

City of Santa Paula  
Planning Department  
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River Rock Development  
March 8th 2016

Please accept my previous comments along with these for this comment period attached are photos and the Petition

Below are my concerns included is supporting documentation with links to agencies are provided in blue.

## **2. PROJECT DESCRIPTION:**

### **Location**

The Project Site is located on a 19.28-acre property at 1226 Ojai Road, in Santa Paula, California, 93060. The Assessor Parcel Number (APN) for the Project Site is 100-0-040-015. The existing General Plan land use designation for the Project Site is Hillside Residential. The zoning designation is HR 2-PD (Hillside Residential 2PD, 0-3 du/ac) Based on the allowable density of 0-3 units per acre, the 19.28- acre site would permit 57 single-family dwelling units. This parcel is the location of a residence constructed in 1884 (Main Residence), Barn/Stables, Second Residence, and a Garage/Residence. 2 Project Location

Approximately 9.56 acres of the Project Site will be retained as open space. The Project will also include the construction of associated access roads, and an unpaved recreational trail on the sloped northwestern side of the property.

**Easements and the 6ft wall around the property are not addressed.**

**The proposed project is zoned for 0-3 units per acre. Only 9.72 acres will be developed. That would allow a total 27 homes to be developed not 57 homes.**

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## **3. ENVIRONMENTAL IMPACT ANALYSIS**

### **1. AESTHETICS.** Would the project:

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

**Potentially Significant Impact Unless Mitigated.** A significant impact would occur if the Proposed Project were to introduce incompatible visual elements on the Project Site or visual elements that are incompatible with the character of the area surrounding the Project Site. The Proposed Project would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of the surrounding neighborhoods. While the proposed project will alter existing views and develop a large, mostly vacant parcel of land with a 54-unit subdivision, the development are compatible with the surrounding single family residential neighborhoods. As such, the proposed Project would not

substantially degrade the existing visual character or quality of the site and its surroundings and aesthetic impacts are considered less than significant.

**There will be a significant degrade in Visual Element of the property with the proposed Development.**

**The Rural Setting of the Hillside, the association of what it once was as far as a working Farm with its Agricultural History will be gone. Every Aspects of Visual Character will be lost. The only Visual you will get is two big Historic Buildings . Any association with what it once was will be gone. The properties to the North will retain more Visual Character than that of the Landmark itself.**

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## **2. AGRICULTURAL RESOURCES**

**Less Than Significant Impact.** Although the Project Site was historically cultivated with a commercial lemon grove, neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. The Project Site is not classified in any “Farmland” category designated by the State of California. The Project Site is not located near or in any significant farmland area (i.e., a significant commercial crop or animal producing site). Therefore, no impact would occur.

The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

### **Biological Constraints Report**

#### **2 Project Location**

The property currently has a two-story Victorian style home originally built in 1884 with supplemental ranch structures including a barn and fallow farmland. **The surrounding land uses include agriculture to the west and residential properties to the east, south, and north**

**The Area directly to the West of the Property is a large Orchard of Avocados, not residential communities. The lots to the North of the property range from large residential lots to large lots with small areas of Agricultural. The statement that the Project Site and the surrounding area are highly urbanized would be wrong**

#### **5.2 Soils**

The two primary soil types of project site include Garretson loam and Castaic and Saugus soils (NRCS 2014). **The Garretson loam dominates the residential and agricultural land use areas of the property. IT IS PRIME AGRICULTURAL SOIL!**

**City of Santa Paula General Plan**

**B. Agricultural and Soil Resources** Agriculture has historically been important to the economy of Santa Paula and this importance continues today. As the area urbanizes, commercial agriculture is very slowly being replaced by other land uses. The presence of prime agricultural soils in the planning area is a natural resource that must be conserved to provide opportunities for ongoing and expanded agricultural operations. Future land use decisions which affect agricultural operations and prime soils must recognize the irreplaceable nature of these resources. The value of these resources are to be given equal weight to other factors being considered in the decision making process. Goals, policies, and implementing measures for protection of agricultural and soil resources are provided at the end of this element. The following text describes the context of the City's agriculture and soil resources.

Considering the property was once a very productive farm and the soil has been determined to be Prime Soil there should be further investigation going into seeing if the property would have agricultural resources.

There is no documentation in this plan showing that the property has no Agricultural Resources.

## **Historic Resources Report**

### **Landscape Features.**

The majority of the property is presently unplanted. However portions of the property, particularly to the north and east of the Main Residence, once featured landscaped gardens, probably designed professionally for the Hardison family. Little of this landscape plan is currently in evidence, with the exception of a number of mature specimen trees, most notably along Ojai Road. **The age and species of the extant landscape materials was not assessed for this report, as this task would be properly completed by a qualified arborist or landscape historian.**

*"The age and species of the extant landscape materials was not assessed for this report, as this task would be properly completed by a qualified arborist or landscape historian".*

**Considering the statement above, the amount of Cultural Resources that can be found on the property, qualified arborist or landscape historian needs to be evaluated by a qualified arborist or landscape historian. The remaining Landscape seems to be something that needs to be evaluated for its Cultural Landscape features.**

**The Landscape directly to the east of the house still has some Original Iris, Chinese Lilies that were planted by Hope Procter, California Poppies. These flowers come annually. In 2010 two Historians had been to the property to look around and had commented that the poppies are original to the Ranch and regarded as Historic. As of Spring 2015 they**

were still growing! The Iris can be seen in a photo from the 1920s. The fence in that same photo is currently in its same spot still as of Oct 2015.

The Landscaping along the rock wall to the south of the driveway, as of Oct 2015, has a Rose Bush and a tree with annual flowers that bloom. This is where the Barn is planned to be relocated. These plants can be seen in a photo from around 1900. The Cactus that is in this same area, documented in the Biological Report. It is probably 100 years old. That same area has served over the decades as a nesting spot for the Quail that live on the property.

According to stories provided by Robert Procter and physical Evidence that was found adjacent to the Cactus, at one point either Clara Hardison or Hope Procter had a Potting Area for the flowers they would plant in the Enclosed Portion of the Porch on the East End, which was used as Greenhouse.

There is documentation (original household paperwork) for the Landscaping of the Property. After the house sold I left the Landscape Layout Documentation of the Landscaped Gardens and Layout of the irrigation Lines for the whole property with Williams Homes (Jennifer) So if further information for the landscape could be obtained that way.

The fencing to the North of the property that separates the Pasture from the yard is still original can be partially seen in family photos.

## **Biological Report Appendix B**

### **5.3.3 Ornamental** (also see Landscaping Section for Ornamental Plants that were not mentioned in Reports)

Ornamental landscaping plants occur around the residential yard footprints of the home and supplemental ranch structures located on the southeast quarter of the property/project site. The species include: sago palm (*Cycad revoluta*), crape myrtle (*Lagerstroemia* sp.), various roses (*Rosa* sp.), Mexican sage (*Salvia leucantha*), spirea (*Spirea* ssp.), and Mexican fan palm (*Washingtonia robusta*). In addition, along the eastern edge of the barn structures is one linear area of remaining lemon (*Citrus limon*) trees.

