



CULTURAL HERITAGE COMMITTEE AGENDA REPORT

SUBJECT: 466 DANA STREET (ARCH-0329-2022) CONSTRUCTION OF 20 LOW TO VERY LOW INCOME AFFORDABLE HOMES AND REHABILITATION OF THE HISTORIC ROSA BUTRÓN ADOBE

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APPLICANT: Smart Share Housing Solutions **REPRESENTATIVE:** Dana Hunter

RECOMMENDATION

Provide a recommendation to the Planning Commission as to the consistency of the proposed project with the City's Historic Preservation Ordinance and provide any feedback on the Cultural Resources and Tribal Resources sections of the Initial Study, prepared pursuant to the California Environmental Quality Act (CEQA).

1.0 PROJECT SUMMARY AND FOCUS OF REVIEW

The applicant, Smart Share Housing Solutions (SSHS) is proposing the construction of 20 very-low to low income affordable homes ranging in size from 220 to 264 square feet. The project also includes a request for a concession pursuant to California State Density Bonus law for a reduction of parking requirements. The project proposes to rehabilitate the Master List Historic Rosa Butrón Adobe, which includes demolition of portions of the building at the rear of the structure. The project also includes the removal of 12 trees with a compensatory planting plan, and a Mitigated Negative Declaration of environmental impact has been prepared to assess the potential environmental effects of the project, pursuant to the California Environmental Quality Act (CEQA).

Housing Accountability and Housing Crisis Act

As an affordable housing project that complies with applicable, objective general plan, and zoning standards, the project constitutes a "housing development project" and is therefore subject to a limitation of up to five (5) public hearings, including continued hearings and appeals, under the Housing Crisis Act of 2019 (SB 330). A decision approving or denying the project must be made no later than the fifth and final meeting. (Cal. Gov. Code § 65905.5.) This is hearing number 1 of the 5 allowable hearings. Additionally, the project may not be denied or conditioned in a manner that renders the project infeasible for use as a low, to very-low income housing development project, including through use of design review standards, unless the City can identify specific findings that the project would result in a specific, adverse impact upon the public health or safety and there is no feasible method to satisfactorily mitigate or avoid the adverse impact. (Cal. Gov. Code § 65589.5(d).) Pursuant to the Housing Accountability Act (HAA) the Committee's recommendation to the Planning Commission cannot include any direction that would reduce the density or number of units, or size.

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Density Bonus Law

Although no density bonus is requested, the project is eligible for concessions and waivers in exchange for providing affordable housing under density bonus law. The project includes a concession of development standard requirements to reduce the amount of vehicle and bicycle spaces, which the Planning Commission will take action on with their decision on the overall project.

Focus of Review and Alternatives

The committee’s purview is to make a recommendation to the Planning Commission regarding the project’s consistency with Historic Preservation Policies, Secretary of Interior Standards, and Historic Preservation Program Guidelines. The Committee may also provide comments on the cultural and tribal resources sections of the Mitigated Negative Declaration of environmental impact. Please note that due to the limitation on the number of hearings allowed by state law on this project, staff has not included continuance of the item as an alternative. As noted above, based on State Law, the Planning Commission will not be able to consider any direction from the Committee that would result in a loss of density (reduction of units) or size of units. Therefore, any comments or findings provided by the Committee to the Planning Commission regarding needed modifications to comply with Historic Preservation policies and standards under the committee’s purview must be limited to architectural features, site layout, roof design, colors, materials, etc., and should be tailored narrowly to what is required to comply with specific policies and standards.

2.0 BACKGROUND



Figure 1: Rosa Butron Adobe as viewed from Dana Street



Figure 2: 466 Dana Site Location

The City of San Luis Obispo has owned the Master List Rosa Butrón Adobe property since 1989, after acquiring the property as a life estate gift from Ms. Mary Gail Black. The City provides basic maintenance and upkeep to the house and grounds, but the house is currently vacant and is at risk of ongoing deterioration and threats to its long-term preservation. On March 6, 2020, at the direction of the City Council, staff issued a [Request for Interest](#) (RFI) document seeking community partners to help the City rehabilitate and re-use the Rosa Butrón Adobe in accordance with program guidance found in the Conservation and Open Space Element (2006) of the General Plan, as follows:

3.6.8 Promote adaptive reuse of historic buildings.

The City will, consistent with health, safety and basic land-use policies, apply building and zoning standards within allowed ranges of flexibility, to foster continued use and adaptive reuse of historic buildings.

