

5.0 Technical Studies

XX. Cultural Resources – Historical Resources

This section provides detailed information about the contents and requirements for technical studies related to historical resources, as well as guidance on when such studies are required or appropriate. Technical studies should be prepared by professionals meeting the Secretary of the Interior’s Professional Qualifications Standards for History, Architectural History, or Historic Architecture, depending on the study. The following summarizes the types of technical studies that may be needed to support a historical resource analysis. Also included is guidance to planners regarding how to review and determine the adequacy of technical studies.

1. Initial Historical Resource Evaluation Memorandum

a. Background and Applicability

For properties not listed under federal, state, or local landmark and/or district programs (Categories 1 and 2) and not identified as significant in a historic resource survey (Category 3), an Initial Historical Resource Evaluation Memorandum (Initial Evaluation Memo) may be required before concluding a project site and its immediate vicinity do not contain any historical resources.

b. Document Parameters and Contents

The purpose of an Initial Evaluation Memo is to verify whether or not a project site and its immediate vicinity contains any properties listed in federal, state, or local registers of historical resources (Categories 1 and 2) or identified as significant in a historic resource survey such as (but not limited to) SurveyLA (Category 3). Properties may include buildings, structures, objects, sites, and districts. In most cases, the immediate vicinity should be defined as the city block on which the project site is located. Additionally, an Initial Evaluation Memo should determine whether or not the properties comprising a project site appear to meet the relevant eligibility standards, contain character-defining/associative features, and/or appear to meet integrity thresholds set forth in the Los Angeles Citywide Historic Context Statement (LACHCS). Thus, the history of each property on the project site should be provided including a chronology of the construction and the names of associated individuals and occupants. If an Initial Evaluation Memo concludes that one or more properties have the potential to meet the relevant eligibility standards, a full Historical Resource Assessment

Report will be required as discussed below. An Initial Evaluation Memo should include the resume of the evaluator demonstrating they meet the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History. Supporting information may include building permits, historic maps and photographs, and current maps and photographs of the project site. An Initial Evaluation Memo need not include lengthy architectural or physical descriptions, excerpts from the LACHCS, or a full regulatory framework. However, an Initial Evaluation Memo should include the following information:

1. Introduction

- Project Location (with map)
- Brief Project Description

2. Summary of Current Designations and Previous Evaluations

- Identification in Built Environment Resources Directory (BERD)
- Identification in Zoning Information and Map Access System (ZIMAS)
- Identification in SurveyLA
- Identification in CRA Survey
- Identification in Specific Plan

3. Historical Overview of Project Site

- Dates of Construction and Alterations
- Names of Associated Individuals (owners, architects, builders)
- Ownership/Occupant History

4. Evaluation of Eligibility

- Identification of relevant Context(s)/Theme(s)/Property Type from LACHCS
- Brief evaluation of significance under federal, state, and local criteria based upon applicable eligibility standards
- Assessment of integrity, if the property meets eligibility standards under any criteria

5. Recommendations

- Based upon the above, whether the property warrants further consideration and additional analysis as a potential historical resource

6. Attachments

- Resume of Evaluator
- Photographs
- Building Permit Records
- Maps (Sanborn, tract, etc.)
- Other material supporting the recommendations

c. Review Considerations

Although an Initial Evaluation Memo will be brief by design, citations for primary and secondary sources should be provided using a standard reference style such as the *Chicago Manual of Style*. In most cases, the potential for significance should be established before the integrity of a property is analyzed. If a property is determined to be ineligible due to lack of significance, an assessment of integrity is not required.

2. Historical Resource Assessment Report

a. Background and Applicability

In most cases, a Historical Resource Assessment Report (HRAR) will not be required for properties in Categories 1 and 2. A property listed under federal and/or state landmark or district programs (Category 1) must be treated as a historical resource. A property listed under local landmark or district programs (Category 2) are presumed to be historical resources unless a preponderance of evidence demonstrates otherwise. For properties in Categories 1 and 2, a HRAR may be required to update the existing documentation based upon additional research and current standards or to determine the character-defining features for project planning purposes. For properties identified as eligible in a historic resource survey (Category 3), a HRAR may be required to determine if the previous evaluation of eligibility is still valid and if so, to determine the character-defining features. A HRAR may also be required for a property that was not identified in SurveyLA because it is not clearly visible from the public right-of-way or new information is discovered indicating the property may be significant. A HRAR may be prepared separately, or the historical resource assessment may be prepared as part of a Historical Resource Technical Report, as discussed below. If a HRAR concludes a project site and its immediate vicinity do not contain any historical resources, a Historical Resource Technical Report analyzing project impacts will not be required.

b. Document Parameters and Contents

The purpose of a HRAR is to determine if a property is eligible for listing under federal, state, or local landmark and/or district programs and therefore a historical resource defined by CEQA. A property must typically be at least 50 years old to be considered potentially eligible as a historical resource. As development projects have long lead times to construction, a property currently 45 years old will qualify for evaluation as it could become 50 years old by the time a project is completed.

