



CITY OF CORONADO

CITY COUNCIL STAFF REPORT

November 21, 2023

{{section.number}}b

REVIEW OF THE DRAFT HISTORIC CONTEXT STATEMENT AND CITYWIDE SURVEY AND DIRECTION ON NEXT STEPS

RECOMMENDATION:

Review the draft Historic Context Statement and Citywide Survey and input received from the June-October 2023 community outreach period, receive public comment and provide direction to staff on proceeding with the project, which may include accepting the Historic Context Statement and Citywide Survey and initiating appropriate environmental review; modifying the Historic Significance Review age threshold and the Tiers; and/or pursuing additional public outreach and exploring other policy concepts for future City Council discussion.

BACKGROUND:

The effort to prepare a Historic Context Statement and Citywide Survey began in late 2018, resulting from recommendations by a City Council subcommittee consisting of Councilmembers Donovan and Downey. At that time, the City Council directed staff to move forward with a Context Statement and Citywide Survey that would guide the preservation of the City's architecturally significant properties as well as provide increased certainty to property owners with regard to modifications on their property. The City Council directed staff to move forward with an architectural survey of properties built through 1970, which is in line with the California Register, National Register, and California Environmental Quality Act (CEQA) best practice of a 50-year threshold for potential historic significance. In the meantime, the City would retain the existing threshold of 75 years for required Determination of Historic Significance review and revisit the idea of changing the age threshold upon adoption of the Context and Survey document. In February 2019, the City Council awarded a contract to Dudek and Associates to prepare the Historic Context and Citywide Survey document.

After preliminary research and preparation, the effort to prepare the Context Statement began with a series of three public kick-off meetings that were held at the Nautilus Room and Coronado Historical Association in September and October of 2019. At these meetings, Dudek and staff made a presentation on the project, discussions took place, and comments were received on themes, people, events, and places that are notable in the context of Coronado's history. Additionally, a page on the City's website was created to provide information on the Context and Survey effort as well as to solicit ongoing public comments via a fillable survey form. An interactive map that allowed users to pin locations and add comments was also developed for the website.

Throughout 2020 and 2021, Dudek conducted in-depth research at local archives and repositories, including Coronado Historic Association, to develop the Historic Context Statement and prepare a database of all structures in Coronado and their built dates. This front-end research effort was lengthier than initially anticipated due to inaccurate built dates that are embedded in the data on file at the County of San Diego. In order to assure accurate dates, City staff double checked all dates against the building permit records, Sanborn Maps, and Lot Books on file at City Hall, and also added information on builders and architects if they were identified on permit records. While this quality assurance check delayed the project, the result is a more reliable and informative database that can be used going forward.

Throughout 2021, Dudek conducted the Citywide Survey, and in January 2022 the draft survey matrix was provided to staff. Staff and Dudek worked together to categorize each property, refine the list of locally significant architectural styles, and develop thresholds for significance. On June 20, 2023 the draft Historic Context Statement and Citywide Survey was received by the City Council and staff was directed to open a public review period of sixty (60) days, which was subsequently extended for an additional two months, to October 31, 2023.

DISCUSSION:

Context Statements provide an analytical framework for identifying and evaluating resources by explaining the broad patterns of historical development of a community that are represented by the physical development and character of the built environment. Coronado's Historic Context Statement is intended to serve as a broad narrative of the history of Coronado and its built environment, identifying important themes, property types, patterns of development, significant events, and people that have shaped the history of Coronado from the City's initial development through 1970. Providing the foundation for a successful survey, the Context Statement identifies locally significant architectural styles and descriptions, identifying character defining features associated with each style, and photograph examples are included for reference. The Context provides a framework for evaluation of resources within the important aspects of Coronado's history and used in conjunction with the City's adopted Designation Criteria Guidelines will assist with consistent identification, evaluation, and preservation of Historic Resources.