3.6.9 City-owned adobes and historic structures.

The City will preserve and, as resources permit, rehabilitate City-owned historic adobes and other historic structures by aggressively seeking grants, donations, private-sector participation or other techniques that help fund rehabilitation and adaptive reuse.

As a result of this process, in September 2021, Council approved an [Exclusive Negotiating Agreement](#) (“ENA”) with Smart Share Housing Solutions and the Peace Project that set forth a shared vision between those two organizations for the “Waterman Peace Village.” The City Council further approved an Amended and Restated ENA in February 2024 with Smart Share Housing Solutions only, and the current project scope

entails rehabilitation and re-use of the adobe structure with the construction of 20 low- to very-low income housing units on the site. The intent of the ENA is to set forth certain parameters, terms, and conditions precedent to consideration of a long-term lease with Smart Share Housing Solutions for the site that would enable the opportunity to achieve both the City Council's goals for providing affordable housing ([Housing Element Program 6.17](#)) and the rehabilitation and long-term preservation of the Rosa Butrón Adobe. The ENA requires the Cultural Heritage Committee to review the Waterman Village Project in order to ensure consistency with Historic Preservation Policies, Secretary of Interior Standards, and Historic Preservation Program Guidelines.

3.0 DISCUSSION

3.1 Site and Setting

The subject property measures 25,264 square feet (.58 acres) in area and is located on the north side of Dana Street, approximately 800 feet southwest of Nipomo Street, within the Downtown Historic District. The property borders Stenner Creek on the north side, The Odd Fellows Hall on the east, Dana Street on the south, and a private residence to the west. The Rosa Butrón Adobe is the only existing structure on the property. Sited towards the center of the property, the vacant adobe is approximately 2,600 square feet, initially constructed in 1860 with numerous alterations and additions over the course of the twentieth century. The original portion of the building serves as the front façade facing Dana Street.

A [Historic Resource Evaluation Report](#) (HRER) was prepared on behalf of the City by SWCA Environmental Consultants, discussing the history of the property and the adobe. The property's periods of significance of the adobe is described as from 1860-1926 with an outlying period from 1974-1975 ([HRER](#), page 64), along with the property's character-defining features ([HRER](#), page 65) as listed below:

- *Single-story height and rectangular massing;*
- *Rectangular plan with the original adobe construction encapsulated by subsequent wood frame additions;*
- *Prominent front setback from the street with expanse of open space;*
- *Broad, steeply pitched hipped roof with extended, open eaves;*
- *Symmetrical primary façade with recessed porch flanked by two wings;*
- *Extension of the roof along the primary façade to create a porch canopy, supported by regularly spaced wood posts;*
- *Horizontal drop channel siding;*
- *Mixture of deep fenestration openings associated with the original adobe construction and typical wood frame window openings from the late nineteenth and early twentieth centuries;*
- *Double hung wood windows with divided lites and simple sills and trim;*
- *Primary entrance with paneled screen door and divided-lite door;*
- *Secondary entrances with paneled wood doors;*
- *Interior spaces and materials associated with the original adobe construction and transitional period additions, including the main living room (or sala), and immediate adjacent rooms within the main building footprint; and*
- *General rural quality of the landscape with mature trees.*

3.2 Proposed Work

Demolition. As part of the scope of the project, the non-historic wood additions at the rear (North side) of the adobe are slated to be demolished. The proposed project takes into consideration those additions to the original Rosa Butrón Adobe that have since gained significance. Specifically, this includes the flanking wings adjoining the central adobe core of the building, as well as the northwest addition, which was constructed ca. 1906 and falls within the primary period of significance of the property. Other additions at the rear of the building, which were constructed at a later date, were not found in the historic resource evaluation to have attained significance in their own right, nor has the broader landscape of the property, save for the prominent front setback, which is a character-defining feature. As such, the demolition of the rear additions and the redevelopment of the rear and side portions of the property will not alter any element of the property that has gained significance in their own right. ([HRER](#), page 70)

