

August 23, 2019

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Ryan Bane
City of Santa Cruz Planning and Community Development Department
809 Center Street
Santa Cruz, CA 95060

Subject: Peer Review of Historical Significance Evaluation of Garfield Park Christian Church located at 111 Errett Circle, Santa Cruz, California (APN 00415101)

Dear Mr. Bane

Dudek was retained to conduct a peer review of the Department of Parks and Recreation (DPR) 523 form set for the Garfield Park Christian Church located at 111 Errett Circle, Santa Cruz, California (APN 00415101) prepared by Page & Turnbull, Inc., (dated May 2019). Dudek was specifically asked to comment on the adequacy of the DPR in consideration of the level of documentation, and comment on whether or not the conclusions are well supported under all applicable state and local regulations,. This peer review was conducted by Dudek Senior Architectural Historian Kathryn Haley, M.A. who meets the Secretary of the Interior's Professional Qualification Standards (PQS) for both History and Architectural History.

This peer review did not include a fact-check of the research presented in the report. This peer review operates under the assumption that the building's construction history, its historic context, and architectural description is accurate and based on thorough background research.

1 Assessment of DPR Preparation

All informational fields of the DPR for the property located at 11 Errett Circle prepared by Page & Turnbull are addressed and filled out appropriately. The building on the property is thoroughly documented in written text, through field survey photographs, and historic materials effectively illustrate important development stages of the property. The historic context for the property is clear and based on review of the citations it appears that the property was methodically researched.

2 Assessment of Historical Significance Evaluation

Although Dudek agrees with Page & Turnbull's recommendation that the building on the property does not appear to meet any of the California Register of Historical Resources (CRHR) criteria, this evaluation does not provide an evaluation of the property under the City of Santa Cruz local criteria. Overall, Dudek recommends a few refinements to the approach to this section of the DPR in order to ensure that this evaluation addresses all applicable criteria. The intent of these suggestions are to certify that all possibilities of potential historical significance of this property as a CEQA historical resource are explored in an effort to support the defensibility of the evaluation. Dudek suggests that the following refinements be made to the summary of previous findings and the significance evaluation starting on page 15 of the DPR form, specifically the second paragraph. Text from the

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Page & Turnbull DPR has been pasted below and Dudek's changes and comments are noted following the text in question.

Page & Turnbull DPR page 15, second paragraph:

Evaluation (significance):

111 Errett Circle is not currently listed in the National Register of Historic Places (National Register) or the California Register of Historical Resources (California Register). The building is not included in the 2012 California Historical Resources Information System (CHRIS) directory of properties in the historic property data file. The subject building is also not located within a local historic district or zoning overlay and is not included in Santa Cruz's Historic Building Survey. It is therefore not listed locally as a historic resource.

Dudek Comment:

Although the subject building on the property is not currently locally listed, it is possible that the property was just not addressed or evaluated in the prior Historic Building Surveys. The Historic Building Survey (multiple volumes) is a valuable planning tool, however, the surveys are not a comprehensive study of all historic era buildings and structures throughout the City. A number of properties containing building and structures over the age of 50 have not been evaluated under the City's local criteria. The property is not included in any of the City's Historic Building Surveys. In consideration of any potential local scrutiny regarding the historic significance of this property, Dudek suggests that the subject property be evaluated under the local criteria. An evaluation under the local criteria makes for a more defensible determination under CEQA.

