

1.0 INTRODUCTION

The Phase 1-2 Cultural Resources Study, Historic Resources (HRR) for the property at 83 Eucalyptus Lane (All Saints By-the-Sea Church), California was prepared for All Saints By-the-Sea Episcopal Church (Figures 1 & 2). The 0.81-acre parcel is located in Montecito, County of Santa Barbara (Figure 2). Built improvements to the property include a one-story church, and several other buildings including the detached Centennial Parish House, Friendship Center/Sunday School and several other auxiliary buildings. This HRR was written by Pamela Post, Ph.D., primary author and Timothy Hazeltine and follows the guidelines for a Phase 2 Historic Resources Reports set forth in the County of Santa Barbara Cultural Resource Guidelines Historical Element criteria (see Appendix A for architect's drawings). The study will provide the following:

- a) Evaluate project impacts to the existing church and its setting which a previous Phase 1-2 HRR determined was a significant historic resource for the purposes of environmental review (Post/Hazeltine Associates 2015).

1.1 Previous Studies, Determination of Significance and Period of Significance

An earlier project to dismantle and reconstruct the church's masonry bell tower was the focus of a Phase 1-2 Historic Resources Study prepared by Post/Hazeltine Associates dated April 27, 2015. The report was reviewed and commented upon the Historic Landmarks Advisory Commission on November 9, 2015.

The Phase 1-2 HRR prepared made the following determination regarding the church building:

The church at 83 Eucalyptus Lane (All Saints By-the-Sea Church) qualifies for listing as a significant historic resource at the County level, under Criteria 2, 3 and 4. It also is eligible for listing to the California Register of Historical Resources under Criterion C and the National Register of Historic Places under Criterion c. Therefore, the church which is eligible for listing at the local level, as well as the California Register of Historical Resources and the National Register of Historic Places, is a significant historic resource for the purposes of environmental review (Post Hazeltine Associates: 2015: 32).

The period of significance is 1900-1930 the period when the original church was built and several additions were made to the building.

1.2 Report Format

Evaluation of project impacts to significant historic resources outlined in Task a follows the guidelines for historic property studies outlined in the County of Santa Barbara, Cultural Resources Guidelines, Archaeological, Historical and Ethnic Elements (County of Santa Barbara: 1993, updated February 2011). The primary

analytical tool is the application of the Secretary of the Interior's Standards for Rehabilitation to the project.

1.3 Project Description

The applicant proposes extensive alterations to the existing building it to meet current seismic code requirements and the programmatic requirements of the parish. Project architect is Bob Easton, AIA, Architect, the structural engineer is Parker-Resnick, Structural Engineers. Please see Appendix A for the project plans and Appendix B for the structural engineer's report.

2.0 REGULATORY SETTING

The following policies enacted by the County of Santa Barbara guided the identification of potential significant historic resources and evaluation of potential project impacts to significant historic resources outlined in this report.

2.1 County of Santa Barbara Historical and Archaeological Policies:

1) All available measures, including purchase, tax relief, purchase of development rights, etc. shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.

2) When developments are proposed for parcels where archaeological or other cultural sites are located, project redesign shall be required which avoids impacts to such cultural sites if possible.

3) When sufficient planning flexibility does not permit avoiding construction on archeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with the State Office of Historic Preservation and the State of California Native Heritage Commission (Santa Barbara County Comprehensive Plan, Land Use Element, Adopted 1980, Amended February 2011: 81).

Montecito General Plan

Goal CR-M-1 of the Montecito General Plan Update includes the following: *Preserve and Protect Properties and Structures with Historic Importance in the Montecito Community to the Maximum Extent Feasible of the Montecito General Plan.*

2.2 Project Thresholds

The County of Santa Barbara uses the thresholds outlined in the California Environmental Quality Act (CEQA) to characterize project impacts to significant historic resources. Each impact under consideration is identified according to its level of *significance as described below:*

- *Beneficial Effect*: An impact that would result in beneficial changes to the environment.
- *Less than Significant Impact (Class III)*: An impact that may be adverse, but does not exceed threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- *Significant but Mitigable Impact (Class II)*: An impact that exceeds a threshold of significance, but that can be reduced to below the threshold level given reasonable available and feasible mitigation measures. Such an impact requires findings to be made under §15091 of the State CEQA Guidelines.
- *Unavoidably Significant Impact (Class I)*: An impact that exceeds a threshold of significance and cannot be reduced to below the threshold level, given reasonably available and feasible mitigation measures. Such impact requires a Statement of Overriding Considerations to be issued if the project is approved (per §15093 of the State CEQA Guidelines).

In determining the impact of a project on a significant historic resource, CEQA regulations require the application of the Secretary of the Interior's Standards to the question of whether the project results in a substantial adverse change to the resource and in particular those physical characteristics or character-defining spaces and features that convey its historical significance.

CEQA Guidelines Section 15064.5(b)(3) state, Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary's Standards, Weeks and Grimmer, 1995) shall be considered as mitigated to a level of less than a significant impact on the historic resource.

