



**City of Santa Barbara**  
Planning Division

**Memorandum**

**MEETING DATE:** May 8, 2024

**TO:** Historic Landmarks Commission (HLC)

**FROM:** Nicole Hernandez, City Architectural Historian

**SUBJECT:** Evaluation of project to Secretary of the Interior's Standards for Rehabilitation

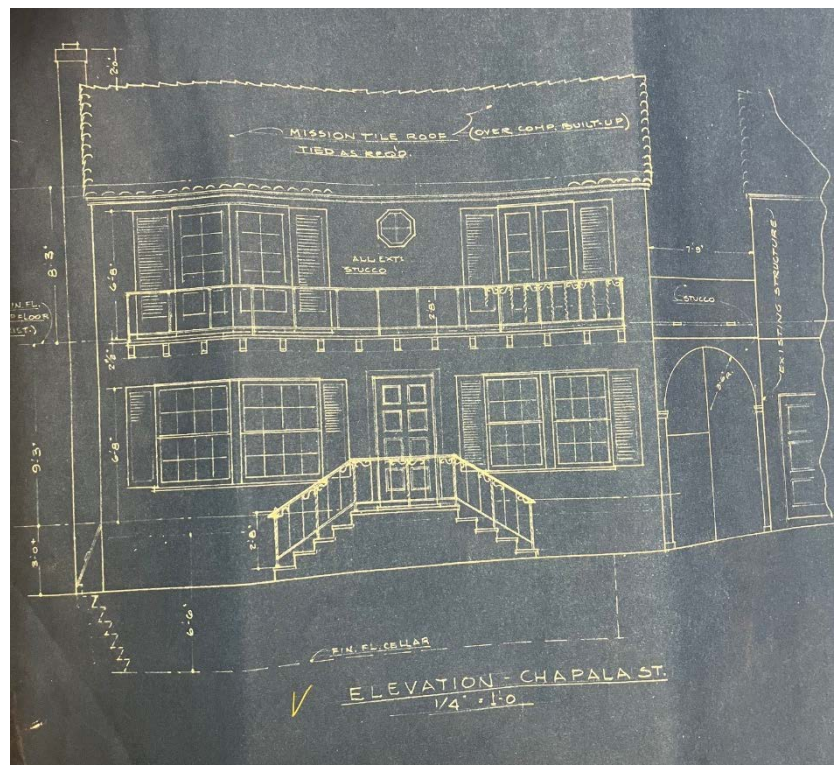
**ADDRESS:** 201 Natoma Avenue, *Listed on the Historic Resources Inventory as contributing historic resource to El Pueblo Viejo Landmark District and potential West Beach Historic District accepted by HLC Full Board action 6/5/13*

**PROJECT:** Proposal to replace existing railings and restore shutters at the front windows  
**Pickets to all be twisted.**

This memo prepared by the Architectural Historian evaluates the proposed project on the historic resource by determining if the project follows the Secretary of the Interior's Standards for the Treatment of Historic Properties. The purpose of this staff evaluation is to assist the Historic Landmarks Commission, in the review of a project when no Historic Structures/Sites Report (HSSR) has been prepared and in order to guide applicants and Commissioners appropriately towards avoiding or lessening project impacts.

**Compliance With the Secretary of the Interior's Standards for Rehabilitation**

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.



*The project meets Standard 1. The property will not have a change in use as part of this proposal.*



2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.

*The project **meets** Standard 2. The proposal will replace the existing metal and wood railings with a similar railing, with simpler design. The building has a variety of railings on the property, the project will install an iron railing on the front with twisted pickets to be closer to what was on original plans. This will not remove a distinctive material or alter an original feature, space or spatial relationship that characterizes the property.*

3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

*No conjectural features are proposed for the building. The project meets standard 3. The railing is a simple iteration of what was originally on the building.*

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

*No changes have acquired historic significance in their own right.*

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

*The project **meets** Standard 5 as they are reinstalling an iron railing with twisted pickets to make all railings consistent. All other materials, features, finishes, and construction techniques will be preserved.*

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

*The project **meets** Standard 6. The shutters are proposed to be restored. The project proposes to replace the railings to create consistency on the building with the front railing to be twisted pickets.*

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

*The project **meets** standard 7. The proposed project will not cause damage to the historic materials on the building.*

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

*This Standard is not applicable.*

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

*The proposed alteration **meets** Standard 9. The proposal will install simple iron railings with twisted pickets thus maintaining materials, features and spatial relationships that characterize the property.*

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

*This Standard is not applicable.*

**ARCHITCTURAL HISTORIAN CONCLUSION.** The replacement of the existing railings with simple iron railings with twisted pickets meets the Secretary of the Interior's Standards for Rehabilitation. The project, therefore, does qualify for a California Environmental Quality Act (CEQA) categorical exemption as per section 15064.7 of the CEQA Guidelines. If the HLC concurs that the project meets the Secretary of the Interior's Standards for the Rehabilitation, they may find the project qualifies for the Categorical Exemption.