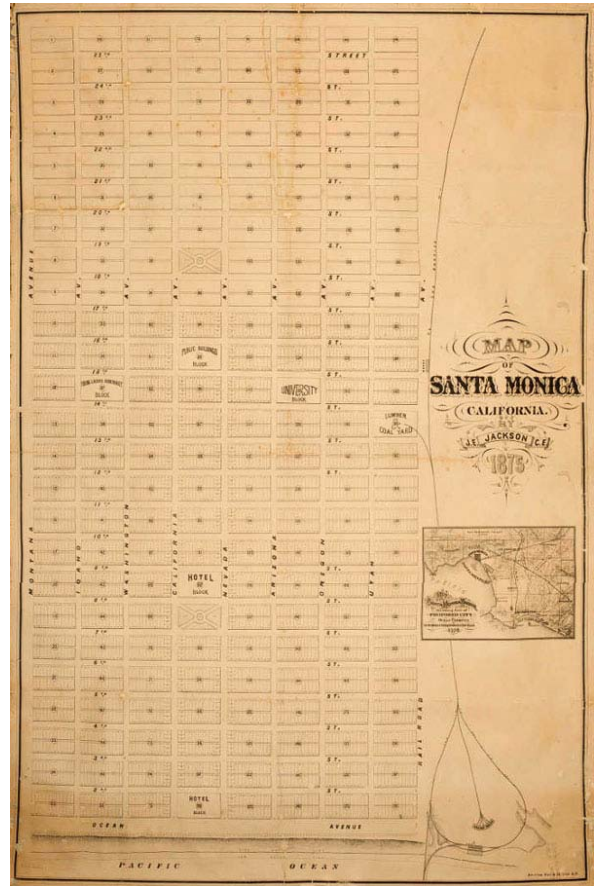


APPENDIX D

Historic Architectural Resources

Report



Santa Monica 6th Cycle Housing Element June 2021

HISTORIC RESOURCES GROUP

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HISTORICAL RESOURCES TECHNICAL ANALYSIS

**Santa Monica 6th Cycle Housing Element
June 2021**

HISTORIC RESOURCES GROUP

PREPARED FOR

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HISTORICAL RESOURCES TECHNICAL ANALYSIS

Santa Monica 6th Cycle Housing Element
June 2021

HISTORIC RESOURCES GROUP

This historical resources technical report examines the City of Santa Monica's 6th Cycle Housing Element ("the Project") and analyzes its potential to adversely impact historical resources as defined by the California Environmental Quality Act (CEQA)¹. This report is intended to inform environmental review of the Project under CEQA.

The Project sets forth policies, strategies, and actions for the protection of existing housing and production of new housing within the City of Santa Monica. As such, the analysis contained herein is concerned with the Project's potential for impacts to historic resources on a program level. The potential impacts to historical resources for any specific future development projects that may occur as a result of the Project cannot be pre-determined and are not considered as part of this analysis.

Under CEQA the potential impacts of a project on historic resources must be considered. The purpose of CEQA is to evaluate whether a proposed project may have a significant adverse effect on the environment and, if so, if that effect can be reduced or eliminated by pursuing an alternative course of action or through mitigation measures.

The impacts of a project on an historic resource may be considered an environmental impact. CEQA states that:

A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.²

Thus, an evaluation of project impacts under CEQA requires a two-part inquiry: (1) a determination of whether the project site contains or is adjacent to a historically significant resource or resources, and if so, (2) a determination of whether the proposed project will result in a "substantial adverse change" in the significance of the resource or resources. This report examines the City-wide identification of historic resources and discusses the potential for any adverse change in the significance of such resources as a result of the Project.

This report contains:

- A review of the record of identified historic resources within the City of Santa Monica.

¹ California PRC, Section 21084.1.

² Ibid.

- A review of the policies, strategies, and actions discussed within the Project that would protect existing housing and enable the production of new housing.
- Review of the required consideration of historic resources under the California Environmental Quality Act (CEQA).

This report was prepared using sources related to the Project Site's development. The following documents were consulted:

- City of Santa Monica historic resources inventory data
- Existing City of Santa Monica historic resources survey reports
- City of Santa Monica Historic Context statements
- California State Historic Resources Inventory for Los Angeles County

Research, field inspection, and analysis were performed by Paul Travis, AICP, Principal; and Robby Aranguren, Planning Associate/GIS Specialist, both of whom meet the Secretary of the Interior's Professional Qualifications Standards in Architectural History.

HISTORICAL RESOURCES TECHNICAL ANALYSIS

Santa Monica 6th Cycle Housing Element

June 2021

HISTORIC RESOURCES GROUP

The City of Santa Monica (City) is proposing the 6th Cycle 2021-2029 Housing Element Update. The Housing Element is Santa Monica's strategic plan for providing new housing opportunities to meet the housing targets established by SCAG's RHNA and to preserve housing for existing residents. Santa Monica's Housing Element provides the policy framework to promote production of necessary housing while preserving the existing housing stock and preventing tenant displacement.

The proposed 6th Cycle Housing Element represents the most aggressive housing plan to date. The Housing Element serves as the guiding document for how the City will address the community's housing needs during these unprecedented and challenging times.

2.1 Project Goals

The City's 2021-2029 Housing Element goals were developed based on public input and in recognition of the City's core community values. The proposed Housing Element's goals are built around four key principles:

- Increase housing production for all, with an emphasis on affordable housing
- Promote greater housing stability for existing residents at risk of displacement.
- Locate housing close to daily services and amenities like transportation, jobs, parks, and schools in addition to places around the City that have historically not accommodated housing.
- Facilitate equitable housing access to all neighborhoods by expanding access to housing opportunities and overcoming patterns of segregation by planning for housing in areas that have historically excluded diverse housing opportunities.

From these key principles, the proposed Housing Element establishes seven goals to address housing issues in the City:

- *Goal 1 Overall Housing Production:* Production of new housing that is sustainable, innovative, safe and resilient, appropriate with the surrounding neighborhood, offers opportunities for active and healthy living, including walking and biking, and increases equitable housing opportunities.

³ Description of the 6th Cycle Housing Element as provided by the City of Santa Monica. Description is edited to focus on information relevant to historic resources analysis.

- *Goal 2 Affordable Housing Production:* Housing production for all income categories including for the community's workforce and most vulnerable communities.
- *Goal 3 Preserve Existing Housing:* Preservation of the existing supply of housing and prevent displacement of existing tenants.
- *Goal 4 Equitable Housing Access:* A community that provides equitable housing access to all neighborhoods.
- *Goal 5 Address Homelessness:* Housing for persons experiencing homelessness
- *Goal 6 Housing Assistance:* Provision of housing assistance and supportive programs and services to extremely low-, very low-, low-, and moderate-income households and households with special needs, families, seniors, and the homeless.
- *Goal 7 Anti-Discrimination in Housing:* Eliminate housing discrimination on the basis of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, age, marital status, national origin, ancestry, familial status, income level, source of income, disability, veteran or military status, genetic information, or other such characteristics.