While compliance with the Secretary's Standards indicates that a project may have a less than significant impact on an historical resource, the converse of this does not hold. Failure to comply with the Secretary's Standards is not, by definition, a significant impact under CEQA. CEQA recognizes that alterations that are not consistent with the Secretary's Standards still may not result in significant impacts on the historical resource. Therefore, the significance of project impacts on an historical resource can be evaluated by determining:

- Whether a project is in conformance with the Secretary's Standards (less-than-significant impact);
- Whether a project is in substantial conformance with the Secretary's Standards and does not result in material impairment (less-than-significant impact); or

- Whether a project is not in conformance with the Secretary's Standards and results in material impairment (significant impact).

The above criteria are important not only in determining whether the project would have a significant impact on a significant cultural resource, but also in considering effective mitigation measures and/or alternatives.

The Secretary of the Interior's Standards for The Treatment of Historic Properties (Restoration and Rehabilitation):

The following standards for rehabilitation and restoration, developed by the United States Department of the Interior are the generally accepted guidelines for assessing the suitability of additions and modifications to historic resources. Implementation of the guidelines helps identify potentially significant impacts to historic resources and helps to ensure that the historic character of a property is preserved. The guidelines are as follows:

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.*

- 1) *A property will be used as it was historically or given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*
- 2) *The historic character of a property will be retained and preserved. The removal of distinctive materials or alterations of features, spaces, and spatial relationships that characterize a property will be avoided.*
- 3) *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*
- 4) *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*
- 5) *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*
- 6) *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*
- 7) *Chemical and physical treatments, if appropriate, will be undertaken by the gentlest means possible. Treatments that cause damage to historic materials will not be used.*
- 8) *Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

- 9) *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale, and proportion, and massing to protect the integrity of the property and its environment.*
- 10) *New additions and adjacent or related new construction will be undertaken in such a manner that if removed, in the future, the essential form and integrity of the historic property will be unimpaired (36 CFR Part 68, 1995 Federal Register, Vol. 60, No. 133).*

To assess the effects of the proposed project on an identified historic resource within the project site, the definition of significant effects from CEQA Appendix G, Section 15064.5, is commonly used. Section 21084.1 of the Public Resources Code provides the framework for determining whether a property is an historic resource for CEQA purposes; these include historic resources that are listed in or eligible for listing in the California Register of Historical Resources (California Register), that are, *per se* significant, other resources that are officially designated on a local register, or that are found to be significant by the State Historic Preservation Officer (SHPO) under Section 5024.1 (j) of the Public Resources Code are presumed to be significant. In determining potential impacts on historical resources under CEQA, projects are reviewed according to the Secretary of the Interior's Standards (Standards). The Standards are discussed in detail below. A "substantial adverse change" means "demolition, destruction, relocation, or alteration of the resource such that the significance of an historical resource would be materially impaired." Section § 800.5 (a) (2) states that adverse effects on historic properties include, but are not limited to:

- (i) Physical destruction of or damage to all or part of the property;*
- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;*
- (iii) Removal of the property from its historic location;*
- (iv) Change of the character of the property's use or of physical features within the property's setting that contributes to its historic significance;*
- (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;*
- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and*
- (vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.*

Under CEQA modifications or alterations to a designated historic resource must be evaluated to determine if they will result in an adverse impact to the

resource. An adverse effect is defined by as an action that will diminish the integrity of those aspects of the property that make it eligible for the listing at the local or state level, or in the NRHP.

CEQA defines an adverse effect in the following manner:

A substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

CEQA defines material impairment of a historic resource in the following manner:

A. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;

B. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA (State CEQA Guidelines Section 15064.5).

Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995) shall be considered as mitigated to a level of less than significant. Therefore, in determining the impact of a project on an "historical resource" CEQA regulations require the application of the Secretary of the Interior's Standards to determine if the project results in a substantial adverse change to the resource or those physical characteristics or character-defining spaces and features that convey its historical significance.

3.0 HISTORICAL SUMMARY

A detailed history of the property of the property is found in the Phase 1-2 Historic Resources Report prepared by Post/Hazeltine Associates in 2015. This section of the report provides a brief historical overview to provide a context for the

analysis of the proposed project.

3.1 The Property at 83 Eucalyptus Lane (All Saints By-the-Sea Church) (1900-2016)

By July 1900 a sum of \$2,500.00 had been raised to fund the construction of a new church on a lot on 83 Eucalyptus Lane. Construction began on September 3, 1900 under the supervision of the architect, Arthur B. Benton; several weeks later, on September 26th the cornerstone was laid (the cornerstone was uncovered this year when the bell tower was dismantled). The church was designed by Benton in the Craftsman style with Gothic Revival elements somewhat reminiscent of the Bay Area Tradition popular in Northern California, particularly for ecclesiastical architecture during the late 19th and early 20th centuries (Figures 3 - 5). On November 27, 1900 All Saints By-the-Sea Church was consecrated by Bishop Johnson with 100 parishioners in attendance (McGee, 2000: 8). On January 18, 1901 a 616- pound bell was placed in the bell tower donated by Mr. & Mrs. Walter Humphrey in memory of their daughters. Two years after completion of the church, in 1902, a small one-story two-bedroom Vicarage, located to the south of the church, was completed for \$1,000.00; the funds provided by Josiah and Emmaline Doulton (this building forms the nucleus of the existing Centennial House/Parish House). By 1910 stained-glass windows had been installed in most of the window openings (The majority of which were fabricated by Judson Studios of Los Angeles) (McGee, 2000: 16). In 1913 leaded glass windows were installed for "all clerestory sash in old and new windows of church" by the architectural firm of E. Russel Ray and Winsor Soule. Ray and Soule also were engaged to finish the gable of the new organ chamber, including an exterior truss, as well as re-shingle the church's roof, dormers and robing robe (Order Sheets for the Office of E. Russel Ray, October 15, 27 and October 30, 1913). A year later, in 1914, a chancel was erected as a memorial to Reverend Moore (the architect for this addition is not documented in church records).