A HRAR should include an executive summary, a brief project description, a summary of current designations and previous evaluations as applicable, a physical description and construction history of the evaluated property including the names of owners, tenants, businesses, architects, builders, etc., and an evaluation of the property as a potential historical resource. The regulatory framework should be based upon the City's Regulatory Framework but may be customized as appropriate. A HRAR should include, but not necessarily be limited to:

1. Table of Contents
2. Executive Summary
3. Introduction
 - Project Location (with map)
 - Brief Project Description
 - Geographic Scope
 - Summary of Current Designations and Previous Evaluations
 - Methodology – Research Techniques and Field Studies
 - Qualifications of Evaluator (with resume attached)
4. Regulatory Framework
 - Federal Regulations
 - State Regulations
 - City Regulations
5. Environmental Setting
 - Brief History of the Area

- Property Description and History
- Architectural Description, including photographs
- Construction History, including alterations
- Ownership/Occupant History

6. Historic Contexts

7. Evaluation of Eligibility

- Significance
 - National Register
 - Criterion A
 - Criterion B
 - Criterion C
 - Criterion D
 - California Register
 - Criterion 1
 - Criterion 2
 - Criterion 3
 - Criterion 4
 - HCM
 - Criterion 1
 - Criterion 2
 - Criterion 3
- Integrity, if appropriate
- Character-Defining Features, if appropriate

8. Conclusions

9. References

10. Appendices

- California Department of Parks and Recreation (DPR) Forms
- Building Permit Records

A HRAR should generally be outlined as indicated above because a property is most efficiently and effectively evaluated when this sequence is followed. Citations for primary and secondary sources should be provided using a standard reference style such as the *Chicago Manual of Style*.

c. Documentation Instructions

The following instructions should be followed in preparing HRARs:

Geographic Scope - The geographic scope of a HRAR should be defined, justified, and mapped. Only properties on the project site will require evaluation as potential historical resources. Properties in the immediate vicinity do not require evaluation; however, currently listed and previously surveyed historical resources should be identified. In most cases, the immediate vicinity should be defined as the city block on which the project site is located.

Summary of Current Designations and Previous Evaluations - A HRAR should summarize current designations and previous evaluations. As previously stated, currently designated properties on a project site will not require re-evaluation in most cases. Previous evaluations of eligibility should be reviewed for consistency with current standards. Properties evaluated more than five years ago may require re-evaluation to account for new information and physical changes.

This section may present the findings of a records search through the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The correspondence from the SCCIC need not be attached; however, the date of the request or search should be included, and the results should be summarized. Otherwise, a HRAR should include the list of historical resource databases consulted and should minimally include the Built Environment Resources Directory (BERD) managed by the State Office of Historic Preservation and HistoricPlacesLA managed by the Los Angeles Office of Historic Resources.

Methodology - The methods used in the preparation of a HRAR may be included as a narrative or as a bulleted list. The methods should explain when and who conducted the field survey of the project site and any limitations they may have encountered. Access to interior spaces is preferred, but not necessarily required for the evaluation of a property. Lack of access to interior spaces should not prevent the property from being fully evaluated in most cases. Based upon the field survey, a HRAR should explain if the property will be evaluated individually as a building, structure, object, or site, as a component of a district, or both. The

research techniques used in the preparation of a HRAR should be discussed, such as the repositories, archives, historical societies, etc., consulted and/or contacted.

Qualifications - A HRAR should be prepared by professionals meeting the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History. Stating the name of a cultural resource management firm is not sufficient evidence the evaluator meets the qualifications. The name of the person(s) who prepared the HRAR must be provided and their resume(s) demonstrating that they meet the qualifications must be attached.

Regulatory Framework - The evaluator is encouraged to use the City's Regulatory Framework, which may be customized as appropriate. For example, regulations pertaining to districts do not need to be included if a HRAR does not involve the identification or evaluation of any districts. Alternatively, if the property type being evaluated is among those usually excluded from the National Register, the relevant Criteria Considerations should be included.

Brief History of the Area - A brief history of the area should be included. In most cases, this may be adapted from the Historic Resource Survey Reports for SurveyLA, which were prepared for each Community Plan Area. It should be explicitly understood that the history of the area is not considered a historic context. The only exception would be the pre-consolidation communities of Los Angeles where the history of the area will overlap with the context and theme in the LACHCS.

Property History and Description - The history and description of the property should include a physical description, a construction history, and an ownership and occupancy history. The information may be presented as appropriate depending on the size and complexity of the property, the number of properties being evaluated, and the type of property being evaluated. HRARs should address interior spaces that are accessible to the public with demonstrated potential for historical or architectural significance such as a hotel, recording studio, or auditorium. HRARs involving the evaluation of districts do not need to include a detailed physical description of each component but must include dates of construction and alterations, photographs, and maps. Historic and current photographs and maps may be included in the body of a HRAR or in the appendices.

Historic Context - As discussed above, the history of the area and the history of the property are not historic contexts, because they are not frameworks for the evaluation. Evaluations must be based upon the eligibility standards, character-defining/associative features, and integrity thresholds in the LACHCS. The contexts, themes, and property types from the LACHCS should be referenced, but lengthy excerpts are discouraged. Contexts and themes cover both individual property types, as well as districts. A property may be significant under more than one context/theme combination and evaluators should use all that apply. The applicable eligibility standards, character-defining/associative features, and integrity thresholds should be included in a HRAR, preferably in a user-friendly table format.