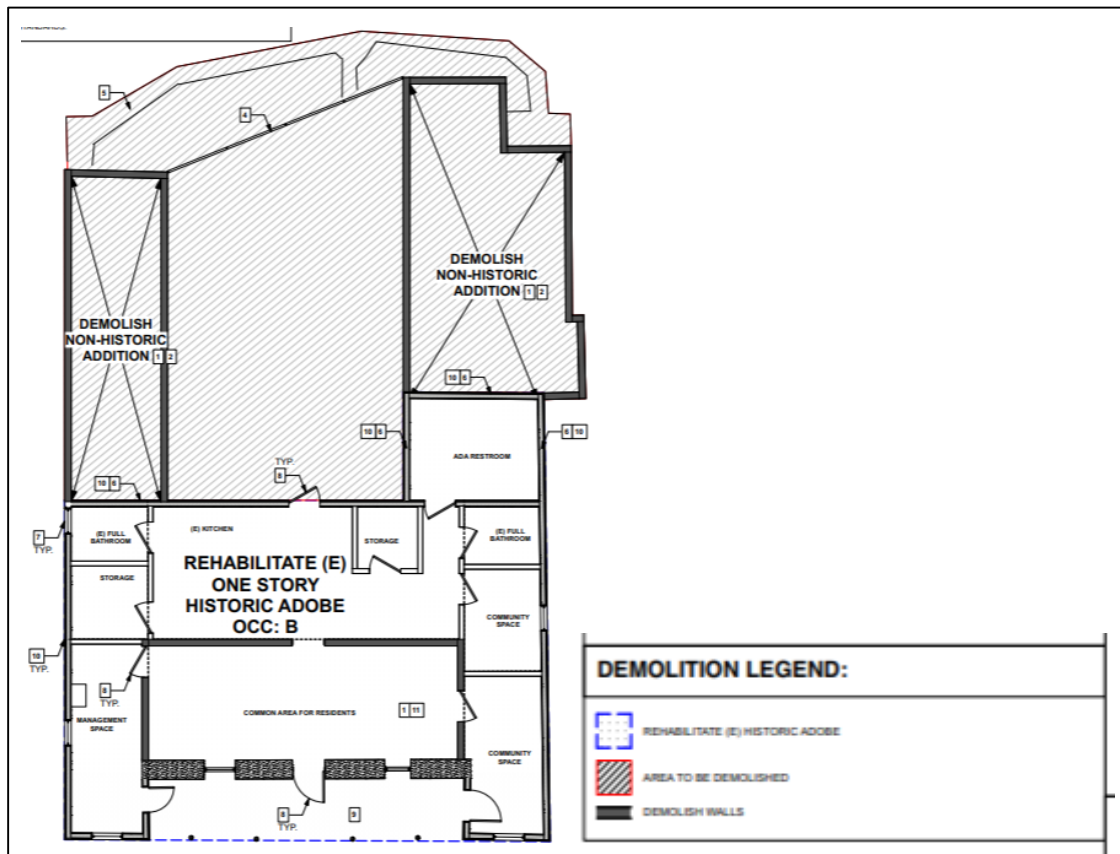


Figure 3: Floor plan from project plans showing the non-historic addition areas to be demolished.

