



TITLE 20 AMENDMENT – SENATE BILL 9 (SB 9) AND CULTURAL RESOURCES DEFINITION

Community & Economic Development Department

**Cultural Heritage Board
Agenda Item: 4
September 17, 2025**

BACKGROUND ON SENATE BILL 9 (SB 9)

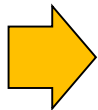
January 2022:

SB 9 takes effect, allows two-unit developments & lot splits on SF lots



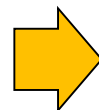
July 2022:

City Council implements SB 9 in RMC



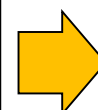
January 2024:

AB 434 takes effect, SB 9 enforcement authority granted to HCD



January 2025:

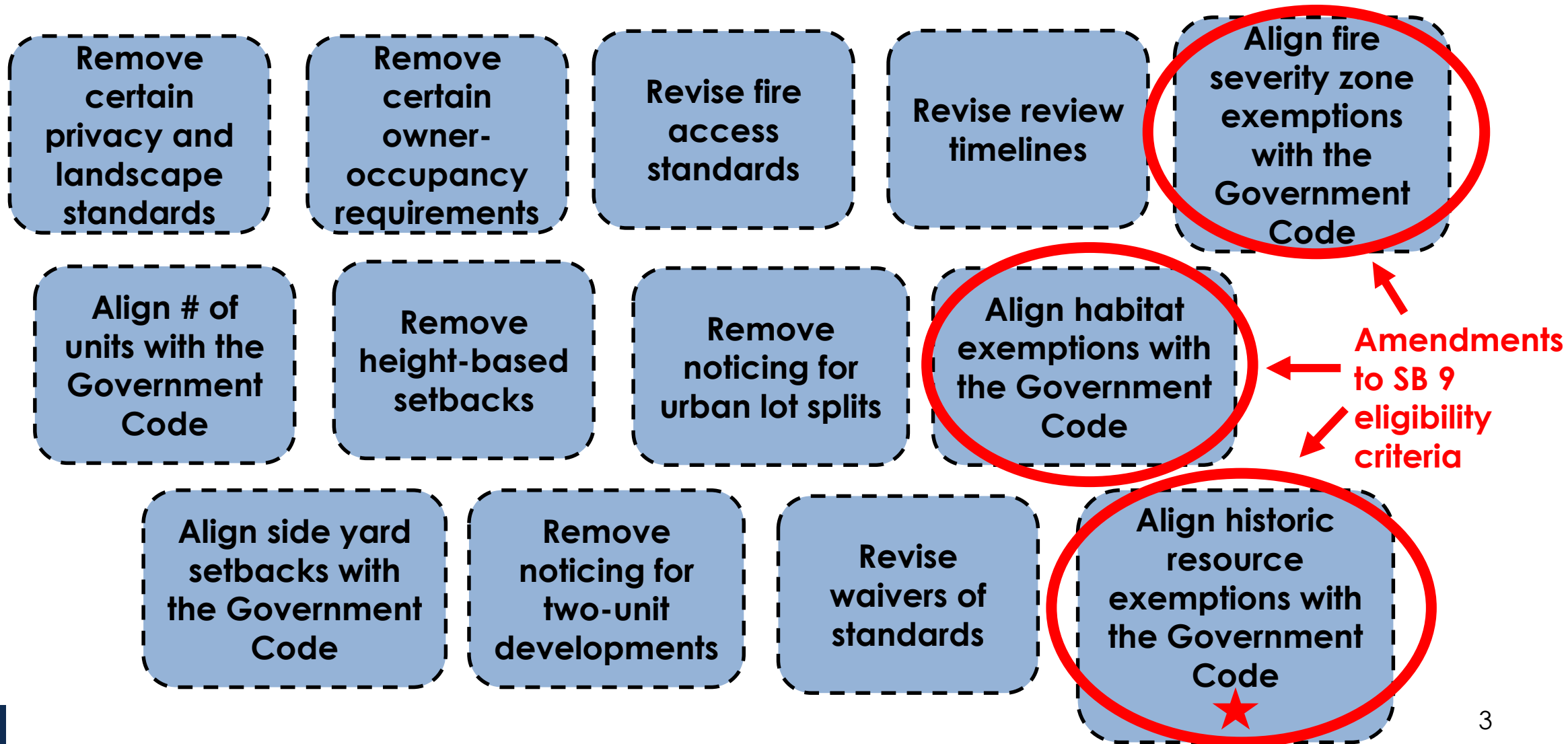
SB 450 takes effect, updates SB 9



March 2025:

