORICAL 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/Landscape Architect/Designer/Builder/Mason or Artisan (if known)
- Original Significant Owner (if known)
- Local name of building (if applicable)
- Period of Significance
- Photograph of the front of the building and/or significant cultural landscape or cultural resources

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 physical features suggesting boundaries or concentrations of shared architectural, historic, or cultural characteristics including cultural landscape and cultural resource features. (It does not have to be an official designated city neighborhood.)

Property Description

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

- Area and Vicinity
- Physical Setting, including relationship to the street, other historic resources, cultural landscapes and cultural resources
- Significant features, walls, trees, or 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 resources including relevant buildings, sites, streetscapes, cultural landscapes and cultural resources and features, labeled with the date the photograph was taken (if known), the point of view of the photographer, and photo credit.
- Contemporary photographs of the streetscape; nearby cultural resources; the site; the front, side, and rear of the resource; and detailed images of character-defining features of the resource. Each photograph must be labeled with the date taken, the photographer's point of view, and photo credit. Additionally, label each page and photo with a number and include cardinal directions (north, south, east, west) to indicate the photo's orientation. Internet photos (e.g., Google Street View) may only be used as a supplemental resource to assess property alterations.
- Sanborn Fire Insurance Maps or other historical maps should also be included to illustrate the site's or resource's development.
- 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 a substantial history of the neighborhood and site, including themes, historic events, people associated with the site and how they are associated with the resource.

Architectural/Cultural Landscape/Resource History

Architectural/Cultural Landscape/Resource history to include the following if available:

- Reference to craftsmen, artisans, masons, builders, designers, engineers, architects, and landscape architects, associated with the resource and list of any significant exterior alterations and dates (if known).
- Discussion of the architectural/landscape 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/landscape style was part of a larger movement; and why the style is important to Santa Barbara's architectural/landscape repertoire. Indicate if the resource 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/ Landscape Architect/ Designer/ Builder/ Artisan/ Mason

Provide a comprehensive biography, highlighting the education, career, and major accomplishments of the architect/landscape architect, designer/builder /artisan / mason. Include a list of other notable projects to showcase their body of work. Additionally, assess whether they are recognized as a “master” in the field, based on their influence, innovation, and contributions to architectural history. This evaluation should consider whether their work exemplifies a particular style, whether they introduced a groundbreaking techniques, or if they have been widely recognized within professional circles or by historic preservation entities.

Significant People

Provide a detailed biography of any historically significant people associated with the site. Outline 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. Consider whether their actions had a lasting impact on the area or contributed to broader historic movements.

Significant Events

Describe any significant events associated with the site.

Designation Criteria Analysis

Analyze if the resource meets the national, state, and local criteria to qualify as a historic resource.

Note: The City’s criteria match those of the State and National criteria for consistency and efficiency.

Local Designation Analysis: The resource 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 Historic Resources.

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

Historic Integrity Analysis

Identify the alterations and dates, if known, of any exterior alterations or additions to the resource.

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 resource conveys its historic significance/original appearance or period of significance.

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

If inappropriate alterations or additions that sacrificed the historic integrity were completed without required permits, the analysis should be to the condition prior to the alteration. Thus, unpermitted work will not become a means to inappropriately alter potentially 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 Historic 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 footnote references throughout the document using the Chicago Manual of style, latest edition.

PHASE II HISTORIC RESOURCES REPORT: SUBMITTAL STANDARDS

PHASE II HISTORIC RESOURCE REPORT: DETERMINING IMPACTS TO HISTORICAL 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 online 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 analyzing 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:

Class Levels of Impacts

- **Class I:** Significant Unavoidable: Demolition of a resource or complete exterior renovation eliminating the property's ability to convey historic 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, whether listed on the Historic Resources Inventory, Structure of Merit, Landmark or listed on the State or National Registers, is not eligible for a CEQA exemption, as it constitutes a significant, unavoidable impact.

Mitigated Negative Declaration or Environmental Impact Report

Pursuant to CEQA Guidelines Section 15300.2 (f), a categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. 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. See page 14 for recommended mitigation measures for Class I or Class II impacts.

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

FORMAT AND CONTENT OF PHASE II HISTORICAL 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 Historic Resource Report)
- Construction date
- Period of significance
- Architectural style/cultural landscape style
- Original architect/landscape architect/designer/builder/artisan/mason (if known)
- Significant original owner (if known)
- Local resource name (if applicable)
- Photograph of the front of the resource

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 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 impacts 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 that 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 the Mitigated Negative Declaration or Environmental Impact Report process.

Project Changes

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

DIRECTION FOR CEQA DOCUMENTS

If the project impacts to historic resources are classified as Class I (significant unavoidable), mitigation measures shall be discussed in an Environmental Impact Report. If a project's impacts are classified as 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 or the 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 historic 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 historic resources. The measures are generally listed in preferential order, and documentation explaining why each measure is not feasible 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. 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 historic 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 historic 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 historic display, or for donation and use at another historic site. 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 Historic 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 in this document 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 in the Planning Division of the Community Development Department.

Removal from the Qualified Consultant List

If a consultant is not willing to follow the required 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.