The eligibility standards, character-defining/associative features, and integrity thresholds are guidelines and evaluators should use their professional judgment. Properties do NOT need to meet ALL eligibility standards and possess ALL character-defining/associative features to be eligible; these are guidelines based on knowledge of known significant examples of property types. Integrity thresholds are guidelines for assessing integrity within a specific context/theme. There are many variables to consider in assessing integrity depending on WHY a resource is significant. For more information, see the SurveyLA Guide for Professionals Using the Historic Context Statement for Property Evaluations.

Evaluation of Eligibility - The subject property must be evaluated under all four criteria for listing in the National Register (Criteria A, B, C, and D) and California Register (Criteria 1, 2, 3, and 4) as well as all three criteria for HCM (Criteria 1, 2, and 3) designation (see Table 1). A HRAR may combine the evaluation of the property under the National and California Registers for efficiency. However, this may not be an appropriate approach for property types usually excluded from the National Register where there are relevant Criteria Considerations to apply. Furthermore, a property ineligible for listing in the National and California Register may still be eligible for HCM designation. Thus, evaluators are encouraged to prepare separate evaluations for each program.

Criterion A/1/1—To be eligible for listing under Criterion A/1/1, a property must have a direct association with events that have made a significant contribution to the broad patterns of our history. However, mere association with historic events or trends is not enough, in and of itself to qualify under Criterion A/1/1. The property's specific association must be considered important as well. The context(s) and theme(s) from the LACHCS considered in the evaluation of eligibility under Criterion A/1/1 must be stated.

Criterion B/2/2—To be eligible for listing under Criterion B/2/2, a property must be associated with the lives of persons significant in our past. Several steps are involved in determining whether a property is significant under Criterion B/2/2. First, the person must be significant within a historic context. Second, the property must be associated with the person's productive life. Finally, the property must be compared with other associated properties to identify the best representation of the person's historic contributions. The context and theme in which the person is being evaluated must be drawn from the LACHCS. Persons involved in designing and constructing the property should be addressed under Criterion C/3/3, not Criterion B/2/2.

Criterion C/3/3—To be eligible for listing under Criterion C/3/3, a property must embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction. Each of these components of Criterion C/3/3 must be addressed in a HRAR.

A type, period, or method of construction refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. This component of Criterion C/3/3 encompasses all architectural styles and construction practices. A building or structure is eligible as an architectural type specimen if it is an important example of construction practices from a particular period in history.

A master is a figure of generally recognized greatness in a field of design or construction such as architecture, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The use of terms such as “noted” or “prominent” are not appropriate for the evaluation of a property under this component of Criterion C/3/3. If the subject property was designed by an architect, a HRAR must state if they meet the definition of a master. If not, further analysis is not required. If so, the property must express a particular phase in the development of the master’s career, an aspect of his or her work, or a particular idea or theme in his or her craft. A property is not eligible as the work of a master, simply because it was designed by a noted or prominent architect.

The possession of high artistic values refers to a property’s articulation of a particular concept of design so fully that it expresses an aesthetic ideal. A property does not possess high artistic values, however, if it does not express aesthetic ideals or design concepts more fully than other properties of its type. Thus, a comparative analysis is essential to the evaluation of a property under this component of Criterion C/3/3.

The last aspect of Criterion C/3, representing a significant and distinguishable entity whose components lack individual distinction, refers to districts. A district must be significant, as well as being an identifiable entity. Thus, an eligible district must meet this component of Criterion C/3, as well as Criterion A/1, Criterion B/2, Criterion D/4, or other components of Criterion C/3. The evaluation of local districts will utilize the criteria in the Historic Preservation Overlay Zone (HPOZ) Ordinance. A HRAR should state if the area in which the property is located was identified as a potential district by SurveyLA. The field survey conducted for a HRAR should determine if there are enough properties with shared physical characteristics or historical associations in the area to form a potential district. Historic districts are discussed in more detail below.

Criterion D/4—Criterion D/4 generally applies to archaeological sites but may apply to buildings and structures in instances where the property may contain important information about topics such as construction techniques or human activity. In any case, the property must be the principal source of information. If appropriate, a HRAR may refer to a separate Phase I Archaeological Survey or other studies.

TABLE 1: COMPARISON NATIONAL, STATE, AND LOCAL CRITERIA

Significance	National Register Criteria	California Register Criteria	HCM Criteria
Event	Criterion A	Criterion 1	Criterion 1
Person	Criterion B	Criterion 2	Criterion 2
Design or Construction	Criterion C	Criterion 3	Criterion 3
Information Potential	Criterion D	Criterion 4	N/A
Age	If not 50 years of age, exceptional significance must be demonstrated	If not 50 years of age, understanding of historical importance can be demonstrated	No particular age threshold

Period of Significance—If a property is ineligible due to lack of significance, an assessment of integrity is not required. If a property meets one or more of the criteria for significance, an assessment of integrity is required, which means the period of significance should be identified. In the case of architecturally significant properties (Criterion C/3/3), the period of significance is typically the date (or range of dates) of construction. For historically significant properties (Criterion A/1/1 or B/2/2), the period of significance is usually measured by the length of the association(s).