2.2 Proposed Components

The proposed 6th Cycle 2021-2029 Housing Element establishes the City's housing vision for the next 8 years. This Housing Element provides a comprehensive plan for protecting existing housing in the City and ensuring that the City has the ability to meet its RHNA allocation of 8,895 units, more than 5 times the number of units planned for in the prior 5th Cycle Housing Element.

To plan for this unprecedented level of housing growth, the Housing Element proposes a number of policies and programs that would enable the production of housing of varying affordability levels and protect existing housing and residents. The programs that help achieve the seven goals of the proposed Housing Element are listed in Table 1.

Table 1: Programs

Program #	Program Title
1.A	Streamlined Approvals For Housing Projects
1.B	Streamline The Architectural Review Process For Housing Projects
1.C	Incentivize Housing Development On Surface Parking Lots in Residential Zones That Are Associated With Existing Commercial Uses
1.D	Explore Reducing or Eliminating Minimum Parking Requirements for Certain Housing Projects.
1.E	Revise The Design And Development Standards In The Bergamot Area Plan (BAP) For Easier Understanding And To Support Housing Production
1.F	Revise the Downtown Community Plan Development Standards To Support Housing Projects
1.G	Promote The Use Of Accessory Dwelling Units Through An ADU Accelerator Program .
1.H	Adaptive Reuse Of Existing Commercial Buildings For Permanent Residential Use
1.I	Ensure That Local Regulations Support Innovations In Construction Technology To The Extent Technically Feasible
1.J	Ensure That Local Regulations Support Sustainable Construction
2.A	Establish A Citywide_Affordable Housing Overlay
2.B	Right Of First Offer Ordinance For Nonprofit Affordable Housing Providers
2.C	Update The City's Affordable Housing Production Program and Development Standards to Ensure that Housing Projects are Feasible
2.D	Update Density Bonus Ordinance to Ensure Consistency With State Law And Integration Into The City's Land Use System
2.E	Commit To The Production Of Affordable Housing On City-Owned/Publicly- Owned Land

Program #	Program Title
2.F	New Affordable Housing Finance Programs To Enable Continued Provision Of Technical And Financial Assistance For Housing Production
2.G	Facilitate The Development And Maintenance Of Special Needs Housing
2.H	Maintain Proposition I Monitoring.
3.A	Restrict The Removal Of Existing Rental Units For Site Redevelopment And Require That Protected Units Are Replaced
3.B	Develop Programs To Address State And Federal Legislative Mandates
3.C	Facilitate The Conservation Of Restricted And Non-Restricted At-Risk Housing.
3.D	Maintain An Acquisition And Rehabilitation Program
3.E	Maintain A Low Income Residential Repair Program
3.F	Enhance Code Enforcement Response To Housing-Related Violations
3.G	Maintain A Mandatory Seismic Retrofit Program
3.H	Information And Outreach For Property Owners Regarding Rehabilitation And
4.A	Zoning Ordinance Amendment To Permit Multiple-Unit Housing In Non-Residential Zones Where Not Currently Permitted
4.B	Revise Development Standards To Incentivize Housing Projects Over Commercial Development
4.C	Facilitate The Development Of Housing On Surface Parking Lots Owned By Religious Congregations
4.D	Explore Options to Address Single-Unit Dwelling Zones

Program #	Program Title
5.A	Reduce The Number Of Homeless Individuals Living On The Streets Of Santa Monica Through The Provision Of A Range Of Housing Options, With An Emphasis On Affordable, Permanent, Supportive Housing.
5.B	Low Barrier Navigation Centers As By-Right Use
6.A	Maintain Rental Housing Voucher Programs And Expand To Assist All Persons With Disabilities
6.B	Seek Funding Sources To Support Rental Assistance For Vulnerable Individuals And Households At-Risk Of Displacement
6.C	Maintain And Expand The Preserving Our Diversity (Pod) Program
6.D	Information And Outreach Coordination For Tenants And Landlords On Housing Programs And Resources
6.E	Maintain A Community Development Grant Program
6.F	Provide Tenant Relocation Assistance
6.G	Maintain A Temporary Relocation Program.
6.H	Maintain Reasonable Accommodations To Ensure Equal Opportunity For Housing
7.A	Maintain Fair Housing Programs.
7.B	Provide Tenant/Landlord Mediation And Legal Services.
7.C	Right To Counsel Program
7.D	Maintain A Tenant Eviction Protection Program.

Amended Development Standards to Support Housing Production

The proposed Housing Element would amend the existing development standards in the City's commercial and mixed-use zones to levels that can support the housing projects with the City's minimum inclusionary housing requirements and incentivize housing relative to commercial. In general, the proposed development standards would be amended to allow an increase in height of 1-2 stories and new FARs that would be

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higher than the current Tier 2 FARs for housing projects. This effectively negates the need for Tier 2 for housing, and, therefore, it is proposed that Tier 2 be largely eliminated for housing projects. For non-housing projects, the existing development standards under the tier system would remain unchanged.

Equitable Housing Access

Housing Element law (AB 686) requires that the City's Housing Element include policies and programs that Affirmatively Further Fair Housing (AFFH). While the LUCE established a strategy to encourage housing production around major transportation systems, it does not account for the new AFFH mandate. Key LUCE policies to develop complete neighborhoods in mixed-use areas within easy access to transit opportunities and daily services remain but the proposed Housing Element is driven largely through an equity and inclusion lens. In order to increase housing opportunities throughout the City and break down the patterns of segregation that have resulted from decades of discriminatory housing practices, the draft Housing Element proposes the following programs:

- *Program 4.A:* Zoning Ordinance Amendment to Permit Multiple-Unit Housing In Non-Residential Zones Where Not Currently Permitted
- *Program 4.B:* Revise Development Standards To Incentivize Housing Projects Over Commercial Development
- *Program 4.C:* Facilitate The Development Of Housing On Surface Parking Lots Owned By Religious Congregations
- *Program 4.D:* Explore Options to Address Single-Unit Dwelling Neighborhoods

Revision to the Affordable Housing Production Program

In July 1998, the City Council enacted the Affordable Housing Production Program (AHPP), requiring developers of market-rate apartment and condominium projects to contribute to affordable housing production and thereby help the City meet its affordable housing need. The AHPP implements Proposition R, a 1990 voter initiative that requires that 30% of all multi-unit housing completed each fiscal year be affordable to and occupied by low- and moderate-income households and at least 50% of the total affordable housing completed be affordable to and occupied by low-income households. The AHPP is the successor to the Inclusionary Housing Program (IHP), adopted by Council on June 28, 1988. To simplify the program and provide flexibility for the location of off-site inclusionary units in the City's commercial and mixed-use zones, revisions to the AHPP are proposed:

- Eliminate the “Menu” and Replace with Minimum 15% inclusionary Divided Evenly Across Affordability Levels

Currently, the City’s AHPP allows market-rate developers to select from a “menu” of options for the production of affordable housing. The AHPP formerly allowed market-rate housing projects to include a minimum of 5% of their units as affordable to 30% AMI households. This had the effect of producing few affordable units at the extremely low-income level at the cost of production of other income levels with particular shortages happening at the 80% to 120% AMI income levels. Therefore, the Housing Element Update includes a proposal to eliminate the current “menu” option of affordability requirements from the AHPP and instead establish a base affordability percentage of 15% with the inclusionary units provided equally among all affordable income levels.