The City has set up a process for amending the existing Historic Building Survey and the first step is for the property to be evaluated for historical significance under the City's criteria which is outlined in the Municipal Code Section 24.12.440 Santa Cruz Historic Building Survey, amended by Ordinance No. 2003-14, effective April 22, 2003. The full text for Ordinance No. 2003-14 is provided in Attachment A:

The property is either a building, site, or object that is:

1. Recognized as a significant example of the cultural, natural, archaeological, or built heritage of the city, state, or nation
2. Associated with a significant local, state, or national event
3. Associated with a person or persons who significantly contributed to the development of the city, state, or nation
4. Associated with an architect, designer, or builder whose work has influenced the development of the city, state, or nation
5. Recognized as possessing special aesthetic merit or value as a building with quality of architecture and that retains sufficient features showing its architectural significance

6. Recognized as possessing distinctive stylistic characteristics or workmanship significant for the study of a period, method of construction, or use of native materials
7. Retains sufficient integrity to accurately convey its significance

Dudek recommends that the DPR be modified to include an evaluation of the subject property under the City of Santa Cruz criteria. If the property is found to meet any of the City's criteria it will be considered a historical resource for the purposes of CEQA.

Page & Turnbull DPR page 15, second paragraph (continued):

The property was previously evaluated with DPR forms in 2018 by Bonnie Bamburg of Urban Programmers. This evaluation gave the subject building a California Historical Resource Code of 6Z, meaning the building was found ineligible for the National Register, California Register, or local designation through survey evaluation.

Dudek Comments:

1. It is unclear why Page & Turnbull are evaluating this property since it was evaluated by Bonnie Bamburg only one year ago (2018). Dudek has two options in addressing this issue:
 - a. Is this Page and Turnbull DPR to be considered an "Update" to the Bamburg form set? If so, what does the Page & Turnbull DPR form address that the Bamburg form does not? Was the property not evaluated under all applicable criteria? Was there a discrepancy with facts or approach? If the Page & Turnbull DPR is "Updating" the record and evaluation of this property Dudek suggests briefly stating why the property is being re-evaluated, adding a brief summary of Bamburg's findings (why was the property found ineligible for listing), and attaching the Bamburg DPR to the finalized Page & Turnbull DPR form set.
 - b. If the Page & Turnbull DPR is meant to be a separate or stand-alone evaluation of the subject property, Dudek suggests removing the reference of the 2018 Bamburg DPR and evaluation findings. If the Bamburg DPR is not on file through the California Historical Resources Information System, the City of Santa Cruz, or the California Office of Historic Preservation has not made a formal determination of eligibility on the subject property based on the 2018 documentation prepared by Bamburg, then it does not need to be acknowledged in the Page & Turnbull DPR. However, if this option is chosen, the Page & Turnbull evaluation in the DPR needs to be revised to address National Register of Historic Places (NRHP), CRHR, and the City of Santa Cruz criteria (all applicable criteria in which the property could be considered a CEQA historical resource). Both the Bamburg and the Page & Turnbull evaluations will then serve as stand-alone documents. The City's Historic Preservation Commission may want to weigh in to decide which DPR form set they chose to finalize.

Lastly, there are special criteria considerations that should be applied when evaluating the significance of certain properties under NRHP criteria. As stated in National Register Bulletin 15:

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Certain kinds of properties are not usually considered for listing in the National Register: religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed properties, commemorative properties, and properties achieving significance within the past fifty years. These properties can be eligible for listing, however, if they meet special requirements, called Criteria Considerations, in addition to meeting the regular requirements (that is, being eligible under one or more of the four Criteria and possessing integrity).

In light of this fact, Dudek suggests that the evaluation be expanded to explain the application of NRHP/CRHR¹ Criteria Consideration A: Religious Properties. Information and guidance on how to apply Criteria Consideration A is outlined in National Register Bulletin 15. This information to aid significance assessments of religious properties is available online through the following web address:

https://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_7.htm#crit%20con%20

In summary, Dudek agrees with Page & Turnbull's assertion in their DPR that the subject building does not appear eligible for listing under CRHR criteria. Overall, Dudek found the Page & Turnbull DPR 523 form set for 111 Errett Circle well produced but identified complications with the evaluation regarding the lack of assessing the property under the City's local criteria. Dudek also suggests re-addressing the 2018 DPR form prepared by Bamburg and adding a brief note regarding application of NRHP/CRHR Criteria Consideration A. Should you have any questions or concerns regarding this peer review, specifically regarding suggestions to address the evaluation issues and modification recommendations of the Page & Turnbull DPR, please do not hesitate to contact me directly at khaley@dudek.com or (916) 539-2202.

