



## **PERMIT ANALYSIS**

### **The McCormick House 1600 Santa Barbara Street**

UPDATE: 30 October 2025

**Prepared for:**

Santa Barbara Museum of Art  
c/o Amada Cruz

**Prepared By:**

SEPPS Inc.  
Shelby Messner Janke, AICP  
1625 State Street, Suite 1  
Santa Barbara, CA 93101  
(805) 966-2758

## TABLE OF CONTENTS

### **1.0 BACKGROUND INFORMATION**

1.1	Site and Applicant Information	Page 5
-----	--------------------------------	--------

### **2.0 KEY CONSIDERATIONS**

Page 6

### **3.0 SITE CONTEXT AND HISTORY**

Table 3-1	Parcel Information	Page 7
-----------	--------------------	--------

3.1	Location	Page 7
-----	----------	--------

3.2	Property History	Page 7
-----	------------------	--------

### **4.0 RESIDENTIAL MULTI-UNIT (R-M) ZONE**

Table 4-1	Project Site Zoning Designation	Page 8
-----------	---------------------------------	--------

4.1	Residential Development Standards
-----	-----------------------------------

Table 4-2	Residential Zones Development Standards	Page 8
-----------	---	--------

4.2	Allowed Uses	Page 9
-----	--------------	--------

Table 4-3	List of Allowed Uses and Permit Type	Page 9
-----------	--------------------------------------	--------

### **5.0 CONDITIONAL USE PERMIT**

5.1	Conditional Use Permits	Page 10
-----	-------------------------	---------

5.2	Existing Conditional Use Permit	Page 10
-----	---------------------------------	---------

### **6.0 AVERAGE UNIT DENSITY INCENTIVE PROGRAM (AUD PROGRAM)**

6.1	AUD Program	Page 11
-----	-------------	---------

6.2	AUD Project at the Subject Site	Page 12
-----	---------------------------------	---------

Table 6-1	Private Open Yard Requirements	Page 12
-----------	--------------------------------	---------

### **7.0 PROPOSED ADAPTIVE REUSE ORDINANCE**

7.1	Draft Adaptive Reuse Ordinance	Page 13
-----	--------------------------------	---------

## **8.0 HISTORICAL ANALYSIS**

8.1 Historic Resources Inventory Page 14

8.2 Historic Analysis Page 15

## **9.0 ACCESSORY DWELLING UNITS (ADUs)**

9.1 Potential for Additional Units Through ADUs Page 15

## **ATTACHMENTS**

1. Assessor Parcel Map
2. Resolution 40
3. Resolution 68
4. CUP Review Memo
5. R-M Zone Development Standards
6. R-M Zone Land Use Regulations
7. Substantial Conformance Handout
8. AUD Program Ordinance
9. Draft Adaptive Reuse Ordinance
10. Mills Act Informational Packet
11. Accessory Dwelling Unit Guide

## **1.0 BACKGROUND INFORMATION**

### **1.1 Site & Applicant Information**

<b>Request:</b>	This analysis evaluates the development potential of the property located at 1600 Santa Barbara Street, as a potential Average Unit Density residential conversion, possible other allowed uses, evaluates the City's recently adopted Adaptive Reuse Ordinance, and contains an analysis of the existing Conditional Use Permit and possible allowances under the existing entitlement.
<b>Applicant's Representative:</b>	Shelby Messner Janke, Associate Planner IV SEPPS Land Use Consulting Inc. (SEPPS) 1625 State Street, Suite 1 Santa Barbara, CA 93101 (805) 966-2758 X 104 shelby@sepps.com
<b>Review Authority:</b>	City of Santa Barbara, Historic Landmarks Commission
<b>Project Site Access &amp; Location:</b>	The property is located on the corner of Santa Barbara Street and Arrellaga Street. Vehicle access is provided via an existing driveway on Santa Barbara Street. Pedestrian access can be taken from Arrellaga Street to the main entry of the existing building.
<b>Project Address:</b>	1600 Santa Barbara Street Santa Barbara, CA 93101

