

5.5 CULTURAL RESOURCES

5.5.1 INTRODUCTION

This section describes existing cultural resources in the East Gateway Project Area, potential environmental impacts, measures recommended to mitigate the potential impacts identified and the level of significance of these impacts after mitigation.

5.5.2 EXISTING CONDITIONS

This section is concerned with the following types of historic and cultural resources: paleontological, archaeological, and historic. A brief description of each is provided below:

- Historic Resources: Buildings, structures, improvements, and remnants associated with a significant historic event or person(s) and/or have a historically significant style, design, or achievement; generally any resource more than 50 years old has the potential to be considered a historic resource;
- Archaeological Resources: Remnants of human activity from an earlier time (e.g. milling slick); and
- Paleontological Resources: Remnants of prehistoric plants and animals (e.g. fossils).

Historical Resources

Historical resources refer to the material and non-material expressions of human adaptations which characterized the post-contact or historic period. These resources include historic event or activity sites, historic archaeological sites, standing architecture and other significant properties, documents and other sources of historical information, and objects of material culture; and secondarily, the more intangible cultural qualities, such as folklore, social organization, and value systems, which are associated with these properties.

Ventura County maintains an inventory of historical landmarks and points of interest¹ that reflects the diversity of sites, buildings and natural features which have been recognized by the Cultural Heritage Board for their outstanding historical character. Included are Chumash archaeological sites, Spanish and Mexican adobes, Victorian-era mansions, banks, trees and innumerable other points of interest. There are no sites listed on the Ventura County inventory that are located within the East Gateway Project area.

1 Ventura County General Plan, Resource appendix, June 2011, Figure 1.8.2.

A detailed summary of the historic setting and its context to potential historic resources in the area is provided in the Historic Resources Report² in **Appendix 5.5**.

Potential Historic Resources

The East Gateway Project area has been divided into ten subareas and assigned a letter for each, as illustrated in **Figure 5.5-1, East Gateway Project Subareas**. These subareas and any potential historic resources within them are characterized below.

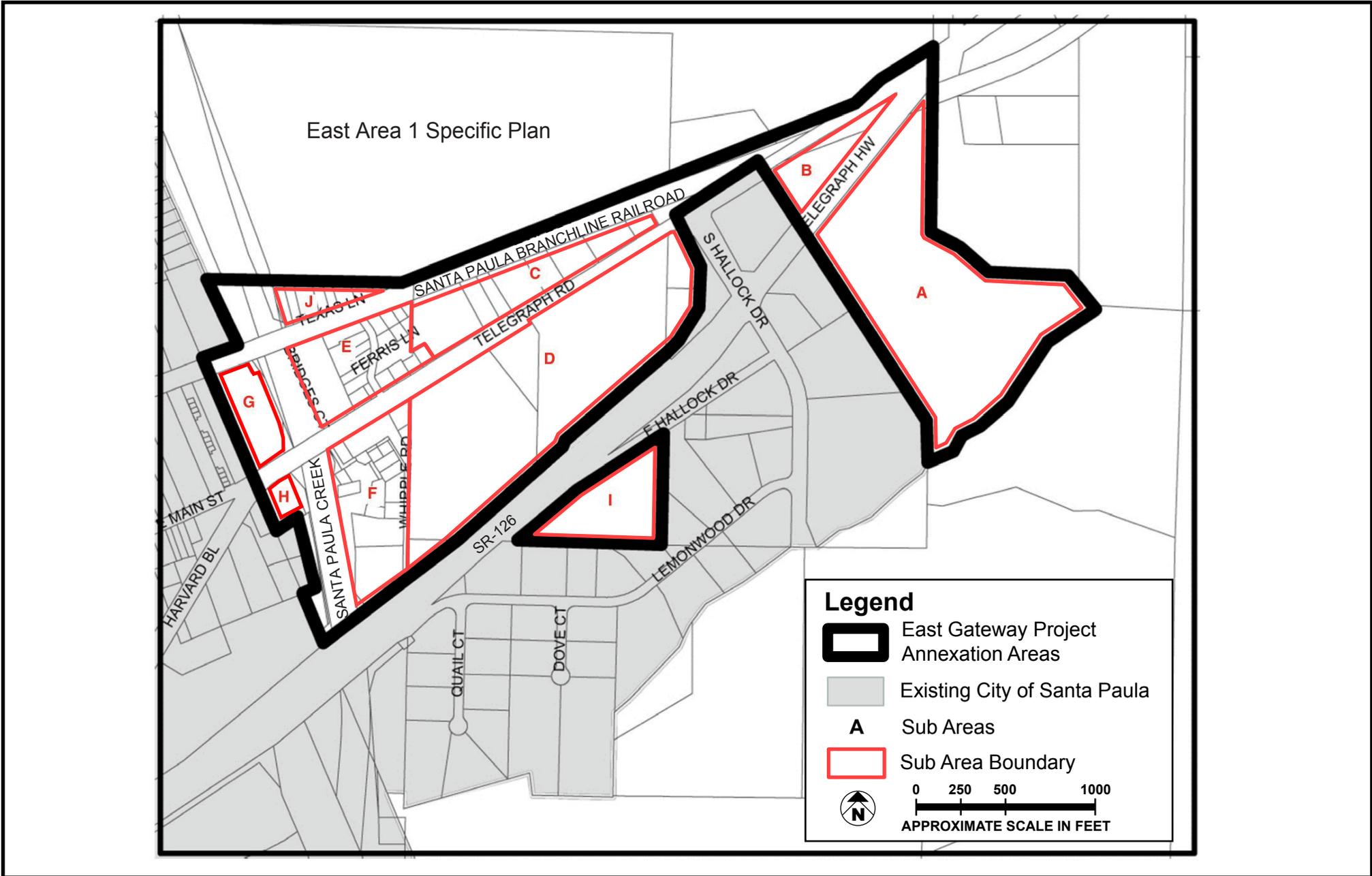
A portion of the proposed annexation area, along with roughly 65 square miles of the Santa Clara Valley of Ventura County, was subject to a comprehensive and intensive historic resources survey of over 1,700 parcels conducted in two phases completed in 1996 and 1999.³ These surveys identified a National Register of Historic Places (NRHP) rural historic district eligible under Criterion A and Criterion C.

In this survey, the Santa Clara Valley was found to be significant and eligible under NRHP Criterion A (events) for its reflection of the growth and development of agriculture during its period of significance (1874-1950). The district was found to illustrate the historical development of agricultural products and farming techniques, and to document the progression of land uses from the dry farming of grains and row crops, to irrigated tree crops and citrus ranching.

The district was also found to be significant and eligible under Criterion C (design) as one of the best-preserved examples of a mature Southern California citriculture landscape. The district was found to possess a significant concentration of buildings, structures, objects and sites related to this land use. The district was found to be eligible for its representation of the human designed landscape of agriculture in the specific historical form, pattern and arrangement of buildings, structures and objects. Together, these physical elements were found to contribute to the interpretation of citriculture in California. A wide variety of architectural styles and building types from the period of significance were also found to be illustrative of the development of agriculture as both family farming and agribusiness enterprises. The findings of this survey were reviewed and accepted by the Office of Historic Preservation, and adopted by the Ventura County Cultural Heritage Board and the Ventura County Board of Supervisors.

2 San Buenaventura Research Associates, CEQA Historic Resources report, East Gateway Project, Santa Paula, CA, October 14, 2011.

3 Ibid, p. 5.



SOURCE: San Buenaventura Research Associates, 2011

FIGURE 5.5-1

If a property was evaluated in the 1999 Historic Resources Survey, the Historic Resources Report⁴ (**Appendix 5.5**) reflects the NR status code assigned to each property in the survey. A new or revised CHR status code based on a field survey of the area conducted in connection with the recent historic resources survey.