Historic Surveys are intended to identify potentially significant properties, provide information needed to make informed planning decisions, prioritize preservation goals and objectives, and increase the public's understanding of and appreciation for the built environment. Coronado's Citywide Survey provides evaluation of structures constructed through 1970 and identifies those that appear to be significant under Coronado's Criterion C related to architectural significance, which states: *It possesses distinctive characteristics of an architectural style and has not been substantially altered.* Criterion C served as the basis of the Historic Survey as it is the most readily identifiable criterion with reasonable effort given the scope of a citywide survey, and because it was a criterion applied in nearly all—97%—of Historic Designation determinations. The Citywide Survey is intended to provide an architectural evaluation of properties, in an effort to identify potentially architecturally significant resources and also reduce the number of properties that are unnecessarily encumbered by the current Determination of Historic Significance review despite their significant alterations.

Tier Assignments

The City's Historic Designation Criteria Guidelines state that in order to meet Criterion C, a structure should retain enough character defining features to be truly representative of an architectural style and should be unaltered or minimally altered from historic condition. Properties that are identified as potentially architecturally significant will not automatically be designated as Historic Resources as a result of the survey. Rather, properties are categorized in tiers relative to apparent Criterion C significance based on observed retention of original architectural appearance. The following tiers were established and used to categorize the properties evaluated in association with the Citywide Survey:

Tier 1 - Unaltered or minimally altered from historic condition and potentially eligible for City designation under Criterion C.

Tier 2 - Recognizable as a particular architectural style but based on observation and/or construction history are more than “unaltered or minimally altered” from historic condition and do not appear to be eligible for historic designation under Criterion C.

Tier 3 - Substantially altered properties that retain little to no elements of a particular architectural style and, based on observation and/or construction history, are not eligible for historic designation under Criterion C.

The tiers are described in more detail in Section 2.4 of the Context Statement, including descriptions of alterations that are generally acceptable within each tier. Based on information received during the public comment period, tier assignments for several properties are recommended to be adjusted. Staff has included proposed changes to tier assignments for these properties, along with explanation for the proposed changes, in Attachment 2. Accounting for these changes, the number for properties assigned to each tier are as follows:

Property Age Within Tier Assignment			
	Tier 1	Tier 2	Tier 3
1948 & earlier	161	131	989
1949 to 1970	38	17	708
Total	199	148	1,697

Public Comments

Staff received public comment from individuals and groups between June 20, 2023 and October 31, 2023. Three (3) public meetings were held during this time at which staff and the consultant gave a presentation on the document, answered questions, and took notes on comments:

- August 23, 2023, Zoom meeting
- September 20, 2023, Historic Resource Commission meeting
- October 11, 2023, Coronado Public Library Winn Room

Video recordings from the Zoom meeting and Historic Resource Commission meetings are linked on the City’s Project Coronado website and the Historic Preservation Program website, www.coronado.ca.us/preservation. The public comment period and outreach meetings announced were on the City’s website, Project Coronado, all Historic Resource Commission meetings, and were widely publicized by the City’s Communications and Engagement Officer.

Comments received are summarized in a comment and response document included as Attachment 3, and emailed comments are provided in full. In addition to comments from the 5 Historic Resource Commissioners at their September meeting, 56 individuals provided public comments over email, in person at public meetings, or by signing the Project Coronado Guestbook. There was some overlap, with several individuals commenting on multiple platforms and multiple times, but overall the volume of comments received speaks to a community that is engaged in the process. Comments were largely focused on the Citywide Survey effort and ranged from general thoughts and questions to very specific information about individual properties. Common themes seen in the comments were related to public outreach, property specific information, use of the survey tiers, and age threshold for required review.

Only a small number of comments regarding the Historic Context Statement were received. Members of the public made recommendations on ideas for expanded content and deeper dives into specific aspects of history not covered by Criterion C, as well as addition of architects and builders to the biography section. No comments related to the list of architectural styles and character defining features, or registration requirements, were received. Several commenters remarked on the lack of identification of geographic historic districts. While the consultant was asked to note any areas that appeared to be obvious candidates for locations of potential historic districts while in the field performing evaluations of individual properties, this survey effort was not intended to be an in-depth research and evaluation of specific geographic historic districts.