HCD presents Staff w/letter outlining needed revisions to the RMC

REQUESTED RMC REVISIONS



ALIGNMENT OF HISTORIC RESOURCE EXEMPTIONS

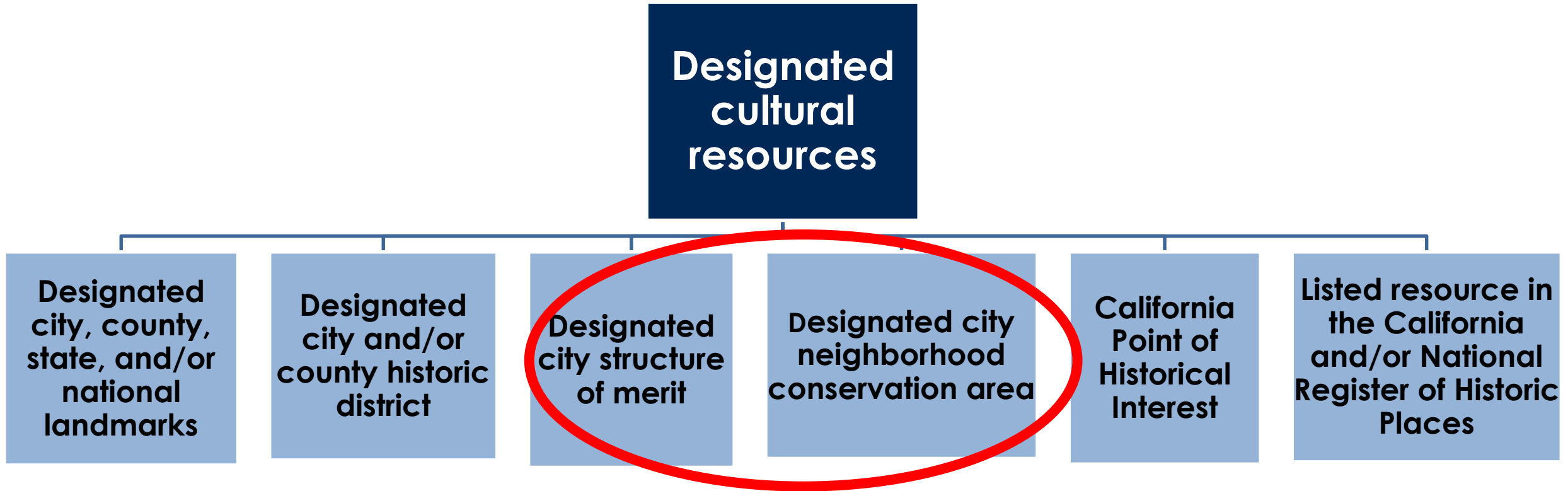
TYPES OF HISTORIC RESOURCES EXEMPT FROM SB 9

Riverside Municipal Code (Chapter 18.085 - Urban Lot Splits and Chapter 19.443 - Two Unit Developments)	California Government Code (Section 65852.21 and Section 66411.7)
Historic districts	Historic districts
Neighborhood conservation areas (NCAs)	Landmarks
Landmarks	Historic properties
Structures of merit	
State Historic Resources Inventory-listed property	
Other historic properties pursuant to Title 20	