Sincerely,



Kathryn Haley, MA
Senior Architectural Historian

¹ CRHR Criteria is based on NRHP criteria. The California Office of Historic Preservation guidance advises the use of National Register Bulletin 15 for interpreting CRHR Criteria.



Attachment A

Santa Cruz City Ordinance No. 2003-14

Santa Cruz City Ordinances

ORDINANCE NO. 2003-14

AN ORDINANCE OF THE CITY OF SANTA CRUZ AMENDING SECTIONS 24.12.420 THRU 24.12.450, SECTIONS 24.08.900 THRU 24.08.930, AND SECTIONS 24.08.1011 THRU 24.08.1032 OF THE CITY ZONING CODE RELATED TO HISTORIC PRESERVATION (APPLICATION NO. 01-009)

WHEREAS, amendments to the City zoning code related to historic preservation have been developed and refined over several years by City staff, professional consultants and the Historic Preservation Commission; and

WHEREAS, an incentive program, including the Historic Building Code, Staff Approved Permits for Minor Projects, Commission Approved Permits for Major Projects, Increased Property Values, Reduced Permit Fees, Housing Rehabilitation Loans/Grants, Mills Act Contracts, and How-to User Brochures, was simultaneously considered with the amendments to provide a balanced overall preservation program; and

WHEREAS, on May 23, 2001, the Historic Preservation Commission held a public hearing, reviewed the proposed amendments and incentive program and recommended approval of the zoning code amendments to the Planning Commission; and

WHEREAS, on July 19th, 2001, the Planning Commission considered the proposed ordinance amendments at a public hearing and recommended approval to the City Council; and

WHEREAS, on March 12, 2002, the City Council considered the proposed ordinance amendments at a public hearing and directed staff to confer with the Chair of the Historic Preservation Commission and any Councilmembers who have input regarding the ordinance language, and that staff return for a first reading of the revised ordinance; and

WHEREAS, staff has conferred with the Chair of the Commission and certain Councilmembers and has revised certain ordinance language; and

WHEREAS, the City Council conducted a public hearing on the ordinance on April 22, 2003, and, as required by Section 24.06.040 of the Zoning Ordinance, found the following:

1. The proposed changes to the historic preservation zoning regulations allow for a more user-friendly application process. Administrative historic alteration permits issued by the Zoning Administrator without a public hearing are allowed for smaller projects located to the rear of buildings and projects that involve alterations to a non-historic building on an historic site. Regular historic alteration permits issued by the Historic Preservation Commission after a public hearing are required for larger projects and projects which involve alterations to the front of historic buildings. These amendments will encourage the preservation of historic buildings, thus furthering the general community welfare and good zoning practices.
2. The proposed changes recognize and reference up-to-date historic building survey criteria and alteration review criteria. State and national preservation governmental bodies and organizations recognize these criteria.

3. The proposed changes to the historic preservation ordinance follow the recommendation by the General Plan to develop and enforce land-use and other regulations that are flexible enough to maintain the viability of historic buildings while effectively protecting them.

NOW, THEREFORE BE IT ORDAINED by the City Council of the City of Santa Cruz as follows:

Section 1. Chapter 24.12, Part 5 of the Santa Cruz Municipal Code is hereby amended as follows:

Part 5: HISTORIC PRESERVATION

24.12.400 Purpose.

It is hereby found that the protection, enhancement, perpetuation and use of structures, districts, lands, and neighborhoods of historic, archaeological, architectural, and engineering significance, located within the City of Santa Cruz, are of cultural and aesthetic benefit to the community. It is further found that respecting the heritage of the City will enhance the economic, cultural and aesthetic standing of this City. The purpose of provisions in this title related to historic preservation is to:

1. Designate, preserve, protect, enhance, and perpetuate those historic structures, districts, and neighborhoods contributing to cultural and aesthetic benefit of Santa Cruz;
2. Foster civic pride in the beauty and accomplishments of the past;
3. Stabilize and improve the economic value of certain historic structures, districts, and neighborhoods;
4. Protect and enhance the City's cultural, archaeological and aesthetic heritage;
5. Promote and encourage continued private ownership and use of such buildings and other structures now so owned and used, to the extent that the objectives listed above can be obtained under such policy;
6. Serve as part of the Local Coastal Implementation Plan for the Coastal Program.

