

Historic Preservation Stakeholders' Meeting #4
Historic Reports and Historic Report Guidelines
Staff Notes
10/13/09, 1-2:30 p.m.

Q: Timeline?

A: May be a meeting #5 – the goal is to wrap up in the next month.

How does the tally fit into historic reports?

- + The qualities of the property are more important than the number
- + Just using qualities to describe a property may be too confusing and too open to abuse

- + The tally is valuable, but the weakness is the number at the bottom. The elements are important. The tally can be used to communicate why a resource is or is not important to the general public.

- + The tally allows us to weight things differently
 - + The number creates a problem
 - + Using E-VG-F-P is a better indicator – make judgements on each criteria

Q: How does qualitative criteria work?

A: Up or down, in or out.

- + All agencies lack clear descriptions as to why properties are on the inventory. The City of San Jose does better than most.

- + The wide spread of points for a structure of merit creates problems – should be broken down further.

- + The Tally sheet is a good exercise – it forces solid thinking – bbut there's concern about the absolute number at the end.

Staff: What the contents of a historic report could be:

- DPR as the starting point
- Tally without bonus points
- Show range of comparable buildings to determine significance
- Annotated photos to show character-defining features

- + Annotated photos are a good idea.

- + If it isn't possible to create a visual inventory due to a structure's uniqueness, what would be done?

- + Can document that there's only one
- + Can go outside of the city for comparison
- + Annotated photos are a waste of time and money. May be helpful for a lay person's understanding, but these reports are meant to be reviewed by staff for decision-makers.

+ CEQA requires public understanding

+ Need a technical report and a layperson's report. Reports of comparable structures were expensive and time-consuming and never seemed to be enough. The annotated photo is a good tool.

Staff: How can we create the necessary analysis to determine a structure's uniqueness?

Staff: Digital photos can be added to a database to create a library of comparable structures.

+ Tally asks for an analysis of uniqueness. If the comparison is the quality of a bungalow – for instance – then comps make sense.

+ A property may be distinct without being unique.

+ Are we satisfying the public's understanding of the inventory?

+ Process has to be valuable to the applicant – the goal should be to streamline the process.

+ There has to be a balance between Historic Preservation streamlining and inventory maintenance. Staff needs to update the inventory.

+ There needs to be clear restrictions and requirements. Clear parameters from which to work.

+The pool of comparable structures should come from buildings already on the inventory.

+ Adding extra layers to the process will discourage participation.

+ Update both the inventory and context statements. Context statements tend to focus on general styles of architecture—actually, architectural styles are far more complex—need to better understand the building in terms of its context statement.

+ Is the consultant still responsible for making conclusions under CEQA?

Staff: The preparer of the Environmental Clearance document will do that.

+ This is a big change, because the historic consultant has traditionally done that.

+ Candidate City Land mark doesn't necessarily equal a CEQA resource.

Staff: The City's qualitative criteria are parallel to California Register and National Register criteria.

- + There's a difference between evaluating CEQA and a building's significance.

Staff: A CEQA resource is a building that is National Register eligible, Cal Register eligible, or a candidate City Landmark.

- + The consultant's job has been to cite the California resources code, and make conclusions

- + The Planning Division makes the final determination.

- + The CA, National and local registers equal CEQA resources. If it's listed on the inventory, it's a CEQA resource, and has to be considered. That includes Structures of Merit.

- + Not how planning interprets this. If the inventory is not adopted by the City Council and then sent to the state, it's not a CEQA resource.

- + The list is sent to Sacramento with the CLG report.

- + Does the CEQA conclusion statement still belong in the historic report?

- + Just want to know the rules for historic reports.

Staff: The guidelines haven't been updated in 20 years, and we're trying to level the playing field and establish clear rules, and seeking feedback in this meeting. Not going to bypass CEQA.

Staff: A Cal, National Register or a City Landmark structure is a CEQA resource.

- + I know that I need to comply with CEQA—anything else needs to be based on a clear Council Policy. I want to know the requirements and need clarity.

- + A cover letter—a summary letter—could add CEQA conclusions to the cover letter (such as, appears eligible to be a CEQA resource). Best to bring up the possibilities for the sake of the applicant.

- + Environmental consultants need a well-prepared DPR, and not CEQA conclusions.

- + Requirements have changes a lot in the last twenty years. Originally, it was a full report, with a DPR attached. Now the DPR is the important document. Need to know the requirement—a full historic report or just DPRs.

- + Made on a case by case basis depending on the number of resources involved.
- + Need to know more up front to give a correct quote to the applicant.
- + Need to know what the City needs.
- + Need clarity on different types of evaluations for different situations (i.e., multiple sites and structures).
- + We need examples of different types of requirements.
- + We've done DPRs and later consolidated them into a report.
- + Potential resources with no existing context involve more work.
- + DPRs should follow guidelines developed by the state—should require discussion of demolitions and not just alterations.

Historic Evaluations for Surveys

- + Conservation areas are both architectural character and history. If the survey doesn't look at the history of the people who lived in the homes, then an important part of the context is missing. Need to do individual research of homes to determine that.

Staff: How important are individual; aspects of individual buildings for context?

- + Why is an individual analysis needed if the weight is on visual character?
- + Evaluation is to determine eligibility for the Cal or National Registers, not for determining contributing structures. Need to identify structures that contribute to the context.
- + How will the creation of these conservation areas prevent implementation of the General Plan or infill development? Everybody in this room is unique, like everybody else.
- + In the Washington areas, there was an emphasis on compatible uses.
- + Staff's direction is correct – better than the current survey process for conservation areas.
- + After an area becomes a conservation area, residents resist change – it becomes static.
- + How does this fit in with CEQA? What are the consequences of creating Distinctive Neighborhoods? How are we preparing for how it will interact with CEQA? We need to understand the process and requirements.

Staff: Development in conservation areas would not require an EIR, and would not go to the HLC, the process would be a single family house permit.

- + We need to know the unintended consequences.
- + An overall concern – if we move too broadly, we start to dilute resources that are really important. Want to understand how this process will impact historic resources.
- + This is just a discussion of conservation areas?

Staff: The process for Historic Districts remains the same.

- + Agree with the concept of visual analysis for determining contributing structures—concerned about missing the history of the people who lived there.
- + May be best to create a different process for conservation areas – not just a process for historic buildings.
- + Too many things are getting mashed together here – it’s getting too muddy.
- + The context statement is the key to identifying themes and architectural understanding.
- + The problem with conservation areas is that it’s architectural character and history. Should be and/or.
- + Agree with the idea that it’s getting muddier. May not understand the streamlined conservation area process compared to the distinctive neighborhoods process. If it doesn’t apply to newer neighborhoods, then don’t understand the issue.
- + Historic Preservation process needs to be kept apart from the distinctive neighborhoods process.
- + Need flow chart / CEQA clarity – common set of expectations.
- + Map it – including how it attaches to SNI as well.