## 2.0 KEY CONSIDERATIONS

- Historical Analysis: The existing structure on site, known as the McCormick House, is listed on the City's Historic Resources Inventory, meaning there is a preponderance of evidence that the building meets the City's criteria for Historic Structures of Merit. Due to this status, careful design consideration and early consultation with an architectural historian is recommended should new development or exterior alterations be proposed to ensure that the proposal does not negatively impact the historic resource on site.
- Existing Entitlements: The property was gifted to the Santa Barbara Museum of Art (SBMA) in 1967 and has operated as an extension of the museum since 1970 under two Conditional Use Permits (CUPs), granted by the City Planning Commission. A three-year recheck of the use was required under the second CUP, which was never completed, however, continued use of the site in accordance with the original permit terms and issuance of a 1990 building permit which received zoning approval indicates the use is still valid.
- Similar Uses Allowed Under the Existing Entitlement: Conditional Use Permits (CUPs) are generally issued to a specific entity for a defined use and typically do not run with the land, rather they are more commonly issued to a specific user to operate their requested use. As such, a new CUP is usually required if ownership changes. However, if a new owner proposes a use that is substantially similar to the existing permitted use, the existing CUP may remain valid, subject to confirmation by City staff through a Substantial Conformity Determination. We recommend submitting an initial Planner Consultation request with a detailed description of the proposed use to allow staff to conduct a preliminary review. In most cases, a new CUP would be required if the proposed use is not allowed by the base zoning. A user wishing to operate under the existing CUP, would need to be very closely aligned to the uses allowed under the existing entitlement, which authorized an adjunct to the Santa Barbara Museum of Art. In most cases, we believe that a new CUP would be required for a use that is not permitted by-right in the zone.
- Residential Multi-Unit (R-M) Zone: The R-M zone allows single-unit, two-unit, and multi-unit residential uses, and allows for certain institutional uses with issuance of a Conditional Use Permit. The subject site is approximately 31,271 square feet and could support up to 9 units by base density, or up to 20 units under the City's Average Unit Density Incentive Program (AUD) with an average unit size of 905 square feet. An AUD project would be subject to open yard, parking, and inclusionary housing (i.e., affordable housing) requirements. Based on the historic status of the building, the most likely residential use on site would be through a conversion of the existing structure into residential units. Based on a review of the site, meeting the City's open yard and parking requirements could constrain development, and modifications to those standards may be required to accompany an AUD development if strict compliance could not be met.

- Recently Adopted Adaptive Reuse Ordinance: The City's recently adopted Adaptive Reuse Ordinance offers a potentially more flexible alternative to the AUD Program. The Ordinance allows for the conversion of older nonresidential buildings, like the McCormick House, to residential use without triggering standard requirements for density limits, open yard, or additional parking. Given the site's historic nature and spatial constraints, this pathway may offer significant advantages over an AUD development.

### 3.0 SITE CONTEXT AND HISTORY

**Table 3-1 Parcel Information**

Assessor's Parcel Number	027-192-020
Parcel Size	0.72 acres / 31,271 square feet (per City data)

Please refer to Attachment 1, Assessor Map.

#### 3.1 Location

The subject property at 1600 Santa Barbara Street is situated at the intersection of Santa Barbara and Arrellaga Streets, directly adjacent to Alice Keck Park Memorial Gardens. The site lies within the City of Santa Barbara's Residential Multi-Unit (R-M) zoning district, which permits a variety of residential uses along with certain residential accessory uses. Surrounding properties include a mix of institutional and residential uses, such as the Christian Science Sunday School, the Simpson House Inn (a designated historic resource), the Unitarian Society, and the adjacent public park. The site is currently developed with an approximately 12,000-square-foot building that has been owned and operated by the Santa Barbara Museum of Art since 1970.

#### 3.2 Property History

The property at 1600 Santa Barbara Street, historically known as the McCormick House, was gifted to the Santa Barbara Museum of Art (SBMA) following the death of Katharine McCormick on December 28, 1967. Ms. McCormick, a prominent philanthropist and advocate for women's rights, had purchased the property in 1940 and made it her primary residence until her passing. In her will, she expressed a strong desire that the property not be sold or developed in a way that would negatively impact the character of the surrounding neighborhood, particularly the adjacent Alameda Park. She envisioned the home being used by SBMA for the storage and display of artwork and for arts education purposes.