Integrity—If a property is eligible under any of the federal, state, or local criteria, an assessment of integrity will be necessary. The assessment should be based upon the National Register’s seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. A property may not retain sufficient integrity to meet the criteria for listing in the National Register but may still be eligible for listing in the California Register. An altered property may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.¹ Therefore, in most cases the evaluation for listing in the National and California Registers will reach the same conclusion. Los Angeles regulations regarding Historic-Cultural Monuments (HCM) do not have an integrity standard; therefore, a property ineligible for listing in the National and California Registers for lack of integrity may still be eligible for designation as an HCM.

The significance of a property must be established before the integrity may be analyzed and, thus, an assessment of integrity must always follow the evaluation of significance using the established criteria. Why, when, and where a property is important will determine the physical features that must be present to convey significance. The assessment of integrity must be based upon the current state of a property, not how it appeared historically or its potential for restoration.

¹ Title 14 California Code of Regulations § 4852 (c).

The assessment of integrity often involves a comparative analysis. In other words, the evaluator should understand the general extent of alterations common to each property type—especially for types that are rare. Conversely, properties that are ubiquitous should retain all, or nearly all, of their physical features to qualify for listing. As a property either retains integrity or not, evaluators should avoid conclusions like a property has good or bad integrity or high or low integrity. Furthermore, integrity should not be confused with condition.

Table 2 provides a general application for determining which aspects of integrity are essential based upon significance and property type. However, the relevant integrity thresholds in the LACHCS should always be used as the starting point. Most property types significant under Criterion A/1/1 should retain integrity of location, materials, feeling, and association. Integrity of design and workmanship are less important for properties that are historically significant (Criterion A/1/1 and B/2/2). Integrity of location may be crucial for a property that was the site of a historic event, but not for a property that is an excellent example of a particular architectural style. High priority is typically placed on integrity of design, materials, and workmanship for properties significant under Criterion C/3/3. All properties change over time and properties do not need to be unaltered to retain all aspects of integrity. If materials have been replaced in kind because they were deteriorated beyond repair, a property will still retain integrity of materials, but the integrity of workmanship may be lost if the construction techniques were evocative of the period.

Assessing the integrity of a building as a contributor to a district is often different from assessing the integrity of a building as an individual resource. For example, alterations such as window replacement may be acceptable for a contributing building to a district but less so for a building individually significant as the work of a master architect.

Integrity of setting principally refers to the physical features within the boundary of a property but may also include the larger surroundings. However, in urban areas such as Los Angeles, the broad setting has often been changed by development that postdates the period of significance for the subject property. Thus, changes to the surrounding area should only factor into the assessment of integrity if the broad setting is essential to the understanding of the property.

Condition and integrity are two different concepts. Condition refers to the physical state of a property and is usually assessed as good, fair, or poor. HRARs do not require condition assessments. A property in good condition may be ineligible due to lack of integrity if alterations were not in keeping with its historic character. Alternatively, a property in poor condition may retain all aspects of integrity if it is substantially unaltered. Thus, poor condition should not be used as justification for evaluating a property ineligible as a historical resource.

TABLE 2: ASPECTS OF INTEGRITY MATRIX—GENERALIZED APPLICATION					
Criteria	Building	Structure	Object	Site	District
A/1—Event	Location Materials Feeling Association	Location Materials Feeling Association	Location Materials Feeling Association	Location Materials Feeling Association	Location Setting Feeling Association
B/2—Person	Location Design Feeling Association	Location Design Feeling Association	Location Design Feeling Association	Location Setting Feeling Association	Location Setting Feeling Association
C/3—Design or Construction	Design Workmanship Materials Feeling	Design Workmanship Materials Feeling	Design Workmanship Materials Feeling	Setting Design Materials Feeling	Setting Design Materials Feeling
D/4—Information Potential	Workmanship Materials	Workmanship Materials	Workmanship Materials	Location Materials	Location Materials

Historic Districts - The methodology for a HRAR should consider whether a property requires evaluation individually as a potential historical resource, as a component of a district, or both. A district is a property that possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. Generally, a concentration means the majority of the components will contribute to the significance; however, every district is unique and there are no quantitative guidelines or standards for the necessary ratio of contributing to noncontributing components. To be eligible for listing in the National Register, a district must meet the last aspect of Criterion C “a significant and distinguishable entity whose components may lack individual distinction” as well as other aspects of Criterion C or Criterion A. Criterion B rarely applies to districts, while Criterion D may apply to districts that are archaeological resources. To be eligible for listing in the California Register, evaluators should use the same guidance for the National Register. The evaluation of local districts will utilize the criteria in the HPOZ Ordinance. If a property is located in an area that has no potential to qualify as a district, a HRAR should state the potential for a district was considered but rejected.

Character-Defining Features - When a HRAR evaluates a property as an eligible historical resource, the character-defining features should be identified. Character-defining features are distinctive, tangible elements and physical features that convey a resource’s historic appearance and are indispensable to conveying its historic significance. Character-defining features can be generally grouped into three categories: overall visual character (which can include site and setting), exterior materials, design elements, and craftsmanship, and in some cases, interior spaces, features, and finishes. The relative importance of character-defining features depends on the level of quality, visibility, and integrity. The level of effort in the identification of character-defining features will depend on the nature of the proposed project. In some cases, the character-defining features may be summarized as a

bulleted list and in other cases more detailed analysis illustrated with photographs and plans may be required.