During Weld's tenure other improvements were made to the church, including the construction of a room off the east end of building and a wing off its south end to provide a study for the rector and a choir room. It was completed in 1916 (no architect could be documented for these additions). After an earthquake in June of 1925, unspecified damage to the church required \$4,500.00 to repair (McGee 2000: 18 -19). Based on a detailed inspection of the bell tower during its dismantling in June and July of 2016, much of the repairs appear to have involved the bell tower which appears to have been partially rebuilt. In 1929 that the interior of the church was renovated when the ceiling was replaced and interior arches constructed when aisles were added off either side of the nave. In 1930 trusses were installed in the nave's ceiling and additional windows were added under the supervision of architect Carleton Winslow (Letter from Carleton Winslow to Reverend Weld, February 26, 1930).

In 1938 the church underwent further remodeling (there are no details as to what

the remodeling entailed). In 1941 St. Michael's Chapel was added to the church's north elevation (no architect could be documented for the St. Michael's addition) (McGee, 2000: 79). No major additions or alterations took place during World War II, though during this period the Parish Hall was used as a USO canteen. The last improvement during Reverend Pettus' tenure was the re-roofing of the Parish Hall in 1947 (McGee, 2000: 79).

In 1958-1959 the nave of the church was enlarged by constructing an addition at the east end of the original building to accommodate an additional 125 seats; this addition was designed by the architectural firm of Howell, Arendt, Moser and Grant. In 1987 the church's interior was remodeled and a room was built behind the new altar to house pipes for the organ. Alterations to the hardscape and landscaping surrounding the church, including raising the ground level by a least one-foot, were made in 1999 by Thompson/Naylor Architects. The bell tower is currently being reconstructed using the original stone and woodwork.

5.0 SITE DESCRIPTION

The following description is derived from the Phase 1-2 Historic Resources Report prepared by Post/Hazeltine Associates in 2015.

5.1 The Church

Built in 1900, the wood-framed and masonry Craftsman style church incorporates Gothic Revival style motifs (Figure 11). The church, which is essentially rectangular in configuration, is aligned on a west to east axis with the vestibule at its west end, opening into the narthex and baptistery. The narthex opens into the nave which extends east to the sanctuary, which is flanked on its south side by the vestry and a small chapel. The church's picturesque massing, composed of steeply pitched roofs and a masonry bell tower set at the northwest corner of the building, is designed to emphasize the domestic scale of the building which recalls the appearance and character of a rural Gothic Revival English church as filtered through the sensibilities of Arthur Benton's interpretation of the Craftsman style.

The building's exterior employs a range of materials, including wood shingles, dressed masonry, stained glass windows, wrought metal, and massive wood timbers finished to emulate the appearance of hand-hewn beams. These building materials are characteristic features of the Craftsman style, which emphasized the use of hand-crafted natural materials or those that emulated the appearance of handcrafting rather than mechanization of industrially-produced products. This emphasis on natural materials can be seen in the employment of the church's sandstone masonry base, which is composed of rectangular sandstone blocks. Other natural, handcrafted materials include wood-framed walls sheathed in wood shingles on the church's north, west and south elevations, wood timbers, hand-wrought metal, and stained glass windows.

The steeply pitched roof, with its thick wood fascias, and chamfered beam ends also emphasizes the appearance and quality of handcrafted materials and finishes. The picturesque quality of the building is further enhanced by the employment of an apse-like projection housing the baptistery on the primary façade (west elevation) and the architect's decision for asymmetry by locating the main access to the church at the base of the bell tower rather than on axis with the nave.

West Elevation (entrance facade)

The west elevation is the entrance façade of the building (Figures 12 - 14). Its picturesque massing is defined by the asymmetry of the elevation with the main front gable roof flanked on its north by a masonry bell tower composed of rectangular sandstone blocks housing a recessed entry porch at its base and a belfry. A series of steeply-pitched front gable roofs cap the main block of the church and the two recessed wings set off the south side of the elevation. The central gable is capped by a Celtic style cross. Wide wood plank fascias sheath the slightly projecting roof eaves. A semi-circular apse-like projection housing the baptistery at the centerpoint of the façade is embellished with five lancet-style stained glass windows. Three narrow lancet-style stained glass windows are set below the apex of the elevation's main front-facing gable. The bell tower is composed of a rectangular masonry base with flared corners, capped by two masonry piers with pyramidal caps that support a Gothic style wood belfry. Set atop a short flight of sandstone steps, the porch's arched opening is sheltered beneath a shallow front-facing gable roof featuring Gothic style wood trusses, supported by timber braces. On the recessed wing, flanking the central gable, a similar, but slightly simplified version of this roof type, shelters a secondary entrance into the church. This wing is flanked on its south by recessed, shingle-clad recessed wing capped by a front-facing gable roof with a centrally-placed brick chimney. The fenestration of this wing composed of twelve-over-one wood sash windows.