Following the transfer of ownership, the City of Santa Barbara granted SBMA a Conditional Use Permit (CUP) on August 6, 1970 (Resolution 40, Attachment 2), allowing use of the property as a public art museum adjunct in the residential zone. Approved uses included board meetings, annual fundraising events, studio art classes for adults and children, and storage of museum artwork. The CUP was approved for a three-year period.

In 1973, a second CUP was issued (Resolution 68, Attachment 3), extending the permitted uses under the same terms, with a requirement for staff review after three years. City records do not indicate that the review ever occurred; however, in 1990, a building permit (permit #4475) for a significant renovation of the McCormick House was issued, with zoning approval. Given the continued use of the property in accordance with the CUP and the City's zoning approval for the renovation, it was determined in a memo from the Planning Department that the CUP remained valid and no zoning violation existed, even though the recheck had not occurred. Please refer to Attachment 4, CUP Review Memo.

#### 4.0 RESIDENTIAL MULTI-UNIT (R-M) ZONE

**Table 4-1 Project Site Zoning Designation**

Zoning:	R-M (Residential Multi-Unit)
---------	------------------------------

As noted above, the site is located in the R-M zone; the R-M (Residential Multi-Unit) zone is meant to allow a mix of multi-unit housing types while keeping the overall feel of a residential neighborhood. The goal is to protect the area's residential character by limiting uses that do not fit well in a neighborhood setting. Some nonresidential uses may be allowed if they support everyday neighborhood needs, fit in with the surrounding homes, and do not create major issues like extra traffic, parking problems, noise, or glare.

#### 4.1 Relevant Development Standards

The R-M zone requires a minimum lot size of 14,000 sq. ft. for newly created lots under 10% slope, with larger lot size requirements on steeper slopes. Lots must also have at least 60 feet of public street frontage. Base residential density allows for 3 units or 1 unit per 3,500 sq. ft. of lot area, whichever is greater. Additional residential density may be possible through programs like the Average Unit-Size Density (AUD) Incentive Program and through the State Density Bonus Program. Please refer to Attachment 5, R-M Zone Development Standards.

**Table 4-2 Residential Zones Development Standards**

<b>Maximum Density (Base Density)</b>	9 units (1 unit/3,500 square feet of net lot area)
<b>Maximum Density Under the City's Average Unit Density Program</b>	20 units with a maximum average unit size of 905 square feet
<b>Front Setback (Residential Structures)</b>	1 <sup>st</sup> and 2 <sup>nd</sup> stories: 10 feet Portions above 2 <sup>nd</sup> story: 20 feet
<b>Interior Setback (Residential Structures)</b>	1 <sup>st</sup> and 2 <sup>nd</sup> stories: 6 feet Portions above 2 <sup>nd</sup> story: 10 feet Covered parking, Multi-Unit Residential: 6 feet
<b>Front Setback (Nonresidential Structures)</b>	Same as for Residential Structures



<b>Interior Setback – Conversions or Alterations (Nonresidential Structures)</b>	If an existing residential building is converted to a nonresidential use, or alterations to an existing structure contains nonresidential uses; comply with setback requirements for residential structures <sup>1</sup>
<b>Height Limit</b>	45 feet maximum

## 4.2 Allowed Uses

The R-M zone allows for a variety of residential uses, including single-unit, two-unit, and multi-unit housing, as well as accessory dwelling units, caretaker units, and small-scale community care facilities. Home occupations, community gardens, agriculture, and accessory uses typically related to residential use are also permitted. Certain uses—such as group housing, hotels, larger community care facilities, schools, and public or semi-public facilities—may be allowed with a Conditional Use Permit (CUP) to ensure they are compatible with the residential character of the area. This is the case for the current use of the property as an adjunct to the art museum; the use would not be typically allowed under the zone and required a Conditional Use Permit. CUPs are described in greater detail in the next section of this report.