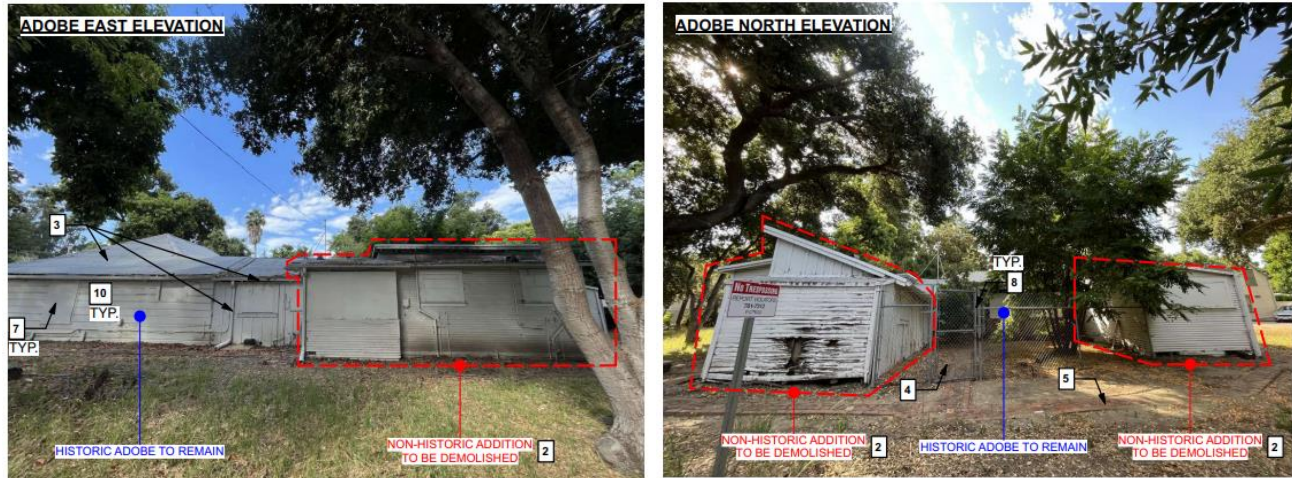


Figure 4: Areas of non-historic significance to be demolished (North and East Elevations)

Adobe Rehabilitation. The [Historic Resource Evaluation Report](#), which evaluated the project proposal and proposed project plans (Attachment A), depict and describe rehabilitation work to be done to the adobe, consisting of:

Exterior Rehabilitation

- Make the necessary repairs to the adobe in a manner consistent with the Secretary of Interior's Standards.
- Roof—remove the roll roofing, plastic gutters and downspouts and faux chimney and frame new roof in original configuration and slope; with adequate strapping to walls, per structural engineer; sheath the new roof with wood shingles, repair chimney and install wood or metal gutters and downspouts.
- Windows—repair existing windows, as possible, and replace windows that cannot be repaired or have been previously removed with exact reproduction wooden sash windows.
- Doors—repair existing doors and hardware, as possible, and replace doors that cannot be repaired with solid panel doors.
- Porch—build a new porch on the south side of the adobe consistent with the original size and framing style. New porch will be of either wood or brick, as consistent with what is determined to be the original material used.
- Exterior walls—a natural plaster finish will be installed on the exterior adobe wall.
- Exterior grading—will be completed around the adobe to create drainage away from the house, per civil engineer's drainage plan (Parker-King 2023).
- Back wall—where patio and shed additions are to be demolished—finishes will be existing windows with wood siding, consistent with existing wood siding.

Interior Rehabilitation

- Floors—pour a new concrete foundation under wood walls, including concrete slab or wood framing to support flooring, and install new wood floors.
- Walls—install a natural plaster finish on the interior adobe walls.
- Fireplace—restore the existing fireplace and mantel.
- Kitchen—update existing kitchen.
- Bathroom—create one ADA bathroom at rear of adobe, in one of the existing two bathroom areas.

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The intent of the rehabilitation work is to preserve the character-defining features of the adobe, and restore the layout, south facade, and roof of the adobe to the conditions present during the period of historical significance. The treatment of these elements is discussed in more detail in section 4.2 of this report below, regarding consistency with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Residential Unit Construction. As depicted in project plans as well as the Historic Resources Evaluation Report, the applicant proposes to construct 20 residential units, 18 units at 220 square feet and 2 ADA-compliant units at 264 square feet in size. Each unit will be installed on pier foundations approximately 36 inches above finished grade to accommodate site requirements in the 100-year flood plain. Units will be accessible via a raised walkway with several stairs and ramps. The units will range from 13'-10" to a maximum height of 18'-8", which will result in only a 3-foot height difference between the tallest units and the adobe. The units will be arranged towards the rear of the property, preserving the adobe's prominence in the primary facade of the property from the street. The exterior finishes for the units consist of hardi-plank siding, wood window surrounds, and sash-style windows. The materials are appropriate and consistent for this portion of the Downtown Historic District and complement the adobe materials while adequately differentiating the units from the adobe.



Figure 3: Architectural rendering of homes sited to the rear and side of the historic adobe (Attachment A)

4.0 EVALUATION

Guidance for rehabilitation to, and new construction associated with, historical resources is provided in the City's Historic Preservation Program Guidelines and the Secretary of the Interior's Standards for the Treatment of Historic Properties. Relevant applicable guidelines, standards, and recommendations from these documents are outlined below.