A. Gateway Specific Plan Area

This portion of The East Gateway Specific Plan area is located east of the Santa Paula city limits and south of the Santa Paula Freeway (SR 126) is in agricultural use. This subarea is otherwise vacant, and was not considered a contributing agricultural parcel to the NRHP-eligible historic district documented in the 1999 Historic Resources Survey.

B. Vacant Parcel

This pie-shaped wedge of land located between Telegraph Road and the Santa Paula Freeway (SR 126) is presently vacant. This subarea was not considered a contributing agricultural parcel to the NRHP-eligible historic district documented in the 1999 Historic Resources Survey.

C. Telegraph Road A

This subarea is located on the north side of Telegraph Road between South Hallock Drive on the east and Ferris Lane on the west and is characterized by mixed residential and commercial/industrial uses. Properties located within this area include a number of historic properties documented and evaluated in the 1999 Historic Resources Survey and considered potentially eligible for individual designation under a local ordinance. They were not found to be contributors to the NRHP-eligible historic district. Few changes appear to have occurred within this area since the completion of the survey.

D. Telegraph Road B

This subarea consists of a mixture of residences, one industrial site, orchards, and vacant land on the south side of Telegraph Road between Hallock Drive on the east and Whipple Road on the west. Properties located within this area include a number of historic properties documented and evaluated in the 1999 Historic Resources Survey and considered potentially eligible for designation as a small grouping under a local ordinance. They were not found to be contributors to the NRHP-eligible historic district. Since the completion of the 1999 survey, four of the eligible buildings within this subarea were demolished and over half of the associated agriculture removed. One surviving residence was relocated elsewhere on the property.

4 San Buenaventura Research Associates, CEQA Historical Resources Report, East Gateway Project, Santa Paula, CA, October 14, 2011, pp. 9 to 11.

E. Ferris Lane

This subarea is located north of Telegraph Road and is comprised primarily of single-family residences and a scattering of commercial businesses along East Telegraph Road constructed between 1915 and 1949. Properties located within this area include a number of buildings documented and evaluated in the 1999 Historic Resources Survey and considered not eligible for individual NRHP, CRHR or local listing or as a contributor to a district, but eligible “for special consideration in local planning.” This “special consideration” language does not denote a historic resource for purposes of CEQA. Few changes appear to have occurred within this area since the completion of the 1999 survey.

F. Whipple Road

Located south of East Telegraph Road, this area is primarily composed of one-story single-family residences, a former motel converted to multi-family residences, and a commercial automotive garage use. Properties located within this area include a number of buildings documented and evaluated in the 1999 Historic Resources Survey. Two properties in this area were determined to be ineligible for the NRHP and California Register for Historical Records (CRHR) but potentially eligible for individual listing under a local ordinance. The remainder of the properties surveyed in 1999 were considered not eligible for local listing or as contributors to a district but eligible “for special consideration in local planning,” a designation that does not denote a historic resource for purposes of CEQA.

G. Telegraph Road

This subarea is located on the north side of East Telegraph Road and on the west side of the Santa Paula Creek bridge, and consists of a single parcel that features commercial/industrial uses. The property is listed in the 1999 Historic Resources Survey and was determined not eligible for individual NRHP or CRHR but potentially eligible for listing as a small grouping under a local ordinance. Few changes appear to have occurred within this area since the completion of the 1999 survey.

H. Telegraph Road

This subarea is located west of the Telegraph Road bridge and features a mix of commercial and industrial uses. This area was not included in the 1999 Historic Resources Survey. The single improved property located in this area does not appear to be eligible for NRHP or CRHR listing, or for historic designation under a local ordinance.

I. Lindsay Parcel

This subarea consists of one parcel, located at 1775 East Lemonwood Drive, on the south side of the Santa Paula Freeway. This large parcel features an industrial use. This area was not included in the 1999 Historic Resources Survey. This largely vacant parcel, owned by Lindsey Excavating and Grading Company, contains an industrial building on the southern end of the property, probably constructed in the 1980s. This building is not fifty years of age and should not be regarded as a historic resource for purposes of CEQA.

J. Texas Lane

Located north of the railroad tracks and east of Santa Paula Creek, this area contains a number of single-family residences built constructed primarily after 1950 on the north side of the street. This area was not included in the 1999 Historic Resources Survey. The railroad right-of-way and railroad bridge are located on the north side. No properties within this subarea appear to be eligible for NRHP or CRHR listing, or for historic designation under a local ordinance.

Eligibility of Historic Resources

The Historic Resources Report⁵ (**Appendix 5.5**) summarizes the parcels evaluated for eligibility in the 1999 Historic Resources survey and updated or evaluated for the first time in this report. The status code system was revised in 2003, subsequent to the completion of the survey, from the previous “NR Status Code” system to the present “CHR Status Code.” Consequently, the table reflects both a translation of the old codes to the new system and a revision based on current conditions. Parcels with a CHR Status Code prefix of five (5) or lower should be regarded as potential historic resources for the purposes of CEQA.

The following properties should be regarded as potential historic resources for the purposes of CEQA:

Map ID	Address	Parcel Number	Use
1	18145 E. Telegraph Road	107-0-041-070	Strangeland Trucking Company, 1926
2	18115 E. Telegraph Road	107-0-041-060	Clark Oil Company, 1926
3	18101 E. Telegraph Road	107-0-041-045	Single Family Residence, 1937
4	18029 E. Telegraph Road	107-0-041-015	Single Family Residence, 1912
5	18212-36 E. Telegraph Road	107-0-042-050	Single Family Residences on one parcel, 1885-1930
6	97 Whipple Road	107-0-030-145	Single Family Residence, 1890
7	112 Whipple Road	107-0-011-335	Single Family Residence, 1890
8	17905 E. Telegraph Road	107-0-020-360	Industrial buildings, 1922

The locations of the properties are shown on **Figure 5.5-2, Location of Potentially Eligible Historic Properties.**

⁵ San Buenaventura Research Associates, CEQA Historical Resources Report, East Gateway Project, Santa Paula, CA, October 14, 2011, pp. 9 to 11.

Properties less than 50 years of age may be eligible if they can be found to be “exceptional.” While no hard and fast definition for “exceptional” is provided in the NRHP literature, the special language developed to support nominating these properties was clearly intended to accommodate properties which demonstrate a level of importance such that their historical significance can be understood without the passage of time. In general, according to NRHP literature, eligible “exceptional” properties may include, “resources so fragile that survivors of any age are unusual. [Exceptionalness] may be a function of the relative age of a community and its perceptions of old and new. It may be represented by a building or structure whose developmental or design value is quickly recognized as historically significant by the architectural or engineering profession [or] it may be reflected in a range of resources for which the community has an unusually strong associative attachment.” No buildings or structures in the annexation area that are currently less than fifty years of age appear to rise to the exceptional level.