Below is a list of some uses which may be desired at the subject site and the corresponding permit requirements for the use. Please refer to Attachment 6, R-M Zone Land Use Regulations for a full list of land uses and the required permits.

**Table 4-3 List of Allowed Uses and Permit Type**

Use Type	Approval Type
Single, Two-Unit, & Multi-Family Residential	Allowed, no further Discretionary Approval Required
Accessory Dwelling Unit (ADU)	
Caretaker Unit	
Community Care Facility (6 or fewer individuals)	
Family Day Care Home – Small	
Community Care Facility (7–12 individuals)	Performance Standard Permit (PSP)
Large Family Day Care Home	
Garden Apartment	Conditional Use Permit (CUP)
Planned Residential Development	
Community Care Facility (more than 12 individuals)	
Cultural Institution	
Day Care Center	
Community Assembly	
Hotel or Similar Use	

<sup>1</sup> The City's recently adopted Adaptive Reuse Ordinance is discussed below, which could allow for a conversion of the structure from a nonresidential use to a residential use, with no additional building setback requirement.

## **5.0 CONDITIONAL USE PERMIT**

### **5.1 Conditional Use Permits**

Conditional Use Permits (CUPs) provide a mechanism for evaluating uses that align with the overall intent of the zoning district but may have unique characteristics that require additional review. CUPs allow the City the opportunity to evaluate proposed uses that align with the general intent of the zoning district but may require additional oversight and are not expressly permitted by the base zone. Because each proposal is unique, conditions and standards are tailored to the specific characteristics of the project. CUPs are reviewed and approved by the Planning Commission at a public hearing.

### **5.2 Existing Conditional Use Permit Entitlement**

As previously noted, the Santa Barbara Museum of Art (SBMA) received approval of two Conditional Use Permits (CUPs) to operate the McCormick House as an extension of the main museum facility, allowing for art exhibitions, educational classes, and events. A CUP was required because such institutional or cultural uses are not typically permitted by right in the R-M zone under standard allowed uses.

According to recent discussions with City Planning staff and a review of archival records, we understand that the CUP is considered to be valid because museum-related activities have continued without interruption since the original CUP approvals, and the use is allowed to continue under the existing entitlement.

We were asked to research whether or not any other similar uses would be able to take place on site, under the existing CUP entitlement should a different owner/operator takeover the building. Based on our review of the CUP and discussions with Staff, we understand that in most circumstances, a new proposed use would be required to obtain a new CUP. This is because the existing CUP was granted specifically to SBMA and expressly states the use is to be an adjunct to the museum, which does not leave much flexibility for other uses or operators under that entitlement. Should a different owner/operator wish to continue the use or propose a use that is very similar to the entitled use, the CUP may still be valid. The validity would be evaluated under a Substantial Conformity Determination. Based on our review of the CUP and discussions with Staff, we do not think Staff would distinguish or give greater preference to a non-profit or for-profit organization in this case. They would consider the similarity of use to the existing entitlement and operations. That said, the proposed use would need to be nearly identical to what was approved under the existing entitlement and would likely need to remain connected to the SBMA in order for Staff to even consider it as a similar use.

Substantial Conformance Determinations are used to approve minor revisions to a previously approved discretionary project when those changes are found to be consistent with the original project description, findings, and conditions. These changes must not increase the project's intensity or have any potentially detrimental effects. Substantial Conformance cannot be used

to alter or remove conditions of approval. There are four levels of review depending on the scope of the proposed change—ranging from very minor modifications approved during plan check to more involved changes requiring informal input from decision-makers. Staff informed us that review of the CUP to confirm if a similar user could operate under the existing entitlement would likely require a Level 3 Substantial Conformity Determination, which includes dialogue with the decision-maker to get their input. The items are listed on the decision-maker's agenda for an informal “lunch meeting” where Staff presents the request, and the applicant may be present if they desire.