- Flexibility in Off-Site Option Location

The AHPP currently allows developers to fulfill their affordable obligation by providing units off-site. However, the units are required to be located within ¼ mile of the market-rate project. The off-site requirements vary somewhat for Tier 2 projects. Within the Downtown Community Plan area, Tier 2 housing developers have the flexibility to locate the off-site housing anywhere within the Downtown. In addition, the off-site housing project must be owned or operated in whole or in part by a non-profit housing provider.

To support increased affordable housing production, the Housing Element Update proposes to create additional flexibility to the AHPP program in the City’s mixed-use and commercial zones to make the off-site affordable housing option a more viable alternative to on-site affordable units. The proposal would allow projects to locate off-site affordable housing to be located anywhere in the City but not within a disadvantaged area, as determined through metrics such as overconcentration of lower-income households.

Affordable Housing Zoning Overlay for 100% Moderate Income Projects

To incentivize 100% moderate income projects to be developed, the City is proposing a Moderate-Income Affordable Housing Overlay. The overlay would allow 100% affordable housing projects to be developed with:

- Up to an additional 3 stories or 33 feet
- 50% FAR/density bonus
- No minimum parking requirements

- Up to 4 incentives or concessions from development standards
- Flexibility for smaller unit sizes in exchange for larger common area amenities

With the proposed overlay, 100% moderate-income affordable housing projects would be able to have greater density and height than market-rate housing making it more competitive to build. This overlay would apply in targeted areas such as Downtown, Bergamot, and the immediate ½-mile area around the 17th Street Metro E Line station.

City-owned Sites

The City owns a variety of property in various zones, including the parcels surrounding the Downtown Santa Monica Station, parking lots on Main Street and along Wilshire Boulevard, the Bergamot Arts Center, Parking Structure 3, and the site at 4th Street/Arizona Avenue. City-owned sites have the potential to contribute significantly to the production of affordable housing. The proposed Housing Element would commit City-owned sites for the production of affordable housing with the following program:

- *Program 2.E: Commit To The Production Of Affordable Housing On City-Owned/Publicly- Owned Land.*

Parking Lots of Religious Sites and Parking Lots in Residential Zones

AB1851 was passed in 2020 to remove an important barrier to housing construction on lands owned by a religious institution. The law states that a jurisdiction cannot deny a housing project proposed by a religious institution on the sole basis that it will remove parking. A number of religious congregations with large surface parking lots are located throughout the City. These lots could play an important part in providing affordable housing; however, many of the sites are located in R2/OP2 zoning districts which severely limits the housing potential of these sites. To support affordable housing on lands owned by religious congregations, the proposed Housing Element would create a zoning overlay with new development standards through the following program:

- *Program 4.C: Facilitate The Development Of Housing On Surface Parking Lots Owned By Religious Congregations.*

In addition, there are over 100 parcels within residentially zoned (R1/R2/R3/R4) areas that are developed with surface parking lots serving adjacent street-fronting commercial uses. Some of these parcels have an “A” Off-Street Parking Overlay (known as A-lots). These parcels are intended to support the parking needs of commercial corridors and neighborhood commercial areas, and to serve as a buffer between commercial and residential uses. These parcels have been identified for high housing potential. The proposed Housing Element proposes to incentivize the development of these sites for

housing, including removing the existing density caps for these parcels, removing commercial parking replacement restrictions, and restoring underlying maximum allowable density.

- *Program 1.C: Incentive Housing Development On Surface Parking Lots In Residential Zones That Are Associated With Existing Commercial Uses*

Incentives for Accessory Dwelling Units

An Accessory Dwellings Unit (ADU) is a secondary dwelling unit with independent living facilities, usually on the same grounds as another residential unit(s). ADUs play an important role in the production of housing, particularly within single-unit residential zoning districts where historically only one unit is permitted. In recognition of this, the State over the past four years has started to enact laws to help spur the production of housing through the development of ADUs. Since implementation of these new State laws, the City has seen an increase in ADU production and interest each year. ADUs are seen as one approach for cities and counties to meet unmet housing demand. HCD has indicated that local governments may report ADUs as progress towards its RHNA pursuant to Government Code Section 65400 based on the actual or anticipated affordability.

While Santa Monica has taken steps beyond what is required by State law to incentivize the production of ADUs, the Housing Element Update proposes an “ADU Accelerator” program that is anticipated to include pre-approved plans and review of fees and process for ADUs. Additionally, the program proposes to increase the number of ADUs allowed on a R1 parcel. Currently the maximum amount of units by right an R1 parcel can contain is three – one single-unit dwelling, one detached ADU, and one JADU (which is required to be incorporated into the footprint of the single-unit dwelling). The proposed incentive program would allow a property owner the ability to construct an additional ADU if the unit is restricted to only be permanent rental housing. This incentive program would help achieve the Housing Element goal of affirmatively furthering fair housing by providing housing opportunities that are more affordable than home ownership units within the R1 zone district, an area of the city that has largely been unaffordable to many. Based on past production of ADUs in the City as well new State laws that have recently incentivized production of ADUs, the proposed Housing Element Update anticipates that up to 600 new ADUs could be constructed over the next 6th Cycle Housing Element period.