4.1 Historic Preservation Program Guidelines

Alterations to Historic Resources	
§ 3.4.1 (c) Accessory Structures	New accessory structures should complement the primary structure's historic character through compatibility with its form, massing, color, and materials.
§ 3.4.3 Retention of character-defining features	Alterations of historically-listed buildings shall retain character defining features. New features [...] should be completed in a manner that preserves the original architectural character, form, scale, and appearance of the building.
§ 3.4.4 Exterior building changes	Exterior changes to historically-listed buildings or resources should not introduce new or conflicting architectural elements and should be architecturally compatible with the original and/or prevailing architectural character of the building [...]. Additions to historic buildings shall comply with the Secretary of the Interior's Standards to complement and be consistent with the original style of the structure. Building materials used to replicate character-defining features shall be consistent with the original materials in terms of size, shape, quality and appearance. However, original materials are not required.
§ 3.4.5 Interior building changes	Interior changes to publicly-accessible listed historic buildings whose architectural or historic significance is wholly or partially based on interior architectural characters or features shall preserve and restore significant interior architectural features.

Discussion. The proposed housing units are sited in a manner intended to preserve the integrity and siting of the historic adobe.

Height and Scale

The height and scale of the proposed new construction will be one- to one-and-a-half-story construction that will have a height range of 13 feet 10.75 inches to a maximum height of 18 feet and 8.25 inches. Comparatively, the handful of taller units will only be approximately 3 feet taller than the historic single-story adobe building, and in keeping with the established height of the adjacent low-density residential neighborhood overall.

Massing

The massing of the proposed new construction will be appropriate within the setting of the historic district. The collection of the new construction housing units and their arrangement towards the rear of the historic Rosa Butrón Adobe proposes massing that is visually and subservient to the adobe building, highlighting it as the primary building on the property through its broader massing. The overall smaller massing and siting of the new construction housing units as paired or individual units will evoke the sense of accessory buildings in relation to the massing of the adobe. While this is a departure from the established massing found throughout the adjacent area with larger single-family residences on site, the smaller units within the immediate context of the Rosa Butrón Adobe are appropriate because of this on-site hierarchy, as well as the increased visual permeability by the smaller massing of the new construction. Therefore, the massing of the proposed new construction will be appropriate within this portion of the Downtown Historic District.

Materials, Character Defining and Architectural Features

The hardi-plank siding, wood window surrounds, and sash style windows exhibit a form and character that are sufficiently differentiated but compatible with the historic adobe structure. The rehabilitation of the adobe will preserve character defining features by removing non-contributing additions and restoring the original adobe façade materials to the conditions present during the property's primary period of significance, which is the period between 1860-1926 ([IS-MND](#), page 68).

4.2 Secretary of the Interior's Standards (Rehabilitation)

The following rehabilitation standards and discussion points are summarized from the [Historic Resources Evaluation Report](#) prepared by SWCA:

Rehabilitation Standard 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.

Discussion. The Rosa Butrón Adobe was historically used as a single-family residence. The project will repurpose the adobe building as a multi-purpose room and administrative space, which will not require major changes to the building's materials and spaces. The character-defining front setback of the adobe will be retained, maintaining the visual connection between the primary façade of the adobe with Dana Street. ([HRER](#), page 69).

Rehabilitation Standard 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.

Discussion. The project includes the rehabilitation of the Rosa Butrón Adobe, as well as the construction of new housing units towards the rear and sides of the property. The rehabilitation work on the adobe includes the preservation and repair of character-defining features and materials. The new housing units will not significantly alter the spatial relationships at the property. The front setback and the relationship between the primary

façade and Dana Street is the most significant spatial relationship, which is being preserved through the siting of the housing units towards the rear and sides of the lot. ([HRER](#), page 70)

Rehabilitation Standard 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.

Discussion. The project does not propose adding conjectural features to the historic Rosa Butrón Adobe, nor to the proposed new construction. The adobe will be rehabilitated using an approach that emphasizes the repair of existing historic features and materials wherever feasible, and in-kind materials when materials are found to be beyond repair. The new units will not utilize any conjectural historical elements that create a false sense of historical development. ([HRER](#), page 70)

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

Discussion. The project takes into consideration those additions to the original Rosa Butrón Adobe that have since gained significance. This specifically includes the flanking wings adjoining the central adobe core of the building, as well as the northwest addition, which was constructed in 1906 within the period of significance of the property. The other rear additions, which were constructed at a later date, do not have significance in their own right, nor has the broader landscape of the property, save for the prominent front setback which is a character defining feature. As such, the demolition of the rear additions and the redevelopment of the rear and side portions of the property will not alter any element of the property that has gained significance in their own right. ([IS-MND](#), page 70)

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

Discussion. The proposed project will preserve the distinctive materials, features, finishes, and other elements associated with the historic Rosa Butrón Adobe. The Rehabilitation Plan requires careful attention to the historic elements and materials, with sensitive and appropriate repairs incorporated to the historic adobe walls, wood siding, wood windows, trim, fascia, chimney and fireplace, and other character defining features. ([IS-MND](#), page 71)

Rehabilitation Standard 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.