**Citrus Stock that are still present and producing are on the property, unlike what was mentioned in the Historic Writeup.**

**The Eastern end portion of the Driveway to the Barn has Remaining Citrus Trees. There are 2 remaining citrus trees in front of the East Portion of the Second Residence. and one remaining citrus tree to the South of the Second Residence. On the 1st and Second terrace on the hillside to the west there is still small leftover citrus stock, which are still producing. There is one producing Lemon Tree to the South along the fence line of the proposed Royal Oak Street and an Orange producing Tree to the South.**

## Landscape Review

<http://www.nps.gov/tps/how-to-preserve/briefs/36-cultural-landscapes.htm>

On ground, evidence should then be studied, including character-defining features, visual and spatial relationships. By reviewing supporting materials from historic research, individual features can be understood in a systematic fashion that show the continuum that exists on the ground today. By classifying these features and relationships, the landscape can be understood as an artifact, possessing evidence of evolving natural systems and human interventions over time.

For example, the on-site investigation of an abandoned turn-of-the-century farm complex reveals the remnant of a native oak and pine forest which was cut and burned in the mid-nineteenth century. This previous use is confirmed by a small stand of mature oaks and the presence of these plants in the emerging secondary woodland growth that is overtaking this farm complex in decline. A ring count of the trees can establish a more accurate age. By reading other character-defining features, such as the traces of old roads, remnant hedgerows, ornamental trees along boundary roads, foundation plantings, the terracing of grades and remnant fences—the visual, spatial and contextual relationships of the property as it existed a century ago may be understood and its present condition and integrity evaluated.

The findings of on-site reconnaissance, such as materials uncovered during archival research, may be considered primary data. These findings make it possible to inventory and evaluate the landscape's features in the context of the property's current condition. Character-defining features are located *in situ*, in relationship to each other and the greater cultural and geographic contexts. . When landscapes are documented in photographs, *registration points* can be set to indicate the precise location and orientation of features. Registration points should correspond to significant forms, features and spatial relationships within the landscape and its surrounds. The points may also correspond to historic views to illustrate the change in the landscape to date. These locations may also be used as a management tool to document the landscape's evolution, and to ensure that its character-defining features are preserved over time through informed maintenance operations and later treatment and management decisions.

All features that contribute to the landscape's historic character should be recorded. These include the physical features described above (e.g. topography, circulation), and the visual and spatial relationships that are character defining. The identification of existing plants, should be specific, including genus, species, common name, age (if known) and size. The woody, and if appropriate, herbaceous plant material should be accurately located on the existing conditions map. To ensure full representation of successional herbaceous plants, care should be taken to document the landscape in different seasons, if possible.

## Historic Plant Inventory

Within cultural landscapes, plants may have historical or botanical significance. A plant may have been associated with a historic figure or event or be part of a notable landscape design. A plant may be an uncommon cultivar, exceptional in size, age, rare and commercially/unavailable. If such plants are lost, there would be a loss of historic integrity and biological diversity of the cultural landscape. To ensure that significant plants are preserved, an inventory of historic plants is being conducted at the North Atlantic Region of the National Park Service. Historical landscape architects work with landscape managers and historians to gather oral and documented history on the plant's origin and potential significance. Each plant is then examined in the field by an expert horticulturist who records its name, condition, age, size, distribution, and any notable botanic characteristics. Site Analysis: Evaluating Integrity and Significance

By analyzing the landscape, its change over time can be understood. This may be accomplished by overlaying the various period plans with the existing conditions plan. Based on these findings, individual features may be attributed to the particular period when they were introduced, and the various periods when they were present.

It is during this step that the *historic significance* of the landscape component of a historic property and its integrity are determined. Historic significance is the recognized importance a property displays when it has been evaluated, including when it has been found to meet National Register Criteria. A landscape may have several areas of historical significance. An understanding of the landscape as a continuum through history is critical in assessing its cultural and historic value. In order for the landscape to have integrity, these character-defining features or qualities that contribute to its significance must be present

*Integrity* is a property's historic identity evidenced by the survival of physical characteristics from the property's historic or pre-historic period. The seven qualities of integrity are location, setting, feeling, association, design, workmanship and materials. When evaluating these qualities, care should be taken to consider change itself. For example, when a second-generation woodland overtakes an open pasture in a battlefield landscape, or a woodland edge encloses a scenic vista. For situations such as these, the reversibility and/or compatibility of those features should be considered, both individually, and in the context of the overall landscape. Together, evaluations of significance and integrity, when combined with historical research, documentation of existing conditions, and analysis findings, influence later treatment and interpretation decisions

**4. BIOLOGICAL RESOURCES.** Would the project:  
Potentially Significant Unless Mitigation Incorporated

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

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The following analysis is based in part on the findings and conclusions of the William Homes Santa Paula River Rock Project Biological Constraints and Jurisdictional Delineation Report prepared by Wildscape Restoration, in December 2014 and Conducted a reconnaissance survey on November 3, 2014. The survey consisted of habitat assessment, vegetation mapping, and an inspection for the necessity of any jurisdictional delineation.

#### **5.4 Plants Observed Onsite**

**Plants observed onsite during the survey, November 3, 2014,** are listed in Table 2 of the Biological Report

#### ***Protocols for Surveying and evaluating Impacts***

##### ***TIMING AND NUMBER OF VISITS***      *Survey Protocols*    *Page 4 of 7*

*Conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting. Space visits throughout the growing season to accurately determine what plants exist on site. Many times this may involve multiple visits to the same site (e.g. in early, mid, and late-season for flowering plants) to capture the floristic diversity at a level necessary to determine if special status plants are present . The timing and number of visits are determined by geographic location, the natural communities present, and the weather patterns of the year(s) in which the surveys are conducted*

#### **5.5 Common Wildlife**

During the November 3, 2014 reconnaissance site visit, common wildlife observations were limited to birds. There were no fish, amphibians, or reptiles observed on site. The two-striped garter snake, south coast garter snake, and the coast horned lizard could occur on the project site due to their adaptability to soil types and available areas for sunning. A former property employee of the property stated that there is one known rattlesnake inhabiting the sloped area of the site, specifically on the northeastern edge. Bird species observed on the project site include turkey vulture (*Cathartes aura*) scrub jay (*Aphelocoma californica*), and

acorn woodpecker (*Melanerpes formicivorus*). Evidence of barn owls was found in the barn. Regurgitated pellets were on the upper floor of the structure

#### **6.4 Raptors**

If construction occurs during raptor breeding season, usually between February 1 and June 30, the loss of an active nest of any raptor species, including common raptors species would be considered a violation of Sections 3503, 3503.5, and 3513 of the California Fish and Game Code. Raptors (birds of prey) have potential to nest within the taller trees such as the oaks on the project site and eucalyptus trees on adjacent properties. Raptors that are likely to nest in the area include Cooper's hawks (*Accipiter cooperii*), red-tailed hawks (*Buteo jamaicensis*),

***There is a pair of reproducing Red Tailed Hawks that have returned to their nesting site for over ten years now. There is currently a nest on the Properties hillside.***

***The Barn is known for its returning Barn Owls, which at one time had a set of nesting Owls on each side and there was a total of 6 Barn Owls in the Barn.***

Noreen Murano and Allyson Biskner conducted a reconnaissance survey on **November 3, 2014 (Middle of Fall)** The survey consisted of habitat assessment, vegetation mapping, and an inspection for the necessity of any jurisdictional delineation

#### **NEGATIVE SURVEYS**

Adverse conditions may prevent investigators from determining the presence of, or accurately identifying, some species in potential habitat of target species. Disease, drought, predation, or herbivory may preclude the presence or identification of target species in any given year. Discuss such conditions in the report.