Modifications to the West Elevation

Originally, the recessed wing and secondary entrance flanking the south side of the nave was capped by a shed roof (see Figures 3 & 4). This wing was rebuilt with a front gable roof and a porch capped by open trusswork whose design emulated the roof over the main entrance to the church. The addition housed a study and choir room. The recessed wing at this end of the elevation was built in 1916.

The North Elevation

The north elevation is L-shaped in configuration, with the entry porch and belfry flanked on their east by an extension to the nave added in 1921 that has a front-facing gable roof (Figures 15 -18). At its east end the addition is flanked by the

remaining section of the original exterior wall of the church, which is capped by a side gable roof. This part of the elevation features a base of sandstone blocks capped by a shingled wall. Fenestration is comprised of a series of stained-glass windows set in arched openings. A circular stained glass window, added in 1921, is set in the gable end of the wing.

Modifications and Additions to the North Elevation

In 1921 a part of the north elevation was extended several feet to the north to provide space for approximately 40 additional seats in the nave. In 1941 St. Michael's Chapel was built off the north side of the sanctuary. Further changes took place in 1958-1959 when the building was further enlarged to accommodate seating for 125 additional worshippers.

The East (rear) Elevation

The east elevation has an irregular footprint composed of the centrally-placed sanctuary at the end of the church, flanked on its south by the recessed end of the vestry and on its north by the slightly recessed end of the 1921 addition to church (Figures 19 & 20). The entire east elevation is clad in wood shingles. Fenestration is confined to a small entry door accessed through a Gothic style ogee arch opening; set in a slight projection, it comprises the east end of the sanctuary.

Modifications and Additions to the East Elevation

In 1914 the elevation was altered when a chancel was inserted at the east end of the sanctuary. In 1916 a small room was added off the east end of the sanctuary. Finally, in 1987 a room was added behind the altar to house additional pipes for the organ.

The South Elevation

The south elevation is L-shaped in configuration and is flanked on its east by a projecting wing built in 1916 housing a study for the rector and a choir room (Figures 21 & 22 and see Figure 14). The nave and aisles of the church are capped by a steeply-pitched side-gable roof; its fenestration is composed of stained glass windows set in arched reveals. The choir room and study are capped by a steeply-pitched side gable roof. A porch, capped by a front-gable roof supported by corbelled wood timbers, shelters a glazed wood-paneled door that provides access to the choir room.

Modifications to the South Elevation

The wing at the east end of the south elevation was built in 1916 (Today this wing, built to house the rector's study and a choir room, is referred to as the Vesting

Room). In 1916 other alterations were made to the wing, which included enlarging the interior to accommodate more seating. Changes may have been made to this side of the building in 1958-1959 when extensive alterations were made to increase the building's seating by 125 seats.

6.0 SUMMARY STATEMENT OF SIGNIFICANCE

The following summarizes the significance findings of the Phase 1-2 Historic Resources Report prepared by Post/Hazeltine Associates in 2015.

The church at 83 Eucalyptus Lane (All Saints By-the-Sea Church) qualifies for listing as a significant historic resource at the County level, under Criteria 2, 3 and 4. It also is eligible for listing to the California Register of Historical Resources under Criterion C and the National Register of Historic Places under Criterion c. Therefore, the church which is eligible for listing at the local level, as well as the California Register of Historical Resources and the National Register of Historic Places, is a significant historic resource for the purposes of environmental review.

7.0 POTENTIAL ADVERSE IMPACTS

The following section of the report will evaluate the impact of the proposed project on the significant resources identified in this report. Potential adverse impacts include alterations or changes that result in changes to a resource or its setting that diminish those qualities that justify its potential listing as a significant historic resource at the County of Santa Barbara, state and national levels. Please refer to Section 2 of this report for an overview of the regulatory setting for the project. Please see Section 1.3 for a project description and Appendix A for project plans and Appendix B for the structural engineer's report.

State CEQA Guidelines #15064.5 for determining the significance of impacts to historic resources:

An adverse effect is defined as an action that will diminish the integrity of those aspects of the property that make it eligible for listing in a local, State or National register of historic resources. CEQA defines adverse effect in the following manner: *A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment* (Public Resource Code 15064.5 (b)). *Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired* (Public Resource Code 15064.5 (b1)).

CEQA defines material impairment of a historic resource as follows:

(A) Demolishes or materially alters in an adverse manner those physical

characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;

- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or*
- (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA. (Public Resources Code 15064.5 (b2).*
- (D) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995) shall be considered as mitigated to a level of less than significant.*
- (E) A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.*

The following direction for applying mitigation measures is found in Section 2.5 of the MEA *Guidelines for Archaeological Resources and Historic Structures and Sites* (2002: 65 - 70).

These include the following:

- 1) In-situ preservation is the preferred manner of avoiding damage to significant historic resources.*
- 2) Planning construction so that demolition or alteration of structures, sites and natural objects are not required; and*
- 3) Incorporating existing structures, sites and natural objects into planned development whenever avoidance is not possible.*

Secretary of the Interior's Standards (Standards):

The project proposes alterations to the building including additions to the existing

north, east and west facades. Under the Standards this project is defined as rehabilitation. The Standards define rehabilitation as follows:

Rehabilitation is defined as the act or process of making possible a compatible use for property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural or architectural values (<http://nps.ov/history/hps/tps/standards/rehabilitation.htm>).