(Ord. 94-33 § 60, 1994; Ord. 85-05 § 1 (part), 1985).

24.12.410 Historic Preservation Procedures Authorized by this Title.

The following procedures related to historic preservation are authorized by this title:

1. Historic District Designation (Part 2, Chapter 24.06).
2. Historic Landmark Designation (Section 24.12.420).
3. Archaeological Procedures (Section 24.12.430).
4. Procedure for Amending Historic Building Survey (Section 24.12.440).
5. Procedure; New Construction in Historic Districts (Section 24.12.450).
6. Historic Alteration Permit (Part 10, Chapter 24.08).
7. Historic Demolition Permit (Part 11, Chapter 24.08).

8. Historic Overlay District (Part 22, Chapter 24.10).
(Ord. 86-13 § 6, 1986: Ord. 85-05 § 1 (part), 1985).

24.12.420 Historic Landmark Designation/Deletion.

1. Purpose. The purpose of this procedure is to provide for the designation/deletion of an individual structure or other feature, or group of structures on a single lot or site, or a site having special aesthetic, cultural, architectural, or engineering interest or value of an historical nature as a "landmark."
2. Procedure.

a. Designation/deletion of landmarks may be proposed by the City Council, Historic Preservation Commission, the secretary to the Historic Preservation Commission (Planning Director), or on application of the owners, or their authorized agents, of the property for which designation is requested.

b. Each proposal shall be considered by the Historic Preservation Commission at a public hearing, allowing time for notice to the owner or owners of the property and to the public pursuant to the provisions of Chapter 24.04. The Commission shall encourage public participation in the hearing and the presentation of testimony about the property under consideration. The staff may prepare a summary of information about the property prior to the hearing. When recommending the approval of a designation or a deletion, the Commission shall prepare a report setting forth the factual basis for the required findings.

c. After receiving a recommendation from the historic preservation commission, the city council shall hold a public hearing at the earliest possible date of a regular meeting, allowing time for public notice.

3. Findings Required. Prior to the Historic Preservation Commission recommending approval of landmark designation or deletion to the City Council and prior to the City Council approving the application, each shall find as appropriate:

a. That the proposed landmark, or group of structures, or features thereof has or no longer has significant aesthetic, cultural, architectural, or engineering interest or value of an historical nature.

b. That approval or modified approval of the application to designate or delete a landmark is consistent with the purposes and criteria of the City's historic preservation policies set forth in Section 24.12.400 herein, and the Cultural Resources Element of the General Plan.
(Ord. 94-33 § 61, 1994: Ord. 86-13 § 6, 1986: Ord. 85-05 § 1 (part), 1985).

24.12.430 Protection of Archaeological Resources.

1. Policy and Purpose. Existing in Santa Cruz are certain deposits and sites of cultural significance believed to have been left by Native Americans and other early inhabitants. These deposits and sites are unique and irreplaceable phenomena of significance in the history of the City and the understanding of the cultural heritage of our land and of all humankind. Such sites have a deep, spiritual significance to Native Americans, especially the native peoples of the State of California, and constitute a precious archaeological and historical heritage, which is fast disappearing as a result of public and private land development. Uncontrolled excavation or modification of these resources would destroy

their cultural integrity. This loss would affect future generations and must be prevented in the public interest. Such cultural resources should be preserved in an undisturbed state wherever possible, for future generations who should be more skilled and have access to better methods of study. In order to promote the public welfare, it is necessary to provide regulations for the protection, enhancement, and perpetuation of such sites. This section therefore, is intended to provide a procedure for preserving the valuable cultural resources in the City of Santa Cruz.