If this was desired, we recommend first submitting a Planner Consultation request to the City, describing the proposed use, allowing Staff the opportunity to do an initial evaluation to determine if the uses are feasible under the issued CUP, before a full Substantial Conformity Determination application is submitted. However, based on our research and discussions with City staff, it is our understanding that the CUP is quite specific to the Santa Barbara Museum of Art operations; therefore, a new CUP would likely be required for any future operator, even for a similar use, unless there was a proposed connection to the art museum.

See attachment 7, the City's Substantial Conformance handout for more information on this process.

## **6.0 AVERAGE UNIT DENSITY INCENTIVE PROGRAM (AUD PROGRAM)**

### **6.1 AUD Program**

The Average Unit-Size Density (AUD) Incentive Program is a key component of the City of Santa Barbara's housing strategy, created to implement the 2011 General Plan and address the community's need for smaller, more affordable housing units. The program allows for higher residential densities than would typically be permitted under standard zoning regulations in exchange for smaller average unit sizes. Its primary objective is to promote workforce and priority housing types, particularly rental housing. Projects developed under the AUD Program may qualify for modified development standards such as a lower parking requirement, which is intended to support the creation of smaller, more affordable housing units while maintaining compatibility with surrounding neighborhood character.

The AUD Program includes inclusionary housing requirements to ensure a portion of new residential development remains affordable. Projects with 10 or more rental units must provide at least 10% of the units as moderate-income housing. Projects with 5 to 9 units may either provide a moderate-income unit or pay an in-lieu fee. All inclusionary units must be comparable in quality to market-rate units, distributed throughout the development, constructed concurrently, and deed-restricted for a minimum of 90 years.

## 4.2 AUD Project at the Subject Site

The subject property is within the Medium-High residential density area which allows for 15-27 dwelling units per acre. Based on the lot size of 31,271 square feet, a total maximum of 20 units with an average unit size of 905 square feet could be provided on site. Because the existing structure is listed on the City's Historic Resources Inventory, we would not advise a proposal to completely demolish the building, as it would not be supported by City policy and goals regarding historic preservation, however, an AUD project could be proposed by remodeling the existing building into a multi-unit project by utilizing the existing infrastructure and upgrading it as necessary to meet Building Code and accessibility requirements.

An AUD project at this site would be subject to standard residential setbacks and height limits of the zone as referenced in Table 1-4 above. AUD projects have a reduced parking requirement which requires one parking space for one and two-bedroom units, and two parking spaces for units with 3 or more bedrooms. Additionally, the project would be required to comply with open yard requirements for residential zones. The project would be required to provide a minimum of 15% of the net lot size (4,690 square feet) in a minimum of 10-foot dimensions as open yard for the entire site. Additionally, each unit would be required to have private open space.

The City has adopted a local Inclusionary Housing Ordinance to promote development of affordable housing in Santa Barbara. For AUD projects proposing 10 or more rental housing units, at least 10% of the total residential units on site must be offered for rent at an affordable rate as moderate income units. For a 20 unit AUD project at this site, two affordable residential units would be required.

See the table below for private open yard requirements.

**Table 6-1 Private Open Yard Requirements**

Location	Unit Type	Minimum Area (sq ft)	Minimum Dimensions (sq ft)
First Story	Studio	100	10' x 10'
	1- bedroom	120	10' x 10'
	2 -bedroom	140	10' x 10'
Second Story or Higher	Studio	60	6' x 6'
	1 bedroom	72	6' x 6'
	2-bedroom	84	6' x 6'

Open yard areas are allowed within front yards, with limitations: they must be outside the primary front setback and at least 10 feet back from any secondary front lot line. Private open yard areas must maintain a 10-foot setback from the front lot line and cannot exceed 50% of the total front yard area.

Based on our review of the example plan, meeting the City's parking and open yard requirements may present notable challenges, and modifications to these standards could be required, which would complicate the approval process. Because the existing building will remain, opportunities to accommodate required parking and open yard areas are limited to the space currently available on site surrounding the structure. The presence of two front yards further constrains where open yard and parking spaces may be located. Additionally, we understand that some residential units would be introduced at the basement level of the building, which could complicate the provision of private open yard for those units. If an AUD project is pursued, we recommend early consultation with an architect to thoroughly evaluate site layout and circulation options to understand the feasibility of this option.