Appendices - A HRAR should include a location map, current photographs of the property showing multiple views of buildings and structures, diagrams, and historic maps and photographs, if available, in the body of the report or as appendices. It may or may not be necessary to attach secondary source materials or the entire building permit record. It may be appropriate to attach selected permits, such as those for the original construction or alterations that have in some way changed the historic character of the building, or to summarize the building permit record in the form of a table.

DPR Forms - Evaluations should be recorded on California Department of Parks and Recreation (DPR) 523 forms A (Primary Record) and B (Building, Structure, Object Record), if they do not already exist. If they do exist, they may be included as an appendix and the updated evaluation may be documented on a Continuation Sheet. When a HRAR identifies an eligible historic district, it is not necessary to complete DPR 523 A forms for every property. A single DPR 523 A and DPR 523 D (District Record) for the district is sufficient.

d. Review Considerations

The following considerations should be used by planners in reviewing HRARs:

TABLE 3: REVIEW CONSIDERATIONS FOR HRARS	
Geographic Scope	
Does the report clearly state the geographic scope?	
<input type="radio"/> Yes <input type="radio"/> No	
Qualifications	
Does the evaluator(s) meet the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History? Are resumes attached?	
<input type="radio"/> Yes <input type="radio"/> No	
Summary of Current Designations and Previous Evaluations	
Did the evaluator check the basic historical resource databases and online sources including the BERD, ZIMAS, and HPLA?	
<input type="radio"/> Yes <input type="radio"/> No	
Regulatory Framework	
Does the report contain the relevant regulatory framework for the evaluation of the subject property?	
<input type="radio"/> Yes <input type="radio"/> No	

TABLE 3: REVIEW CONSIDERATIONS FOR HRARS	
Methodology	
Did the evaluator conduct an intensive physical inspection of the property?	<input type="radio"/> Yes <input type="radio"/> No
Does the report clearly state if the property will be evaluated individually as a building, structure, site, or object or as a component of a district, or both?	<input type="radio"/> Yes <input type="radio"/> No
Does the report include a description and history of the subject property?	<input type="radio"/> Yes <input type="radio"/> No
Does the report include a map(s) of the project site and/or study area?	<input type="radio"/> Yes <input type="radio"/> No
Does the report include current photographs of the project site?	<input type="radio"/> Yes <input type="radio"/> No
Historic Context(s)	
Does the report identify and summarize all of the relevant contexts and themes from the LACHCS?	<input type="radio"/> Yes <input type="radio"/> No
Evaluation of Eligibility	
Was the property evaluated in the sequence recommended by NPS?	<input type="radio"/> Yes <input type="radio"/> No
Was the property evaluated under all four criteria for listing in the National Register (Criteria A, B, C, and D) and California Register (Criteria 1, 2, 3, and 4) as well as all three criteria for HCM (Criteria 1, 2, and 3) designation?	<input type="radio"/> Yes <input type="radio"/> No
Were the relevant eligibility standards from the LACHCS cited and applied?	<input type="radio"/> Yes <input type="radio"/> No
Were the relevant guidelines from the National Register Bulletins cited and applied?	<input type="radio"/> Yes <input type="radio"/> No
If the property was found significant under one more criterion, was the period of significance identified and was the integrity assessed?	<input type="radio"/> Yes <input type="radio"/> No
Were the relevant integrity thresholds from the LACHCS cited and applied?	<input type="radio"/> Yes <input type="radio"/> No

3. Historical Resource Technical Report

a. Background and Applicability

The purpose of a Historical Resource Technical Report (HRTR) is to identify historical resources on or in the immediate vicinity of a project site, analyze the potential impact(s) a project may have on the identified historical resource(s), and recommend mitigation measures, as warranted. A HRTR may include the evaluation of properties as potential historical resources or may summarize the significance, integrity, and character-defining features of listed and/or previously surveyed and evaluated historical resources. If the HRTR includes the evaluation of properties as potential historical resources, all of the information contained in a HRAR discussed above should be included.

b. Document Parameters and Contents

In addition to identifying historical resources, a HRTR will analyze the direct, indirect, and cumulative impacts based upon the Appendix G Thresholds of Significance (see [Chapter 4.XX Cultural Resources - Historic Resources, Section 7, Impact Analysis](#)). If a project would result in a significant impact on historical resources, a HRTR should recommend mitigation measures that would avoid or lessen the impact. A HRTR will include, but is not necessarily limited to:

1. Table of Contents
2. Executive Summary
3. Introduction
 - Project Location (with map included)
 - Project Description
 - Project Design Features, if appropriate
 - Regulatory Measures to be Implemented as Part of the Project, if appropriate
 - Impact Area (with map included)
 - Methodology
 - Qualifications of Evaluator (with resume attached)
4. Regulatory Framework
 - Federal Regulations

- State Regulations
 - City Regulations
5. Environmental Setting
 - Brief History of the Area
 - Summary of Current Designations and Previous Evaluations (with documentation attached)
 - Summary of HRAR Findings (with DPR forms attached)
 - Or all of the information contained in a HRAR, discussed above
 6. Project Impacts
 - Thresholds of Impacts on Historical Resources
 - Analysis of Project Impacts
 - Recommended Alternatives, if appropriate
 - Recommended Mitigation Measures, if appropriate
 7. Conclusions
 8. References
 9. Appendices

c. Documentation Instructions

The following instructions should be followed in preparing HRTRs:

Project Description - The impacts analysis will be based upon the project description and entitlement submittals provided by an applicant. A HRTR may include the project description in its entirety or summarize the aspects of the project that have the potential to impact the identified historical resources. Documents included with the entitlement application such as conceptual plans used to inform the impacts analysis may be included as an appendix; otherwise, the name, date, and source of documents should be explicitly referenced in a HRTR.