Archaeological Resources

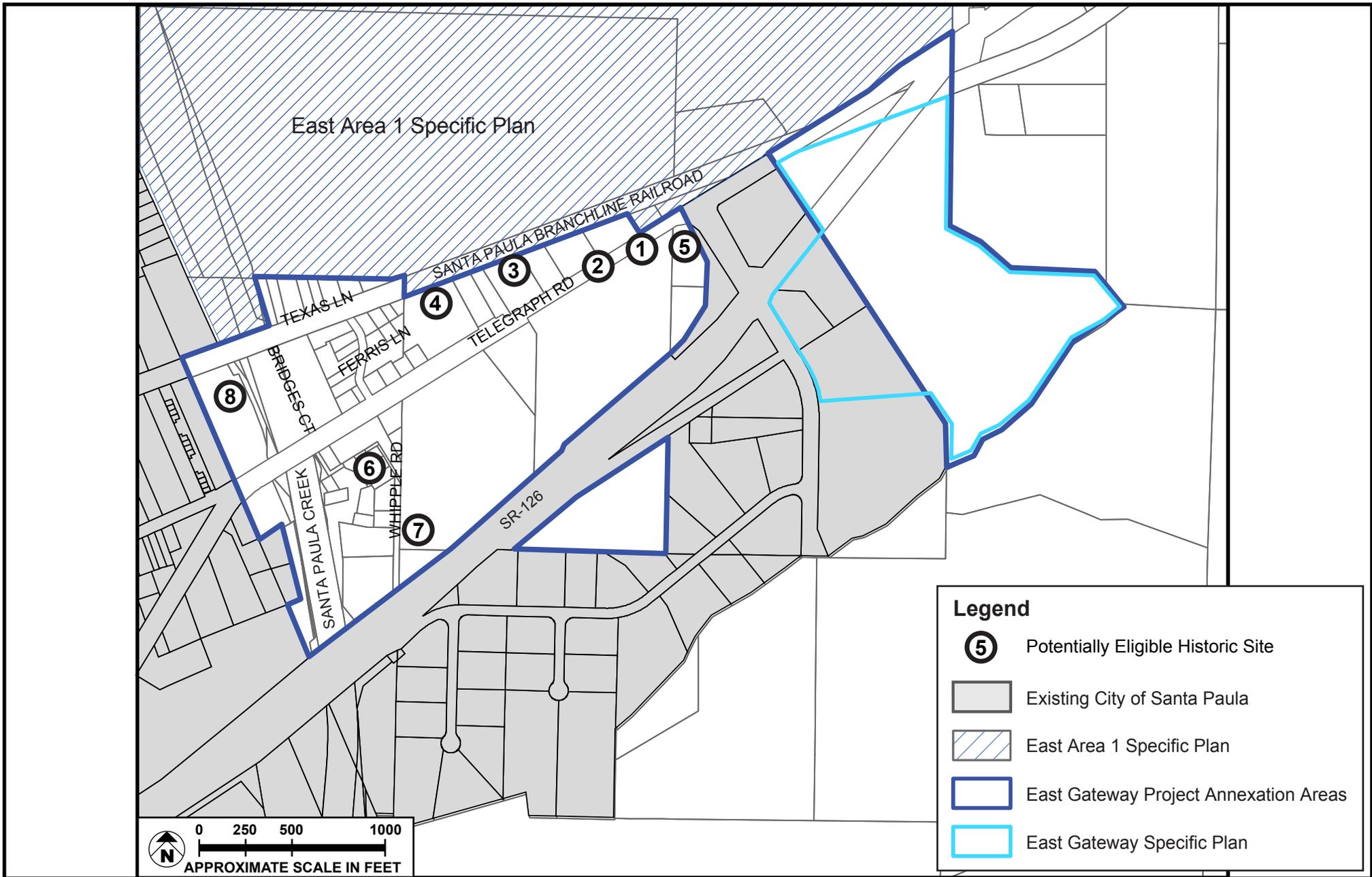
The archaeological basis for the regional prehistoric sequence in Ventura County lies ultimately in the research of David Banks Rogers (1929), who worked on the Channel Islands and along the Santa Barbara coastline. William J. Wallace (1955) subsequently modified the terminology of Roger’s scheme, and improved with additional and more detailed data and radiocarbon dates.

Wallace’s chronology for southern coastal California includes four time periods: Early Man/Big Game Hunting Period; Early Millingstone Period (or Early Horizon Period); Intermediate (or Middle) Period; and Late Prehistoric Period. Below is a brief discussion of each time period.

Figure 5.5-3, Archaeological Sensitivity Map, Ventura County (South Half), portrays generalized archaeological site sensitivity areas based on known or suspected prehistoric use areas. The map indicates that the East Gateway Project area lies outside of areas designated as “sensitive” or “very sensitive.”

A detailed summary of the early history of the area, including ethnographic resources, is provided in the Phase I Archaeological Survey of the East Gateway Specific Plan Area⁶ in **Appendix 5.5**.

6 W & S Consultants, Phase I Archaeological Survey of the East Gateway Specific Plan Area, Santa Paula, Ventura County, California, November 2011.



SOURCE: San Buenaventura Research Associates, 2011

FIGURE 5.5-2



SOURCE: Ventura County General Plan, Resources Appendix, 2011

FIGURE 5.5-3

Archaeological Sensitivity Map, Ventura County (South Half)

Archival Records Search

An archival records search⁷ was conducted at the California State University, Fullerton, Archaeological Information Center (AIC), by AIC staff members to determine: (i) if prehistoric or historical archaeological sites had previously been recorded within the East Gateway Specific Plan study area; (ii) if the project area had been systematically surveyed by archaeologists before the initiation of this field study; and/or (iii) whether the region of the field project was known to contain archaeological sites and to thereby be archaeologically sensitive. The complete results of this archival record search are included in this document as **Appendix 5.5**.

Files and records at the AIC indicate that a records search was conducted for the study area in 1997, but that no sites had been recorded at that time. Furthermore, no prehistoric sites had been recorded within the immediate vicinity of the study zone. The only previously recorded sites in the general vicinity are the Telegraph Road bridge (56-152833) over Santa Paula Creek, built in 1940, a prehistoric site (56-001792) which is located ½-mile to the north and four historic sites all of which are located over a ¼-mile north of the study area.

Examination of historical maps (specifically, Santa Paula, CA 1903 and 1947 15-minute series USGS topographical quadrangles) indicates that no structures were present within the study area over 100 years ago or by the immediate post-war period.

Previous studies documented the presence of five archaeological sites (56-001792, 56-001793, 56-001794, 56-1795 and 56-001796) and one additional cultural resource (56-152833) within a ½-mile radius of the two unincorporated island areas in the East Gateway Project area, indicating that the study area has high archaeological sensitivity with respect to prehistoric (Native American) and historic archaeological sites. None of the recorded sites or cultural resources are located within the study area.

In summary, the archival records search indicated that the project area had never been surveyed previously. No prehistoric archaeological sites had been identified at that time and historical maps revealed that no structures were present as of 1947.

7 W & S Consultants, Archaeological Records Search for two unincorporated island areas in the western portion of the East Gateway Specific Plan area, Ventura County, California, November 2011.

Field Survey

An intensive archaeological field survey of the East Gateway Specific Plan study area, Ventura County, was conducted by W&S Consultants in November, 2011.⁸ Field survey found that the entire study area had been farmed. Based on historical records, farming has occurred for the last century, although this has involved row crops rather than orchards. Most of the study area was found to have been recently planted with row crops (cabbage sprouts) at the time of the survey and ground surface visibility was hence excellent. The study area had been cultivated for many years and some surficial grading had occurred along a drainage ditch which is located on the eastern edge of the subject property.

The intensive Phase I archaeological survey of the East Gateway Specific Plan study area failed to find any evidence of unrecorded archaeological sites, either prehistoric or historical in nature.

Paleontological Resources

The East Gateway Project area, encompassing approximately 95 acres, is located within the unincorporated area of Ventura County, found at the eastern edge of the City of Santa Paula. Specifically, the project site is located in the western Transverse Ranges Province, where major linear geographic features (i.e., mountains, valleys) and the underlying geologic structures (i.e., faults, folds) trend in a dominantly east-west direction.⁹

The project site consists primarily of a flood plain and alluvial fan adjacent to the confluence of the Santa Paula Creek and Santa Clara River. The project site consists of an over-bank flood deposit (consisting of a very rocky alluvium, containing cobbles and boulders) that either developed naturally, or immediately along the creek, was artificially dredged up and deposited during channelization.