Please refer to Attachment 8, for more information about the City's AUD Program.

## **7.0 ADAPTIVE RESUSE ORDINANCE**

### **7.1 Adaptive Reuse Ordinance**

On October 21<sup>st</sup>, 2025, the City of Santa Barbara City Council adopted an Adaptive Reuse Ordinance as part of its 2023–2031 Housing Element implementation (Program HE-1), with the goal of encouraging the conversion of older nonresidential and historic buildings into residential or mixed-use housing. The newly adopted ordinance is designed to remove barriers and streamline the process for such conversions by codifying commonly approved zoning modifications, allowing qualifying projects to bypass certain standard zoning requirements.

The ordinance applies citywide—excluding the Coastal Zone—to all zones where multi-unit residential use is permitted, provided the existing building received a final inspection/certificate of occupancy at least 5 years prior to the date of an adaptive reuse project application. The adaptive reuse ordinance includes several key development incentives: it removes maximum residential density limits, eliminates open yard requirements, allows residential use to retain existing setbacks, and removes requirements for additional parking (though bicycle parking and accessibility standards still apply). The ordinance also waives the pre-application and concept review process for eligible projects, significantly reducing the overall permitting timeline. Projects that do not propose exterior alterations may proceed directly to building permits without discretionary review.

Adaptive reuse projects must convert nonresidential floor area to residential, the reuse must occur within the existing building envelope, though limited additions are allowed for shared residential amenities or to meet Building Code requirements, and minor exterior alterations as necessary for Code Requirements and accessibility would be permitted.

The Adaptive Reuse Ordinance provides a formal framework to encourage the residential conversion of aging nonresidential and historic buildings, offering regulatory relief and a simplified approval process while balancing design review, health and safety requirements, and consistency with long-term city planning goals. The ordinance was crafted in alignment with

existing City policies and the General Plan, promoting infill development, sustainability, housing flexibility, and the preservation of historic structures.

For the purposes of this evaluation, the Adaptive Reuse Ordinance has been considered as a potential pathway for converting the subject building to a multi-unit residential use outside of the City's Average Unit-Size Density (AUD) Program. The Ordinance was recently adopted on October 21<sup>st</sup>, 2025, and will go into effect 30 days after adoption. The ordinance offers significant regulatory relief, including the removal of maximum unit limits and the elimination of open yard and additional parking requirements.

These provisions may be especially beneficial given the historic nature of the site and could alleviate some of the constraints mentioned in the section above. As noted, open yard requirements, in particular, could be difficult to meet and could require approval of a modification under an AUD project. Under the adaptive reuse ordinance, such modifications would not be necessary for open yard, allowing for a more streamlined conversion process. Additionally, no additional parking would be required to be provided beyond what currently exists on site, so the potential need for a parking modification would also be eliminated. Overall, the proposed ordinance presents a favorable option for enabling residential use while preserving the building's character and minimizing design constraints.

At this time, the Inclusionary Housing requirements discussed in the section above would also apply to an Adaptive Reuse project, and 10% of the units would be required to be offered at moderate-income affordable rents.

Please refer to Attachment 9, the code section for the Adaptive Reuse Ordinance.

## **8.0 HISTORICAL ANALYSIS**

### **8.1 Historic Resources Inventory**

As described above, the property has historic value based on the age of the structure and based on its previous owner, Ms. McCormick. The property is currently listed on the City's Historic Resources Inventory, which means that there is a preponderance of evidence that the structure may qualify as a historic resource, though it has not been officially designated as such yet. The City is required to keep an inventory of such buildings per the California Environmental Quality Act (CEQA). Based on our understanding, we would recommend pursuing an official Historic Structure of Merit Designation, as it provides for some flexibility such as allowing use of the Historic Building Code<sup>2</sup> and possible property tax exemptions under the Mills Act<sup>3</sup>.

---

<sup>2</sup> The Historic Building Code is available to "qualified historical buildings or structures" which includes properties officially designated or eligible for designation. Use of the historic building code may still be an option for this property, if the property was not designated as a Structure of Merit.