The following standards developed by the National Park Service to evaluate rehabilitation projects will guide the evaluation of the proposed project:

Secretary of the Interior's Standards for Rehabilitation

- 1) *A property will be used as it was historically or given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*
- 2) *The historic character of a property will be retained and preserved. The removal of distinctive materials or alterations of features, spaces, and spatial relationships that characterize a property will be avoided.*
- 3) *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*
- 4) *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*
- 5) *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*
- 6) *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*
- 7) *Chemical and physical treatments, if appropriate, will be undertaken by the gentlest means possible. Treatments that cause damage to historic materials will not be used.*
- 8) *Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*
- 9) *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale, and proportion, and massing to protect the integrity of the property and its environment.*
- 10) *New additions and adjacent or related new construction will be undertaken in such a manner that if removed, in the future, the essential form and integrity of the historic property will be unimpaired (36 CFR Part 68, 1995 Federal Register, Vol. 60, No. 133).*

Further guidance for retrofitting projects is given in NPS Preservation Brief 41: *The Seismic Retrofit of Historic Buildings, Keeping Preservation in the Forefront*:

- *Historic materials should be preserved and retained to the greatest extent possible and not replaced wholesale in the process of seismic strengthening;*
- *New seismic retrofit systems, whether hidden or exposed, should respect the character and integrity of the historic building and be visually compatible with it in design; and,*
- *Seismic work should be "reversible" to the greatest extent possible to allow removal for future use of improved systems and traditional repair of remaining historic materials.*

As noted in Preservation Brief 41 the scope of retrofitting is based on several factors:

The integrity and significance of the historic building, paired with the cost and benefit of seismic upgrading, need to be weighed by the owner and the consulting team. Buildings in less active seismic areas may need little or no further bracing or tying. Buildings in more active seismic zones, however, may need more extensive intervention. Options for the level of seismic retrofit generally fall into four classifications, depending on the expected seismic activity and the desired level of performance. Realistically, for historic buildings, only the first three categories apply.

1. Basic Life Safety. *This addresses the most serious life-safety concerns by correcting those deficiencies that could lead to serious human injury or total building collapse. Upgrades may include bracing and tying the most vulnerable elements of the building, such as parapets, chimneys, and projecting ornamentation or reinforcing routes of exit. It is expected that if an earthquake were to occur, the building would not collapse but would be seriously damaged requiring major repairs.*

2. Enhanced Life Safety. *In this approach, the building is upgraded using a flexible approach to the building codes for moderate earthquakes. Inherent deficiencies found in older buildings, such as poor floor to wall framing connections and unbraced masonry walls would be corrected. After a design level earthquake, some structural damage is anticipated, such as masonry cracking, and the building would be temporarily unusable.*

3. Enhanced Damage Control. *Historic buildings are substantially rehabilitated to meet, to the extent possible, the proscribed building code provision. Some minor repairable damage would be expected after a major earthquake.*

4. Immediate Occupancy. *This approach is intended for designated hospitals*

and emergency preparedness centers remaining open and operational after a major earthquake. Even most modern buildings do not meet this level of construction, and so for a historic building to meet this requirement, it would have to be almost totally reconstructed of new materials which, philosophically, do not reflect preservation criteria (National Park Service, Preservation Brief 41). Based on a review of the proposed project and the goals of the applicant, the proposed intervention is considered to be Category 3, *Enhanced Damage Control* as the project intends to provide for both enhanced life safety and enhanced damage control.

7.2 Identification of Character and Non-Character-Defining Historic Fabric

West Elevation (street façade, primary elevation)

Character-Defining

- Bell tower (currently being rebuilt); and
- Front gable element with its apse featuring stained glass windows, three lancet windows set below the peak of the gable, shingle siding, and masonry base;
- Recessed portion of the wing added to the south side of the church in the early 20th century including its stone and shingled walls, roofed porch and its door, brick chimney, stained glass windows and the front gable element; and
- Façade of the one-story addition including its covered porch and casement windows.

Non-Character-Defining

- Concrete steps into bell tower.

South Elevation (side elevation facing Parish House)

Character-Defining

- Recessed portion of church building with its arcaded stained glass windows, stone base, shingled walls and front and side gable roof;
- and
- Wing housing the choir room, sacristy including its shingle walls, porch and overall arrangement of fenestration featuring sash windows.

Non-Character-Defining

- Door which may be later replacement.

East Elevation (rear elevation)

Character-Defining

- Elevation of the one-story wing and its fenestration and brick chimney; and
- The exterior corner of the sanctuary built in c. 1914.

Non-Character-Defining

- Additions made after 1930 including the organ equipment rooms, existing equipment yard; and
- The addition at the north end of the addition, which may in part date to 1914 (due to later alterations).

North Elevation (facing towards parking area)

- Side elevation of bell tower;
- Section of wall with arcaded stained glass windows, its shingled walls and stone base;
- The stained glass windows in the additions constructed between 1941 and the late 1950s (which appear to have been relocated from the original exterior wall of the church).