Housing Stability

The City operates many housing programs intended to preserve housing stock and provide assistance to existing tenants including acquisition/rehabilitation, financial

assistance, and supportive services. The proposed Housing Element Update would continue to operate existing programs to protect existing housing and residents from displacement, and to strengthen these programs when additional funding sources become available. The programs addressing the protection of housing and displacement of existing residents include:

- Program 3.A - Restrict The Removal Of Existing Rental Units For Site Redevelopment And Require That Protected Units Are Replaced
- Program 3.B. - Develop Programs To Address State And Federal Legislative Mandates
- Program 3.C. Facilitate The Conservation Of Restricted And Non-Restricted At-Risk Housing.
- Program 3.D. Maintain An Acquisition And Rehabilitation Program
- Program 3.E Maintain A Low-Income Residential Repair Program
- Program 3.F Enhance Code Enforcement Response To Housing-Related Violations
- Program 3.G Maintain A Mandatory Seismic Retrofit Program
- Program 3.H. Information And Outreach For Property Owners Regarding Rehabilitation And Maintenance Of Housing Units
- Program 5.A - Reduce the Number of Homeless Individuals Living on the Streets of Santa Monica through the Provision of a Range of Housing Options w/an Emphasis on Affordable, Permanent, and Supportive Housing
- Program 5B – Low Barrier Navigation Centers as a By-Right Use
- Program 6.A - Maintain Rental Housing Voucher Programs & Expand to Assist All Persons w/Disabilities
- Program 6.B - Seek Funding Sources to Support Rental Assist. for Vulnerable At-Risk of Displacement
- Program 6.C - Maintain & Expand the Preserving Our Diversity (POD) Program
- Program 6.D - Information & Outreach for Tenants + Landlords on Housing Programs/Resources
- Program 6.E - Maintain a Community Development Grant Program

- Program 6.F - Provide Tenant Relocation Assistance
- Program 6.G - Maintain a Temporary Relocation Program
- Program 6.H - Maintain Reasonable Accommodations to Ensure Equal Opportunity for Housing
- Program 7.A - Maintain Fair Housing Programs
- Program 7.B - Provide Tenant / Landlord Mediation & Legal Services
- Program 7.C - Right to Counsel Program
- Program 7.D - Maintain a Tenant Eviction Protection Program

Program 3.A is a new program under the proposed Housing Element and require the City to consider enacting a local version of SB330 tenant protections since that State law sunsets in 2025. Under SB330, the City is prohibited from approving a housing project that will demolish existing residential units and would not replace, at a minimum, the same number of residential units. Program 3.A would consider amending the Santa Monica Municipal Code to authorize the No Net Loss protections to continue and become permanent, preventing the net loss of units from the redevelopment of existing multi-unit residential properties.

Suitable Sites Inventory

Government Code Section 65583(a)(3) requires local governments as part of the Housing Element to prepare an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites. This inventory of land suitable for residential development, otherwise known as the Suitable Sites Inventory (SSI), is used to demonstrate that there is sufficient land at appropriate densities and development standards to accommodate the RHNA at the income levels specified within the planning period. Per Government Code Section 65583.2(c), the SSI must include a calculation of the realistic residential development capacity of the sites. To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that a jurisdiction create a buffer in the housing element inventory of at least 15 to 30 percent more capacity than required, especially for capacity to accommodate the lower income RHNA.

The City's SSI for the 6th Cycle Housing Element includes approximately 312 commercially-zoned sites and 23 residentially-zoned sites. These sites have been identified as having the highest potential to accommodate housing and includes

approved housing projects, pending housing projects, City-owned sites, parking lots of religious institutions and parking lots within residential zones. With the proposed programs and new Tier 1 FARs identified in the proposed Housing Element, the sites identified for the SSI combined with anticipated ADU production have the capacity to accommodate at least 11,025 units providing a 24 percent buffer above the City's RHNA of 8,895 units. The buffer is recommended by the State and accounts for the likelihood that not all identified SSI sites may be necessarily developed by a property owner for housing.

The SSI is intended as a planning tool to demonstrate that the City has sufficient adequately zoned land to accommodate the RHNA – it is not a prediction or guarantee of future development. Inclusion of a site on the SSI does not obligate or commit a property owner to develop the site for housing. For this EIR, the SSI is used as an approximation of where impacts associated with residential development could occur.

The City of Santa Monica is located in western Los Angeles County along the coast of the Pacific Ocean. The City is surrounded on three sides by the City of Los Angeles, including the westside communities of Brentwood, Mar Vista, Pacific Palisades, Venice and West Los Angeles. The City comprises approximately 5,280 acres (approximately 8.25 square miles).

3.1 North (North of Montana, Wilshire Montana, and Northeast Neighborhoods)

The northern-most area of the City generally consists of lower density, one- to two-story single-family housing on large parcels along tree-lined streets. This area is known as the North of Montana (NOMA) neighborhood and is mostly zoned for single family or low-density housing with the parcels along Ocean Avenue developed with medium density housing. Montana Avenue is the primary commercial corridor in this area and is characterized by low-scale one to two story neighborhood serving retail/restaurant uses. To the south of Montana Avenue and north of Wilshire Boulevard between Ocean Avenue and 21st Street is the Wilshire Montana (Wilmont) neighborhood. This area is developed with multi-family apartment buildings with scattered single-family homes. The northeast portion of the City includes the Northeast Neighborhood which is characterized by mostly single-family homes with a small mix of multi-family buildings. Wilshire Boulevard serves as the southern boundary of the Wilmont and Northeast Neighborhoods and has a mixed-use character of primarily commercial uses such as office, retail, restaurant, and hotel.

3.2 East (Mid-City and Pico Neighborhoods)

The eastern area of the City includes the Mid-City Neighborhood, which is bounded by Washington Avenue to the north, Centinela Avenue to the east, Colorado Avenue (adjacent to the industrial areas) and Santa Monica Boulevard to the south and 5th Street to the west. The Mid City neighborhood includes primarily low to mid rise multifamily housing and a range of commercial services along Santa Monica Boulevard and Broadway. In particular, this area includes the City's two prominent hospitals, UCLA Hospital and Providence Saint John's Health Center Campus along with supporting healthcare and medical uses. A significant portion of Santa Monica Boulevard is also lined with automobile dealerships, resulting in its moniker as "Auto Row". Further to the south is the Pico Neighborhood which is characterized by a diverse mix of low- to medium rise multifamily with interspersed single family residential uses, commercial, and light industrial uses. Commercial uses include the low scale retail/restaurant uses concentrated along Pico Boulevard, the office uses and light industrial uses within the Bergamot Plan Area, and the light industrial uses near Olympic Boulevard.

3.3 South (Ocean Park Neighborhood and Sunset Park Neighborhoods)

In the southern area of the City are the Ocean Park and Sunset Park neighborhoods. Sunset Park neighborhood comprises the southeast portion of the City and is one of the largest residential neighborhoods in Santa Monica, bound by Pico Boulevard to the north, the eastern City limits, the southern City limits, and Lincoln Boulevard to the west. The Sunset Park neighborhood includes the Santa Monica Airport (slated to close December 31, 2028) as well as the office campus south of Ocean Park Boulevard that includes a number of office buildings. To the southwest of the City is the Ocean Park neighborhood bounded by Pico Boulevard to the north, Lincoln Boulevard to the east, the southern City limit to the south and the Pacific Ocean on the west. The Ocean Park neighborhood consists of low to mid rise multifamily housing with interspersed single family units. The main commercial area is Main Street, a neighborhood street that is home to many retail outlets, restaurants, and neighborhood-serving businesses.