Regional surficial geologic mapping of the project site and surrounding vicinity indicates that the project site is underlain by four late Cenozoic rock units,¹⁰ including the following: (1) late Pliocene to middle Pleistocene, continental Saugus Formation, which underlies the steeper slope at the northern end of the project site; (2) middle Pleistocene older alluvium, which underlies the adjacent gentler slope below and to the south; (3) late Pleistocene to Holocene younger alluvium, which underlies the adjacent flat-lying lower portion of the southern half of the project site; and (4) Holocene stream channel deposits, which floor Haun Creek along the eastern margin of the project site.

8 W & S Consultants, Phase I Archaeological Survey of the East Gateway Specific Plan Area, Santa Paula, Ventura County, California, November 2011.

9 Jahns, R.H. "Investigations and Problems of Southern California Geology." 1954. California Division of Mines Bulletin 170(1): 5-29.

10 Dibblee, T.W., Jr. 1990 and 1992. "Geologic Map of the Santa Paula Quadrangle, Ventura County, California." Dibblee Geological Foundation Map. DF-26 and DF-41

Project Site Conditions

An intensive Phase I archaeological survey¹¹ was conducted for the East Gateway Specific Plan area. This investigation involved an archival records search, a review of existing published and unpublished references on local prehistory and history, and an on-foot, intensive survey of the study area. Archival records indicated that the study area had not been previously surveyed and that no archaeological sites had been recorded within the project. On-foot survey of the study area failed to result in the discovery of any unrecorded cultural resources. Development of the study area, therefore, does not have the potential to result in adverse impacts to cultural resources.

5.5.3 REGULATORY SETTING

5.5.3.1 Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 established the National Register to recognize resources associated with the country's history and heritage. Structures and features usually must be at least 50 years old to be considered for listing on the National Register—barring exceptional circumstances. Criteria for listing on the National Register, which are set forth in the Code of Federal Regulations,¹² are significance in American history, architecture, archaeology, engineering, and culture as present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that are any of the following:

- A. associated with events that have made a significant contribution to the broad patterns of our history;
- B. associated with the lives of persons significant in our past;
- C. embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values, represent a significant and distinguishable entity whose components may lack individual distinction;
- D. have yielded, or may be likely to yield, information important in prehistory or history. Criterion D is usually reserved for archaeological and paleontological resources.

Secretary of the Interior's Standards for the Treatment of Historic Properties

The Secretary of the Interior (SOI) is responsible for establishing standards for the preservation and protection of buildings and other cultural resources eligible for listing in the National Register.¹³ The 1990

11 W & S Consultants, Phase I Archaeological Survey of the East Gateway Specific Plan Area, Santa Paula, Ventura County, California, November 2011.

12 36 CFR § 63 of the Code of Federal Regulations, National Register of Historic Resources.

13 National Park Service, U.S. Department of Interior, "About Us," <http://www.nps.gov/nr/about.htm>, 2008.

document *Secretary of the Interior's Standard for the Treatment of Historic Properties* outlines specific standards and guidelines for the preservation, rehabilitation, restoration, and reconstruction of historically designated structures. Preservation standards and guidelines apply to those buildings that require ongoing maintenance to sustain its existence for historicity. Rehabilitation standards and guidelines involve the reuse of a historic structure or property while maintaining portions that maintain historic value. Restoration standards and guidelines are applicable to projects that remove portions of a building from another historic period in order to reconstruct missing features from the restoration period. Reconstruction standards and guidelines apply to new developments that replicate a historic period or setting. Each set of standards provides specific recommendations for the proper treatment of specific building materials, as well as parts of building development.

Archaeological Resources Protection Act

The intent of the Archaeological Resources Protection Act of 1979¹⁴ (ARPA) is to ensure preservation and protection of archaeological resources on public and Indian lands. ARPA places primary emphasis upon a Federal permitting process in order to control the disturbance and investigation of archaeological sites on these lands. In addition, ARPA's protective provisions are enforced by civil penalties for violation of the Act.

ARPA mandates consultation procedures before initiation of archaeological research on Indian lands or involving Indian archaeological resources. Section 4(c) requires Indian tribes be notified of possible harm to, or destruction of, sites having religious or cultural significance to that group. The Federal land manager must notify affected tribes before issuing the permit for archaeological work. Section (g)(2) specifies that permits to excavate or remove archaeological resources from Indian lands require consent of the Indian or Indian tribe owning or having jurisdiction over such lands. The permit, it is also stipulated, must include such terms and conditions as may be requested by the affected Native Americans. Concerning the custody of archaeological resources, ARPA stipulates that any exchange or ultimate disposition of archaeological resources excavated or removed from Indian lands must be subject to the consent of the Indian or Indian tribes which owns or has jurisdiction over such lands.

Federal Antiquities Act

Paleontological resources are classified as non-renewable scientific resources and are protected by several federal and state statutes, most notably by the 1906 Federal Antiquities Act,¹⁵ which calls for protection of historic landmarks, historic and prehistoric structures, and other objects of historic or

¹⁴ 16 U.S.C. §§ 470aa-470mm, Archaeological Resources Protection Act of 1979, Public Law 96-95, as amended.

¹⁵ 16 USC §§ 431-433, Federal Antiquities Act of 1906, PL 59-209.

scientific interest on federal lands. Because the proposed project does not include any federal lands, this statutory scheme does not apply.

5.5.3.2 State Regulations

State Office of Historic Preservation

The mission of the Office of Historic Preservation (OHP) and the State Historical Resources Commission (SHRC), in partnership with the people of California and governmental agencies, is to preserve and enhance California's irreplaceable historic heritage as a matter of public interest so that its vital legacy of cultural, educational, recreational, aesthetic, economic, social, and environmental benefits will be maintained and enriched for present and future generations.

The OHP is responsible for administering federally and state-mandated historic preservation programs to further the identification, evaluation, registration, and protection of California's irreplaceable archaeological and historical resources under the direction of the SHPO and the SHRC. OHP reviews and comments on several thousand federally sponsored projects, state programs, and state projects annually pursuant to Section 106 of the National Historic Preservation Act.

California Register of Historical Resources

The State Historical Resources Commission has designed this program for use by state and local agencies, private groups and citizens to identify, evaluate, register, and protect California's historical resources. The Register is the authoritative guide to the state's significant historical and archeological resources. The California Register program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for state historic preservation grant funding, and affords certain protections under the California Environmental Quality Act.

To be eligible for listing in the California Register, a resource must meet at least one of the following criteria:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States
2. Associated with the lives of persons important to local, California or national history
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation

In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired, or significant individuals made their important contributions. Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of significance. Alterations to a resource or changes in its use over time may have historical, cultural, or architectural significance. Simply, resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register, if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data.

California Historical Landmarks

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have statewide historical significance by meeting at least one of the criteria listed below. The resource also must be approved for designation by the County Board of Supervisors or the City/Town Council in whose jurisdiction it is located; be recommended by the State Historical Resources Commission; and be officially designated by the Director of California State Parks.

California Points of Historical Interest

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the California Register. No historical resource may be designated as both a Landmark and a Point. If a Point is subsequently granted status as a Landmark, the Point designation will be retired.

SB 18 Consultations

California Senate (SB) 18¹⁶ requires cities and counties to notify and consult with California Native American Tribes about proposed local land use planning decisions in order to protect Traditional Tribal Cultural Places.¹⁷ Cities and counties must obtain a list of the California Native American tribes from the Native American Heritage Commission (NAHC) whose traditional lands within the agency's jurisdiction may be affected by a proposed adoption or amendment of a general plan or specific plan. Before the

16 California Government Code, §§ 65040.2, 65092, 65351, 65352, and 65560 and California Civic Code, § 815.3

17 California Senate Bill 18, Chapter 905, Statutes of 2004.

adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes of the opportunity to conduct consultations on the proposed project. Before the adoption or substantial amendment of the general plan or specific plan, a local government must refer the proposed project to those tribes on the Native American contact list that have traditional lands within the agency's jurisdiction.