Impact Area - A HRTR should analyze the direct and indirect impacts from the construction and operation of the proposed project. The analysis should define and justify the geographic scope of the area that could be affected by the project. In determining the Impact Area, three factors should be considered: (1) the existing setting of the project site, (2)

the scale and nature of the proposed project, (3) and the impacts the project could have on historical resources, if such resources exist. The Impact Area may be limited to the project site if the scale and nature of the proposed construction is similar to the existing setting. If that is not the case, the Impact Area may be expanded to include the entire city block on which the project site is located, adjacent parcels, and parcels on opposite block faces. The Impact Area may be delineated as a uniform radius from the center of the project site but should rarely exceed a one-block or 1,000-foot distance.

Methodology - The methods used in the preparation of a HRTR may be included as a narrative or as a bulleted list. The methods will depend on whether a HRTR identifies listed and/or previously surveyed and evaluated historical resources or also includes the evaluation of properties on the project site as potential historical resources.

Qualifications - A HRTR should be prepared by professionals meeting the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History. Stating the name of a cultural resource management firm is not sufficient evidence the evaluator meets the qualifications. The name of the person(s) who prepared the HRTR must be provided and their resume(s) demonstrating that they meet the qualifications must be attached.

Regulatory Framework - The preparer is encouraged to use the City's Regulatory Framework, which may be customized as appropriate. For example, regulations pertaining to districts do not need to be included, if a HRTR does not involve the identification or evaluation of any districts. Alternatively, if the property type identified or evaluated is among those usually excluded from the National Register, the relevant Criteria Considerations should be included.

Environmental Setting - A HRTR must identify the historical resources on or in the immediate vicinity of a project site that could be affected by the proposed project. The environmental setting will include a brief history of area and a summary of listed and/or previously surveyed and evaluated historical resources. This section may include the results of a field survey and archival research conducted to fill gaps in the existing documentation. For example, older documentation may not have identified the character-defining features of the historical resource, which may be required for the analysis of project impacts. Current and historic photographs and maps may be included in the body of a HRTR or in the appendices. If a HRTR also includes the evaluation of properties on the project site as potential historical resources, this section will contain all of the information contained in a HRAR.

Project Impacts - A HRTR will analyze the direct, indirect, and cumulative impacts based upon the Appendix G Thresholds of Significance (see [Chapter 4.XX Cultural Resources - Historic Resources, Section 7, Impact Analysis](#)). If appropriate, a HRTR should reference regulatory measures and project design features implemented as part of the

project. If a project would result in a significant impact on historical resources, a HRTR should recommend mitigation measures that would avoid or lessen the impact. If appropriate, a HRTR should reference (but not analyze) related topics addressed in other sections of the environmental review document such as Aesthetics and Views, Noise and Vibration, and other Cultural Resource types such as archaeological and tribal resources. A HRTR should not duplicate or recommend mitigation measures that are addressed in related technical reports. The adoption of mitigation measures is within the purview of the lead agency.

Conclusions - For larger projects with multiple historical resources identified and/or complex projects with various components, the preparer is encouraged to summarize the conclusions in the form of a table with the name of the historical resource identified, the type of impact (direct, indirect, cumulative) impact that was analyzed, and the level of impact determined.

Appendices - A HRTR that summarizes currently listed and previously surveyed historical resources or evaluations of historical resources in a HRAR should include the associated documentation such as national, state, and local landmark nomination forms and DPR forms.

d. Review Considerations

The following considerations should be used by planners in reviewing HRTRs:

TABLE 4: REVIEW CONSIDERATIONS FOR HRARS	
Potential Impact Area	
Does the report clearly define the geographic scope of the potential for impacts on historical resources? Is a map attached?	
<input type="radio"/> Yes <input type="radio"/> No	
Qualifications	
Does the preparer(s) meet the Secretary of the Interior's Professional Qualifications Standards for History and/or Architectural History? Are resumes attached?	
<input type="radio"/> Yes <input type="radio"/> No	
Regulatory Framework	
Does the report contain the relevant regulatory framework for the identification and/or evaluation of properties on or in the vicinity of the project site?	
<input type="radio"/> Yes <input type="radio"/> No	
Environmental Setting	
Does the report include a brief history of the area?	
<input type="radio"/> Yes <input type="radio"/> No	

