



## Infill Development Projects: Understanding Impacts to Historical Resources

Infill development is generally considered good land use planning. Dense walkable communities with a variety of housing options encourage people to live closer to their jobs, which can reduce their vehicle miles traveled. Urban infill can lower overall energy consumption for a city. When done effectively, infill development can help build stronger, more stable communities. Historic resources should be considered and incorporated into infill development planning for the health and benefit of the community.

In this CEQA Case Study, an applicant proposed to build two 28-story residential towers and a 3-level parking garage adjacent to a single story historic commercial building in southern California. The neighborhood traditionally consisted of low-rise commercial buildings, but the community's General Plan identified the area as a future high-density, mixed-use zone. The applicant proposed to mitigate any impacts to the historic building's integrity by restoring a few finishes in the building's lobby. The Draft Environmental Impact Report (DEIR) for the proposed project found the towers would have no impact on the historic building's integrity. Historic integrity is defined by *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, as containing seven aspects: location, design, setting, materials, workmanship, feeling, and association. The environmental document did not focus on impacts to the historic building's integrity of setting (physical environment) and feeling (sense of a particular period of time). If significant impacts to elements of a building's historic integrity result from infill development, it is important to acknowledge the impacts and work with the applicant to ensure as much of the building's historic integrity is preserved as possible.

After receiving comments to this effect, the Final EIR

THE CALIFORNIA OFFICE OF HISTORIC PRESERVATION COMMENTS ON CEQA DOCUMENTS AS AN AUTHORITY ON HISTORIC AND CULTURAL RESOURCES. THIS PUBLICATION USES CASE-STUDIES TAKEN FROM ENVIRONMENTAL DOCUMENTS PRODUCED IN CALIFORNIA TO HELP ENVIRONMENTAL ANALYSTS AND LEAD AGENCIES UNDERSTAND HISTORICAL AND CULTURAL RESOURCE IDENTIFICATION AND EVALUATION.

THIS IS NOT AN OFFICIAL POLICY DOCUMENT, BUT THE EXAMPLES INCLUDED CAN HELP PROFESSIONALS AND DECISION MAKERS UNDERSTAND HISTORIC AND CULTURAL RESOURCE EVALUATION AS AN INTEGRAL ELEMENT IN SUCCESSFUL COMPLETION OF THE CEQA PROCESS.

included a historic rehabilitation treatment plan as mitigation for impacts to other elements of the building's historic integrity. The project proponent agreed that the complete restoration would comply with the Secretary of the Interior's Standards for Rehabilitation and they would work with a restoration architect to ensure any unforeseen conditions were approached thoughtfully. The Final EIR maintained that the impact to the historic building was therefore less than significant because the final proposal ensured five aspects of the building's historic integrity would remain intact despite some impact to the buildings historic setting and feeling. Given the project objectives of 1) increased density and 2) preservation/continued use of the historic building, this approach seems like reasonable means for ensuring impacts to the building are less than significant.

Local government planners and preservation advocates should work with project proponents through the local preservation review process, and/or the CEQA process to incorporate historic resources into infill development design. The collaborative approach, exemplified by this Case Study, has the potential to inspire more sustainable infill design when historic resources are involved.





# CEQA CASE STUDIES

## CALIFORNIA OFFICE OF HISTORIC PRESERVATION

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## Requesting CEQA Comments from OHP

Requests for OHP comments from local agencies and concerned local citizens should be made at least two weeks prior to the end of the comment period for the CEQA document prepared for the project in question. Requests made any closer to the end of the comment period will generally not provide OHP with sufficient time to respond to the request. Requests must be made in writing (e-mail, fax, or mail) and should include as much information as possible about the project (name, location, and project description); historical resources information (name of property, location, property description and significance); lead agency information (contact person, contact information, other involved agencies); and CEQA process (document type, comment period).

OHP is occasionally contacted by members of the public who feel that a CEQA document should have been prepared for a

specific project, but one was not. When making a request for comments from OHP in such a circumstance, OHP should still be given at least two weeks prior to any final action on the project in question to respond. A shorter time frame will generally not provide OHP with sufficient time in which to do so. To the extent possible, the same information as described above should be provided.

OHP recognizes that there may be times when no CEQA document is prepared and it is not possible to provide OHP with sufficient information on which to act prior to a lead agency's final action on a project. In such circumstances, and subject to OHP commenting criteria listed below, OHP may request that the lead agency provide additional time in which OHP may provide further comments. The closer the request is made to anticipated final action by a lead agency, though, the less likely it is

that OHP will take any action.

OHP is also occasionally contacted by members of the public for advice and assistance with general CEQA questions not related to a specific project. OHP will attempt to respond to all written requests for advice and assistance with general CEQA questions within a timely manner. All requests should include the name and affiliation of the person making the request and contact information, including phone number, fax number, and email address. Please allow at least two weeks for OHP to respond.



THE OFFICE OF HISTORIC PRESERVATION (OHP) MAY CHOOSE TO COMMENT ON THE CEQA COMPLIANCE PROCESS FOR SPECIFIC LOCAL GOVERNMENT PROJECTS. OHP HAS COMMENTED ON CEQA DOCUMENTS AND ADVISED LEAD AGENCIES SINCE THE 1970S. HOWEVER, IT WAS NOT UNTIL THE ADOPTION OF THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES REGULATIONS IN 1992 AND THE 1998 AMENDMENTS TO CEQA THAT DEFINED HISTORICAL RESOURCES, THAT OHP INITIATED A SPECIFIC CEQA PROGRAM. BECAUSE OHP HAS NO FORMAL AUTHORITY OF LOCAL GOVERNMENT AGENCIES IN CALIFORNIA, THIS PROGRAM IS APPROACHED IN A MORE INFORMAL MANNER THAN OUR COMMENTING RESPONSIBILITIES UNDER SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT OR COMMENTS ON STATE PROJECTS UNDER PUBLIC RESOURCES CODE SECTION 5024.5, WHICH PERTAINS TO STATE OWNED HISTORIC PROPERTIES.

### CEQA RESOURCES

- ◆ [PRC Section 21083.2-21084.1](#)
- ◆ [CEQA Guidelines CCR Section 1500-15387](#)
- ◆ [Advocating for Historic Resources Under CEQA](#)