

December 5, 2017

Comments from: Ingeborg E. Cox MD, MPH

Re: Citywide Historic Context Statement, Archeological Resources

To: Ms. Lisa Prasse, Planning Manager City of Goleta

Ms. Christine Lazaretto (Historic Resources Group)

On November 15, 2017 the archeological resources of the City of Goleta were the theme of the presentation. If preservation is the goal of the multiple ecological sites, villages and burials, then it appears to me the city's permit system has major flaws since Chumash sites continue to be impacted or even destroyed. As Mr. Foster stated it appears that a big part of the City has multiple archeological sites.

It should be imperative that a search request at the Native American Heritage Commission Sacred Lands file is done as the first item that a developer has to do before even starting the permit process.

In my opinion construction near the areas of Atascadero Creek, San Jose Creek, San Pedro Creek, Los Carneros Creek channel, Tecolotito Creek, Goleta beach and Goleta slough and other sites that have archeological value should require filling out the form that goes to the Native American Heritage Commission. It should be a requirement that the City of Goleta places on developers so that Chumash sites are not further damaged or destroyed in these areas.

Why are the sites not mentioned by SBA Number? During the presentation it was stated that they are protected under the "Freedom of Information Act". If that is the case why is it that one can do a Google search and find the SBA number and place of sites?

Slide number seven of the presentation states that not all cultural resources can be assessed because some still require subsurface testing to confirm their locations, evaluate their integrity and ascertain their cultural context. All development near the sensitive areas should have provided this kind of information BEFORE any plans are developed for the area.

I agree with the recommendations that all prehistoric archeological sites are significant for the Chumash and I concur with their recommendation of preservation and conservation of open-space land if these sites are there.

Ministerial permits should NOT be even entertained IF the possibility exists that the site might be of archeological value.

Dec. 5, 2017

Ms. Lisa Prasse
Current Planning Manager
City of Goleta

Dear Ms. Prasse,
Comments for Goleta's Historic Context Statement Part 2:

A document designed to educate and guide the public, the Goleta City Council and staff members on the historical riches that lie within the city's boundaries should provide more direction than does the current draft of Part 2. It is not enough to say, "with little exaggeration, ... the entire city is archaeologically sensitive," though this hints at the need for a strong set of protective ordinances.

While refraining from locating specific local Native American sites. I'd hoped to read analyses of what sectors of Goleta are likely to require careful archaeological research before any new digging is permitted. Analysis of what should be preserved and protected from the pre-European era is generally lacking.

For example, the "extremely high number of discreet 'villages'" mentioned in the draft suggests a concentrated population, but fails to explain how these facts are important to, say, establishing the foundations of Chumash ship-building or the rise of the canoe builders' technology and specialized Chumash societies. People must understand their past to connect to their futures.

One should use the historic context document not only to guide future city policies and ordinances but also to encourage the public (and new staff and councilmembers) to recognize the contributions of those who came before today's residents.

For centuries thousands lived off this narrow strip of land and coast we call the Goleta Valley without destroying its life-nurturing ecosystems. There is much to learn from our predecessors. It should begin by respecting the ancient peoples buried here as well as their living descendants. Ancient burial sites need special protections.

The archaeologists' and BBCI's specific recommendations make sense to me except that the City should require more than just a ministerial permit to commence alteration of sensitive land. Consulting the Native American Heritage Commission and using area academic and historical resources, including tribal sources, should be mandatory.

This logical step must precede any application or EIR assessment in the permit process. Thank you for the chance to comment.

Sincerely,
Vic Cox
Goleta resident

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City of Goleta
Planning & Environmental Svcs.

Nov. 27, 2017

Dear Lisa,

Please thank the Historic Resources Group team of historians for their outstanding work. The narrative is much improved.

Archaeology Section:

Hearing what other citizens brought up in the last workshop meeting, could you please ask that HRG include, as an Appendix, the list of identified historic resources and the map of Goleta with Chumash names for the Slough area and all the Creeks that came from the Santa Barbara County Historic Landmarks Advisory Committee (HLAC). I enclose a copy of the map as a reminder.

Goleta Citywide Historic Context (second review 11-27-2017)

Page 19 – Birabent Hotel

When Birabent Hotel was demolished, the redwood was saved and used to build the Ellwood Hotel. The former Ellwood Hotel still stands today at 170 Magnolia Avenue, in Old Town Goleta. It is now affordable apartment housing in fine condition.