TABLE 4: REVIEW CONSIDERATIONS FOR HRARS
<p>Did the preparer correctly identify the listed and/or previously surveyed and evaluated historical resources using the basic databases and online sources including the BERD, ZIMAS, and HPLA?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>Are the associated documents such as national, state, and local landmark nomination forms and DPR forms attached?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>Does the report include current photographs of the project site?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>Project Impacts</p>
<p>Does the report clearly state the threshold of significant impacts on historical resources in Appendix G of the State CEQA Guidelines?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>Is the analysis based upon the threshold of significant impacts on historical resources in Appendix G of the State CEQA Guidelines?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>Does the report analyze direct, indirect, and cumulative impacts on the identified historical resources?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>Does the report make a clear determination if the project will result in no impact, less than significant impact, less than significant impact with mitigation, significant impact?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>Mitigation Measures</p>
<p>Are the recommended mitigation measures commensurate with the nature of the historical resource and the action that will impact it?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>Are the recommended mitigation measures performance based?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>

4. Secretary of the Interior's Standards Compliance Report

a. Background and Applicability

A Secretary of the Interior's Standards Compliance Report (SOIS Compliance Report) may be applicable to projects involving alterations to historical resources listed under federal, state, or local landmark and/or historic district programs (Categories 1 and 2) or identified as

significant in a historic resource survey or HRAR (Category 3). A project will qualify for a Class 31 Categorical Exemption if (1) the proposed work is limited to the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of an historical resource; and (2) is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards).

Planners may review minor projects for compliance with the Standards. Minor projects encompass scopes of work such as maintenance, repair, obvious restoration, small additions, and other similar activity. A SOIS Compliance Report should be prepared by professionals meeting the Secretary of the Interior's Professional Qualifications Standards for Architectural History and/or Historic Architecture with demonstrated experience in the rehabilitation of historic buildings.

b. Document Parameters and Contents

A SOIS Compliance Report should include the qualifications of the reviewer in the interpretation and application of the Standards, a basic project description, and a summary of the significance, integrity, and character-defining features of the subject historical resource as well as the appropriate treatment, i.e., Preservation, Rehabilitation, Restoration, or Reconstruction. Although not every Standard will apply to every project, a SOIS Compliance Report should provide a point-by-point analysis and reference the Guidelines for Rehabilitation, in most cases, and Preservation Briefs published by the National Park Service (NPS), as appropriate. Conceptual or schematic design plans may not contain sufficient information or details to demonstrate compliance with the Standards. However, a SOIS Compliance Report based upon preliminary plans may be appropriate for a Mitigated Negative Declaration (MND) or Sustainable Communities Environmental Assessment (SCEA). Typically, construction documents with notes and specifications for the treatment of character-defining features will be required to demonstrate compliance with the Standards. A SOIS Compliance Report need not attach a full set of plans; however, a report must provide the name of the architecture and/or engineering firm and the date the plans were issued. If a project does not comply with the Standards, a SOIS Compliance Report should include recommendations for changing the plans to bring the project into compliance. Thus, a project may require more than one report before a Class 31 Categorical Exemption may be issued. If the changes are not made, the project may require the preparation of a MND, SCEA, or Environmental Impact Report. A SOIS Compliance Report will include, but not necessarily limited to:

1. Introduction

- Purpose
- Summary Statement of Significance and Integrity
- Qualifications of Reviewer (with resume attached)

2. Methodology

- Field Studies, if applicable
- Consultation with Design Team, if applicable
- Relevant Documents such as Historic Structure Report (HSR), if applicable

3. Character-Defining Features

- Overall Visual Character
- Exterior Materials, Design Elements, and Craftsmanship
- Interior Spaces, Features, and Finishes

4. Project Description

5. Standards Analysis

6. Recommendations and Conclusions

c. Documentation Instructions

Introduction - A SOIS Compliance Report should begin with a statement of its purpose. If the purpose is compliance with a condition of approval or mitigation measure for a previously approved project, the case number should be provided. The purpose of a SOIS Compliance Report may also be qualification for a Class 31 Categorical Exemption that demonstrates the subject historical resource will not be adversely affected by the proposed project.

As a SOIS Compliance Report is appropriate for properties already identified as historical resources, an evaluation for listing under federal, state, or local landmark programs is not required. However, the significance and integrity of the property should be summarized based upon the landmark nomination form, as appropriate.

A SOIS Compliance Report should be prepared by professionals meeting the Secretary of the Interior's Professional Qualifications Standards for Architectural History and/or Historic Architecture with demonstrated experience in the rehabilitation of historic buildings. Stating the name of a cultural resource management firm is not sufficient evidence the reviewer meets the qualifications. The name of the person(s) who prepared the SOIS Compliance Report must be provided and their resume(s) demonstrating that they meet the qualifications must be attached.

Methodology - A site visit may or may not be required for the preparation of a SOIS Compliance Report. If the reviewer is already familiar with the historical resource because

they prepared the landmark nomination, HRAR, or HSR, another field survey may be unnecessary. Otherwise, a site visit should be conducted. Reviewers are encouraged to consult with the project design team to answer questions and provide guidance in advance. The design process including approaches that were considered but rejected and any special challenges should be discussed in a SOIS Compliance Report. If an HSR or similar document has been prepared that identified the character-defining features, assessed their conditions, and made recommendations for their treatment, it should be referenced and attached.