7.3 Detailed Project Description

The project includes the following components:

- 1) Additions and alterations to meet the programmatic requirements of the Parish. These would encompass interior alterations, including:
 - lowering the floor level;
 - reconfiguring the seating; opening-up the existing choir room to the nave;
 - replacing a one-story addition located at the northeast corner of the building with a columbarium; and
 - reconfiguring the sanctuary by relocating the organ from its existing location off the west side of the altar to behind the altar.
- 2) Address structural deficiencies identified in a structural evaluation prepared by Parker Resnick, Structural Engineers (Appendix B). The report identified a number of deficiencies including:
 - a. Inadequate foundations;
 - b. Lack of sheer walls;
 - c. Deficiencies in the exterior walls' timber framing;
 - d. Bowing walls;

- e. Stonework lacks adequate foundations; and
- f. Building does not meet current seismic codes.

In order to address these deficiencies, the following alterations are proposed:

- Install new concrete foundations. This would include dismantling and re-building the exposed sandstone walls along the street façade and part of the north and south elevations. The new walls would incorporate the original sandstone blocks and would match the original wall in appearance, design and materials;
- Replace the exterior walls on the building's north and west elevations in order to address the deterioration of the existing wood framing, install shear walls, and enhance the building's structural integrity by installing moment frames, additional framing and tying the roof and wall together. This would require replacement of most of the existing wall framing and shingle cladding. The new cladding would match the original shingles, in dimension, thickness, profile, material, and appearance. The existing windows and window frames would be returned to their original location;
- Raise the roof approximately 1-foot to allow for the installation of insulation and roof framing. The new roof would match the overall profile and appearance of the existing roof;
- Lower the floor level of the vestibule to allow universal access;
- Replace the organ room located near the northeast corner of the church with an addition housing a columbarium;
- Alter the wing housing the sacristy, choir room, flower room and restrooms located off the south side of the church by removing the fenestration and installing new doors and relocating several windows. Other changes include relocating the porch and replacing the existing shingle cladding with new shingle cladding that would match the original;
- Alter the rear elevation of the church by constructing an addition off the southwest corner of the church. This would include removing an existing brick chimney; and
- Enlarge an existing equipment yard located off the northeast corner of the church.

As noted in the report prepared by Parker-Resnick, the proposed seismic retrofit of the church (excluding the masonry bell tower) is not required because the

building is a one-story wood frame structure. While retrofitting is not required, the parish is undertaking them to improve life-safety and to allow the building to meet the current needs of the parish.

7.4 Application of the Secretary of Interior's Standards to the Project

The following Standards apply to the project as a whole:

Standard 1: *A property will be used as it was historically or given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*

The applicant does not propose changes to the use of the building which will continue to be used as a place of worship.

Analysis

Since its completion in 1900 the church has functioned as the parish church for All Saints by the Sea Church. After the implementation of the proposed project the building would continue its historic function as a church. Therefore, the proposed project meets Standard 1.

Standard 2: *The historic character of a property will be retained and preserved. The removal of distinctive materials or alterations of features, spaces, and spatial relationships that characterize a property will be avoided.*

The applicant proposes extensive alterations to the exterior including new wall framing, shingle siding and additions as detailed above in Section 7.2 of this report. The alterations would remove and replace historic fabric in kind and construction additions off the north, east and west sides of the building. These alterations and additions are detailed in Appendix A.

Analysis of Proposed Changes

Provided the guidance outlined below under Standards 5, 7 and 9 is followed the project potentially meets Standard 2.

Standard 3: *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*

The project does not propose the addition of conjectural features or architectural or decorative elements from other historic properties.

Analysis

Because the project does not propose the use of historic materials for another property, the proposed project meets Standard 3.

Standard 4: *Changes to a property that have acquired historic significance in their own right will be retained and preserved*

The Phase 1 Historic Resources Report determined that the alterations to the church after 1930 do not embody the level of architectural significance that would make them historically significant in their own right. These changes which are identified in Figure 5. The project does not propose changes to features that have acquired historic significance in their own right (i.e. that date after the period of significance for the building as a whole).

Analysis

Because the project does not proposed additions that have achieved significance in their own right, the proposed project meets Standard 4.

Standard 5: *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

Removal and alteration and repair of historic fabric would include the following:

Cladding

Character-defining shingle cladding would be removed on: 1) the façade (west elevation); 2) shingle siding on the at the west end of the north elevation (this appears to be the only section of the north elevation predating circa-1913; 3) shingle cladding at the west end of the south elevation (recessed portion of the façade; 4) shingle siding on a small part of the east elevation where the sanctuary intersects with the choir room wing; and 5) the east elevation of the choir room wing including its siding would be removed .

Analysis

- Loss of shingle siding on sections of the building that postdate the period of significance would not impair the building's integrity of materials or workmanship and meets Standard 5.
- Removal of the shingle siding on the small addition off the northeast corner of the church would not impair the building's integrity as this addition, while built in part before 1930s does not make a substantial contribution to the building's architecture and therefore, meets Standard 5.

- Loss of all of the shingling on the street façade and at the west end of the north and south elevation would remove substantial amounts of character-defining material dating either to the initial construction of the building in 1900 or shortly after (between 1900 and circa-1920). The most critical of these is the removal of shingles from the street façade which is the public face of the building. Therefore, this proposed alteration does not fully meet Standard 5.
- Loss of shingling on the east elevation of the choir room wing, which was built in 1915-1916 is not as significant, since this is the rear of building which faces away from the public street. Therefore, this proposed alteration meets Standard 5.