Health and Safety Code

It should be noted that sites that may contain human remains important to Native Americans must be identified and treated in a sensitive manner, consistent with the California Health and Safety Code and Public Resources Code as reviewed below:¹⁸

In the event that human remains are encountered during project development and in accordance with the Health and Safety Code Section 7050.5, the County Coroner must be notified if potentially human bone is discovered. The Coroner will then determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) by phone within 24 hours, in accordance with Public Resources Code Section 5097.98. The NAHC will then designate a Most Likely Descendant (MLD) with respect to the human remains. The MLD then has the opportunity to recommend to the property owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and associated grave goods.

5.5.3.3 Local Regulations

County of Ventura

General Plan

The County of Ventura's General Plan provides the following goals and policies related to the preservation of cultural resources:¹⁹

- Goal 1 Identify, inventory, preserve and protect the paleontological and cultural resources of Ventura County (including archaeological, historical and Native American resources) for their scientific, educational and cultural value.
- Goal 2 Enhance cooperation with cities, special districts, other appropriate organizations, and private landowners in acknowledging and preserving the County's paleontological and cultural resources.

18 California Health and Safety Code, §§ 7050.5 and 5097.98

19 County of Ventura, General Plan Goals, Policies, and Programs, 2011. p. 23.

- Policy 1 Discretionary developments shall be assessed for potential paleontological and cultural resource impacts, except when exempt from such requirements by CEQA. Such assessments shall be incorporated into a countywide paleontological and cultural resource database.
- Policy 2 Discretionary development shall be designed or re-designed to avoid potential impacts to significant paleontological or cultural resources whenever possible. Unavoidable impacts, whenever possible, shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data. Determinations of impacts, significance and mitigation shall be made by qualified archaeological (in consultation with recognized local Native American groups), historical or paleontological consultants, depending on the type of resource in question.
- Policy 3 Mitigation of significant impacts on cultural or paleontological resources shall follow the Guidelines of the State Office of Historic Preservation, the State Native American Heritage Commission, and shall be performed in consultation with professionals in their respective areas of expertise.
- Policy 4 Confidentiality regarding locations of archaeological sites throughout the County shall be maintained in order to preserve and protect these resources from vandalism and the unauthorized removal of artifacts.
- Policy 5 During environmental review of discretionary development the reviewing agency shall be responsible for identifying sites having potential archaeological, architectural or historical significance and this information shall be provided to the County Cultural Heritage Board for evaluation.
- Policy 6 The Building and Safety Division shall utilize the State Historic Building Code for preserving historic sites in the County.

Cultural Heritage Ordinance

The purpose of the Ventura County Cultural Heritage Ordinance²⁰ is to promote the economic and general welfare of the County by preserving and protecting public and private historic, cultural and natural resources which are of special historical or aesthetic character or interest, or relocating or recreating such resources where necessary for their preservation and for their use, education, and view by the general public.

Cultural Heritage Board

The Ventura County Cultural Heritage Board researches and records County history and makes historical landmark designations.²¹ The Board was created in 1966 by the County Board of Supervisors and is composed of appointed members from the five supervisorial districts and two members at large. The General Services Agency provides staff support and facilities for the Board which meets monthly. Upon recommendation of the Cultural Heritage Board, the Board of Supervisors makes declarations of landmark status. Landmark status is granted to cultural resources, structures, natural features, and sites or areas of historic merit. The Board operates under the provisions of County Ordinance Nos. 2026, 2737, and 3568. The primary preservation tool at the disposal of the Cultural Heritage Board resides in a requirement that any site designated as an official County Landmark may not be altered or demolished without review by the Cultural Heritage Board.

City of Santa Paula

General Plan

The City of Santa Paula's General Plan Conservation and Open Space Element²² contains descriptive information related to natural resources and open space that is relevant and of concern to Santa Paula, including specific goals, policy statements, and implementation measures that carry out the goals.

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

20 County of Ventura, Code of Ordinances, §§ 1360 et seq.

21 Ventura County, General Plan, Resources appendix, June 2011, p. 96.

22 Santa Paula General Plan, Conservation and Open Space Element.

- 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 values 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 include:

General

Goals

- Goal 1.1 Natural resources and resource sites should be managed, protected, conserved, reclaimed and used wisely, including but not limited to:
- historic, cultural and archaeological sites

Cultural/Historic Resources

Goals

- Goal 6.1 The amenities needed to enrich the quality of life, including cultural and historic places, should be protected and preserved.
- Goal 6.2 The historic, cultural and archaeological resources of the community should be preserved for future generations.

Objectives

- Objective 6(a) The City should encourage Historic Preservation as a valuable tool to retain the City's heritage.
- Objective 6(b) Designating historic districts such as the downtown should be encouraged.

Policies

- Policy 6.a.a. Activities and development that could damage or destroy archaeological, historic or architectural resources are to be avoided.
- Policy 6.b.b. Historic, cultural and archeological resources should be evaluated in the CEQA process and full mitigation provided.

Municipal Code

City of Santa Paula Ordinance No. 816²³ provides for the designation of City Landmarks in accordance with the following standards and procedures:

A. Criteria for Designation of Landmark Nomination.

The Design Assistance Committee shall, upon such investigation as it deems necessary, make a determination as to whether a nominated property or structure meets one or more of the following criteria:

(1) Historical & Cultural Significance

- (a) The proposed landmark is particularly representative of a distinct historical period, type, style, region, or way of life.
- (b) The proposed landmark is an example of a type of building which was once common, but is now rare.
- (c) The proposed landmark is of a greater age than most of its kind.
- (d) The proposed landmark is connected with a business or use which was once common, but now rare.
- (e) The architect or builder was locally or nationally renowned.
- (f) The site is the location of a significant local or national event.

(2) Historic Architectural & Engineering Significance

²³ Santa Paula Municipal Code, Ordinance No. 816.

- (a) The construction materials or engineering methods used in the proposed landmark are unusual or significant or uniquely effective.
- (b) The overall effect of the design of the proposed landmark is beautiful, or its details and materials are beautiful or unusual.

(3) Neighborhood and Geographic Setting

- (a) The proposed landmark materially benefits the historic character of the neighborhood.
- (b) The proposed landmark in its location represents an established and familiar visual feature of the neighborhood, community or city.

B. Any structure, property or area that meets one or more of the above criteria shall also have sufficient integrity of location, design, materials, construction and workmanship to make it worthy of preservation, restoration or rehabilitation. (City of Santa Paula, Ordinance No. 816, Nomination of Landmarks) City of Santa Paula Ordinance No. 816 provides for the designation of Historic Districts in accordance with the following standards and procedures:

Nomination of a historic district may be initiated by the Design Assistance Committee, the Historic Preservation Commission, the City Council or an application of persons, or authorized agents, who own 60 percent of the recorded lots to be included in the proposed district. All districts shall be established through the designation of a Historic Overlay (HO) Zone. Criteria for Designation of a Historic District are as follows:

- (1) The proposed historic district is a geographically definable area, urban or rural, possessing a significant concentration or continuity of site, buildings, structures, or objects unified by past events, or aesthetically by plan or physical development, or
- (2) The historic or aesthetic collective value of the district taken together may be greater than the value of each individual structure, or
- (3) The district meets the criteria which are listed for the designation of Landmarks provided in Section 17.55.080, (City of Santa Paula, Ordinance No. 816, Nomination of Landmarks).

5.5.4 THRESHOLDS OF SIGNIFICANCE

In order to assist in determining whether a project would have a significant effect on the environment, the *California Environmental Quality Act (CEQA)* identify criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions. Specifically, Appendix G of the *State CEQA Guidelines* (Environmental Checklist Form) lists the following thresholds, under which a project may be deemed to have a significant impact on agricultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- Disturb any human remains, including those interred outside of formal cemeteries?