Page 89 – Local example of commercial vernacular

Sorry to report that when Alexandra Cole and I did the study (SAIC, January 1997) we thought it was built in 1915. During a public presentation of the survey, the owners of the building came up afterwards and told us that they built the building in 1950, wanted very much to be compatible to their next door neighbor's building - - the false front style building at 5968 Hollister Avenue, dating to the nineteen teens/early 1920s, and associated with the 1885 Coffey family.

I did find out later that the 1950 Goleta Electric Co. building (5970 Hollister Avenue, in your photo) was indeed built on the site of the demolished home of George Maier Walnut Hulling operation.

Suggestion: maybe you could put in two photos of 5968 and 5960 Hollister Ave. as two good samples of commercial vernacular – both date to the nineteen teens/early 1920s.

Page 100 – Googie

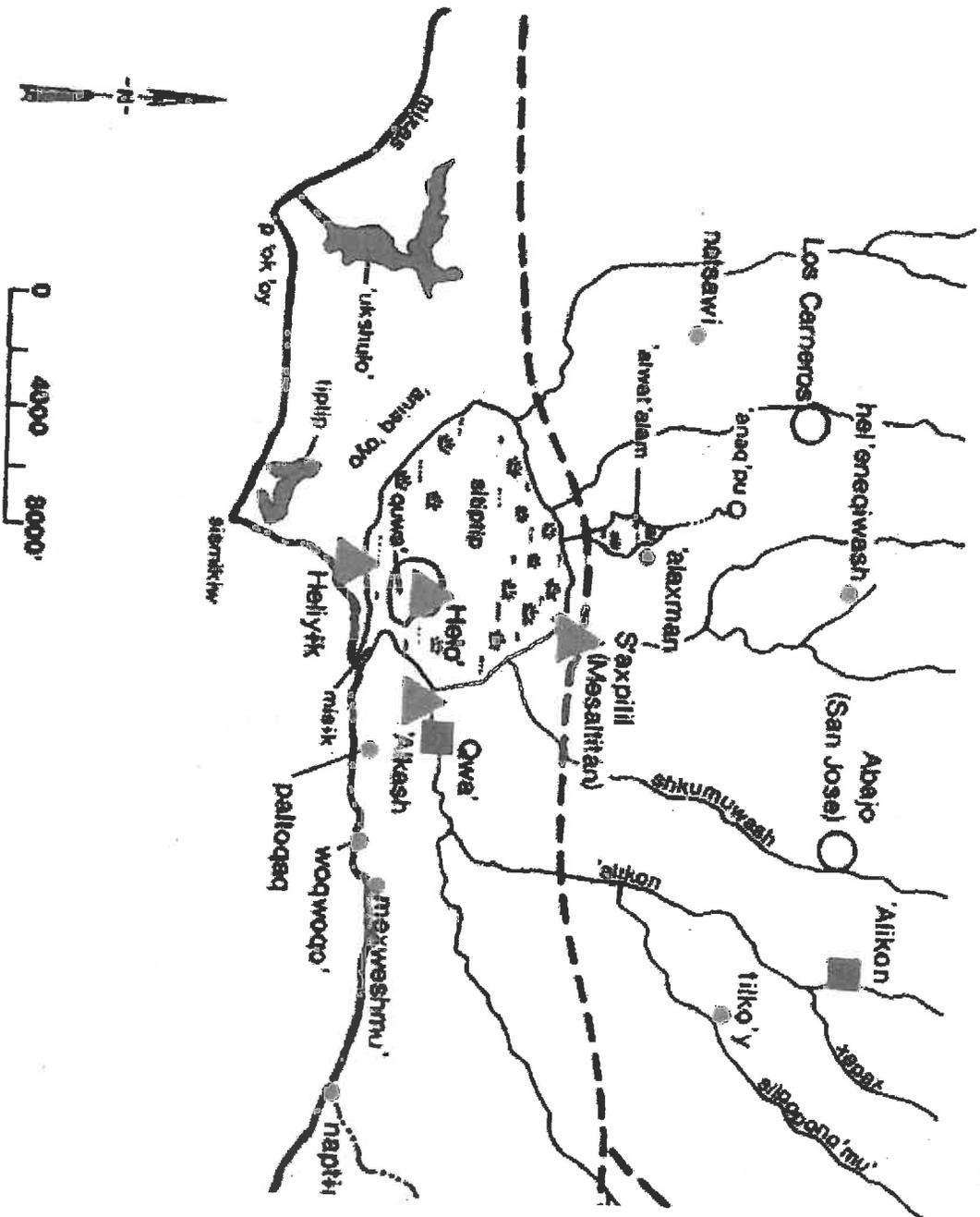
Please include in this section Goleta's iconic Googie building at 5730 Hollister Avenue. I am including copies of a letter with photos from my friend/mentor and Santa Barbara County's top historian Alexandra Cole about this building.