Stonework

The stonework extending along the street façade and the north ends of the north and south elevations would be dismantled and rebuilt on a new concrete foundation using the original stone.

Analysis:

The existing stonework features a rudimentary foundation of roughly formed stone blocks and stone which extend below grade. The structural engineer's report identifies this structurally deficient. The applicant proposes to dismantle and rebuild the stone wall following the same protocol established for the rebuilding of the bell tower that was approved in 2015. Because this would return the foundation wall to its historic appearance using the original historic material it meets the intent of Standard 5.

Brickwork

The unreinforced brick chimney on the east elevation of the choir room wing would be removed and replaced by an addition.

Analysis

The chimney proposed for removal does not form an especially visible element of the architectural assemblage since it is located on the rear of the building. Moreover, the more prominent chimney located on the west elevation of the choir room wing would remain in place which would preserve an example of this type of architectural element. Therefore, Standard 5 is met.

Exterior wall framing

Exterior wall framing at the northeast corner of the building, the entire street

façade (west elevation) and the portions of the north elevation and the choir room wing would be removed and replaced with new wood framing and moment frames to address structural deficiencies in the existing building.

Analysis

Replacement of wood framing that is too deteriorated to repair is acceptable and meets Standard 5 since the exterior appearance of the building would remain the same after the new framing is installed.

However, the replacement of all of the wood framing on the street façade is problematical since it would remove historic building material from the only exterior section portion of the elevation that preserves its 1900 appearance and would require complete rebuilding of the apse element. Therefore, this element of the project as it applies to the street façade and the southwest corner of the building does not meet Standard 5.

An alternative strategy to preserve wall framing on the street façade should be explored. This could include strengthening this section of the interior wall from the interior to preserve some of the original framing as well as substantial portions of the shingle cladding in place. If this can be accomplished the proposed project to rebuild and strengthen the wall framing would meet Standard 5.

Fenestration and other Features

On the south elevation, the choir room wing would be altered by relocating the existing porch slightly to the east to allow for a larger set of doors that would provide better access from the interior of the church to the outside (the current door is a standard person door in size). The three of the existing windows would be relocated on this wing. A large sash window located on this wing's west elevation would be removed to allow for the insertion of a moment frame and structural bracing. Stained glass windows will be returned to their original location once the building's foundations and walls has been repaired/rebuilt.

Analysis

While these proposed changes would alter the appearance of this wing they would preserve most of the existing fenestration and porch and door albeit in a different location on the same wing. Therefore, since these changes would preserve historic fabric they meet Standard 5.

Standard 6: *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

Cladding

As noted above under Standard 5, the shingle siding on the street façade dates to the original construction of the church in 1900. Provided the shingles are not too deteriorated to retain in place, the applicant should consider methods for strengthening the wall framing so the existing shingling on the street façade can be retained. If alternative strategies for reinforcing the wall cannot be identified and if the shingles are too deteriorated to retain the wall can be re-shingled provided the new shingles are wood and mimic the material, profile, dimensions and appearance of the originals. Provided this guidance is met the project potentially meets Standard 6 as it applies to the building's siding.

Stonework

The project proposes to dismantle the existing sandstone foundation on the north, south and west elevations and rebuild it with a concrete foundation clad in the historic stonework. Before the stonework is dismantled it would be photo-documented, inventoried and stored. After the new foundation is installed, the existing stone blocks would be trimmed to fit while maintaining the exterior of each block's exterior dimension and surface finish. After trimming, the blocks would be reinstalled as documented by the archival photographs and would then be pointed using mortar that would match the original mortar joints and material in dimension, material and texture. After rebuilding, the stone walls would emulate their historic material, dimension and appearance. If some of the stone blocks are too deteriorated for re-use, the replacement blocks would match the original in material, overall dimension and appearance.

Analysis

A review of the existing structure by Parker-Resnik, Structural Engineering, revealed that the foundation is constructed of unreinforced sandstone blocks, with a sandstone block foundation.

Preservation Brief 41 encourages the retention of original building fabric to the maximum extent feasible for seismic strengthening projects. This guidance is consistent with the guidance in the Standards. Generally, this standard is met by employing design and construction strategies that minimize the loss of historic building fabric and features. Therefore, the proposed project, which would re-use the original stonework and recreated its original appearance meets Standard 6.

Exterior wall framing

As noted above under Standard 5, loss of such an extensive amount of original wall framing on the street façade and at the northwest and southwest corner of

the building has the potential for adversely affecting the building's integrity of materials and workmanship. Moreover, Preservation Brief 41 encourages the retention of original building materials to the maximum extent feasible. The most significant loss would occur on the street façade and southwest corner of the building were original framing and shingling from 1900 is preserved. If an alternative strategy for rebuilding the walls to preserve the existing street façade is not structurally feasible because of structural deficiencies or advanced deterioration, the proposed project could potentially meet Standard 6 provided the exterior wall is rebuilt to preserve its original exterior appearance (this would allow increasing the "thickness" of the roof to allow for insulating the roof). Provided this guidance is followed the proposed project to strengthen/rebuild the exterior walls potentially meets Standard 6.

Fenestration and other Features

Preservation Brief 41 encourages the retention of original building fabric to the maximum extent feasible for seismic strengthening projects. This guidance is consistent with the guidance in the Standards. Generally, this standard is met by employing design and construction strategies that minimize the loss of historic building fabric and features. Provided the fenestration and porch on the choir room wing are relocate and the exterior stained glass windows are retained and preserved, the propose project to retain the stained glass windows and relocate fenestration and a porch on the south elevation meet Standard 6.

