

SAN BUENAVENTURA RESEARCH ASSOCIATES

MEMORANDUM

1328 Woodland Drive • Santa Paula CA • 93060

805-525-1909
Fax/Message 888-535-1563
sbra@historicrosources.com
www.historicrosources.com

To: James Mason, Deputy Planning Director
From: Mitch Stone and Judy Triem, San Buenaventura Research Associates
Date: 28 November 2017
Re: Santa Paula 2040 General Plan Update (Historic Resources)

The following are our comments on the Public Review Draft for the 2040 General Plan Update as it addresses historic resources in advance of tonight's public scoping session. In general, we feel the draft does not clearly or adequately address a number of issues that we believe are essential to promoting appropriate historic preservation policies within the city.

The main issues we find are the use of incomplete or inappropriate terminology, and the policies making a number of confusing references to protecting resources in districts, but omitting individually eligible properties. The policies also imply that CEQA review of impacts to historic resources is in some way optional. Since this is in fact mandated by state law, we believe the wording is misleading at best and potentially not in conformance with CEQA's most fundamental requirement that environmental impacts be identified, evaluated, and avoided.

We also feel strongly that the policies in the General Plan must promote actively identifying historic resources with the plan review process. The vast majority of historic resources in Santa Paula are not currently designated as City Landmarks. If only designated properties are considered to be historic resources, this perpetuates a massive hole in our resource protection process, which effectively renders historic preservation policies in the General Plan little better than meaningless. The General Plan should clearly and explicitly support closing this gap. For example, most cities require the preparation of historic resources reports in cases where development proposals may have an impact on a property that may be eligible but is not designated.

We have used strikeout text for the Objectives, Policies and Implementation Measures found in Table 5-11 on page 5-39 to indicate where we believe wording should be removed, and underlines where we believe language should be added. We have also added a policy to encourage the city to fully implement the Mills act to extend to designated City Landmarks. This is one of the most effective tools available for promoting historic preservation, which to date is only very minimally employed in Santa Paula as it applies only to properties listed on the National Register of Historic Places.

Objectives

- COS 6(a) The City should encourage Historic Preservation as a valuable tool to retain the City's heritage.
- COS 6(b) Designating historic districts such as the downtown should be encouraged.

Policies

- COS 6.a.a Activities and development that could damage or destroy archaeological or historic ~~or architectural~~ resources are to be avoided. (IM 30-34)

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- COS 6.b.b Historic, cultural and archeological resources ~~should~~ must be evaluated in the CEQA process and full mitigation provided when adverse impacts cannot be avoided. (IM 30-34)
- COS 30 Continue to implement a Historic Overlay Zone for portions of the downtown and surrounding historic neighborhoods.
- COS 31 Complete a comprehensive historic resources survey ~~preservation study~~ for Santa Paula. In the absence of a current, comprehensive survey, the city shall actively seek to identify potential historic resources within the development review process. Methods for doing so may include, but are not limited to, consultation with previous surveys and lists of potential resources, and requirements to prepare historic resources reports.
- COS 32 Establish a program to increase the number of ~~residences~~ properties protected as historic ~~structures~~ resources.
- COS 33 Consider and evaluate cultural and archaeological resources in the CEQA process and provide full mitigation when adverse impacts cannot be avoided.
- COS 34 Pursue local landmark, California Register of Historical Resources, and National Register of Historic Places ~~federal~~ designations for all eligible historic districts and individual properties. ~~eligible under the National Trust for Historic Preservations.~~
- COS 34a Formally document, recognize and designate seven new historic landmark districts including: Downtown Commercial District, Downtown Residential District, South 7th Street, ~~McKevitt~~ McKevett Heights, Park Street, The Oaks, and Richmond Tract.
- COS 34b The City shall implement The Secretary of the Interior's Standards for Rehabilitation standards ~~that~~ to guide new development and alterations to ~~existing~~ structures individually eligible properties and properties within historic districts. ~~Such~~ The application of these guidelines shall be ~~developed~~ assisted by a qualified historian, and shall address architecture, landscaping, streets, and hardscape elements ~~within these districts. Standards should be developed such that they address the particular character of individual districts.~~
- COS 34c The City shall fully implement the Mills Act by extending it to designated City Landmarks.

Other Comments

We find a number of errors and discrepancies in the exhibits. The text on page 5-41 states that seven informal historic districts are shown in Figure 5-7, but this figure illustrates no district boundaries, and also includes errors of location and incorrect terminology. Existing and potential district boundaries need to be plotted on the figure if they are to be of any value as a planning tool. We also question the completeness of the landmark listing in Table 5-12, as we note it fails to list of the existing Santa Paula Street landmark district. The document should also recognize the city's existing protections for heritage trees adopted as CDP 92-02.