

March 27, 2021

Special Planning Commission Meeting 3-29-21
Item No. C.2 - Public Comment No. 1

From: Fermina and Stephen Murray
442 Danbury Court
Goleta, CA 93117

To: Goleta City Planning Commission
130 Cremona Drive, Suite B
Goleta, CA 93117

Subject: Revisions to the Draft Historic Preservation Ordinance Provisions

Dear Chair Katie Maynard and Commissioners:

We want to sincerely thank Lisa Prasse and Peter Imhof for their diligent work in bringing you the revisions to the Draft Historic Preservation Ordinance Provisions. The revisions address your comments from your last meeting in December 2020.

The Ordinance is a complex matter that is not easily understood by the public when they are granted only ten days to read, digest, and comment on the 60-page Ordinance, staff report and exhibits, let alone make a coherent 3-minute public statement at your meeting on Monday evening, March 29, 2021. The pandemic has made it very difficult to have a face-to-face meeting with City Staff where members of the public could ask questions and provide their knowledge about historic preservation. In other words the majority of Goleta public stakeholders are not fully involved in this draft revision of the Ordinance.

Historic Preservation Commission (HPC) – Additional Discussion

The Staff Report is asking the Planning Commission to reconsider options for an HPC. The report is raising concerns about cost, staff time, and whether there will be sufficient work for an HPC. In addition the Staff asks whether an HPC would have the necessary expertise to function as another City review body. The Report suggests that the HPC's responsibilities could be incorporated into either the Design Review Board or the Planning Commission. We think merging the HPC into some other board or commission would be a serious mistake, and we address this issue in this letter.

A review of the complex revisions to the Draft Ordinance reveals that a Historic Preservation Commission will have a great many responsibilities and duties to perform in its efforts to identify and protect Goleta's cultural and historic resources. The Ordinance foresees the Commission as having particular knowledge, expertise, appreciation, concern, and interest in the history of our community. We are confident that Goleta has many citizens capable of serving on the HPC, and that they will come forward to volunteer their services to the City, as Goletans always have.

The Commission will not be operating in the dark when it comes to fulfilling its duties. It will instead receive constant guidance from the various local, state, and national statutes, standards, procedures, and guidelines that shape and direct historic preservation in the United States. The Ordinance that we are considering incorporates a great many of these same provisions that guide historic preservation at all levels. Examples are the Secretary of Interior's Standards for Treatment of Historic Resources, or from the National Register, the seven Aspects of Historic Integrity that guide the evaluation of the historic significance of a property. In the case of a major alteration or demolition of an historic landmark or significant resource, the Commission would be guided by the California Environmental Quality Act (CEQA).

The City has created a well-thought-out and robust Ordinance for Historic Preservation. However, this Ordinance will be significantly weakened if the Commission charged with implementing and enforcing it is subsumed into the Design Review Board or the Planning Commission. As other members of the public have also argued, the HPC will be weakened even further if it is not granted the authority that makes its decisions binding. Therefore, we strongly urge the Planning Commission to give the Historic Preservation Commission the authority that makes their decisions binding.

Housekeeping Matters:

In our review of the Ordinance we found a few small but important matters that we think you will want to attend to.

- Need to define “major” and “minor” Alterations of historic resources.
- Need procedures to designate properties on the Historic Resources Inventory List to become Landmark or Place of Merit properties. The HPC should have this explicit power, and be the body that meets with property owners to discuss incentives and benefits of having one's property formally designated as place of merit or landmark.
- Add “Place of Merit” status, or another appropriate name, to the categories of historical designations (i.e. Landmark, Historic District, or Point of Historical Interest.) Place of Merit would be a property that does not rise to the level of Landmark but deserves formal protection when possible. This is important because the Ordinance includes the Mills Act, which provides tax benefits to owners who maintain or repair historic properties. To be eligible for Mills Act benefits, the property must be on some kind of recognized designation list. Adding a status like Place of Merit opens up use of the Mills Act to many additional properties other than Landmarks or Historic Districts.