Standard 7: Chemical and physical treatments, if appropriate, will be undertaken by the gentlest means possible. Treatments that cause damage to historic materials will not be used.

At this time, the project does not propose the cleaning or treatment of the historic fabric. If the project is revised to include cleaning or other treatments, the treatment plan shall be reviewed by a County-qualified historian to ensure that it is consistent with the Secretary of the Interior's Standards. A letter reviewing the proposed treatment plan shall be submitted to the County of Santa Barbara, for their review and approval.

Standard 8: *Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

Analysis

The application of this criterion to archaeological deposits is beyond the purview of this report.

Standard 9: *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be*

compatible with the historic materials, features, size, scale, and proportion, and massing to protect the integrity of the property and its environment.

The project proposes the construction of additions off the northeast and southeast corner of the building and alterations to the fenestration of the choir room wing.

Analysis

The additions off the rear of the building would not impair the building's primary façade since they are located off the rear of the building. Moreover, they have been designed to emulate the church's existing architecture in materials design and proportion. The design, scale and massing of the columbarium are appropriate provided that the size of the windows or their stained glass be subtly differentiated from the existing to provide some differentiation between the building historic fabric and the addition. While the proposed project would alter the south elevation of the choir room wing it would retain the existing fenestration and porch by relocating these on the wing. This would retain the overall appearance and character of this element of the building. If this guidance is implemented, the project would meet Standard 9.

Standard 10: *New additions and adjacent or related new construction will be undertaken in such a manner that if removed, in the future, the essential form and integrity of the historic property will be unimpaired.*

The proposed changes are not reversible and therefore, do not fully meet Standard 10, since the structural interventions necessary to rebuild and strengthen the building's existing foundations and wall framing are not reversible.

Application of Guidance in NPS Preservation Brief 41: *The Seismic Retrofit of Historic Buildings, Keeping Preservation in the Forefront:*

- *Historic materials should be preserved and retained to the greatest extent possible and not replaced wholesale in the process of seismic strengthening.*

Discussion

Provided the guidance outlined under the application of Standards 5, 6, 7 and 9 is implemented the proposed project would meet the intent of this guidance.

- *New seismic retrofit systems, whether hidden or exposed, should respect the character and integrity of the historic building and be visually compatible with it in design*

Discussion

The seismic upgrades would not be visible. Provided the guidance outlined above under the application of Standards 5, 6, 7 and 9 is implemented, the proposed project meets the intent of this guidance.

- *Seismic work should be "reversible" to the greatest extent possible to allow removal for future use of improved systems and traditional repair of remaining historic materials.*

Discussion

The provided the guidance under Standards 5, 6, 7 and 9 is implemented the proposed project is considered to be as reversible as feasible given the goals of the project to provide for both enhanced life safety and enhanced damage control. Therefore, the proposed project meets the intent of this guidance.

Summary Statement

Provided the guidance outlined under the application of Standards 5, 6, 7, and 9 are implemented, the proposed project meets Standards 1 through 9. Standard 10 is not fully met because the proposed intervention is not reversible. While the project does not fully meet Standard 10, the project as a whole is potentially consistent with the intent of the Standards given the nature of the building's construction techniques and condition of its building materials, which are of unreinforced masonry and wood frame construction.

7.5 Required Treatment Plan

While the methodology for the project potentially meets the Secretary of the Interior's Standards for Rehabilitation (with the exception of Standard 10), the incorporation of the following required treatment plan will ensure that the historic and architectural significance of the property is preserved and that project impacts are less than significant:

1) The exterior elevations of the building and selected interiors (selected by historian of record) shall be photo-documented in detail after (excluding exterior elements documented the previous project with archival large-format black and white photography;

2) Final architectural and structural plans shall incorporate Historic Preservation Treatment Plan Notes prepared by a County-qualified historian and approved by the County of Santa Barbara Planning Staff, detailing the methodology for documenting the recordation of the original placement of the exterior stonework and woodwork.

3) During construction, periodic monitoring encompassing site visits shall be made by a County-qualified historian and letters shall be prepared for submittal to County of Santa Barbara Planning Staff to ensure that the approved treatment plan is implemented.

4) Alterations to the approved treatment plan shall be reviewed and approved by a County-qualified historian and shall be submitted to County of Santa Barbara Planning Staff for their approval.

7.6 Summary Statement of Impacts

After implementation of the proposed treatment plan the church building at 83 Eucalyptus Lane would retain its eligibility for listing as a historic resource at the local, state and national levels. Therefore, implementation of the proposed project and the required treatment plan would ensure that the proposed project would have a less than significant impact on significant historic resources (Class III).

8.0 CONCLUSIONS

Provided the guidance and treatment plan outlined in Section 7 of this report are implemented the proposed project would be potentially be consistent with County of Santa Barbara Historical and Archaeological Policies 1- 3) and Section F, Cultural Resources /Archaeology: Goal CR-M-1: *Preserve and Project Properties and Structures with Historic Importance in the Montecito Community to the Maximum Extent Feasible*. Therefore, project impacts to significant historic resources would be less than significant.

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Other Sources

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