2. Developer's Action on Discovery of Artifacts or Remains During Excavation or Development. Any person exercising a development permit or building permit who, at any time in the preparation for or process of excavating or otherwise disturbing earth, discovers any human remains of any age or any artifact or any other object which reasonably appears to be evidence of an archaeological/cultural resource, shall:

- a. Immediately cease all further excavation, disturbance, and work on the project site;

- b. Cause staking to be placed completely around the area of discovery by visible stakes not more than ten feet apart forming a circle having a radius of not less than one hundred feet from the point of discovery; provided, that such staking need not take place on adjoining property unless the owner of the adjoining property authorizes such staking;

- c. Notify the Santa Cruz County sheriff-coroner and the city of Santa Cruz planning director of the discovery unless no human remains have been discovered, in which case the property owner shall notify only the planning director;

- d. Grant permission to all duly authorized representatives of the sheriff-coroner and the planning director to enter onto the property and to take all actions consistent with this section.

3. Coroner's Action on Discovery of Remains. If human remains are discovered, the sheriff-coroner or his/her representative shall promptly inspect the remains to determine the age and ethnic character of the remains, and shall promptly, after making such determinations, notify the planning director.

4. Planning Director's Action on Discovery of Artifacts or Remains. If any artifacts or remains are discovered, the planning director shall cause an on-site inspection of the property to be made. The purpose of the inspection shall be to determine whether the discovery is of an archaeological resource or cultural resource. If remains have been discovered, the planning director shall consult the sheriff-coroner before making his/her determination. In making a determination, the planning director may also consult with Native American groups, qualified archaeologists, or others with the necessary expertise.

5. Discovery Not an Archaeological/Cultural Resource. Upon determining that the discovery is not of an archaeological/cultural resource, the planning director shall notify the property owner of such determination and shall authorize the resumption of work.

- 6..Discovery an Archaeological/Cultural Resource. Upon determining that the discovery is of an archaeological/cultural resource, the planning director shall notify the property owner that no further excavation or development may take place until a mitigation plan or other measures have been approved by the director the protection of the site.

7. Mitigation Plan. The property owner or his/her agent shall prepare any required mitigation plan. The mitigation plan shall include conditions necessary or appropriate for the protection of the resource including, but not limited to, conditions on the resumption of work, redesign of the project, or other conditions deemed appropriate by the planning director. The director shall review the mitigation plan and may consult with Native Americans, archaeologists, or other interested

persons, to insure proper protection of the resource. When the director is satisfied that the mitigation plan is adequate, the director shall authorize the resumption of work in conformance with the mitigation plan.

8. Referral to Historic Preservation Commission. The planning director may refer to the historic preservation commission the decision whether the discovery is of an archaeological/cultural resource and the decision whether the mitigation plan is adequate to protect the resource. If the director refers the matter to the historic preservation commission, a public hearing shall be held in conformity with the requirements of this title relating to public, hearings.

9. Development on Known Archaeological Sites. No building permit for any earth-disturbing activity shall be issued on parcels identified by resolution of the city council as containing known cultural or archaeological resources, without the owner first obtaining an administrative use permit. The administrative use permit shall be conditioned with appropriate archaeological survey and mitigation procedures such as those prescribed in the Historic Preservation Element and the Local Coastal Land Use Plan.

10. Archaeological Reconnaissance. The city may conduct archaeological reconnaissance on any parcel in the city of Santa Cruz, at the request of or with the consent of the property owner. The city may also as a condition of any permit issued pursuant to this title or as a condition of any building permit issued pursuant to the Santa Cruz Municipal Code, require that an archaeological reconnaissance be conducted on any parcel in the city of Santa Cruz, whenever such requirement is in furtherance of the purposes of this chapter. A fee for such reconnaissance shall be charged to the applicant or property owner as established by resolution of the city council.