Discussion. The proposed project and the associated Rehabilitation Plan specifically outlines an approach of repairing historic materials at the Rosa Butrón Adobe using appropriate methods wherever feasible, followed by in-kind or aesthetically matching replacements where materials are either beyond repair or missing. Features and materials specifically referenced include the historic siding, windows, doors, roof, chimney, trim. ([HRER](#), pages 71-72)

Rehabilitation Standard 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.

Discussion. The project does not involve chemical or physical treatments that would damage historic materials. ([HRER](#), page 72)

Rehabilitation Standard 8: Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

Discussion. Mitigation Measures CR-6 and CR-7 in the IS-MND require the applicant to retain a City-qualified archaeologist to develop an Archaeological Monitoring Plan for the project. If cultural resources are encountered during subsurface earthwork activities, all ground-disturbing activities within a 25-foot radius of the find shall cease and work shall not continue until a City qualified archaeologist assesses the find and determines the need for further study. If the find includes Native American-affiliated materials, a local Native American tribal representative will be contacted to work in conjunction with the archaeologist. If the resource is deemed significant under the California Environmental Quality Act, the archaeologist shall prepare and implement a research design and archaeological data recovery plan, in conjunction with locally affiliated Native American representative(s) as necessary, that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analysis, prepare a comprehensive report, and file it with the Central Coast Information Center, located at the University of California, Santa Barbara, and provide for the permanent curation of the recovered materials. ([HRER](#), page 72)

Rehabilitation Standard 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.

Discussion. The project's new construction will be sited towards the rear and sides of the historic Rosa Butrón Adobe following the demolition of the current non-historic additions at the adobe building. While this does involve the removal of materials at the adobe, these are not considered historic and do not have associations with any of the significant historical context, themes, and periods. The new construction utilizes materials which will match the historic aesthetics of the adobe but will be distinctly contemporary and differentiates the housing units from the adobe. ([HRER](#), pages 72-73)

Rehabilitation Standard 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.

Discussion. The new construction on the site of the Rosa Butrón Adobe will be set back from the rear and side of the adobe and will not be connected in any fashion. The units will be set on pier foundations which will minimize impact on the ground. As such, if the units are removed in the future, this would not affect the essential form and integrity of the historic adobe. ([HRER](#), page 73)

Recommended Treatment of Materials

Wood	
<i>Recommended</i>	<i>Not Recommended</i>
Identifying, retaining and preserving wood features that are important in defining the overall historic character of the building (such as siding, cornices, brackets, window and door surrounds, and steps) and their paints, finishes, and colors..	Removing or substantially changing wood features which are important in defining the overall historic character of the building so that, as a result, the character is diminished. Removing a major portion of the historic wood from a façade instead of repairing or replacing only the deteriorated wood, then reconstructing the façade with new material to achieve a uniform or “improved” appearance.
Replacing a deteriorated wood feature or wood siding on a primary or other highly-visible elevation with a new matching wood feature.	Replacing a deteriorated wood feature or wood siding on a primary or other highly-visible elevation with a composite substitute material.

Discussion. Plans depict retention of original wood siding, trim, fascia, chimney, and fireplace, and other wood features, but also note the potential replacement of such features where they may be damaged beyond repair. Where siding may need replacement, it will be matched in dimension, texture, and appearance to the original material. The Historic Resource Evaluation Report notes the consistency of this approach with Guidelines for wood features ([HRER](#), pg. 77).

Windows	
<i>Recommended</i>	<i>Not Recommended</i>
Designing and installing a new window or its components, such as frames, sash, and glazing, when the historic feature is completely missing. It may be an accurate restoration based on documentary and physical evidence, but only when the historic feature to be replaced coexisted with the features currently on the building. Or, it may be a new design that is compatible with the size, scale, material, and color of the historic building.	Creating an inaccurate appearance because the replacement for the missing window is based upon insufficient physical or historic documentation, is not a compatible design, or because the feature to be replaced did not coexist with the features currently on the building.
Replacing a deteriorated wood feature or wood siding on a primary or other highly-visible elevation with a new matching wood feature.	Replacing a deteriorated wood feature or wood siding on a primary or other highly-visible elevation with a composite substitute material.