3.4 West – (Downtown, Civic Center and Ocean Front Districts)

The western edge of the City includes the Downtown District, that been considered the heart of the City, a popular regional and local destination. The Downtown District is comprised of a diverse mix of uses including retail, restaurant, hotel, entertainment, office, and residential. The Downtown is home to a world class retail district encompassing the Third Street Promenade (Promenade) and Santa Monica Place shopping center, with a mix of restaurants, shops, movie theaters, hotels, and entertainment uses that contribute to the high activity level throughout the day and into the evening hours. Adjacent to the south of the Downtown is the Civic Center district which includes the Los Angeles County Courthouse, Santa Monica City Hall, Tongva Park, Ken Genser Square, Santa Monica Civic Center, Santa Monica High School, RAND, and the Village Mixed-Use Project. West of the Downtown are Palisades Park, the Santa Monica Pier, the beach, and single and multifamily residential uses.

4.1 Historic Resources under CEQA

CEQA requires that environmental protection be given significant consideration in the decision making process. Historic resources are included under environmental protection. Thus, any project or action which constitutes a substantial adverse change on a historic resource also has a significant effect on the environment and shall comply with the State CEQA Guidelines.

When the California Register of Historical Resources was established in 1992, the Legislature amended CEQA to clarify which cultural resources are significant, as well as which project impacts are considered to be significantly adverse. A “substantial adverse change” means “demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired.”

CEQA defines a historic resource as a resource listed in, or determined eligible for listing, in the California Register of Historical Resources. All properties on the California Register are to be considered under CEQA. However, because a property does not appear on the California Register does not mean it is not significant and therefore exempt from CEQA consideration. All resources determined eligible for the California Register are also to be considered under CEQA.

The courts have interpreted CEQA to create three categories of historic resources:

- *Mandatory historical resources* are resources “listed in, or determined to be eligible for listing in, the California Register of Historical Resources.”
- *Presumptive historical resources* are resources “included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1” of the Public Resources Code, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.
- *Discretionary historical resources* are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.⁴

⁴ *League for the Protection of Oakland's Architectural and Historic Resources vs. City of Oakland*, 52 Cal. App. 4th 896, 906-7 (1997)

To simplify the first three definitions provided in the CEQA statute, an historic resource is a resource that is:

- Listed in the California Register of Historical Resources (California Register);
- Determined eligible for the California Register by the State Historical Resources Commission; or
- Included in a local register of historic resources.

Section 15064.5 of the CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3) supplements the statute by providing two additional definitions of historical resources, which may be simplified in the following manner. An historic resource is a resource that is:

- Identified as significant in an historical resource survey meeting the requirements of Public Resources Code 5024.1 (g);
- Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, this category includes resources that meet the criteria for listing on the California Register (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

The fact that a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register of historic resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, does not preclude a lead agency from determining that the resource may be an “historic resource” for purposes of CEQA.

Properties formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register. Properties designated by local municipalities can also be considered historic resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

4.2 Historic Designations

A property may be designated as historic by National, State, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

National Register of Historic Places

The National Register of Historic Places is an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment.⁵ The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects; eligibility for federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or listed in the National Register, a resource must possess significance in American history and culture, engineering, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of an historic resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive Federal funding, a clearance process must be completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, state and local regulations may apply to properties listed in the National Register.

The criteria for listing in the National Register follow established guidelines for determining the significance of properties, and in general apply to properties that are at least 50 years of age. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

⁵ 36CFR60, Section 60.2.

- D. That have yielded, or may be likely to yield, information important in prehistory or history.⁶

In addition to meeting any or all of the criteria listed above, properties nominated must also possess integrity of *location, design, setting, materials, workmanship, feeling, and association*.

California Register of Historical Resources

The California Register is an authoritative guide in California used by State and local agencies, private groups, and citizens to identify the State's historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.⁷

The criteria for eligibility for listing in the California Register are based upon National Register criteria. These criteria are:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register includes the following:

- California properties formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register of Historic Places.
- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for

⁶ 36CFR60, Section 60.3.

⁷ California PRC, Section 5023.1(a).

the California Register in accordance with procedures to be adopted by the State Historical Resources Commission (commission).

- Points of historical interest which have been reviewed by the OHP and recommended for listing by the commission for inclusion in the California Register in accordance with criteria adopted by the commission.⁸

Other resources which may be nominated for listing in the California Register include:

- Individual historic resources.
- Historic resources contributing to the significance of an historic district.
- Historic resources identified as significant in historic resources surveys, if the survey meets the criteria listed in subdivision (g).
- Historic resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria.
- Local landmarks or historic properties designated under any municipal or county ordinance.⁹

Local Designation Programs

In 1976, the City of Santa Monica adopted the Landmarks and Historic District Ordinance.¹⁰ The ordinance includes criteria and procedures for designating City of Santa Monica Landmarks, Structures of Merit, and Historic Districts. Landmarks may include structures, natural features, or any type of improvement to a property that is found to have particular architectural or historical significance to the City. Landmarks are considered to have the highest level of individual historical or architectural significance locally. Structures of Merit are historic resources with a more limited degree of individual significance. In 1992, the City became a Certified Local Government (CLG) and has continued its involvement in the state's program under the Office of Historic Preservation.

⁸ California PRC, Section 5023.1(d).

⁹ California PRC, Section 5023.1(e).

¹⁰ City of Santa Monica, "Landmarks and Historic District Ordinance, Section 9.36.100," March 24, 1974.

The Landmarks Commission may approve the landmark designation of a structure, improvement, natural feature, or an object if it finds that it meets one or more of the following criteria, outlined in Section 9.56.100(A):

1. It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political, or architectural history of the City.
2. It has aesthetic or artistic interest or value, or other noteworthy interest or value.
3. It is identified with historic personages or with important events in local, state, or national history.
4. It embodies distinguishing architectural characteristics valuable to a study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail, or historical type valuable to such a study.
5. It is a significant or a representative example of the work or product of a notable builder, designer, or architect.
6. It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community, or the City.

An improvement may be designated as a Structure of Merit if the Landmarks Commission determines that it merits official recognition because it has one of the following characteristics, outlined in Section 9.56.080:

- A. The structure has been identified in the City's Historic Resources Inventory.
- B. The structure is a minimum of 50 years of age and meets one of the following criteria:
 1. The structure is a unique or rare example of an architectural design, detail, or historical type.
 2. The structure is representative of a style in the City that is no longer prevalent.
 3. The structure contributes to a potential Historic District. (Added by Ord. No. 2486CCS §§ 1, 2, adopted June 23, 2015).