Ron Nye will be sending his comments, and we are suggesting that you include samples of Agriculture Vernacular in your list – two good examples are: a two-story bunkhouse (built 1872-73) housing for the Chinese domestic laborers for the Stow family; and a one-story building the ranch manager's house (built 1915). They are located at the rear of the Stow House.

Thank you very much,
Fermina Murray
442 Danbury Court
Goleta 93117

Phone: 805-967-7189
Cell #: 805-448-4011

Chumash Placenames of the Goleta Valley



PRESERVATION PLANNING ASSOCIATES

July 21, 2003

Mr. Josh Blumer
Shubin + Donaldson Architects
15 West Mason Street
Santa Barbara, CA 93101

Dear Mr. Blumer:

I have reviewed the written materials you sent me and have done some research in the County Assessor's files and the County Architectural Archives for the building in Goleta at 5730 Hollister Avenue as well as making an on-site visit. I thus far have been unable to determine the architect of this building; Scott Kolwitz in the City of Goleta Planning Department is going to look in storage for the original plans. I have the following preliminary comments concerning the building.

The building was constructed in 1959-1960 for Michael Nuzzo. Its playful streamlined shape is an unusual feature for a building of this period; ordinarily the building would have been configured as a rectangular "stucco box". The horseshoe layout allowed for parking next to the small offices or shops, with a drive-through to parking at the rear. Another unique feature as well is the angularity of the first floor walls, giving the picture window of each shop more light and more visibility to a person on the sidewalk. Typical architectural features of the era found on the building include the jalousie windows with aluminum frames, and the stone bulkhead.

It is my professional opinion that the building is significant a) architecturally for its unique 1960s design, and b) for being a building that conveys a sense of time and place important to the community. Its character-defining architectural details, such as the exaggerated streamlined curved overhangs at the first floor and parapet levels, the angular walls, the stone bulkhead, the aluminum-frame show windows, the jalousie windows for ventilation, and the single-pane glass front doors make it an unusual and worthy building along the Hollister corridor. The building is approximately 40 years old, considered a "dangerous age" for a building, meaning that it is perceived as too old to be considered fashionable and yet has not reached the 50 year mark, at which time a sufficient context concerning the architectural ideas of the 1960s would have been developed from which to analyze this particular building. Consequently the building appears ungainly and unattractive to some. However, the 50-year cut off for significance is not a hard and fast rule here, and the building should be considered significant to the Hollister Avenue streetscape. The real joy of the Hollister corridor is that buildings from every period of Goleta's history are there, from false-front to Spanish Colonial Revival to Streamline Moderne, and provide important visual variety and richness. Because of its size and playful quality, this building has become a visual landmark to the community.

This building has a number of architectural elements which are of the period, such as the stone bulkhead, the aluminum-frame windows, the glass doors, the angular layout of the walls, and the rounded overhangs, and I recommend that these elements should be retained and cleaned up, and that the building should be landscaped and repainted. It would be useful to do paint scraping to see what the original color of the building was and then match it.



Plate 1. 5730 Hollister Avenue streetscape., Facing northwest. June 2003. A. C. Cole



Plate 2. 5730 Hollister Avenue. Facing north. June 2003. A. C. Cole



Plate 3. Detail of storefronts. Facing northeast. June 2003. A. C. Cole



Plate 4 Detail of storefronts. Facing west. June 2003. A. C. Cole

If you have any questions, please do not hesitate to call me at 969-4183.

Sincerely,

Alexandra C. Cole

Alexandra C. Cole

Wendy Winkler

From: Stone, David <david.stone2@woodplc.com>
Sent: Thursday, November 16, 2017 2:20 PM
To: Lisa Prasse
Cc: chumashangels@aol.com; jiminyokohama@hotmail.com; SharonEbel@outlook.com
Subject: RE: Citywide Historic Context Statement, Archaeological Resources, City of Goleta

Lisa-

I became aware of this study last night while performing an internet search of other City of Goleta documents. I was not aware of the workshop last night to discuss the Archaeological Resources component. Please consider my comments in light of my not being aware of the workshop.