5.5.5 PROJECT IMPACTS

The environmental impact analysis presented below is based on determinations made in the Notice of Preparation (NOP) for issues that were determined to be potentially significant with mitigation incorporated, or for issues identified by reviewing agencies, organizations, or individuals commenting on the NOP that made a reasonable argument that the issue was potentially significant (see Responses to NOP, **Appendix 1.0**).

5.5.5.1 Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Impacts

The proposed project is planned to be constructed on parcels listed in **Table 3.0-1** totaling approximately 95 acres. A number of the parcels have existing structures while several of the parcels, including those encompassing the East Gateway Specific Plan, are vacant and contain no buildings. For those parcels that are vacant and have no structures, there would be no impact.

For those parcels that have structures, the Historic Resources Report²⁴ (**Appendix 5.5**) summarizes the parcels evaluated for eligibility, and identified the following eight parcels as having structures that have the potential to be considered historic resources for the purposes of CEQA:

Map ID	Address	Parcel Number	Use
1	18145 E. Telegraph Road	107-0-041-070	Strangeland Trucking Company, 1926
2	18115 E. Telegraph Road	107-0-041-060	Clark Oil Company, 1926
3	18101 E. Telegraph Road	107-0-041-045	Single Family Residence, 1937
4	18029 E. Telegraph Road	107-0-041-015	Single Family Residence, 1912
5	18212-36 E. Telegraph Road	107-0-042-050	Single Family Residences on one parcel, 1885-1930
6	97 Whipple Road	107-0-030-145	Single Family Residence, 1890
7	112 Whipple Road	107-0-011-335	Single Family Residence, 1890
8	17905 E. Telegraph Road	107-0-020-360	Industrial buildings, 1922

All of these properties are located within areas proposed for annexation and not within the East Gateway Specific Plan area. As there is currently no development proposed for these parcels within the annexation area, there is no imminent danger of impacts from development to these structures. However, should development be proposed that could potentially impact these historic resources, the impact could be significant.

The City is proposing adoption of the East Gateway Specific Plan in response to plans from the owners of property within the Specific Plan area to develop this property within the next five years. There are no plans for development in the rest of the area proposed for annexation where the potential historic resources listed above are located. These developed areas are proposed for annexation to eliminate an existing island of unincorporated land and avoid the creation of a second island of unincorporated land.

Ventura County maintains an inventory of historical landmarks and points of interest²⁵ that reflects the diversity of sites, buildings and natural features which have been recognized by the Cultural Heritage Board for their outstanding historical character. Included are Chumash archaeological sites, Spanish and Mexican adobes, Victorian-era mansions, banks, trees and innumerable other points of interest. There are no sites listed on the Ventura County inventory that are located within the East Gateway Project area. Impacts would be less than significant.

Mitigation Measures

The following measures have been identified to mitigate the identified impacts:

- 5.5-1** Before approval of development in the annexation areas for the identified structures that would result in the demolition, destruction, relocation, or alteration to buildings or

24 San Buenaventura Research Associates, CEQA Historical Resources Report, East Gateway Project, Santa Paula, CA, October 14, 2011, pp. 9 to 11.

25 Ventura County General Plan, Resource appendix, June 2011, Figure 1.8.2.

structures on those parcels identified in the Historic Resources Report for the East Gateway Project (San Buenaventura Ventura Research Associates, 2011) that are rated with a CHR Status Code prefix of five (5) or lower, the following must be implemented:

- Each property must be evaluated as part of a site-specific analysis to determine if the property is eligible for listing in the NRHP, CRHR or for City of Santa Paula Landmark designation.
- If resources eligible for listing on the NRHP, CRHR or for City of Santa Paula Landmark designation are present, the applicant must modify the Plan of Development to avoid significant cultural resources.
- If avoidance is not possible for any proposed building project that involves remodeling, alteration, or a potential physical effect on a structure that is eligible for listing on the NRHP, CRHR or for City of Santa Paula Landmark designation, conduct appropriate and feasible cultural resource recovery operations or alternative before issuance of a grading permit, the applicant must identify mitigations as determined in consultation with the State Historic Preservation Office (SHPO) as required under the National Historic Preservation Act, including the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995) that will reduce or avoid adverse impacts.

Residual Impacts

Impacts would be less than significant.

5.5.5.2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Impacts

Figure 5.5-1 portrays generalized archaeological site sensitivity areas based on known or suspected prehistoric use areas. The map indicates that the East Gateway Project area lies outside of areas designated as "sensitive" or "very sensitive."

An intensive Phase I archaeological survey²⁶ was conducted for the East Gateway Specific Plan area. Development of the study area, therefore, does not have the potential to result in adverse impacts to cultural resources.

An archival records search²⁷ was conducted at the California State University, Fullerton, Archaeological Information Center. Files and records at the AIC indicate that a records search was conducted for the study area in 1997, but that no sites had been recorded at that time. Furthermore, no prehistoric sites had been recorded within the immediate vicinity of the study zone. The only previously recorded sites in the general vicinity are the Telegraph Road bridge (56-152833) over Santa Paula Creek, built in 1940, a prehistoric site (56-001792) which is located 1/2 mile to the north and four historic sites all of which are located over a ¼-mile north of the study area.

Previous studies documented the presence of five archaeological sites (56-001792, 56-001793, 56-001794, 56-1795 and 56-001796) and one additional cultural resource (56-152833) within a ½-mile radius of the two unincorporated island areas in the East Gateway Project area, indicating that the study area has high archaeological sensitivity with respect to prehistoric (Native American) and historic archaeological sites. None of the recorded sites or cultural resources are located within the study area.

In summary, the archival records search indicated that the project area had never been surveyed previously. No prehistoric archaeological sites had been identified at that time.

An intensive archaeological field survey of the East Gateway Specific Plan study area, Ventura County, was conducted in November 2011. Field survey found that the entire study area had been farmed. Based on historical records, farming has occurred for the last century, although this has involved row crops rather than orchards. Most of the study area was found to have been recently planted with row crops (cabbage sprouts) at the time of the survey and ground surface visibility was hence excellent. The study area had been cultivated for many years and some surficial grading had occurred along a drainage ditch that is located on the eastern edge of the subject property. The Phase I archaeological survey of the East Gateway Specific Plan study area, failed to find any evidence of unrecorded archaeological sites, either prehistoric or historical in nature

The potential to uncover undiscovered archaeological resources exists during grading and subsurface excavations. Therefore, impacts are potentially significant.

Mitigation Measures

The following measures have been identified to mitigate the identified impacts:

26 W & S Consultants, Phase I Archaeological Survey of the East Gateway Specific Plan Area, Santa Paula, Ventura County, California, November 2011.

27 W & S Consultants, Archaeological Records Search for two unincorporated island areas in the western portion of the East Gateway Specific Plan area, Ventura County, California, November 2011.

5.5-2

Before any future development in previously undisturbed areas not previously surveyed as part of a Phase I cultural resources survey that involves ground disturbance in native soils, the project applicant must submit to the City a Phase I Cultural Resources Assessment by a qualified Cultural Resources Professional meeting Secretary of Interior (SOI) standards. The Phase I Cultural Resources Assessment must include the following information:

- An archaeological/historical/cultural resources records search must be conducted at the South Central Coastal Information Center (SCCIC), located at the California State University, Fullerton to identify known resources that may be impacted by the project.
- A sacred lands search must be requested from the Native American Heritage Commission (NAHC) in Sacramento regarding the possibility of special Native American sites that may be located in the vicinity of any project components. Follow up consultation with all Native American tribes and individuals recommended by the NAHC will be conducted.
- A field survey must be conducted by qualified archaeologists and will include intensive pedestrian inspection of the ground surface for evidence of prehistoric (Native American) or historic archaeological materials, and historic resources (e.g., structures, bridges, mines, or wells), in areas where ground disturbance is proposed in previously undisturbed native soils.
- Any identified buildings or structures that may be over 45 years of age at the time the study is prepared that may be impacted by the project must be examined by a qualified Architectural Historian meeting SOI standards. The Historian's recommendations must be implemented before construction.
- A technical report prepared according to Archaeological Resource Management Report (ARMR) guidelines and OHP standards. Reports must be filed with the South Central Coastal Information Center within 30 days of District acceptance.