Significance

The definition of historic significance used by the California Office of Historic Preservation (OHP) in its administration of the California Register is based upon the definition used by the National Park Service for the National Register:

Historic significance is defined as the importance of a property to the history, architecture, archaeology, engineering, or culture of a community, state, or the nation.¹¹ It is achieved in several ways:

- *Association with important events, activities or patterns*
- *Association with important persons*
- *Distinctive physical characteristics of design, construction, or form*
- *Potential to yield important information*

A property may be significant individually or as part of a grouping of properties.

Historic Integrity

Historic integrity is the ability of a property to convey its significance and is defined as the “authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period.”¹² The National Park Service defines seven aspects of integrity: *location, design, setting, materials, workmanship, feeling, and association*. These qualities are defined as follows:

- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

¹¹ *National Register Bulletin 16A. How to Complete the National Register Registration Form*. Washington D.C.: National Park Service, U.S. Department of the Interior, 1997. (3)

¹² *Ibid*, p. 3.

- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.¹³

¹³ *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington D.C.: National Park Service, U.S. Department of Interior, 1995.

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The information in this section is derived from the City of Santa Monica Historic Resources Inventory and narrative information excerpted from the “Santa Monica Historic Resources Inventory Update Survey Report,” August 2018; and the “Historic Resources Inventory Update Historic Context Statement,” March 2018.

5.1 Identification of Historic Resources in Santa Monica

The City of Santa Monica has conducted numerous studies of its history and potential historic resources in support of City historic preservation policies and programs. The City initiated Phase I of its first comprehensive historic resources survey in 1983 as part of an effort to draft its first historic preservation element for inclusion in the City of Santa Monica General Plan. During that effort, several potential historic districts were identified. Phases II and III followed in 1986 and 1993, respectively. Area updates were completed in 1994, 1997, 2002, 2004, 2006, and 2011. The most recent survey update was completed in 2018.

Below is a list of the historic resources surveys completed within the City of Santa Monica:

- *Santa Monica Historical Resources Inventory, Phases I & II Final Report*, prepared by Johnson Heumann Research Associates, 1985-1986.
 - Phases I and II of the City’s first comprehensive historic resources survey; includes brief history of Santa Monica.
- *Santa Monica Historic Resources Inventory, Phase III Final Report*, prepared by Leslie Heumann and Associates, 1994.
 - Phase III of the City’s first comprehensive historic resources survey.
- *Historic Resources Inventory Update, Final Report*, prepared by Parkinson Field Associates, 1995.
 - Post-Northridge Earthquake survey; identified historic resources damaged in the earthquake.
- *Historic Resources Inventory Update*, prepared by Parkinson Field Associates and Janet L. Tearnen, 1998.
- *Historic Resources Inventory Update: Central Business District and the Third Street Promenade, Final Report*, prepared by Janet L. Tearnen, Lauren Weiss Bricker, and William Scott Field, 1998.

- Area survey of the Central Business District and Third Street Promenade.
- *City of Santa Monica General Plan: Historic Preservation Element*, prepared by PCR Services Corporation and Historic Resources Group, 2002.
 - Historic Preservation Element of the City of Santa Monica General Plan; includes brief historic context statement and identifies potentially significant resources throughout the City.
- *Historic Resources Survey Update: Ocean Park, Final Draft*, prepared by Historic Resources Group, 2004.
 - Area survey of Ocean Park; includes historic context statement for Ocean Park.
- *Santa Monica Citywide Historic Resources Inventory Update, Final Report*, prepared by ICF Jones & Stokes, 2010.
 - Citywide historic resources inventory update; includes historic context statement.
- *Santa Monica Citywide Historic Resources Inventory Update, Survey Report*, prepared by Architectural Resources Group and Historic Resources Group, 2018
 - Citywide historic resources inventory update; includes citywide historic context statement.

5.2 City of Santa Monica Historic Resources Inventory

The City of Santa Monica Historic Resources Inventory¹⁴ includes over 1,300 properties that have been evaluated for historic significance. Of these, over 900 properties have been either listed in or identified as eligible for listing in the National Register, the California Register and/or as Santa Monica Landmarks, Structures of Merit or as contributors to a historic district.

Individually Significant Historic Resources

The majority of buildings listed as or identified as eligible for historic listing as an individual resource are residential properties, reflecting the largely residential character of Santa Monica. Single-family residences represent over half of these individual

¹⁴ Santa Monica Historic Resources Inventory dated April 1, 2021, was reviewed for this report.

residential properties. These include residences constructed during the first decades of the 20th century, representative of the City's earliest patterns of residential development. Others are significant as notable examples of an architectural style or type, or as the work of an important architect. A wide range of architectural styles and periods of construction are represented, including Craftsman, Period Revival styles, and Mid-Century Modern. A small number of residences were found significant for their association with persons important in Santa Monica's history.

The HRI also includes a large collection of multi-family residential properties, many of which are significant for representing patterns of multi-family residential development in Santa Monica. These include properties representing the City's earliest multi-family residential development, as well as excellent examples of early multi-family building types such as duplexes, triplexes, fourplexes, bungalow courts, and apartment houses constructed prior to World War II. Courtyard apartments dating from the period just prior to and immediately after World War II have also been identified. A small number of high-rise residential towers, dating from the 1960s and 1970s have also been identified as significant for their association with postwar patterns of residential development in Santa Monica and/or as notable examples of their architectural styles.

A smaller number of properties identified as eligible for historic listing in the HRI are commercial properties. Most of these are significant for their association with the initial development and expansion of the city's original central business district during the first four decades of the 20th century, or the increased development in the post-World War II period, when commercial development expanded beyond the original commercial center. Commercial properties identified as historically significant include retail storefronts, mixed-use buildings, offices, or restaurants, several of which are also significant for their architectural merit, primarily as excellent examples of pre-World War II Period Revival styles such as Italian Renaissance Revival, Spanish Colonial Revival, and Tudor Revival, and early Modern styles such as Art Deco and Streamline Moderne. A small number of commercial properties were found eligible as the long-term location of a local business important to the commercial identity of Santa Monica.

A collection of public and private institutional buildings were also identified as individually eligible in the HRI. These include civic buildings such as schools, post offices, libraries, utility buildings and fire stations. Several Religious buildings have been identified as significant as excellent examples of architectural styles. A handful of private institutional buildings constructed to house clubs and fraternal organizations were also identified in the HRI as listed or eligible for historic listing. The HRI also includes a small handful of industrial buildings.