<sup>3</sup> The Mills Act Program allows owners of designated historic structures to enter into a contract with the City which can offset the cost of maintaining their historic property through a reduction in property taxes. The Mills Act application period runs from January 1<sup>st</sup> to June 30<sup>th</sup> each year. Find more information regarding The Mills Act, attached to this report (Attachment 10).

The Mills Act is a state program that allows local governments, such as the City of Santa Barbara, to offer property tax reductions to owners of qualified historic properties in exchange for a commitment to restore, rehabilitate, and maintain their historic structures. Under a Mills Act contract, eligible owners may receive property tax savings averaging 40–60%, helping to offset the cost of required improvements and ongoing preservation.

To qualify, a property must be designated as a City Landmark, Structure of Merit, or be listed on the California or National Register of Historic Places and must display a historic plaque. The City reviews applications annually between January 1<sup>st</sup> and June 30<sup>th</sup>, and all proposed work must be completed during the initial 10-year term of the contract. Property owners must prepare a Restoration and Maintenance Plan and comply with the Secretary of the Interior's Standards and the California Historical Building Code. Annual reports and periodic inspections are required to ensure compliance. Once approved, contracts renew automatically each year unless formally terminated or non-renewed.

## **8.2 Historic Analysis**

Post Hazeltine, Architectural Historians, provided a Historic Structures Analysis, which details the historic significance of the structure and focuses on what elements of the exterior could be altered, as necessary, that would not affect the historic integrity of the building. Should a project be proposed at this site which would require exterior alterations to the building, careful consideration must be taken to retain and respect the historic significance of the building. Architectural Historians should be consulted with early on in a design process to obtain their recommendations on the proposed design.

## **9.0 ACCESSORY DWELLING UNITS (ADUs)**

### **9.1 Potential for Additional Units Through ADUs**

If additional residential units beyond those permitted through the adaptive reuse of the existing building are desired, a potential option is to pursue the development of two detached Special Accessory Dwelling Units (ADUs). Under the City's current ADU ordinance, properties with multiple residential units may construct up to two detached ADUs, each with a maximum size of 800 square feet and a height of up to 18 feet (or up to 20 feet if needed to match the roof pitch of the primary residential structure). These ADUs would need to be established after the building is converted to residential use and would benefit from reduced setback requirements.

Specifically, Special ADUs may be located as close as 4 feet from interior property lines and must observe the standard front yard setback or be placed at least 20 feet from the front lot line—whichever is greater. In this case, since the front setback is 10 feet, any ADUs would need to be sited a minimum of 20 feet from the front lot lines. No parking is required for Special ADUs.

ADUs are prohibited if their construction would result in an adverse significant impact on a designated historic resource, including City Landmarks and Structures of Merit. Given the historic

nature of the existing building on site, any future ADU development would need to be carefully designed to avoid impacting the historic character of the property. We recommend early consultation with an architectural historian to assist in determining appropriate locations on site where ADUs could be located that would not impact the historic resource on site, as well as to advise on the design style of the ADUs.

Please refer to Attachment 11, Accessory Dwelling Unit Guide for further information about ADUs.

---

This concludes our analysis; we would be pleased to discuss potential follow-up questions and can be reached at (805) 966-2758 x 104.

Sincerely,

**SEPPS Land Use Consulting**



Shelby Messner Janke, AICP  
Associate Planner IV

#### **Disclaimer**

SEPPS Land Use Consulting Inc. (SEPPS) makes every effort to provide the most accurate information possible. However, it is provided without warranty or claim of reliability. It is accepted by the client on the condition that errors or omissions shall not be made the basis for any claim, demand or cause for action. The information and data were obtained from sources believed to be reliable, but SEPPS does not guarantee its accuracy. This report is intended to investigate zoning, policy and other regulatory issues which may apply to the subject property. This report does not evaluate compliance with the Uniform Building Code or the structural integrity of buildings or other site improvements. It is the responsibility of the client to perform proper due diligence before acting upon any of the information provided or making decisions relating to purchasing or development of the subject property.