Should the Phase I cultural resource survey identifies any significant archaeological resource(s) to be present, the proposed development plan must be modified to avoid the resource(s). If avoidance is not possible, before issuance of a grading permit, the applicant must conduct appropriate cultural resource recovery operations or alternative mitigations as determined in consultation with the State Historic Preservation Offices (SHPO) and Native American tribes, as required under the National Historic Preservation Act.

5.5-3

In the event that previously unidentified archaeological resources be discovered during building construction, the contractor must cease work in the immediate area and the City Planning Director shall be contacted. An independent qualified archaeologist, retained by the City at the expense of the applicant, must assess the significance of the find and make mitigation recommendations.

5.5-4 Construction monitoring for archaeological resources must be conducted at any time ground-disturbing activities (greater than 12 inches in depth) are taking place in the immediate vicinity of cultural resources. If monitoring does not produce evidence of significant cultural resources within the project area, further mitigation must be limited to construction monitoring, unless additional testing or other specific mitigation measures are determined by a qualified archaeologist to be necessary to ensure avoidance of damage to significant archaeological resources. A technical report documenting monitoring activities must be prepared by a qualified archaeologist in accordance with professional standards and submitted to the City at the completion of construction monitoring. The archaeological monitoring program shall be implemented by an individual meeting the Secretary of Interior Professional Qualifications Standards in Archaeology (36 CFR 61); individual field monitors must be qualified in the recognition of cultural resources and possess sufficient academic and field training as required to conduct the work effectively and without undue delay.

Residual Impacts

Impacts would be less than significant.

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

Impacts

Impact Assessments are addressed by rock unit.

Older Alluvium

The older alluvium has yielded fossil remains at a number of sites along the Santa Clara River in Ventura County. Correspondingly, there probably is at least a moderate potential for the loss of scientifically important fossil remains, currently unrecorded fossil sites, and associated specimen data and corresponding geologic and geographic site data as a result of development-related earthmoving activities and unauthorized fossil collecting in the project site. For this reason, impacts on older alluvium that might result from these activities would be considered to be of moderate to high potential. Therefore, implementation of the proposed project has the potential to result in significant adverse impacts related to paleontological resources.

Younger Alluvium

The younger alluvium has yielded fossil remains at only several sites along the Santa Clara River in Ventura County. Correspondingly, there probably is only a moderate potential for the loss of scientifically important fossil remains, currently unrecorded fossil sites, and associated specimen data and corresponding geologic and geographic site data as a result of development-related earthmoving activities at depth and unauthorized fossil collecting in the project site. For this reason, impacts on younger alluvium that might result from these activities at depths greater than about five feet below current grade in the project site would be considered to be of moderate potential. Therefore, implementation of the proposed project has the potential to result in significant adverse impacts related to paleontological resources that are at depths greater than five feet below grade.

However, at depths less than about five feet below current grade, there probably is only a low potential for fossil remains being encountered by earthmoving activities in the project site because, at such shallow depths, the younger alluvium probably is too young to contain remains old enough to be considered fossilized. For this reason, impacts on younger alluvium that might result from development-related earthmoving activities at depths less than about five feet below current grade in the project site would be considered to be of low potential. Therefore, impacts to paleontological resources that may be located five feet below grade would be considered less than significant.

Stream Channel Deposits

The stream channel deposits have not yielded any fossil remains in or near the project site. These deposits, moreover, are probably too young to contain remains old enough to be considered fossilized. For these reasons, impacts on the paleontological resources of the stream channel deposits that might result from development-related earthmoving activities in the project site would be considered to be of low potential. Therefore, impacts to paleontological resources within stream channel deposits would be considered less than significant.

Post-Construction Impacts

The potential to uncover undiscovered paleontological resources exists during grading and subsurface excavations. Therefore, impacts are potentially significant.

Mitigation Measures

The following measures have been identified to mitigate the identified impacts:

- 5.5-5** Before the initiation of earthmoving activities associated with the development of the project site, the services of a qualified paleontologist approved by the City and Los Angeles County Museum (LACM) must be retained.
- 5.5-6** Before the initiation of earthmoving activities associated with the development of the project site, the paleontologist or another mitigation program staff member must conduct a field survey of that portion of the project site underlain by older alluvium to locate and recover any larger fossil remains that might occur at currently unrecorded fossil sites, and to document the presence of strata suitable for containing larger fossil remains or for the collection and processing of sediment or rock samples to allow for the recovery of smaller fossil remains.
- 5.5-7** The paleontologist must develop a formal agreement with a recognized museum repository, such as the LACM, regarding final disposition and permanent storage and maintenance of any fossil remains that might be recovered as a result of the mitigation program, the archiving of associated specimen data and corresponding geologic and geographic site data, and the level of treatment (preparation, identification, curation, cataloguing) of the remains that would be required before the entire mitigation program fossil collection would be accepted by the repository for storage.
- 5.5-8** The project paleontologist, or authorized mitigation monitor (construction program staff member), must coordinate with appropriate construction contractor personnel to provide information regarding City and County requirements concerning the protection of paleontological resources. Before the initiation of on-site construction activities, construction contractor personnel, particularly heavy-equipment operators, must be briefed on procedures to be followed in the event that fossil remains and a currently unrecorded fossil site are encountered by earthmoving activities, particularly when the monitor is not on site. The briefing will be presented to new contractor personnel as necessary. Names and telephone numbers of the paleontologist, or authorized mitigation monitor (construction program staff member, and other appropriate mitigation program personnel must be provided to appropriate contractor personnel.
- 5.5-9** Earthmoving activities must be monitored by the paleontologist only in those areas of the project site where these activities would disturb previously undisturbed strata. Monitoring must be conducted on a full-time basis in areas underlain by the Saugus Formation, on a half-time basis in areas underlain by older alluvium and, at depths greater than 5 feet below current grade, the younger alluvium. If fossil remains are encountered by

earthmoving activities in an area underlain by older or younger alluvium and following approval from the City, monitoring will be increased to full time, at least in the vicinity of the fossil site. On the other hand, if no fossil remains are found once 50 percent of earthmoving activities have been completed in an area underlain by a particular rock unit, monitoring can be reduced to half time in the remainder of the area underlain by the Saugus Formation, and to quarter time in an area underlain by older or younger alluvium following approval from the City.

5.5-10 If any paleontological resources are encountered during construction in this area, activities in the immediate area of the find must be halted and the discovery assessed . The paleontologist will recommend appropriate mitigation measures pursuant to guidelines developed by the Society of Vertebrate Paleontologists (SVP).

5.5-11 All fossil specimens recovered from the project site as a result of the mitigation program, including those recovered as the result of processing fossiliferous rock samples, must be treated (prepared, identified, curated, catalogued) in accordance with designated museum repository requirements. Rock or sediment samples from the older and younger alluvium will be submitted to commercial laboratories for microfossil, pollen, radiometric dating, or other analysis, as appropriate.