Historic Districts

The 2018 Historic Resources Inventory update recognizes 16 groupings of properties that are listed or identified as eligible for listing as a historic district.¹⁵ Similar to the individually significant resources, the majority of Santa Monica's historic districts represent residential development, with most of these being single-family residential neighborhoods. Contributing buildings to these districts were largely constructed between 1920 and 1950 in Period Revival styles, although one district was constructed in the 1950s. Several historic districts representing multi-family development have also been listed or identified as eligible for historic listing.

One (1) commercial historic district, the Main Street Commercial Historic District, was identified as eligible for historic listing as a rare collection of retail storefronts constructed in during the first four decades of the 20th century in the Ocean Park neighborhood. A single, small industrial district, the Nebraska Avenue Industrial Historic District, has also been identified as a rare concentration of industrial properties developed during the post- World War II era.

Many properties identified as contributors to a historic district have also been identified as individually significant.

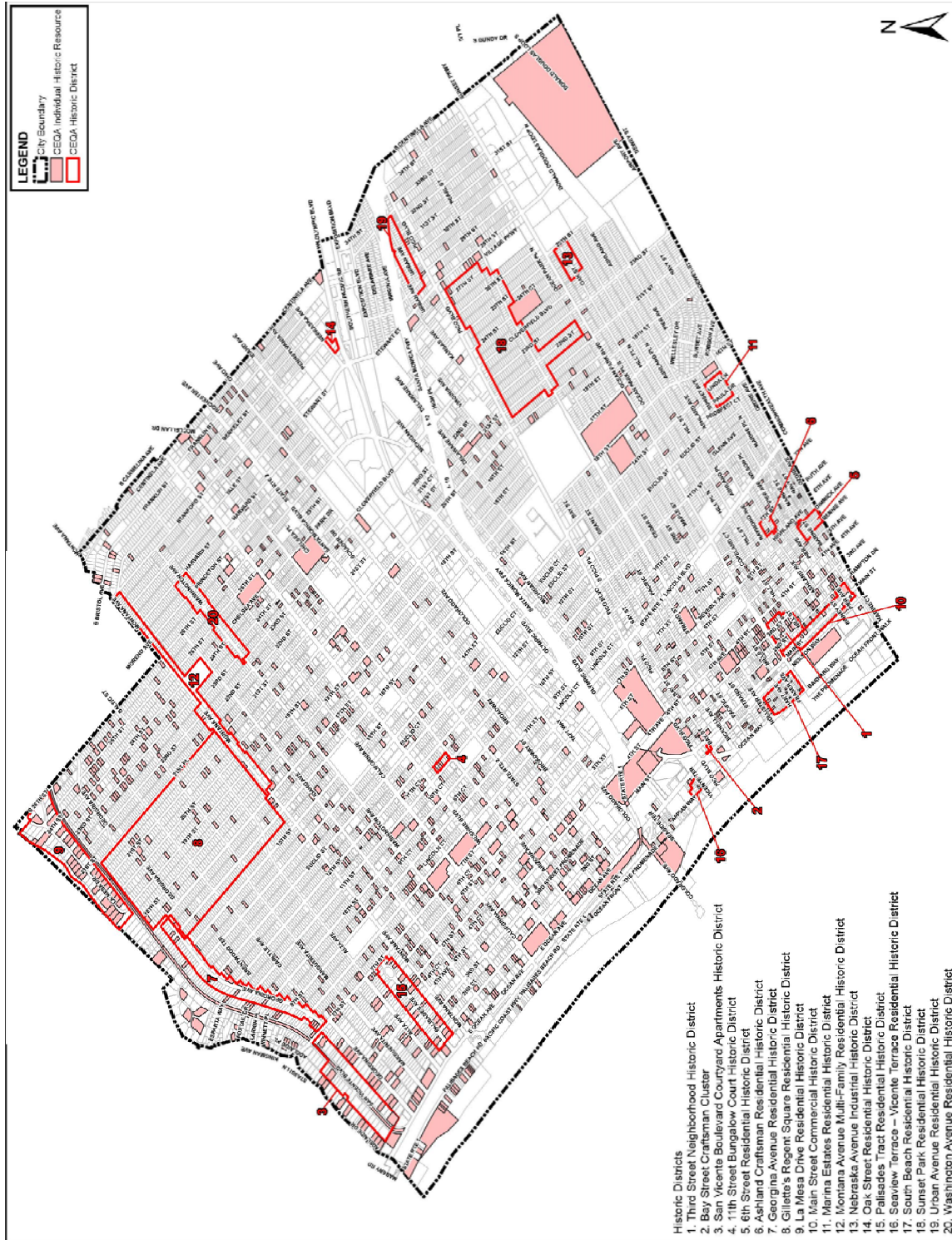
5.3 Unidentified Potential Historical Resources

In addition to the properties that have been previously listed as historic resources, or identified as eligible for historic listing, it is not out of the realm of possibility that there are properties that are eligible for historic listing and have not been previously identified. Other properties may become eligible for historic listing over the eight-year period of the 6th Cycle Housing Element as additional historic contexts and themes are uncovered and their associated properties are identified. As time passes more properties will have remained in existence long enough to be considered as potential historic resources.

Therefore, in acknowledging the programmatic nature of this investigation, currently undocumented buildings or structures of historic age which qualify as historical resources pursuant to CEQA may also exist within the City. The extent and nature of these hypothetical resources is unknown.

¹⁵ The 2018 Historic Resources Inventory Update also identified "Conservation Districts," which do not appear eligible for historic listing due to diminished integrity but still retain some cohesion with respect to character, massing, scale, and use. These were identified for planning purposes only and are not considered historical resources for the purposes of CEQA.

Figure B: Identified Historic Resources



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6.1 Framework for Analysis

The following analysis is informed by National, State and local guidelines.

Thresholds of Significance

According to Appendix G, Environmental Checklist of the State CEQA Guidelines, cultural resource impacts resulting from the implementation of the proposed project would be considered significant if a project would:

- Cause a substantial adverse change in the significance of a historical resource defined in CEQA Guidelines Section 15064.5.

CEQA Thresholds

The State CEQA Guidelines (2014) indicate that a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of a historical resource. A substantial adverse change in significance occurs if the project involves “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.”¹⁶

The Guidelines go on to state that “[t]he significance of an historic resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources... local register of historic resources... or its identification in a historic resources survey.”¹⁷

Historical resources could be subject to the following potential impacts:

- **Direct Impacts** involve the demolition, material alteration, relocation or conversion of a historical resource and/or important character-defining features.
- **Indirect Impacts** involve alteration to the surroundings of a historical resource that could remove part or all of the associated setting of a historical resource, remove character-defining features or spaces surrounding the historical resource, or substantially impair or obscure the ability of the resource to convey its historical significance. Indirect impacts may also involve potential damage related

¹⁶ CEQA Guidelines, section 15064.5(b).