**The failure to locate a known special status plant occurrence during one field season does not constitute evidence that this plant occurrence no longer exists at this location, particularly if adverse conditions are present.** Visits to the site in more than one year increase the likelihood of detection of a special status plant especially if conditions change. To further substantiate negative findings for a known occurrence, a visit to a nearby reference site may ensure that the timing of the survey was appropriate

**5. CULTURAL RESOURCES:** Would the project: Potentially Significant Unless Mitigation Incorporated

**a.** Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?

#### **Phase I/II Historic Resources Report**

##### **General Approach**

All relocation and restoration activities will be conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation

### **Summary Discussion of the Secretary of the Interior's Standards**

The following is a discussion of the proposed project activities evaluated in terms of their conformance with the **Secretary's of the Interior's Standards for Rehabilitation**

**1.** A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment

**Discussion.** The project represents a continuation of the historic residential use associated with the property. Consequently the project conforms to the general principle stated in the Secretary's Standards, by which it is understood that entirely new uses of historic buildings or properties (often called "adaptive reuse") is less desirable than the continuation of its historic uses, which tend to minimize the degree to which alterations will be required. Much of the historic property and immediate setting will be lost, however.

**2.** The historic character of a property shall be retained and preserved. The removal of historic materials or alterations of features and spaces that characterize a property shall be avoided.

[NPS Standards](#) (Top from Historic Writeup - Below from NPS website)

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

**Discussion.** The proposed project will result in the introduction of new construction within the boundaries of the eligible property and in close proximity to the buildings that contribute to its significance. The Barn/Stables building will be relocated closer to the Main Residence and restored and appropriately reused as a garage.

The two buildings to be removed were not constructed during the property's main period of significance.

- They would contribute to the main history of the Ranch.
- They played a part in the Cultural and Agricultural History of the property.
- They are part of the network of Ranching on the property.
- The Second House was used for the Mexican Workers on the Ranch.
- The room attached to the Garage was used as an office for Guy Hardison and also used as the living quarters for the Japanese Worker.
- The Garage has 2 rooms, one with a fireplace, restroom, and 2 closet spaces. The Garage is also made out of Redwood.
- The Second House is bordered with Rock around the Front to the Back of the Second House .
- To the South of the House it has a rock pathway and concrete pit added at some point.

- To the Southwest Corner of the second residence still has its Rock Circles where there used to be apricot trees.

## LANDSCAPE

These Landscape features should have been included in the report and were not: To the south of the property where the Barn is located it has a rock drainage ditch that runs up the side of the property that feeds into the Rock Terraces. There are 4 levels of rock terraces that were used for citrus cultivation. There is also still producing original stock citrus trees on the terraces. The Barn also had downspouts for the rain that feed into this drainage system that feeds under the driveway to the rock drainage around the Barn that is still fully functional but the Barn no longer has this. This is the same Drainage ditch that feeds into the rock terraces and also connects to the rock border around the driveway where the main house is. With relocation and restoration of the Barn those things will be removed and lost and these are also not mentioned in any of the Historic write up under landscaping features.

The water storage tank on the northwest side adjacent to the rock terraces of the property was not included in the write up. This should have been addressed when evaluating the property.

To the north the residential area is larger lots with some agriculture, (unlike what the historic report states and can be shown in photos)

The house is also mentioned in the **Phase I/II Historic Resources Report** here Hardison's in-laws, William Benjamin Harrison and Elizabeth McDonald, followed them from Pennsylvania to Santa Paula, buying the adjacent parcel to the north (1310 Ojai Road). The home built on this property during the 1880s may have preexisted the purchase, and been occupied by the Hardison's prior to the completion of the family home.

### [NPS Standards](#)

#### [Identify, Retain and Preserve](#)

##### **Recommended**

**Identifying, retaining, and preserving buildings and their features as well as features of the site that are important in defining its overall historic character. Site features may include circulation systems such as walks, paths, roads, or parking; vegetation such as trees, shrubs, fields, or herbaceous plant material; landforms such as terracing, berms or grading; furnishings such as lights, fences, or benches; decorative elements such as sculpture, statuary or monuments; water features including fountains, streams, pools, or lakes; and subsurface archaeological features which are important in defining the history of the site**

**Retaining the historic relationship between buildings and the landscape.**

## NOT RECOMMENDED

Removing or radically changing buildings and their features or site features which are important in defining the overall historic character of the property so that, as a result, the character is diminished.

Removing or relocating buildings or landscape features, thus destroying the historic relationship between buildings and the landscape.

Removing or relocating historic buildings on a site or in a complex of related historic structures--such as a mill complex or farm--thus diminishing the historic character of the site or complex.

Moving buildings onto the site, thus creating a false historical appearance.

Radically changing the grade level of the site. For example, changing the grade adjacent to a building to permit development of a formerly below-grade area that would drastically change the historic relationship of the building to its site.

### Phase I/II Historic Resources Report

#### *National and California Registers: Significance, Eligibility and Integrity*

b. Cause a substantial adverse change in significance of an **archaeological resource** pursuant to State CEQA §15064.5? **Potentially Significant Impact Unless Mitigation Incorporated.** A significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources.

The Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas. there is relatively low potential for the accidental discovery of any unknown archaeological materials to occur.

#### **HARDISON PHASE I/II HISTORIC WRITEUP FOR WILLIAMS HOMES Appendix C**

NRHP Criterion D and CRHR Criterion 4 pertain to archeological resources and consequently have not been evaluated in this report.

Properties may be eligible for the National Register of Historic Places (NRHP) under any one, or combination, of four criteria. This document concerns itself solely with eligibility under Criterion D, which states that properties may be eligible for the National Register (NR) if they “have yielded, or may be likely to yield, information important in prehistory or history.”<sup>1</sup>

**The research design posits that agricultural properties might address the following research themes within the contextual or interpretive approach: site structure and land use patterns, economic behavior, ethnicity and cultural diversity, agricultural technology**

## **and scientific innovation, household composition and lifeways, and labor history and relations**

The **cultural history of California agriculture is particularly important**; but it is often not easily identifiable from just historic records alone. At the turn of the century, Mexican laborers found work alongside Japanese, Chinese, and Filipinos. Many growers purposefully segregated worker housing based upon racial or ethnic lines. Understanding both the physical and cultural characteristics of workers' housing in California's agricultural industry is paramount to addressing questions related to acculturation, assimilation, race, gender, and family.

Several of the most important forces that spurred agricultural development in California include:

- Available agricultural labor from a succession of international sources including China, Japan, the Philippines, India, and Mexico,
- The spread of irrigation,
- Improved transportation including railroads, refrigerated rail cars, trucking and rural, and improved handling, storage, and technology,
- The development of marketing cooperatives,
- mechanization.

All of these fall under the citrus history of our community and the family home. The second house that is proposed to be demolished and the Garage that has the extra room attached should be considered part of that same history. It housed the Mexican Workers that worked on the ranch, the room attached to the garage also served as an office for Guy Hardison at one period in time and the Japanese that also worked the Ranch

### **Office of Historic Preservation**

An **archeological site** may be considered an **historical resource** if it is **significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California (PRC Section 5020.1(j))** or if it meets the **criteria for listing on the California Register (14 CCR Section 4850)**. CEQA provides somewhat conflicting direction regarding the evaluation and treatment of archeological sites. **The most recent amendments to the CEQA Guidelines try to resolve this ambiguity by directing that lead agencies should first evaluate an archeological site to determine if it meets the criteria for listing in the California Register. If an archeological site is an historical resource (i.e., listed or eligible for listing in the California Register) potential adverse impacts to it must be considered, just as for any other historical resource (PRC Sections 21084.1 and 21083.2(l)).** If an archeological site is not an historical resource, but meets the definition of a **“unique archeological resource” as defined in PRC Section 21083.2**, then it should be treated in accordance with the provisions of that section.