Section 3.0, Site Information.

It is quite understandable that this review of existing archaeological site data did not necessarily review each technical report prepared in support of projects that resulted in the recordation or supplementing or archaeological site records. This would have been an extensive undertaking and an associated cost. However, the description of some sites lacks recognition of major excavation efforts that provided updated information on the site contents. I have personally been involved with excavations at the following sites:

CA-SBA-52 and -53: Cabrillo Business Park
CA-SBA-56: Willow Springs Apartments
CA-SBA-58: Marriott Residence Inn
CA-SBA-60: 151 South Fairview Mixed Use
CA-SBA-1703: Las Vegas-San Pedro Creek Improvements

All of these excavation reports (both Phase 2 Site Significance and Phase 3 Mitigation Data Recovery) are electronically submitted to the City and the Central Coast Information Center (CCIC), University of California, Santa Barbara (the CA-SBA-1703 report would not have been submitted to the City of Goleta, as it is actually on Santa Barbara Airport property within the City limits). It is disingenuous to state that these reports were not accessed because they were not in electronic format.

It is more truthful to state that the summary of archaeological site characteristics in Table 1 is limited to information provided in site records accessed at the CCIC. If this were the extent of available funding for this task, that is understandable. But to state that the reasons for not reviewing technical reports addressing these sites was because of their lack of electronic format is simply untrue.

There are corrections I will provide to Table 1, based on generally available information.

CA-SBA-46: Goleta Sanitary District (GSD). This site, the ethnohistoric village of *Helo*, is extremely important to include among those surrounding the Goleta Slough. Though it may not be within the City's jurisdiction (as it is within the GSD property), its presence, along with the village of *Saxpalil* at CA-SBA-60, held great influence on Chumash settlement for thousands of years. It needs to be added to this list.

CA-SBA-56. Add: Single intact burial identified during testing. Other isolated remains identified during surface survey.

CA-SBA-58. Add: Two cemeteries were recorded by David Banks Rogers in his 1929 *Prehistoric Man on the Santa Barbara Coast*.

040911 Stow House. This is misspelled "Stowe."

Section 5.0 Evaluation

This section fails to reference the existing guidelines and protocols that are implemented by the City of Goleta to ensure that archaeological studies including Phase 1 Surveys, Phase 2 Significance Assessments, and Phase 3 Mitigation Data Recovery Programs are conducted in a professionally consistent manner. These Cultural Resource Guidelines, adopted from the County of Santa Barbara when the City incorporated, need to be referenced. If there are suggestions as to how the guidelines could be refined and/or improved, that would be appropriate. But without referencing these guidelines, the reader is left with the impression that cultural resource investigations are undertaken without any consistent professional rigor and organization. This is entirely incorrect.

Research Questions (page 16). It is a tremendous challenge to present the complete range of research questions that might be appropriate to address project locations within the City. However, the existing discussion fails to reference any of the prehistoric background discussion, and does not provide any relevant local expression of research potential. Again, this is not necessarily a failing of the Context Statement, given limited time and budget. However, the existing Archaeological Element of the City's Cultural Resource Guidelines, as adopted from the County of Santa Barbara, should be referenced as an effort to provide just that: a list of conceptual research topics that researchers who have focused their attention on the prehistory of Goleta regularly address. In other words, the existing Statement needs to explain that research questions already exist that are used to focus Santa Barbara Channel prehistory investigations. The general categories of research are defined herein, but are not at all exclusive to the range of questions that can be addressed.

For example, questions of trade representing economic and social exchange between Chumash populations occupying sites within the City's jurisdiction and outlying Chumash areas to the west, north, east and south (among Channel Island settlements) are a critical area of research. A review of one of the major excavation reports available at the CCIC would easily provide greater breadth of the research questions that are regularly addressed by Chumash researchers.

Table 2 Site Significance and Integrity.

This table suffers from a lack of updated information, as it is only based on the review of original site records, as discussed above. For example:

CA-SBA-55. This site was explored in support of Los Carneros Road improvements. Cultural materials were recovered.

CA-SBA-56. This discussion fails to address the mitigation data recovery undertaken for the Willow Springs I and II projects. Significant, though limited, cultural materials were evaluated for both projects.

