

ATTACHMENT 2

NOTICE OF EXEMPTION

TO: Santa Barbara County Clerk of the Board of Supervisors

FROM: Planning and Development

The project or activity identified below is determined to be exempt from further environmental review requirements of the California Environmental Quality Act (CEQA) of 1970, as defined in the State and County Guidelines for the implementation of CEQA.

APN: 009-710-019 **Case No.:** 14APL-00000-00006

Location: 461 San Ysidro Road, Montecito, California

Project Title: Rehabilitation of County Historic Landmark #34, Juarez-Hosmer Adobe

Project Applicant: 461 San Ysidro Road, LLC

Project Description: The Board of Supervisors approval of a revised rehabilitation plan, pursuant to the Secretary of the Interior's Standards for Rehabilitation of the historic structures at the County Historic Landmark #34. The revised rehabilitation plan refines the means and methods for rehabilitation of the historic structures on the property that were originally approved by the Historic Landmarks Advisory Commission (HLAC) on July 12, 2012.

Name of Public Agency Approving Project: County of Santa Barbara

Name of Person or Agency Carrying Out Project: 461 San Ysidro Road, LLC

Exempt Status: (Check one)

- ☐ Ministerial
- ☐ Statutory Exemption
- ☒ Categorical Exemption
- ☐ Emergency Project
- ☐ Declared Emergency

Cite specific CEQA and/or CEQA Guideline Section: CEQA Guidelines Section 15331 – Historical Resource Restoration/Rehabilitation

Reasons to support exemption findings: A Class 31 categorical exemption allows an exemption from environmental review for rehabilitation, restoration and/or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Building (1995), Weeks and Grimmer.

In the instant case, the Board of Supervisors approval of a revised rehabilitation plan to allow for additional means and methods to rehabilitate the historic structures on the property is consistent with the

exemption. In particular, once construction commenced under the 2010-approved rehabilitation plan, it was revealed that two of the historic structures on the property (the adobe and the wooden water tower) were more severely deteriorated than previously thought. A revised rehabilitation plan was prepared by a noted expert in the field of adobe engineering (Nels Roselund, the Roselund Engineering Company, April 2014), reviewed by an architectural historian (Alexandra Cole, Preservation Planning Associates, April 30, 2014), and peer reviewed by architectural historians (Erica Schultz and Carole Denardo, Garcia and Associates, June 3, 2014). The reports concluded and the peer reviewer concurred that the revised rehabilitation plan would comply with the Secretary of the Interior's Standards for Rehabilitation.

Similarly, the 2010-approved rehabilitation plan for the water tower noted the poor to bad conditions of this wood structure. The approved plan included a 184-sq. ft. addition, the addition of a water tank to the top of the tower to replicate the missing water tank, the reuse of all redwood siding and wood framing that could be salvaged, and replacement of those wood components that were found to be unsalvageable. The 2010-approved plan envisioned the potential situation that portions of the walls might need to be disassembled and reassembled to accomplish the rehabilitation goals. Taylor & Syfan, structural engineers for the project, determined that damage to much of the existing framing was more extensive than previously identified and that disassembly and reassembly would be necessary (February 20, 2014). The water tower would be rehabilitated by carefully taking the structure apart, and reusing all materials, including timber, that can be salvaged, and replacing members damaged beyond repair with replacement wood framing. As stated by Preservation Planning Associates in the *Letter Addendum* dated April 30, 2014, and reiterated by Garcia and Associates in the independent peer review for the adobe, the Standards for Rehabilitation allow for the in-kind replacement of severely deteriorated features that cannot be repaired. The same holds true for the water tower. The revised rehabilitation plan would, therefore, comply with the Secretary of the Interior's Standards for Rehabilitation. Therefore, this exemption applies to Board of Supervisors approval of the revised rehabilitation plan.

There is no substantial evidence that the proposed project involves unusual circumstances, including future activities, resulting in or which might reasonably result in significant impacts which threaten the environment. The exceptions to the categorical exemptions pursuant to Section 15300.2 of the State CEQA Guidelines are:

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.**

A Class 31 categorical exemption is not qualified by consideration of its location. Therefore, this exception to the exemptions does not apply.

- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.**

The rehabilitation of historic landmarked buildings is intended to protect and preserve the historic resource into the future, which can be considered a beneficial impact. Furthermore, designated landmarks are located in various places and scattered around the County. Therefore, cumulative impacts would not result.

- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.**

There are no unusual circumstances that would cause the activity to create a significant effect on the environment. The Board of Supervisors approval would revise the rehabilitation plan that was approved by the HLAC to allow for additional means and methods for the rehabilitation of the historic structures on the property. The rehabilitation of the historic structures would allow their continued existence and historic use into the future, a beneficial effect. The revised rehabilitation plan would comply with the Secretary of the Interior's Standards for Rehabilitation of historic structures, confirmed by the County's peer reviewer, Garcia and Associates (June 3, 2014). Therefore, this exception to the exemption would not apply.

- (d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.**

The site is not located near a scenic highway and is not visible from a scenic highway. Therefore, there would be no significant damage to scenic resources near a state scenic highway and this exception to the exemptions does not apply.

- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.**

The site has not been identified on any list as a hazardous waste site. Therefore, this exception to the exemptions does not apply.

- (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.**

The revised rehabilitation plan for the adobe would comply with the Secretary of the Interior's Standards for Rehabilitation of historic buildings, confirmed by the County's independent peer

reviewer, Garcia and Associates (June 3, 2014). The rehabilitation plan for the water tower complies with the Secretary of the Interior's Standards for Rehabilitation as documented by Preservation Planning Associates in 2010 (approved by the HLAC on July 12, 2010). The Standards for Rehabilitation also allow for the in-kind replacement of severely deteriorated features that cannot be repaired; thus, the more extensive methods needed to rehabilitate the water tower due to the more extensive damage would comply with the Secretary of the Interior's Standards for Rehabilitation. The rehabilitation of the historic buildings would allow for their continued historic residential use into the future and would preserve the structures on the site and in the location in which they were originally constructed, which would be beneficial to the historical resources over the long-term. The rehabilitation of the historic buildings in situ would not cause a substantial adverse change in the significance of the historical resources; the structures and grounds would retain all of the relevant elements of, and the designation as, County Historic Landmark #34.

Lead Agency Contact Person: Alice McCurdy

Phone #: (805) 568-2518 Department/Division Representative: _____

Date: _____

Acceptance Date: _____

distribution: Hearing Support Staff

Date Filed by County Clerk: _____.