Discussion. The project plans and rehabilitation scope call for the existing windows to be repaired to the extent possible, and for the replacement of windows that cannot be repaired or have previously been removed with exact reproduction wooden sash windows. The Historic Resource Evaluation Report notes the consistency of this approach with Guidelines for windows ([HRER](#), pg. 77).

Roofs	
<i>Recommended</i>	<i>Not Recommended</i>
Identifying, retaining, and preserving roofs and their functional and decorative features that are important in defining the overall historic character of the building. The form of the roof (gable, hipped, gambrel, flat, or mansard) is significant, as are its decorative and functional features (such as cupolas, cresting, parapets, monitors, chimneys, weather vanes, dormers, ridge tiles, and snow guards), roofing material (such as slate, wood, clay tile, metal, roll roofing or asphalt shingles), and size, color, and patterning.	<p>Removing or substantially changing roofs which are important in defining the overall historic character of the building so that, as a result, the character is diminished.</p> <p>Removing a major portion of the historic roof or roofing material that is repairable, then rebuilding it with new material to achieve a more uniform or “improved” appearance.</p> <p>Changing the configuration or shape of a roof by adding highly visible new features (such as dormer windows, vents, skylights, or a penthouse).</p> <p>Stripping the roof of sound historic material, such as slate, clay tile, wood, or metal.</p>

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Discussion. The project plans and rehabilitation scope call for the existing roll roofing and plastic gutters to be removed, and for a new roof to be framed in the original configuration and slope from the historic period of significance. The new roof will be sheathed with wood shingles, and the chimney will be repaired, with wood or metal gutters installed. The Historic Resource Evaluation Report notes the consistency of this approach with the Guidelines for rehabilitation ([HRER](#), pg. 77).

Related New Construction	
<i>Recommended</i>	<i>Not Recommended</i>
Locating new construction far enough away from the historic building, when possible, where it will be minimally visible and will not negatively affect the building's character, the site, or setting.	Placing new construction too close to the historic building so that it negatively impacts the building's character, the site, or setting.
Designing new construction on a historic site or in a historic setting that it is compatible but differentiated from the historic building or buildings.	Replicating the features of the historic building when designing a new building, with the result that it may be confused as historic or original to the site or setting.
Ensuring that new construction is secondary to the historic building and does not detract from its significance	Adding new construction that results in the diminution or loss of the historic character of the building, including its design, materials, location, or setting. Constructing a new building on a historic property or on an adjacent site that is much larger than the historic building.

Discussion. The proposed housing units are sited in a manner intended to preserve the integrity and character-defining front setback of the historic adobe. The small unit size additionally minimizes the visual impact on the adobe site. The exterior materials of hardiplank siding, wood window surrounds, and sash style windows exhibit a form and character that are compatible with the historic adobe structure while also differentiating their form from the adobe.

5.0 ENVIRONMENTAL REVIEW

The City has completed a [Draft Initial Study and Mitigated Negative Declaration](#) (IS-MND) pursuant to CEQA that has been circulated for review and comment. The Committee is asked to review the Cultural Resources and Tribal Resources sections of this document and provide input to staff. The IS-MND identifies several mitigation measures within this section to be implemented as part of the project. The mitigation measures are found in the Mitigation Monitoring and Reporting Program (Attachment C). These include the requirement for a detailed rehabilitation plan, historic resources training for all construction staff, protection protocols to protect the adobe during construction, and the

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requirement for the applicant to choose a contractor with demonstrated experience preserving and rehabilitating historic resources to the satisfaction of the City. There are also additional mitigation measures requiring the retention of a City-qualified archaeologist to develop an Archaeological Monitoring Plan. With these measures and other mitigation measures incorporated, the City has determined that the project will have a less than significant impact per the requirements of CEQA.

6.0 ACTION ALTERNATIVES

1. Recommend that the Planning Commission find the project consistent with applicable historical preservation policies, standards, and guidelines.
2. Recommend that the Planning Commission find the project inconsistent with historical preservation policies, standards, and guidelines based on specific findings describing the inconsistencies.

6.0 ATTACHMENTS

A - Project Plans (Hunter Smith Architecture)

B - Mitigation Monitoring and Reporting Program