



# Memorandum

**TO:** CITY COUNCIL

**FROM:** Councilmember Tordillos  
Councilmember Campos  
Councilmember Cohen  
Councilmember Kamei

**SUBJECT:** SEE BELOW

**DATE:** March 13, 2026

Approved

**SUBJECT: Analysis on Senate Bill 79/Assembly Bill 130 and Historic Resources and Policy Recommendations.**

**RECOMMENDATIONS:**

1. Approve staff recommendation.
2. Direct the City Manager's Office to conduct a workload analysis for a new historic resources survey, with a focus on TOD areas within the pre-World War 2 boundaries of the City.
3. Decline to move forward with a delayed effectuation ordinance.

**BACKGROUND:**

The staff recommendation to narrow the definition of "demolition" is in line with best practices from other California cities and will help strike the balance between preserving historic resources and leveraging AB 130 to meet our housing goals. We appreciate staff's thoughtful analysis and whole-heartedly endorse the recommendation for staff direction.

At the same time, our historic resources inventory remains outdated, with certain properties whose historic characteristics have eroded to the point of being unrecognizable and others that are classified as historic due to their location but were built in the last decade. This problem is particularly focused within the city's pre-World War 2 boundaries; the downtown core hasn't had a renewed historic resources survey since 2004, so any analysis of historic resources in this key development area will rely on information that is more than two decades out of date.

The information we do have on the concentration of historic resources near TOD sites suggests a delayed effectuation ordinance would disproportionately impact the very same parts of the city that we've identified as opportunities for significant development. In particular, of the six TOD Areas identified as having high concentrations of historic resources, all of them have impacts in and around downtown, and five of them are entirely focused there. These are areas that the Council through recent votes on downtown-focused housing policies have reaffirmed as priority areas for housing development; they are also the parts of the city that have the highest concentrations of transit and jobs and the greatest opportunities for infill development. Adopting a delayed effectuation ordinance could create unintended consequences, hindering our ability to leverage these key areas for housing development into the 2030s. The development of such an ordinance would also impose new demands on staff time and resources. Given our PBCE personnel are already under pressure to maintain critical services while implementing new housing and economic development policies, we feel additional demands on their limited time for this purpose would not be appropriate.

As such, we recommend focusing instead on moving forward with an SB 79/AB 130 implementation plan that retains CEQA review for significant alterations to historic resources while delivering on our goals of creating housing close to transit and employment hubs.

*The signers of this memorandum have not had, and will not have, any private conversation with any other member of the City Council, or that member's staff, concerning any action discussed in the memorandum, and that each signer's staff members have not had, and have been instructed not to have, any such conversation with any other member of the City Council or that member's staff.*