Thank you very much,

Fermina B. Murray, Consultant Historian

Stephen C. Murray, Anthropologist

cc: Lisa Prasse, Current Planning Manager, City of Goleta
Peter Imhof, Planning and Environmental Review Director, City of Goleta
Goleta Valley Historical Society Board of Directors and Advisors
The Goodland Coalition

Ronald L. Nye, Ph.D.
Historian

Special Planning Commission Meeting 3-29-21
Item No. C.2 - Public Comment No. 2

March 28, 2021

Via Email

Goleta City Planning Commission
130 Cremona Drive, Suite B
Goleta, CA 92117

Re: Comments: Revised Draft Historic Preservation Ordinance of March 2021.

Dear Chair Maynard and Planning Commissioners:

Thank you for this opportunity to comment on the City's Revised Draft Historic Preservation Ordinance of March 2021. I appreciate the fact that City staff has revised the prior draft document in response to comments made by the commission and the public. The following are my comments based on my experience as a professional architectural historian and present chair of the Santa Barbara County Historic Landmarks Advisory Commission.

1. *Historic Preservation Commission (HPC) meetings:* I recommend that the HPC meet on a regular schedule once every month instead of once every other month. If there is no business to conduct on a given month, then the HPC would simply not meet. This is less likely to happen, however, if the HPC's preservation mandate encompasses not only a project's potential impacts to listed historic resources but to potential historic resources either on the project site, near the project, in a neighborhood, or in a historic landscape. In this scenario the HPC would review a proposed project prior to DRB review to provide the latter board with helpful guidance in assessing the appropriateness of a given project.

2. *Historic Inventory Resources List (HIRL) Update:* I think that reducing the number of "potential" historic resources on the inventory from 46 to 29 without more in-depth research of the properties, especially if some are not visible from the street, poses risks to possible historic resources that this ordinance is designed to protect. Several of the 46 may indeed not merit listing on the HIRL as a potential resource but we must recognize that these properties were at some point in time recognized by an earlier generation of citizens and deemed important to the history of the community. I have found that such "potential" lists are a very valuable tool in evaluating a property's significance simply because, if nothing else, the property has been flagged by a governing agency and therefore deserves a closer look regarding its possible significance. True, these removed properties may be added to the list over the course of time, but they also might be ignored in the planning process and lost because their "flag" has been removed. Such a listing as "potential" does not impose a burden on property owners, since the property is not considered a historic resource, but does provide a useful tool to community preservation efforts.

3. *HPC responsibilities:* I very strongly urge, in the interests of pursuing a viable preservation program that would inspire pride of place in Goleta citizenry, that a stand-alone HPC be created by the City to administer the draft preservation ordinance presently under discussion. As the

staff memo states clearly, neither the DRB nor PC is qualified to adequately handle such responsibilities. Indeed, the memo continues, six of the seven jurisdictions surveyed established separate HPC-type bodies.

4. *Place of Historic Merit (PHM) designation:* As I have suggested at prior hearings, the City should add an intermediate significance designation to the existing types of designated historic resources. The PHM would designate a property that is not as significant as a Landmark and would not offer the same protections as a Landmark designation, but would nonetheless highlight a property that is worthy recognition for its lesser but nonetheless important contribution as a visual, architectural, or biographical resource to the community. Such a designation would not necessarily prevent demolition, but may often provide the opportunity for City historians, planners, and design review boards to provide preservation-friendly suggestions to project applicants in the interest of neighborhood or design compatibility. Both the city and county of Santa Barbara preservation ordinances include a PHM designation.

5. *HPC Submittal of Nominations:* I support giving the HPC, as a body with the express responsibility of promoting “the protection, enhancement; perpetuation, or use of places, sites, buildings, structures, works of art, and other objects having a special character or special historical or aesthetic interest or value,” the ability to submit applications for designation to the City Council. I can’t imagine a more logical practice, along with the responsibilities already enumerated in the draft ordinance, than allowing historians and preservationists on the HPC to contribute to Goleta’s well being in this manner. The County of Santa Barbara provides this option for its landmarks commission and I would assume that the City of Santa Barbara does as well.