### **CONSERVATION CURRENT SITUATION**

The cultural resources of California are being lost or damaged at an alarming rate and there is no strategy for their conservation. A statewide effort is needed to recognize this problem and take steps to remedy it. A report published by the Society for California Archaeology in 1973 stated that an estimated 1400 archaeological sites were being lost to development within California every year. The report also estimated that 50% of all sites in California had already been destroyed. If we project up to 2005, at least 44,800 more archaeological sites have been lost since then.

Population data indicate many additional Californians will soon be occupying and recreating within our rapidly disappearing open spaces, where many archaeological sites exist. The open space in California -- in particular, public lands dedicated to recreation and public use-- will face ever-increasing pressures to provide greater access and greater flexibility in allowable uses. There are two main issues connected with cultural resources conservation:

- \* Population growth and the demand for use of open space. There is an increasing pressure for converting land to development and recreational use.
- • The general lack of recognition of the importance of conserving cultural resources on a landscape scale. This results in incremental loss of cultural and traditional areas.

### **IDEAL SITUATION**

Archaeological sites are often interconnected locations that were used systematically by people, and include living areas and processing locations. They may also be tied to places that, although not archaeological sites, are part of the overall "cultural landscape", such as resource-gathering areas and sacred or religious places. There are many examples of these areas being preserved, but few that have been recognized as districts or cultural landscapes. Instead, individual archaeological sites and features have been recorded with no understanding of the connectivity between the sites and features, nor recognition of the relationship of the sites to the environment. Without the concept of the overall cultural landscape, individual sites and features may appear to lack importance, and are incrementally destroyed by development or inappropriate public uses. The ideal situation would:

- Conserve open space specifically for archaeological districts and the overall cultural landscapes of which they are a part
- Consider appropriateness of uses for this land and control those uses.

Initial Study/Mitigated Negative Declaration

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

**Potentially Significant Impact Unless Mitigation Incorporated.** A significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological resources or geologic features which presently exist within the Proposed Project site. The Proposed Project site has been previously graded and is currently occupied by the former Hardison House residence with three associated structures and an undeveloped hillside. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources

Lots of fossils can be found and have been found on the property. This information should be further evaluated.

Twenty-one surveys and/or excavations have been conducted in the City's Area of Interest. Several prehistoric sites have been identified by these surveys, most of which are located near one of the many water resources in the area. However, the specific locations of these sites are not included in this report in order to protect these resources. Qualified archaeologists and historians may view the site records, which are on file with the City of Santa Paula.

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a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?

The following section summarizes and incorporates by reference the information and findings provided in the Hardison House Phase I/II Historic Resource Report, Wallace Libbey Hardison Residence 1226 Ojai Road (Tentative Tract Map 5928), prepared by San Buena Ventura Research Associates, July 28, 2015. The Historic Resources Report is contained in Appendix C to this IS/MND.

Potentially Significant Impact Unless Mitigation Incorporated.

"a project that may cause a substantial change in the significance of an historical resource is a project that may have a significant effect on the environment." By definition, a substantial adverse change means, "demolition, destruction, relocation, or alterations," such that the significance of an historical resource are impaired. For purposes of National Register of Historic Places (NRHP) eligibility, reductions in a property's integrity (the ability of the property to convey its significance) should be regarded as potentially adverse impacts. (PRC §21084.1, §5020.1(6)).

[The Preservation of Historic Barns](#)

## **Understanding Barns and Their History**

Historic barns are preserved for a number of reasons. Some are so well built that they remain useful even after a hundred years or more. Many others are intimately connected with the families who built them and the surrounding communities. Others reflect developments in agricultural science or regional building types.

Before restoring a historic barn or rehabilitating it for a new use, an owner should study the building thoroughly. This process involves finding out when the barn was built, who built it, and why. It means understanding how the building was changed through the years. It means assessing the condition of the barn, and understanding its components. This process has as its end an appreciation of the building's historic character, that is, the sense of time and place associated with it. It is this physical presence of the past that gives historic buildings their significance.

To assess the historic character of a barn, an owner should study old photographs, family records, deeds, insurance papers, and other documents that might reveal the building's appearance and history. Neighbors and former owners are often important sources of information. Local libraries, historical societies and preservation organizations are additional sources of help.

As part of this overall evaluation, the following elements should be assessed for their contributions to the property. They are the principal tangible aspects of a barn's historic character, and should be respected in any work done on it attached is a link for further information

### **Secretary of the Interior's Standards for Rehabilitation – Standard 9**

#### **New Construction within the Boundaries of Historic Properties**

It is possible to add new construction within the boundaries of historic properties if site conditions allow and if the design, density, and placement of the new construction respect the overall character of the site. According to the Secretary of the Interior's Standards for Rehabilitation – Standard 9 in particular – and the Guidelines for Rehabilitating Historic Buildings, new construction needs to be built in a manner that protects the integrity of the historic building(s) and the property's setting.

In addition, the following must be considered:

- Related new construction – including buildings, driveways, parking lots, landscape improvements and other new features – must not alter the historic character of a property. A property's historic function must be evident even if there is a change of use.
- The location of new construction should be considered carefully in order to follow the setbacks of historic buildings and to avoid blocking their primary elevations. New construction should be placed away from or at the side or rear of historic buildings and must avoid obscuring, damaging, or destroying character-defining features of these buildings or the site.

- Protecting the historic setting and context of a property, including the degree of open space and building density, must always be considered when planning new construction on an historic site. This entails identifying the formal or informal arrangements of buildings on the site, and whether they have a distinctive urban, suburban, or rural character. For example, a historic building traditionally surrounded by open space must not be crowded with dense development.
- In properties with multiple historic buildings, the historic relationship between buildings must also be protected. Contributing buildings must not be isolated from one another by the insertion of new construction.
- As with new additions, the massing, size, scale, and architectural features of new construction on the site of a historic building must be compatible with those of the historic building. When visible and in close proximity to historic buildings, the new construction must be subordinate to these buildings. New construction should also be distinct from the old and must not attempt to replicate historic buildings elsewhere on site and to avoid creating a false sense of historic development.
- The limitations on the size, scale, and design of new construction may be less critical the farther it is located from historic buildings.
- As with additions, maximizing the advantage of existing site conditions, such as wooded areas or drops in grade, that limit visibility is highly recommended.
- Historic landscapes and significant view sheds must be preserved. Also, significant archeological resources should be taken into account when evaluating the placement of new construction, and, as appropriate, mitigation measures should be implemented if the archeological resources will be disturbed.

#### NOT RECOMMENDED

- Designing and constructing new additions that result in the diminution or loss of the historic character of the resource, including its design, materials, workmanship, location, or setting. Relocating any new construction on the building site in a location which contains important landscape features or open space, for example removing a lawn and walkway and installing a parking lot. Introducing new construction onto the building site which is visually incompatible in terms of size, scale, design, materials, color, and texture; which destroys historic relationships on the site; or which damages or destroys important landscape features. Removing a historic building in a complex of buildings; or removing a building feature, or a landscape feature which is important in defining the historic character of the site.