Character-Defining Features - A SOIS Compliance Report should identify the character-defining features based upon NPS *Preservation Brief #17: Architectural Character Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character*. Character-defining features are distinctive, tangible elements and physical features that convey a building's historic appearance and are indispensable to conveying its historic significance. Character-defining features can be generally grouped into three categories: the overall visual character of a building; the exterior materials and craftsmanship; and the interior spaces, features, and finishes. The relative importance of character-defining features depends on their level of quality, visibility, and integrity. Primary character-defining features are considered the most important elements contributing to the significance of the building, while secondary features are considered less important.

A primary feature dates from the period of significance, and also demonstrates most, if not all, of the following:

- It directly relates to the original use, type, and style
- It retains integrity, with no or only minor alterations
- It displays craftsmanship
- It is highly visible from the public right-of-way
- It is a space or series of spaces that were originally accessible to the public

A secondary feature dates from the period of significance, but also demonstrates one or more of the following:

- It has been altered since the end of the period of significance, but retains integrity overall
- It directly relates to the original use, but is also utilitarian in design and/or included in the design only to serve a necessary purpose
- It is less or not visible from the public right-of-way

- It is a space or series of spaces that were originally private or semi-private and not generally accessible to the public

The level of effort in the identification of character-defining features will depend on the nature of the proposed project. In some cases, the character-defining features may be presented as a bulleted list and in other cases more detailed analysis illustrated with photographs and plans may be required. Character-defining features identified in an HSR or HRAR may be referenced and summarized, if applicable.

Project Description - A SOIS Compliance Report should include a description of the proposed rehabilitation work based upon the drawings as well as other documents such as conditions assessment reports and specifications. The description should specifically include a discussion of features and materials that will be removed or added. Whether the work is voluntary or required by code should also be discussed.

Standards Analysis - The Standards were issued by NPS and are accompanied by Guidelines for four types of treatments: Preservation, Rehabilitation, Restoration, and Reconstruction. The most common treatment is rehabilitation. Rehabilitation is defined as “the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.”² The Standards for Rehabilitation assume that at least some repair or alteration of a historical resource will be needed in order to provide for continued or new uses.

There are two sets of Standards for Rehabilitation. The Standards for Rehabilitation codified as 36 CFR 67 are regulatory for the Federal Historic Preservation Tax Incentives program, while the Standards for Rehabilitation codified as 36 CFR 68 are advisory. For CEQA purposes, reviewers should use 36 CFR 68. Every Standard will not necessarily apply to every project; however, a SOIS Compliance Report should address each Standard. Rather than omitting a Standard, the SOIS Compliance Report should explain that it is not applicable to the project and why. The reviewer should reference the Guidelines for Rehabilitation as appropriate.

Recommendations and Conclusions - Recommendations and conclusions may be addressed together or separately. If a project does not comply with the Standards, a SOIS Compliance Report should include recommendations for changing the plans to bring the project into compliance. When reviewing schematic design or design development plans, recommendations may include corrections and clarifications in the plans and notes or

² *Anne E. Grimmer, The Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Washington, D.C.: U.S. Department of Interior, National Park Services, Technical Preservation Services, 2017), 2.*

requests for product specifications, mock-ups, or test patches. For the issuance of a Class 31 Categorical Exemption, the conclusion must clearly state that the project complies with Standards as a whole, based upon the materials that were reviewed.

d. Review Considerations

The following considerations should be used by planners in reviewing SOIS Compliance Reports:

TABLE 5: REVIEW CONSIDERATIONS FOR SOIS REPORTS	
Introduction	
Does the report clearly state the purpose? If the purpose is compliance with a mitigation measure or condition of approval, has the case number been provided?	
<input type="radio"/> Yes <input type="radio"/> No	
Does the report include a summary statement of significance and integrity? If the property is a designated HCM, has the number been provided?	
<input type="radio"/> Yes <input type="radio"/> No	
Does the reviewer meet the Secretary of the Interior's Professional Qualifications Standards for Architectural History and/or Historic Architecture? Are resumes attached? Does the reviewer have experience in applying the Standards?	
<input type="radio"/> Yes <input type="radio"/> No	
Methodology	
Did the reviewer conduct a site visit of the property? If not, is a reason provided?	
<input type="radio"/> Yes <input type="radio"/> No	
Did the reviewer consult with the design team prior to preparing the report?	
<input type="radio"/> Yes <input type="radio"/> No	
Has a HSR or similar document been prepared for the historical resource?	
<input type="radio"/> Yes <input type="radio"/> No	
Character-Defining Features	
Does the report identify the character-defining features of the historical resource based upon NPS Preservation Brief #17 or reference another document such as an HSR?	
<input type="radio"/> Yes <input type="radio"/> No	
Project Description	
Does the report describe the scope of the rehabilitation work?	
<input type="radio"/> Yes <input type="radio"/> No	

TABLE 5: REVIEW CONSIDERATIONS FOR SOIS REPORTS
Are the plans attached or referenced including the name of the firm and the date prepared? <input type="radio"/> Yes <input type="radio"/> No
Standards Analysis
Does the report apply the Standards for Rehabilitation codified as 36 CFR 68? <input type="radio"/> Yes <input type="radio"/> No
Does the report fully analyze the proposed work based upon each Standard with references to the Guidelines where appropriate? <input type="radio"/> Yes <input type="radio"/> No
Recommendations and Conclusions
Do you concur with the recommendations and conclusions? <input type="radio"/> Yes <input type="radio"/> No