6. *17.33.070, C. Criteria/Procedure for Director Review of Alterations:* Under “1) Required Findings,” letters a. and b., I strongly suggest that more detailed language be inserted to more clearly define the term “minor” alteration. Secondly, under the letters b. and c., is a Director likely to be fluent in the application of the Secretary’s Standards for the Treatment of Historic Properties when evaluating any potential impacts to a historic property? Likewise, is a Director likely to be competent to determine if “the proposed alteration will not diminish, eliminate, or adversely affect the character, character-defining features, or historic integrity of the historic resource.”? If a Director is so qualified, then Goleta will be blessed. As a rule, however, these are guidelines and assessments that for the most part only architectural historians are intimately familiar with and employ on a regular basis. HPC could serve an important role in assisting the City in administering the preservation ordinance if it were to be given a voice in these matters.

I acknowledge and thank the City Planning Commissioners, city staff, and consultants who have put in many hours of labor to bring this momentous preservation ordinance to fruition.

Sincerely,

A handwritten signature in cursive script, reading "Ronald L. Nye".

Ronald L. Nye

From: [CECILIA BROWN](#)
To: [Kim Dominguez](#)
Subject: Revisions to the Draft Historic Preservation Ordinance - PC Special Meeting 3-29-2021
Date: Monday, March 29, 2021 11:53:57 AM

Hi Kim! Hope all is well with you. Would you please forward my letter to the PC for tonights meeting. Ive sent copies to Fermina, Ron Nye and Lissa Prasse. Thank you, Cecilia

Dear Chair and members of the Planning Commission

My comments relate to the proposed composition of the Historic Preservation Committee (HPC).

I think it very important that members of that commission have specific knowledge of and familiarity with standards and issues when reviewing historic and cultural resources. In my experience as both a former DRB member and a Santa Barbara County Planning Commissioner, I believe that including representatives from The DRB and the City's PC to the HPC, who may not necessarily have the above expertise, would not be additive to the HPC's efforts. The City has made great efforts to draft a robust Historic Preservation Ordinance and I think it would be important to have a HPC with "the heft" to carry it out its intentions.

Please query My Nye, who is Chair of SB Countys Historic Landmarks Commission on the scheduling and operation of that Commission, since I believe that City support for the HPC would not be as onerous as is suggested by the staff report.

Thank you for considering my comments.

Cecilia Brown

From: [Amanda De Lucia](#)
To: [Kim Dominguez](#)
Cc: [ferminamurray@gmail.com](#); [Lisa Prasse](#); [Peter Imhof](#); [City Clerk Group](#); [grelles@gmail.com](#); [Barbara Massey](#); [stevemurray1966@yahoo.com](#); [brownknight1@cox.net](#)
Subject: Re: Revisions to the Draft Historic Preservation Ordinance - PC Special Meeting 3-29-2021
Date: Monday, March 29, 2021 12:31:04 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
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[image006.png](#)

Dear Lisa,

I would like the City Council, Planning Commission, and all involved in this important process to know that the Goleta Valley Historical Society has been following this evolution with much interest and enthusiasm. While our focus can clearly be seen at Rancho La Patera & Stow House, our greater mission has always been to collect, preserve, interpret and foster appreciation of Goleta Valley's history in its entirety. I am so pleased we have such capable and experienced people spearheading this effort.

Thank you, Lisa, Fermina Murray, Ron Nye and all of you who have worked so hard on this project! I look forward to hearing the continued discussion.

Cheers,

On Mon, Mar 29, 2021 at 10:16 AM Kim Dominguez <kdominguez@cityofgoleta.org> wrote:

Good Morning Fermina and Steve,

I am in receipt of your Public Comments word document. I will label and distribute the comments to the Chair and members of the Commission. Thank you for your comments.

Best Regards,

Kim Dominguez

Management Assistant

Planning and Environmental Review Department

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Amanda De Lucia
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"For while we have our eyes on the future, history has its eyes on us..." - Amanda Gorman, American Youth Poet Laureate