#### **HARDISON PHASE I/II HISTORIC WRITEUP FOR WILLIAMS HOMES Appendix C**

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

To the greatest extent feasible, alterations to historic buildings to accommodate new uses should be reversible. Compliance with this standard is most readily accomplished by avoiding attachment of new construction to historic construction. In this case, no new construction is proposed to be attached to historic buildings. The reduction of the property size on which the historic buildings are located and the relocation of the Barn/Stables is, however, an irreversible change to the integrity of property of the kind that is discouraged by the Standards.

### **Summary Conclusion**

This project as proposed PARTIALLY conforms with the Secretary of the Interior's Standards Secretary of the Interior's Standards for Rehabilitation – [Standard 10 Rehabilitation the Approach](#)

### **Alterations/Additions for the New Use**

Some exterior and interior alterations to a historic building are generally needed to assure its continued use, but it is most important that such alterations do not radically change, obscure, or destroy character-defining spaces, materials, features, or finishes. Alterations may include providing additional parking space on an existing historic building site; cutting new entrances or windows on secondary elevations; inserting an additional floor; installing an entirely new mechanical system; or creating an atrium or light well. Alteration may also include the selective removal of buildings or other features of the environment or building site that are intrusive and therefore detract from the historic character. The construction of an exterior addition to a historic building may seem to be essential for the new use, but it is emphasized in the Rehabilitation guidelines that such new additions should be avoided, if possible, and considered only after it is determined that those needs cannot be met by altering secondary i.e., non character-defining interior spaces. If, after a thorough evaluation of interior solutions, an exterior addition is still judged to be the only viable alternative, it should be designed and constructed to be clearly differentiated from the historic building and so that the character-defining features are not radically changed, obscured, damaged, or destroyed. Additions and alterations to historic buildings are referenced within specific sections of the Rehabilitation guidelines such as Site, Roofs, Structural Systems, etc.

### **BUILDING SITE**

The landscape surrounding a historic building and contained within an individual parcel of land is considered the building site. The site, including its associated features, contributes to the overall character of the historic property. As a result, the relationship between the buildings and landscape features within the site's boundaries should be considered in the overall planning for rehabilitation project work. The building site may be significant in its own right, or derive its significance simply from its association with the historic structure. The level of significance, association integrity, and condition of the building site may influence the

degree to which the existing landscape features should be retained during the rehabilitation project. Designed historic landscapes significant in the field of landscape architecture require a more detailed analysis of their character-defining features which may include lawns, hedges, walks, drives, fences, walls, terraces, water features, topography (grading) and furnishings. Vegetation is an important feature in landscapes; this material, including both native species and cultivated plants, creates an appearance that is constantly changing, both seasonally and annually. Since most plant material is adapted to specific environments, the character of landscapes varies dramatically in different climates, elevation and regions

#### **RECOMMENDED**

Identifying, retaining, and preserving buildings and their features as well as features of the site that are important in defining its overall historic character.

Site features may include circulation systems such as walks, paths, roads, or parking; vegetation such as trees, shrubs, fields, or herbaceous plant material; landforms such as terracing, berms or grading; furnishings such as lights, fences, or benches; decorative elements such as sculpture, statuary or monuments; water features including fountains, streams, pools, or lakes; and subsurface archaeological features which are important in defining the history of the site.

Retaining the historic relationship between buildings and the landscape.

#### **NOT RECOMMENDED**

Removing or radically changing buildings and their features or site features which are important in defining the overall historic character of the property so that, as a result, the character is diminished.

Removing or relocating buildings or landscape features thus destroying the historic relationship between buildings and the landscape.

Removing or relocating historic buildings on a site or in a complex of related historic structures-such as a mill complex or farm thus diminishing its historic character. Radically changing the grade level of the site. For example, changing the grade adjacent to a building to permit development of a formerly below-grade area that would drastically change the historic relationship of the building to its site.

#### **6. GEOLOGY AND SOILS.** Would the project. Landslides

b. Result in substantial soil erosion or the loss of topsoil?

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The hillside has a lot of potential for landslides if evaluated further you would see how the soil is gradually coming down. The runoff of soil after rains is substantial and is evident when looking at the buildup of soil to the Back of the Garage on the property.

What will be long term effects on the treatment facility from the amount of mud that runs of the property after rains.

**10. LAND USE AND PLANNING.** Would the project:

City of Santa Paula General Plan Open Space

**E. Cultural and Historical Resources**

Lands throughout the City and the surrounding Area of Interest contain a wide variety of resources which are significant in the area's local history, regional architecture, archaeology, and culture. The resources considered significant usually meet the following criteria:

- The resource is associated with events that made a significant contribution to the broad patterns of our history; or
- The resources are associated with the lives of persons significant in our past; or
- The resources embody the distinct characteristics of a type, period or method of construction, or represent the work of a master, or possess high artistic values, or represent a significant distinguishable entity; or
- The resources have yielded or may likely yield information on history or prehistory.

Future land use decisions which affect the community's heritage must recognize the irreplaceable nature of cultural resources. The value of these resources are to be given equal weight to other factors being considered in the decision-making process. Goals, policies and implementing measures for protection of cultural resources are provided at the end of this element. The following text describes the context of the City's history and some of the known cultural resources in the Santa Paula area. A detailed discussion of the City's history, historic resources, and prehistoric/archaeological resources are found in Appendix A.

A. Open Space As defined in this element, open space land is any parcel of land that is undeveloped for urban uses. Within the City, open space can be found in parks, along river and creek floodways, on steep hillside slopes, in public gathering spaces, and on agricultural parcels. According to California law, the General Plan must address open space for the following uses: • Open space for the preservation of natural resources, such as watersheds, habitat, and archaeological sites. • Open space for the managed production of resources,

such as agricultural lands and mineral resources. • Open space for outdoor recreation and trails including active uses, passive uses and trails. • Open space for public health and safety including fuel breaks, flood ways, and steep slopes. • Open space for aesthetics and urban form including areas of outstanding scenic value, buffers and separations, and scenic roadways.

#### **14. PUBLIC SERVICES**

**The Open Space that will feature a Trail on the Hillside which will be maintained by HOA Community. It has been stated by Williams Homes that the Trail will be open to the Public and have a Public Access Point. There are a few questions:**

- 1. Where will the Public Parking be for this Trail?**
- 2. How will the neighboring community feel about the possibilities of the public parking in front of their properties?**
- 3. Will there be enough Public Safety Officers to enforce an issue if it arises?**
- 4. The increase in Public Safety from transients trespassing on the hillside which is already an ongoing problem on the property.**
- 5. How will the neighboring Communities feel with the trail providing easy access to the hillside their homes back up too?**
- 6. How will the neighboring Agriculture Property feel to the West about the trail providing easy access to their property which could cause trespassing and theft on their property?**
- 7. It is already a high risk in fire and then adding a trail will further elevate that risk especially with the increased public access.**
- 8. There is already a lack of public resources currently between Fire and Police in Santa Paula and has been brought to the city's attention through "Citizens for a Safer Santa Paula" why would we allow to put more strain on our Fire and Police that are already short staffed.**

#### **16. TRAFFIC STUDY Appendix H:**

Study Intersection Locations Impacted the most

- *Ojai Road (SR-150) & Oakdale Place*
- *Ojai Road (SR-150) & Richmond Road*
- *Ojai Road (SR-150) & Orchard Street*