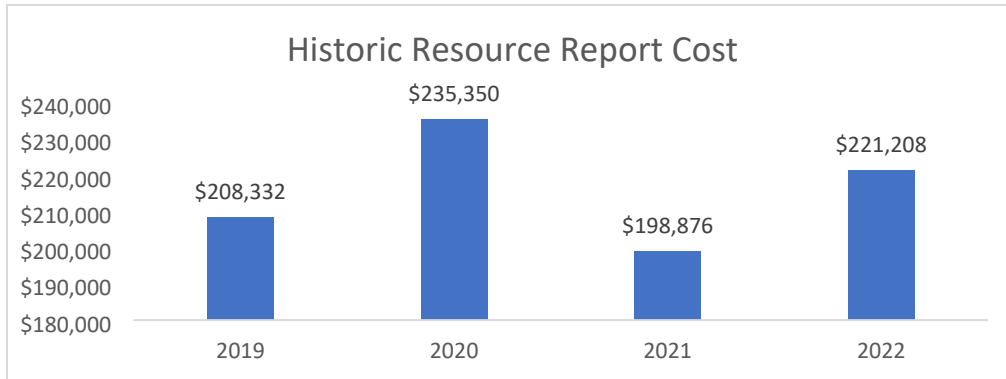
Feedback from the public during the comment period revealed differing opinions among community members and property owners with tier assignment for properties and potential use of the tiers to exclude properties from required review. Some residents do not support any required historic review for any properties, some residents support required review for potentially architecturally significance properties only, while others disagree with excluding any properties from a required historic review process. The chart below provides the number of comments from members of the public that were specific with their recommendation on use of tiers.

Public Comment Regarding Use of Tiers	
Recommendation	Comments
Do not exclude any tiers (review all)	9
Exclude tier 3, or tiers 2 and 3	8
Exclude all tiers (no required review)	4

Ideally, adoption of the Citywide Survey and use of the tier categories as a threshold for a required Determination of Historic Significance review will provide a balance of increased and consistent protection of potentially architecturally significant resources with transparency and certainty regarding the ability to modify or develop properties that have already seen significant alterations.

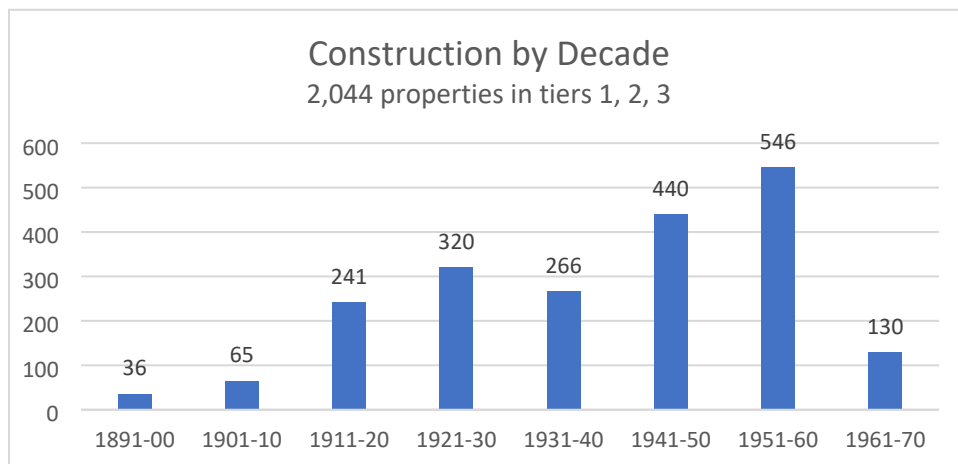
Determination of Historic Significance Age Threshold

The City's current Determination of Historic Significance review process involves required historic review of any structure that is 75 or more years old that is the subject of a project involving demolition or removal of original architectural features that are visible from the street right of way. The process involves submittal of an application and basic supporting documents by the property owner. Staff then assigns a work order to one of the City's as-need historic planning consultants who researches the property and prepares historic research report. Once the historic report is received, the application is scheduled for a public hearing of the Historic Resource Commission, where the Commission makes the official determination of whether the property is a Historic Resource. The historic reports are research intensive and provide a thorough analysis and evaluation of the property's significance under the City's adopted Historic Designation Criteria. These cost for these reports is fully subsidized by the City, averaging about \$7,000 per report in 2022. There is no cost to the property owner beyond the application fee to cover staff time, about \$1,000, and the cost for preparing the public hearing mailed notice package. In a typical calendar year, staff receives 25 or more Determination of Historic Significance applications. Since 2019, when contracts with historic consultants began, the annual cost to the City for preparation of historic reports has ranged from just under \$200,000 to over \$230,000.