5.5-12 The paleontologist must maintain daily monitoring logs that include the particular tasks accomplished, the earthmoving activity monitored, the location where monitoring was conducted, the rock unit encountered, the fossil specimens recovered, and associated specimen data and corresponding geologic and geographic site data . A final technical report of results and findings will be prepared by the paleontologist, in accordance with any City requirement.

Residual Impacts

Impacts would be less than significant.

5.5.5.4 Disturb any human remains, including those interred outside of formal cemeteries?

Impacts

The nearest formal cemetery to the East Gateway Project area is Santa Paula Cemetery, which is located approximately 2 miles west of the project area in western portion of the City of Santa Paula. There are no known sites containing human remains within the area. However, there exists the potential for currently

unknown human remains to be discovered during the construction of future projects. Project construction would require ground-disturbing activities, including grading and excavation, and the presence of construction equipment, which could result in the discovery of previously unrecorded human remains, including Native American burials. Impacts related to construction would be limited to the construction area for each individual project.

As required by SB 18, consultation with the Native American Heritage Commission and tribal representatives was conducted during preparation of the cultural resources report (see **Appendix 5.5**). No responses regarding the presence of Native American sites, including burial sites, were received. Furthermore, there is no record of human remains in any archaeological record within the East Gateway Project area. Ground-disturbing activities could have the potential to uncover previously unknown resources, including human remains.

Impacts would be potentially significant.

Mitigation Measures

The following measures have been identified to mitigate the identified impacts:

- 5.5-13** In the event of a discovery of human bones, suspected human bones, or a burial, during ground-disturbing activities, all excavation in the vicinity must halt immediately and the area of the find protected until a qualified archaeologist determines whether the bone is human. If the qualified archaeologist determines the bones are human, the Ventura County Coroner must be notified before additional disturbance occurs. The construction contractor must ensure that the remains and vicinity of the find are protected against further disturbance until the Coroner has made a finding with regard to PRC 5097 procedures, in compliance with Health and Safety Code Section 7050.5(b). If it is determined that the find is of Native American origin, the City will comply with the provisions of PRC Section 5097.98 regarding identification and involvement of the Native American Most Likely Descendant (MLD).

Residual Impacts

Impacts would be less than significant.

5.5.6 CUMULATIVE ANALYSIS

Cumulative Impacts

Historical Resources

A number of eligible and potentially eligible historic properties exist within the City and its Sphere of Influence. However, the nature and extent of historical development and land use patterns since the 1800s suggests that a number of standing and buried historical archaeological resources, either individually, or as a district, exist undocumented or minimally documented.²⁸ Infill development within these areas (shown in the proposed General Plan) could affect the historic integrity of existing structures in these areas, particularly within downtown Santa Paula, where some vacant land exists. These impacts are considered potentially significant.

Cultural Resources

The project evaluation for cultural resources concluded that there was a very low likelihood for finding significant archaeological and paleontological resources on the project site. Nothing in the pending or proposed project outlined in **Table 4.0-1** of the EIR have a significant potential to adversely impact historic resources based on size and locations of these projects or because most are on previously disturbed sites in the City.

The City's Conservation and Open Space Element²⁹ identifies the key areas outside of the City's core as having the potential for historic resources. These include:

Santa Clara River Valley-West Area 2. This historically agricultural area was first settled in 1867. Some of the Santa Clara Valley's most significant farmhouses in terms of age, architectural styles and historical importance are located along Telegraph Road. In addition, these farmhouses have also maintained their historic agricultural setting. Buildings that remain include: ranch residences, barns, foreman residences, worker housing, and other agriculture-related buildings.

Adams Canyon. Historically part of Rancho Ex-Mission San Buenaventura, Adams Canyon was primarily developed by the oil industry. The first oil tunnels were drilled into the hillsides in the early 1860's, with later tunnels dug by Union Oil Company during the early 1890's. Many of these tunnels exist today and are significant for their distinctive method of oil extraction (Pederson, 1990: 9-11). In addition, a number of other oil-related structures such as sheds, derricks, tanks, worker residences and other structures and

²⁸ Santa Paula General Plan Update EIR, February 1998, p. 4.9-9.

²⁹ Santa Paula General Plan, Conservation and Open Space Element, pp. CO-19 to 20.

objects may also remain. The canyon has also been home to ranchers and farmers co-existing with the oil interests.

Fagan Canyon. Historically this canyon was part of Rancho Ex-Mission San Buenaventura. Agriculture has been the principal historic use of the canyon. A small number of residences, barns, and sheds related to the historic agricultural uses of the canyon are known to exist, but could not be inventoried due to lack of access.

Future development in these areas would require evaluation of their respective cultural resources at that time. Should significant impacts be identified, specific mitigation would be identified.

Given the low likelihood of resources being on-site and the fact that other projects in the area are subject to similar protective mitigation for cultural and historic resources, no cumulatively considerable impacts would occur to these resources as a result of the proposed project.

West Area 2. This historically agricultural area was first settled in 1867. Some of the Santa Clara Valley's most significant farmhouses in terms of age, architectural styles and historical importance are located along Telegraph Road. In addition, these farmhouses have also maintained their historic agricultural setting. Buildings that remain include ranch residences, barns, foreman residences, worker housing, and other agriculture-related buildings.

Previous records search have not identified any previously recorded prehistoric archaeological resources within the City's Sphere of Influence. However, based on the fact that areas directly adjacent to Santa Paula Creek contain prehistoric archaeological resources, which exist within a similar physiographic context as the project area, it can be postulated that the potential for encountering additional resource remains within the unsurveyed portions of the proposed Sphere of Influence is extremely high. Potential impacts are assumed to be significant, particularly near watercourses, including Santa Paula Creek. General Plan policies and implementation measures serve to protect unknown pre-historic archeological resources.

Cumulative Mitigation Measures

Mitigation Measures 5.5-2 through 5.5-13 must be implemented for all future projects within the City.

In addition, the following measures have been identified to mitigate impacts for historic resources:

5.5-14 All projects must complete a Phase 1 Cultural Resource Study, except where a prior cultural resource study has been performed, or where adequate information has been

obtained from the Archaeological Information Center to confirm that no additional work is warranted within the project area.

Before approval of development that would result in the demolition, destruction, relocation, or alteration to buildings or structures that are 45 years old or older, the following must be implemented:

- Each property must be evaluated as part of a site-specific analysis to determine if the property is eligible for listing in the NRHP, CRHR or for City of Santa Paula Landmark designation.
- If resources eligible for listing on the NRHP, CRHR or for City of Santa Paula Landmark designation are present, the applicant must modify the Plan of Development to avoid significant cultural resources.

If avoidance is not possible for any proposed building project that involves remodeling, alteration, or a potential physical effect on a structure that is eligible for listing on the NRHP, CRHR or for City of Santa Paula Landmark designation, the applicant must conduct appropriate and feasible cultural resource recovery operations or alternative mitigations as determined in consultation with the State Historic Preservation Office (SHPO) as required under the National Historic Preservation Act, including the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), that would reduce or avoid adverse impacts.

Residual Impacts

Impacts would be less than significant.

5.5.7 REFERENCES

Local agency planning documents used in this section include the following:

- Santa Paula General Plan, Conservation and Open Space Element.
- County of Ventura, General Plan, Goals, Policies and Programs, last amended on June 26, 2011.
- County of Ventura, General Plan, Resources Appendix, last amended on June 28, 2011.

Project specific studies are available in **Appendix 5.5** and include:

5.5 Cultural Resources

- San Buenaventura Research Associates, CEQA Historic Resources report, East Gateway Project, Santa Paula, CA, October 14, 2011.
- W & S Consultants, Archaeological Records Search for two unincorporated island areas in the western portion of the East Gateway Project area, Ventura County, California. November 2011.
- W & S Consultants, Phase I Archaeological Survey of the East Gateway Specific Plan Area, Santa Paula, Ventura County, California, November 2011.