**Traffic Study should have been done for the intersection of Virginia Terrace and Ojai Rd.**

- *Ojai Rd and Virginia Terrace is a highly used Connector for access to Mckevett Elementary and Santa Paula High School. To and from school*

- There is a Crosswalk at Ojai Rd and Virginia Terrace which is one of the Main Crosswalks Mckevett Elementary and Santa Paula High School. Students use.
- Northbound Traffic on Ojai Rd has a left hand turning lane onto Virginia Terrace
- Virginia Terrace has left and right turning options which is also affected by traffic turning into the shopping center directly to the East of Ojai Rd and Virginia Terrace

**Current community Impacts at this intersection;**

- Delays in wait time North and South
- Crosswalk has high rate of pedestrian traffic
- Heading N. on Ojai Rd approx ¼ mile up from signal you come into a turn that comes out at the Crosswalk
- Residents entering or exiting driveways onto Ojai Rd
- Delays due to southbound traffic making the right turn onto Virginia Terrace

**Impacts on the community during the 2 year Development period**

- Increase in traffic and larger related from the Development
- construction related vehicles on the road;
- Increased risk for the pedestrians due to the already high rate of use at that crosswalk
- Increased risk for the drivers who have to be prepared to stop for those pedestrians in the crosswalk and a higher risk to the driver when pedestrians do not follow the laws of the crosswalk
- Increase in delays for wait times at signal lights
- Harder for residents to pull into or out of their driveways onto Ojai Rd
- Increase in damage to the roadway

**Projects that will contribute to the Impacts above**

***Citywide Pavement Rehabilitation Project.*** ○

*This project also includes the replacement of approximately 12,900 linear feet of water mains and 2,400 linear feet of sewer mains*

*4. Eighth Street*

*14. Pleasant Street*

*17. Santa Barbara Street*

*18. Seventh Street*

***23. Virginia Terrace***

*Due to the size and scope of this project, City residents and the traveling public will experience some inconvenience during construction. To minimize exposure of cars*

to the work, staff will limit access and use of the roadways during construction. Individual traffic lanes and, if necessary, project street sections will be closed to traffic in order to perform the necessary work.

### **Projects possibly impacted by the Development**

Caltrans 126 Corridor improvement project Increased number of larger vehicles on roadway due to hauling debris from site to landfill and back. Already a high risk in driver safety on the freeway already and then this will add more.

### **Local Landmark Status**

#### ***HARDISON PHASE I/II Technical appendix C (HISTORIC WRITEUP FOR WILLIAMS HOMES)***

#### ***Previous Listings or Determinations of Eligibility***

*The W.L. Hardison House was designated Ventura County Landmark No. 35 in 1977, at a time when the historic preservation program in the City of Santa Paula was operated under a joint powers agreement with the County of Ventura. This agreement lapsed in 1984 when the city adopted its own Historic Preservation commission within the City of Santa Paula. Since that time, the city has re-designated several County Landmarks located within the city as City Landmarks. It appears that the Hardison House has not been re-designated as a City Landmark, leaving its current locale listing status unclear.*

Its current status should not be unclear! The house has been mentioned in the Surveys that have been done for Santa Paula after the City Separated from the County. Before the Hardison House sold San Buena Ventura Research Associates was suppose to be doing the paperwork to Register with the State California Register and for what reasons are unknown. So for this comment ***“It appears that the Hardison House has not been re-designated as a City Landmark, leaving its current locale listing status unclear”*** to be made is questionable considering these facts below:

#### ● **Ventura County Star Lifestyle section March 10, 2012**

#### **Historians to tell of Santa Clara River Valley's past**

"It's one of the few places in Southern California where you can still read the history of the agricultural development in the land and in the buildings," Stone said of the valley.

That history stretches back about 150 years. In bits and pieces, in nooks and crannies, it's still there ? and Stone and Triem would know.

In three bursts over an 11-year period from the late 1980s to the late '90s, they surveyed the valley, visiting almost every ranch and farm in it. They with the help of a corp of volunteers interviewed property owners, researched what had been grown

on each ranch over time, took photos, made note of architectural styles and documented every farmhouse, barn and outbuilding, Triem said.

## **HISTORY IN THE LANDSCAPE**

The Stone-Triem survey findings were presented in a little-known report awhile back. The March 18 talk will touch on the surveys. Another finding they made was that the valley could qualify for the National Register of Historic Places based on landscape values. Among the National Register's many categories for areas deemed worthy of preservation are rural historic landscapes. County officials are aware of that, but the idea of forming such a historical district has not been taken to the National Register.

### ● **A portion of a letter from Phil Hardison with the Cultural Heritage Board**

21 October 1991

Robert Procter, P. O. Box 188, Santa Paula, CA 93060

Thank you very much for showing Steve and me around. Your house is just great! **In fact, having made quite a study of nineteenth century houses in Ventura County, I would guess that your Grandfather's House might well have been the finest in the county when it was built in 1884.** It was certainly larger than Antonio Schiappa Pietra's famous house that was built in Ventura in (demolished in 1876 1953), and the more elaborate Cook Mansion at Piru was not built until 1890. Equally interesting is the barn or carriage house. I don't know of anything else like it still existing in this county. Sometime, I would very much like to return and measure the porches around the front of the house more accurately, so that I could draw a front elevation.

-----Original Message----- From: Mitch Stone > Sent: Monday, March 17, 2014 4:38 PM > To: Amber > Subject: Re: robert procter letter > >

This is quite interesting. The letter is from Phil Hardison (a distant cousin from the Fillmore branch of the Hardison's). He was an architect who drew plans of many historic houses in the county as a sort of hobby. Phil died quite young sadly. We were friends of his, and his brother knowing that gave us quite a lot of the photos and plans he'd collected, but I don't remember seeing this one among them. Have you found them anywhere? Hardison was a member and past chairman of Ventura's Historic Preservation Commission, architectural advisor to the Ventura County Cultural Heritage Board, a docent at the Santa Paula Union Oil Museum and a member of the American Institute of Architects.

### ***City of Santa Paula Ordinance 816***

***17.55.280.***

***Relationship With Ventura County Landmarks. All structures and sites designated as Ventura County Landmarks prior to the effective date of this ordinance will remain Ventura County Landmarks.***

**§ 16.33.050 MAINTENANCE OF PROPERTY.** The owner or individual in charge of a designated landmark or a structure within a historic district must maintain the designated landmark or structure within the historic district in good condition, in accordance with City Council Ordinance No. 816. If the owner or individual in charge fails to make the necessary improvements for maintenance, the city may make the improvements and charge the costs as a lien against the property.(Ord. 1100, passed 7-6-04)

**17.55.240. Duty to Keep in Good Repair.**

The owner, occupant or the person in actual charge of a designated historic landmark or property located within a designated historic shall keep and maintain in good condition and repair all exterior portions thereof, and all interior portions thereof whose maintenance is necessary to prevent deterioration and decay of any exterior architectural feature or natural feature.

The MND Report states the property will be sold “AS IS” and is to be maintained and preserved under new ownership. The planned sale price for Barn and Main House on less than an acre, loss of its Historic Landmark Integrity the house is planned at \$750,00. 00. Seems like a lot for the amount of damage that has happened and is currently happening under their Ownership . There is a Widow upstairs missing from the added sleeping porch that has not been replaced or covered to protect it from further damage to the inside. The Barn is not protected from the elements as recommended by [Secretary of Interior's Standards](#).