**Neighborhood conservation areas (NCAs) and
structures of merit ≠ historic resources?**

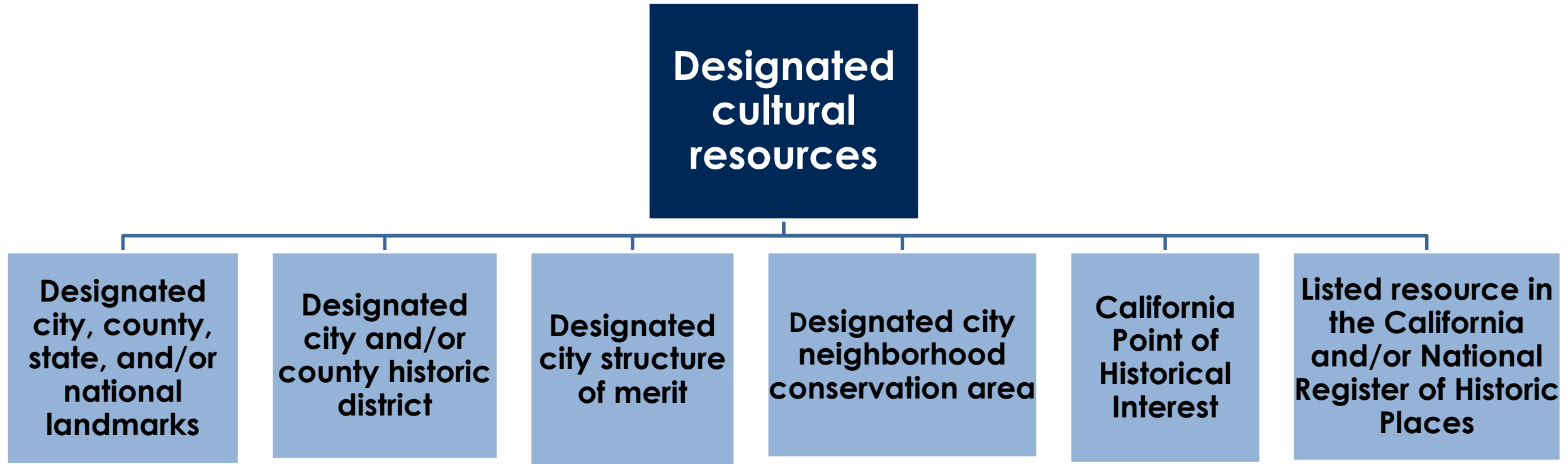


NCAS AND STRUCTURES OF MERIT ARE CULTURAL RESOURCES



**Structures of merit and
neighborhood conservation areas
receive the same protections as
other cultural resources**

CULTURAL RESOURCES ARE HISTORIC RESOURCES



Classification of historic resources as cultural resources in the RMC

+

No distinction between cultural and historic resources in the RMC

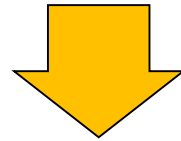
=

Cultural and historic resources have the same meaning in the RMC



TITLE 20 – AMENDMENT

Proposal: Clarify in Title 20's definition of cultural resources that all cultural resources, including neighborhood conservation areas and structures of merit, are historic resources which affirms they are ineligible for SB 9 urban lot splits and two-unit developments.



Cultural resource means improvements, natural features, sites, cultural landscapes, or other objects, which may reasonably be of scientific, aesthetic, educational, cultural, architectural, social, political, military, historical or archaeological significance. This includes designated cultural resources, eligible cultural resources, and contributing features to Historic Districts and Neighborhood Conservation Areas. A "Point of Cultural Interest" as recognized under Title 20 is expressly not under this definition. Cultural resource has the same meaning as historic resource pursuant to the California Government Code.

RECOMMENDATION

That the Cultural Heritage Board recommend that City Council:

1. **Determine** that Planning Case PR-2025-001800 is exempt from further California Environmental Quality Act (CEQA) review pursuant to Sections 15308 (Actions to Protect Environment), 15060(c)(2) (No Physical Change), 15060(c)(3) (Not A Project), and 15061(b)(3) (General Rule), as the proposed amendment will cause no direct or indirect change to the environment and does not meet the definition of a Project under CEQA, and is pursuant to Section 65852.21(k) and Section 66411.7(n);
2. **Approve** Planning Case PR-2025-001800 (Title 20 Zoning Code Text Amendment) as outlined in the staff report and summarized in the Findings Section of this report; and
3. **Introduce**, and subsequently **adopt**, an Ordinance amending Title 20 (Cultural Resources) of the Riverside Municipal Code.