The City Council directed that the Survey should include properties constructed through 1970, which is in line with the California Register, National Register, and California Environmental Quality Act (CEQA) best practice of a 50-year threshold for potential historic significance. Concern about inclusion in a list or inventory of historically significant properties is something that has been expressed by property owners, and it is important to note that the current 75-year historic review required by the Coronado Municipal Code currently operates as such an inventory or list. Thus, any property built in 1948 or earlier already is qualified as potentially historic, even though it is not specifically detailed in an inventory. Properties building in 1949 or later are not currently considered potentially historic and are not subject to the Determination of Historic Significance review. Members of the public provided some opinion on use of an age threshold, with 5 commenters expressing support of a 50-year age threshold and 4 commenters supporting maintaining the existing 75-year age threshold.

Should the City Council change the age threshold to 50 years, additional properties would require a Determination of Historic Significance review. It is difficult to quantify exactly how big the increase in required reviews would be without knowledge of future development trends, but it is anticipated that the increase would be sizeable, based on the uptick in construction that is documented from the late 1940s through 1960. Should the City Council maintain the current process of reviewing all properties that meet the age threshold for review, it is anticipated that the annual cost for Historic Research Reports would increase based on more properties aging into the required review process.



California Environmental Quality Act (CEQA)

Issues that would need to be considered with regard to CEQA are related to tier assignments and release of properties from required historic review in association with a Determination of Historic Significance. While the historic survey evaluated of each property's potential significance under Criterion C as observed, Criteria A, B, and D were not addressed. Evaluation of properties under Criteria A, B, or D cannot reasonably be done with a survey, as these criteria would require in depth historic evaluation of thousands of properties. While it is uncommon for properties to meet the threshold for designation as a Historic Resource by meeting two adopted Criteria other than Criterion C, it is possible and has occurred on 8 occasions since the Historic Preservation Program began in 2000. As such, the City will need to process an appropriate CEQA document, likely an Environmental Impact Report, in order to assess the potential loss of historic resources if any Tiers are excluded from historic review.

Next Steps

Staff requests that the City Council review the community input gathered through the outreach period, receive additional public comment and provide direction to staff. The City Council may consider a range of actions which could include:

1. Accept the draft Historic Context Statement and Citywide Survey, proceed with the recommended tier adjustments and direct staff to initiate appropriate environmental review in order to adopt the Historic Context Statement and Citywide survey for use as reference materials and a Historic Preservation Program planning tool including:
 - a. modification of the City's current Determination of Historic Significance Review age threshold from 75- to 50- years, and either:
 - i. exclusion of Tier 3 from required review, or
 - ii. exclusion of Tiers 2 and 3 from required review;
2. Accept the recommended tier adjustments, adopt the Historic Context Statement and Citywide survey for use as reference materials only, and direct staff to proceed with next steps toward modification of the City's current required Determination of Historic Significance Review process by changing the age threshold for required historic review from 75- to 50-years;
3. Accept the recommended tier adjustments, adopt the Historic Context Statement and Citywide survey for use as reference materials only, and maintain the City's current required Determination of Historic Significance Review process with no changes, maintaining the 75-year age threshold for required historic review; or
4. Direct staff to conduct additional community outreach and/or explore other policy concepts for future City Council discussion.

FISCAL IMPACT:

The City Council authorized a contract with Dudek for the completion of the Historic Context Statement and Citywide Survey in amount of \$120,780. The amount billed against the contract to date is \$105,835.60. The project is currently within budget.

ALTERNATIVE:

The City Council could direct staff to make changes to the document, perform additional research, and/or return to a future Council meeting for further discussion.

CALIFORNIA ENVIRONMENTAL QUALITY ACT:

This report to the City Council is exempt from environmental review because it is not a project as defined by CEQA. Environmental analysis and preparation of a CEQA document will be required if the Council chooses to exclude any properties identified in the survey tiers from future historic review through the Determination of Historic Significance process.

PUBLIC NOTICE:

No notice required.

ATTACHMENTS:

1. Draft Historic Context Statement and Citywide Survey. (Also available at this link: <https://www.projectcoronado.org/citywide-historic-resource-survey>)
2. Table of proposed tier adjustments
3. All public comments received

Submitted By: Community Development Department / Tricia Olsen