Shouldn't these same ordinances be followed under present ownership and damage caused from lack of protection. Before this property is even considered to be put up for sale at a later date these things should be taken into consideration. I would hope the City would evaluate the property and have the damages that have happened under Williams Homes Ownership and further protection from further damage to the structures addressed before allowing it to be sold .It's disrespectful I think that Williams Homes talks about caring about this community and its History and is fully aware of the Extent of Damage that has happened and has done nothing to address the damage and keep further damage from happening. To turn around and put it up for sale and ask for \$750,00.00 for the sale price knowing that the extent of damage now could have been reduced if addressed after it happened.

**18. MANDATORY FINDINGS OF SIGNIFICANCE**

Potentially Significant Unless Mitigation Incorporated

**a.** Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

**b.** Does the project have impacts which are individually

limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).

A better plan would be preserve the buildings in place, leave the size of the lot the buildings are sitting on up until the North fence that separates the pasture from the house. Continue with the planned Restoration of the Barn. Sale at a respectful price, taking into consideration the extent of the damage that will have to be fixed. At least the large lot will give someone the opportunity to rent it out for venues, wedding, etc so that money can be used to fix, maintain, and preserve the house and barn like it meant to be after restoration.

A nice size park to the North east part of the property already bordered with the fence. The Plaque can be placed at the Park entrance and Royal Oak entrance. Plaque will still feel like it was placed on the Main House Lot. The Scenic View will still exist and the visual Integrity of the property will remain.

A walking trail could be incorporated from the park through the proposed development that leads to the unaltered terraces. The trail could incorporate roses and other plants along the terraces levels at the same time of preserving the terraces integrity and its place on the property without removing it..

The Fuchsia Lane emergency access can be used as the entrance to the Terraced walking path. The walking path could be connected to the fuchsia lane trail entrance The rock terraces seem to start at front portion of the last house on the west side of fuchsia. Which would help preserve and be used as part of the terraced walkway to the hillside terraces.

Limiting the Development to large single story lots priced higher accordingly with the General Plan which help meet the need for the moderate sized homes. It also fits in with the neighboring communities going up Ojai Rd. The park and walking trail will also help with the need for parks in the General Plan.

**Attached are photos and the Petition**

Thank You

Former Employee of Robert Procter and The Hardison Ranch

Amber Mickelson



21 October 1991

Robert Procter  
P. O. Box 188  
Santa Paula, CA 93060

Dear Bob,

Here at last is the plan that I have drawn of your house. The front rooms are shown very accurately, but the kitchen is somewhat approximate as I didn't measure everything there as thoroughly. The porches and rooms behind the kitchen are also approximate. I have not shown where any of the porches have been enclosed, but I have guessed as to how they might have been originally. Likewise, I have not shown the addition to the north of the kitchen.

Thank you very much for showing Steve and me around. Your house is just great! In fact, having made quite a study of nineteenth century houses in Ventura County, I would guess that your grandfather's house might well have been the finest in the county when it was built in 1884. It was certainly larger than Antonio Schiappa Pietra's famous house that was built in Ventura in 1876 (demolished in 1953), and the more elaborate Cook Mansion at Piru was not built until 1890. Equally interesting is the barn or carriage house. I don't know of anything else like it still existing in this county. Sometime, I would very much like to return and measure the porches around the front of the house more accurately, so that I could draw a front elevation.

If you would like more copies of the plan, I would be happy to give them to you. Also, as it was drawn with a computer aided drafting system, it can be plotted out at larger or smaller scales, if you would like them.

Once again, thank you very much for showing Steve and me around, and thank you especially for your patience and for indulging me in my interest in old houses.

Sincerely,

*Phil*



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.

## How to Identify and Evaluate Historic and Cultural Landscapes

Historic vernacular landscapes and rural historic landscapes are being impacted throughout California by urban encroachment. According to *National Register Bulletin 30* Rural Historic Landscapes are defined as:

“[A] geographical area that historically has been used by people, or shaped or modified by human activity, occupancy, or intervention, and that possesses a significant concentration, linkage, or continuity of areas of land use, vegetation, buildings and structures, roads and waterways, and natural features.”

A historic landscape may extend well beyond the traditional area of potential effect established by an environmental document, yet a project may still pose a significant impact to the resource. The most proactive approach for communities is to incorporate the best examples of these resources into their long-range development plans—thru General Plans or Specific Area Plans. Yet this approach may not be practical or possible for some communities.

One example of this resource type is the citrus groves in California. The citrus groves in this CEQA case study were originally part of a much larger network of family citrus orchards, which grew into a Southern California citrus industry with national notoriety.

What remains today are a collection of orchard groves, buildings, and other landscape features associated with the citrus industry—a mere fraction of the much industry that once dominated the lowlands of Southern California. As Southern California continues to urbanize, these historic citrus farms have become a threatened resource type. CEQA documents should identify significant historic landscapes, including citrus farms, in their discussion of cultural resources. This way the public and decision makers can fully understand the environmental impacts of proposed projects.

The project in our CEQA case-study proposed to turn a historically significant citrus farm into a residential subdivision. The project included relocation of the farmhouse, removal of all trees, and demolition of the landscape features that occupy the site. The Lead Agency prepared a Mitigated Negative Declaration for the proposed but failed to identify the historic farm as a contributing resource of a larger historic vernacular landscape.

When dealing with a historic landscape, the building is only one part of the larger resource. Relocating the building and demolishing all other features associated with the setting would result in a significant impact and an EIR should be prepared.

This case study demonstrates that when looking at interconnected buildings, structures, and landscape features, it is important to determine if a single set of resources may be part of a larger historically significant landscape. If the landscape as a whole is significant and would be impacted by the proposed project, the impact to historical resources should be identified and evaluated in an EIR. This way the Lead Agency can consider a full range of alternatives and mitigation measures during the CEQA process.

Identifying historic vernacular landscapes, either as part of the CEQA process or a more proactive planning program is important because it can help preserve the best examples of these resources for the state’s future generations.





# 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.

FOR QUESTIONS ABOUT CEQA AND HISTORIC AND CULTURAL RESOURCES, PLEASE CONTACT: SEAN DE COURCY, AT (916) 445-7042 OR [SEAN.DECOURCY@PARKS.CA.GOV](mailto:SEAN.DECOURCY@PARKS.CA.GOV)

## CEQA RESOURCES

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

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

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December 16, 2014

Guillermo Arreola  
City of Loma Linda Planning Division, Associate Planner  
25541 Barton Road  
Loma Linda, 92354

Dear Mr. Arreola:

**RE: CITRUS LANE ANNEXATION PROJECT NOTICE OF INTENT TO ADOPT A  
MITIGATED NEGATIVE DECLARATION**

Thank you for including the California Office of Historic Preservation (OHP) in the environmental review process for the Citrus Lane Annexation Project and the City of Loma Linda's intent to adopt a Mitigated Negative Declaration (MND). The State Historic Preservation Officer and the OHP have broad responsibilities for the implementation of federal and state historic preservation programs in California. Our comments are offered with the intent of preserving historical resources impacted by the proposed project while allowing the City of Loma Linda to meet its program needs. The following comments are based on a review of the Notice of Intent to adopt a MND for the Citrus Lane Annexation Project and the McKenna et al report, prepared for the Lilburn Corporation (project applicant), which was provided to OHP on December 12, 2014.