(Ord. 86-13 § 6, 1986: Ord. 85-05 § 1 (part), 1985).

24.12.440 Santa Cruz Historic Building Survey.

1. Background - Availability. The Santa Cruz Historic Building Survey, Volume I - prepared for the city of Santa Cruz by Charles Hall Page and Associates Inc., and published in 1976, and Volume II – prepared by John Chase, Daryl Allen and Jeanne Gordon, and published is 1989, is hereby adopted, as amended, as the Santa Cruz Historic Building Survey, and is incorporated herein by reference. Three copies of said building survey are, and shall be, maintained on file in the office of the city clerk, city of Santa Cruz, for the use of, and examination by, the public. See Chapter 24.08 for permits and requirements relating to Historic Building Survey buildings.

2. Procedure for Amending Historic Building Survey.

a. The city council may amend the Historic Building Survey by resolution by adding buildings or property to the survey or deleting buildings or property from the survey. This shall be done following a recommendation by the historic preservation commission. The historic preservation commission shall report to the city council on changes to buildings or property listed on the survey, and the commission shall recommend initiation of a new survey when there is a need to update the Historic Building Survey.

b. A public hearing shall be held by both the city historic preservation commission and the city council, allowing time for notice to the owner or owners of the property and to the public pursuant to the provisions of Chapter 24.04.

c. Actions by both bodies shall be based on the following criteria:
The property is either a building, site, or object that is:

1. Recognized as a significant example of the cultural, natural, archaeological, or built heritage of the city, state, or nation; and/or
2. Associated with a significant local, state, or national event; and/or
3. Associated with a person or persons who significantly contributed to the development of the city, state, or nation; and/or
4. Associated with an architect, designer, or builder whose work has influenced the development of the city, state, or nation; and/or
5. Recognized as possessing special aesthetic merit or value as a building with quality of architecture and that retains sufficient features showing its architectural significance; and/or
6. Recognized as possessing distinctive stylistic characteristics or workmanship significant for the study of a period, method of construction, or use of native materials; and/or
7. Retains sufficient integrity to accurately convey its significance.

The district is:

8. Recognized as a geographically definable area possessing a significant concentration of buildings that are well designed and other structures, sites, and objects which are united by past events or by a plan or physical development; or is
9. Recognized as an established and geographically definable neighborhood united by culture, architectural styles or physical development.

d. Upon the initiation of an amendment to the Historic Building Survey to add a building or buildings, no zoning or building or demolition permit shall be issued for a period of sixty days or until final action by the city council, whichever occurs first. An exception may be made where public health and safety require it. A public hearing shall be held upon any initiation of an amendment to the Historic Building Survey.

(Ord. 86-13 § 6, 1986; Ord. 85-05 § 1 (part), 1985).

24.12.445 Variations to Regulations for Historic Building Survey Buildings.

1. Modification to District Regulations. District regulations for height, stories, lot coverage, and yards may be modified to the extent that an existing structure, or proposed addition of 100 square feet or less, does not conform to such regulations. A use permitted in the district in which it is located may be established in additional floors and otherwise nonconforming floor area so long as the additional use allowed as a result of this modification occurs entirely within the building and does not materially alter the appearance of the building. Prior to modifying the requirement, the approving body shall find that the modification is necessary in order to allow appropriate findings, per Section 24.08.930, Findings required for historic alteration permit.

2. Reduction of Parking Requirement. The normal parking requirement (number and covered parking requirements) may be modified in order to maintain the value of the property. Prior to modifying the requirement, the approving body shall find that the modification is necessary in order to allow appropriate findings, per Section 24.08.930, Findings required for historic alteration permit, and that such modification will not significantly adversely affect traffic and parking on adjacent and nearby streets and properties.

24.12.450 Procedure - New Construction in Historic Districts.
(Ord. 86-13 § 6, 1986: Ord. 85-05 § 1 (part), 1985).
* Editor's Note: Text was deleted in 2003.