¹⁷ CEQA Guidelines, section 15064.5(b)(2).

to adjacent underground excavation and general construction procedures that could undermine the stability of a historical resource.

6.2 Analytical Organization

As noted, the Project proposes a number of policies, strategies, and actions that would protect existing housing and enable the production of housing of varying affordability levels. Potential impacts to historical resources as a result of the Project are largely tied to those policies, strategies and actions designed to attract and incentivize new housing development in Santa Monica. These policies, strategies and actions may increase development pressure on existing properties, including those properties that contain historical resources. As such, the possibility of new development that may result in direct and indirect impacts to historical resources has the potential to expand beyond what might have occurred if the new incentives had not been in place.

The potential for impacts to historical resources is discussed below in reference to the individual Project components designed to incentivize the expansion of housing in Santa Monica.

6.3 Housing Element Regulatory and/or Policy Changes

To incentivize new housing development, the Project discusses regulatory and/or policy changes to streamline approvals and permit processing. Incentives to encourage housing development and expanded production of affordable housing such as density bonuses, reduced parking requirements, and increases in allowable height. The Project also proposes new policies or standards addressing non-traditional housing model types (co-living/single room occupancy housing, co-working housing, medium term/corporate housing) to address housing needs.

Regulatory and Policy changes are proposed to encourage housing development by increasing the development potential of certain properties. This has the potential to result in direct impacts to historical resources through demolition or alteration that may have been less likely to occur without the proposed changes in regulation and policy.

There is also the potential for indirect impacts from potential new development in proximity to historical resources. Such development could remove part or all of the associated setting of a historical resource, remove character-defining features or spaces surrounding the historical resource, or substantially impair or obscure the ability of the resource to convey its historical significance.

In addition, any new development in direct proximity to a historical resource may also involve potential damage related to adjacent underground excavation and general construction procedures that could undermine the stability of a historical resource.

6.4 Revised Development Standards

As noted above, the Project would modify development standards for several land use designations to enable the increased production of housing units. These revised development standards would apply to future residential projects throughout the City, including the Downtown and Bergamot Area, as well as segments of Colorado Avenue, Lincoln Boulevard, Pico Boulevard, Santa Monica Boulevard, and Wilshire Boulevard. All of these areas contain properties either listed as historic resources or identified as eligible for historic listing. These areas may also contain additional historically significant properties that have yet to be identified.

The proposed increases in allowable height and FAR is designed to encourage housing development in these areas, by incentivizing property owners and developers -- including those that own or control properties containing historical resources -- to redevelop their properties and maximize the increased development potential allowed by the revised standards. This has the potential to result in direct impacts to historical resources through demolition or alteration that may have been less likely to occur without the incentive the revised development standards provide.

There is also the potential for indirect impacts as potential new development in proximity to historical resources may likely be of larger scale and massing than what currently exists in those areas. Such development could remove part or all of the associated setting of a historical resource, remove character-defining features or spaces surrounding the historical resource, or substantially impair or obscure the ability of the resource to convey its historical significance.

In addition, any new development in direct proximity to a historical resource may also involve potential damage related to adjacent underground excavation and general construction procedures that could undermine the stability of a historical resource.

6.5 Suitable Sites Inventory

The Project includes an inventory of available land suitable for residential development to identify potential sites for housing development. The SSI includes all of the following:

- Vacant sites that are zoned for residential development.
- Vacant sites that are not zoned for residential development, but that allow residential development.
- Underutilized sites that are zoned for residential development and capable of being developed at a higher density or with greater intensity.

- Sites that are not zoned for residential development, but can be redeveloped for, and/or rezoned for, residential use (via program actions).

For vacant sites, it can be reasonably assumed that no historical resource or resources are present, and redevelopment of the vacant site will not result in direct impacts to historical resources through demolition or alteration. New construction on vacant sites does, however, have the potential for indirect impacts to adjacent historical resources in the event that such an adjacency exists.

Underutilized sites or sites not currently zoned for residential use may in fact contain historical resources. Therefore, redevelopment of these sites does have the potential to result in direct impacts to historical resources through demolition or alteration in addition to indirect impacts to immediately adjacent historical resources.

6.6 Accessory Dwelling Units

The Project references expanded production of ADU's, and specifically State legislation to enable and accelerate the production of ADU's, as an additional approach for the City to meet unmet housing demand. The Housing Element Update proposes an "ADU Accelerator" program and increases the number of ADUs allowed on a R1 parcel. These are additional incentives over and above the existing State laws. As such, the Project will does have the potential to increase the potential for impacts to historical resources as a result of ADU construction beyond what already exists under the current condition.

6.7 Conclusions

Analysis of the potential impacts to historical resources has found that the proposed Project has the potential to result in substantial adverse changes to historical resources. Regulatory and policy changes to incentivize new housing production, revised development standards that will increase allowable heights and FAR in certain areas, the inventorying of suitable sites for new development, and increased incentives for ADU construction are all designed to encourage new housing development through incentives that would ease barriers to the new construction of housing and increase the allowable size and density of new housing development. Such policies, strategies, and actions, while laudable from a housing perspective, may increase development pressure on properties that contain historical resources. As such, the possibility of new development that may result in direct and indirect impacts to historical resources has the potential to expand beyond what might have occurred without implementation of the Project.

Because the City of Santa Monica has a well-established historic preservation program, existing protections for historical resources, and strong advocacy for historic preservation within the community, it can be assumed that many of the potential adverse effects to historical resources made possible by the Project can and will be avoided through

regular environmental review and entitlement processes as currently practiced. Strong incentives will still be in place to avoid significant impacts to historical resources, design additions and related new construction that is compatible with historic resources and implement standards for construction procedures that avoid potential damage from construction activity adjacent to historical resources.

That said, it cannot be assumed that all of the potential adverse effects to historical resources will be avoided or mitigated. All projections suggest that the intensive need for additional housing will remain into the foreseeable future. With increased incentives for housing development the preservation of a historic resource on a site otherwise ideal for new housing development may prove unfeasible and the City will likely decide in some instances that the need for housing overrides the loss of integrity or demolition of a historic resource. For these reasons, it is assumed that the Project does have the potential to result in substantial adverse change to historic resources and will result in significant impact to historical resources in Santa Monica.

The following measure is recommended to reduce potential impacts to historical resources associated with the Project.

1. Include incentives for housing projects that include the rehabilitation historic buildings and related new construction that maintains the significance and integrity of the historic resource. (Such as expedited approval processes, reduced parking requirements, fee reductions, etc.)

- "2021 California Environmental Quality Act (CEQA) Statute and Guidelines."
California Association of Environmental Professionals, www.califaep.org.
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- "Secretary of the Interior's Standards for Rehabilitation." Website, <http://www.cr.nps.gov/hps/tps/tax/rhb/stand.htm>, September 18, 2008.

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