The proposed project involves two parcels, the Bell and Ramirez Properties, which are currently both developed with three single family homes and citrus orchards. The proposed project involves: 1) a General Plan Amendment which would rezone the Bell property to low-density residential (R-1), and the Ramirez Property as general business (C-2); 2) annex both parcels into the City of Loma Linda for water and sewer; 3) on the Bell Property, relocate the existing residence, and demolish the orchard and all improvements on the parcel and develop 35-single family residences and four common lettered lots. The Ramirez Property would remain in its current state under the proposed project.

The Cultural Resources section of the MND cites the 2014 McKenna et al *Phase I Cultural Resources Investigation*, which determined the existing single family residence on the Bell Property is eligible for listing on the California Register of Historical Resources. The MND proposes to mitigate demolition of the building by recording and relocating the residence. Pursuant to CEQA, the Lead Agency must determine whether a project may cause a substantial adverse change in the significance of a historical resource or cultural resource (CEQA Guidelines § 15064.5). If a substantial impact is identified, the Lead Agency must either mitigate the impact to a less than

significant level, or conduct an EIR. In the case of historical resources, CEQA Guidelines § 15064.5 (b)(3) allows for a project to mitigate potential impacts to less than a significant level, if treatment of the resource complies with the Secretary of the Interior Standards for the Treatment of Historic Properties. In this case, it appears the historic resource is the larger network of farms associated with the Curtis family, not merely the residence as described in the MND. After mitigation, the proposed project will relocate the Curtis residence and demolish all other buildings and landscape features associated with the site. The Secretary of the Interior Treatment of Historic Properties does not provide for this method of treatment; and therefore, the proposed project, after mitigation, will result in a significant impact to the environment for the purposes of CEQA and the Lead Agency is therefore required to prepare an EIR, per CEQA Guidelines § 15065 (a)(1).

The Eli C. Curtis (Bell) Property appears to be part of a larger Historic Vernacular Landscape associated with the citrus industry in San Bernardino county and Southern California. When taken as a whole, the remaining citrus groves (which go beyond the Bell Property and Ramirez property) in San Bernardino County represents a much larger Historic Vernacular Landscape, which should be considered in an EIR. National Parks Service Preservation Brief 36, defines a Historic Vernacular Landscape as one,

*That evolved through social or cultural attitudes of an individual, family or a community, the landscape reflects the physical, biological, and cultural character of those everyday lives. Function plays a significant role in vernacular landscapes. They can be a single property such as a farm or a collection of properties such as a district of historic farms along a river valley. Examples include rural villages, industrial complexes, and agricultural landscapes.*

The larger citrus grove area between the cities of Loma Linda and Redlands in San Bernardino County appears to be a rare but excellent example of an intact historic agricultural landscape which exemplifies Southern California's disappearing citrus industry. The larger network of interconnected farms potentially has state and national significance for its connection with the citrus industry and the impact of the proposed project on the landscape should be evaluated in an EIR. The other landscape features identified in the McKenna et al report that are associated with the Southern California citrus industry (two historic road alignments, railroad berm and retaining wall, two single family houses facing Orange Avenue, mature walnut trees, and the grove of palm trees along Citrus Avenue, and other residential buildings associated with the Curtis family farm network) should also be fully evaluated in an EIR.

In the MND the Lead Agency cites the McKenna et al evaluation for the Eli C. Curtis agricultural complex, and summarizes the report as follows:

*The McKenna [Cultural Resources Investigation] recorded the property as a whole, encompassing the orchard, irrigation system, and structures...Although recorded as a much larger resource, the only significant element within the site is the Eli C. Curtis residence. This*

*relatively large and maintained residence is unique in its setting and associations...it should be considered locally significant and worthy of protection.*

The McKenna et al report recommends mitigation measures be implemented, but does not claim these mitigation measures will reduce the impact to cultural resources to a less than significant level. The historic significance and integrity of the orchard, irrigation system, walnut trees, palm trees, and associated structures appear to be associated with the Vernacular Landscape features that are likely historically significant for their association with the Curtis family, and the agricultural development of Loma Linda and San Bernardino County citrus industry. McKenna et al identifies several other residential properties, which are associated with other members of the Curtis Family. While the MND claims the only element within the complex with any historical significance is the "Eastlake/Queen Anne eclectic Victorian residence," it does not appear the significance of the region was considered as a whole, but rather only the impact of the project on the Bell and Ramirez properties.

McKenna et al demonstrates the "Dinky" Railroad is associated with significant individuals and the development of Redlands and therefore should be considered a historical resource for the purposes of CEQA. Furthermore, McKenna et al explains that the palm grove along Citrus Avenue marked the extent of the Eli C. Curtis property and the OHP believes this grove may be individually eligible as a historic tree grove, and as part of a larger Vernacular Historic Landscape that should be considered.

When discussing the insignificance of the other features on the site the MND claims the orchard is not original, the irrigation system was added later, the garage lacks integrity, and the out-building lacks structural integrity. Merely being planted or added later, and/or lacking structural integrity, does not necessarily make the features insignificant when considered in the larger historic context of the agricultural site and surrounding landscape. Historic integrity is defined by *National Register Bulletin 15*, as containing seven aspects: location, design, setting, materials, workmanship, feeling, and association. The project as described in the MND will significantly impact the historic integrity of location, setting, feeling and association for the historic building, and potentially, the larger Historic Vernacular Landscape (yet to be evaluated). Since a complete historic evaluation of the agricultural landscape was not conducted, it is impossible for the public to evaluate the legitimacy of the Lead Agency's determination that the proposed project will result in a less than significant impact to historic resources. The OHP feels the MND fails to adequately address significant impacts to the Curtis family network of farm complexes as a whole, or the potential cumulative impacts of the project on the larger agricultural region.

The MND is completely silent regarding the historic significance or integrity of the residential buildings located on the Ramirez Property (APN 292-161-12 & APN 292-161-08), which have the potential to be significantly impacted by the re-zoning of the two parcels. The McKenna et al report (Figure 6) indicates these houses are on the former property of Jeremiah J. Curtis (Eli C. Curtis' brother). Additionally, Figure 6 in the McKenna et al report shows the extent of the network of Curtis family farms, which

extend well beyond the Bell and Ramirez properties addressed in the MND. The impact of relocating (or demolishing) the most prominent home, the Eli C. Curtis residence, and associated landscape features should be evaluated based on the collective of Curtis Family farms, and on the larger network of family farms that still exist in the Santa Ana River Valley.

Assuming the Eli C. Curtis residence is the only historically significant feature of the site, as determined by the Lead Agency, the mitigation proposed in the MND will not reduce the impact to a less than significant level, and therefore an EIR is required. McKenna et al recommends preservation in place of the historic Eli C. Curtis residence; however, the Lead Agency proposed mitigation will 1) relocate the residence, 2) document the residence through Historic American Building Survey-like (HABS-like) documentation, and 3) demolish all other elements of the farm complex. This treatment clearly results in a significant impact to historical resources for the purposes of CEQA and an EIR is required to evaluate alternatives and explore more effective mitigation.

Thank you for considering our comments. If you have questions, please feel free to contact Sean deCourcy, State Historian II of the Local Government and Environmental Compliance Unit, at (916) 445-7042 or at [Sean.deCourcy@parks.ca.gov](mailto:Sean.deCourcy@parks.ca.gov).

Sincerely,



Carol Roland-Nawi, Ph.D.  
State Historic Preservation Officer

CC: Los Angeles Conservancy  
San Bernardino Historical Society