CA-SBA-58. This discussion fails to incorporate results of numerous excavations, including those associated with the Marriott Residence Inn project, that recovered and characterized significant resources.

CA-SBA-60. This discussion fails to reference extensive Data Recovery associated with improvements to the Fairview Road/US 101 Overpass, Las Vegas/San Pedro Creek capacity improvements, and Santa Barbara Airport parking area improvements. The understanding of this site has been substantially advanced since 1994.

CA-SBA-1703. Intact cultural resources were tested and mitigated associated with Las Vegas/San Pedro Creek capacity improvements within the Caltrans ROW.

The point to be made is that the determination of significance should be considered extremely tentative if all relevant technical reports that have address mitigation efforts cannot be incorporated in this analysis. The conclusions of this assessment need to provide this qualification.

6.0 Recommendations

This important section fails to provide an extremely important context- a statement of existing GP/CLUP Conservation Element policies that dictate that manner in which cultural resources have been addressed since 2006. These policies stress the importance of avoiding impacts to cultural resources, consultation with Native American community

representatives, and undertaking appropriate data recovery excavations (including curation) when avoidance is proven infeasible. Any recommendations made in this Statement need to build upon the existing GP/CLUP policies, and not contradict or restate them.

It may be worthwhile to restate the stipulations of Public Resources Code 5097.98 that define the legal parameters for addressing human remains during excavations. These existing statutes, like the City GP/CLUP Conservation Element policies, must be acknowledged in the Statement Recommendations. They cannot be contradicted or modified in any manner relative to identification of the Most Likely Descendant, and/or the subsequent consultation between the MLD and the landowner to identify a mutually acceptable solution to the disposition of human remains and burial-related artifacts.

Archaeological Recommendations

Recommendations that could apply universally throughout the entire City's jurisdictions must be supported by substantial evidence and nexus, and also reflect the existing standards that are implemented by the Planning and Environmental Services Department. The Statement should be refining existing practices, rather than present recommendations that do not necessarily acknowledge the application of existing professional standards.

For example, this statement (paragraph 3 in Archaeological Recommendations) deserves attention:

"Because of the potential for undiscovered sites and aspects of the known sites that may not be presently visible, it is suggested that the City of Goleta should consider monitoring during grubbing, earthmoving, or other maintenance and construction activities which might expose deposits now covered by sediments, water, or vegetation."

Currently, the City of Goleta Cultural Resource Guidelines provides the following direction. In circumstances where a project site is located within an environmental context that could have been subject to substantial alluvial activity including erosion overtime, the archaeologist shall address this potential by undertaking subsurface investigations (commonly expressed as an Extended Phase 1 Investigation) to assess the potential for unknown buried prehistoric resources. Therefore, the existing Cultural Resource Guidelines define a protocol for addressing this potential. The proposed recommendation is not addressing the existing protocol, nor does it strive to identify any needed improvements to its implementation.

"Data Limitations

Each successive survey and phase of research has added to the cultural resource inventory. It is more than likely even now, therefore, that the inventory is not complete, and that additional sites will be encountered as a result of future research, field work, or the processes of construction, land clearing, and natural erosion."

This statement does not make sense. As noted above, the background research for this Statement has not reviewed or addressed substantial Phase 2 Significance Assessments and Phase 3 Data Recovery program investigations. These studies have markedly improved our understanding of the City's cultural resources. It is true that the inventory will never be complete- that is the nature of archaeological site location and the limited opportunity to survey, test, and mitigate an archaeological site only when proposed development is proposed. A much more reasonable and factual revision to this statement follows:

"Each successive survey and phase of research has added to the cultural resource inventory. It is more than likely even now, therefore, Though these studies have substantially increased our understanding of Chumash prehistory with the City's jurisdiction, that the inventory of all prehistoric and historic resources is not complete given the lack of access for systematic archaeological investigations in the absence of proposed development requiring City assessment. , and that It is reasonable to assume that additional archaeological sites will be encountered as a result of future field work and research, field work, or the processes of associated with future proposed development construction, including land clearing, as well as and natural erosion."

"One of the most significant data limitations is the systematic lack of boundary testing for the

majority of sites, resulting in an incomplete analysis of constituent materials. Other issues are the lack of continuity in research goals, even basic ones, the lack of documentation regarding integrity, and inconsistent application of recovery and reporting methods. These are just a few of the problems that plague determinations of significance and evaluation of integrity.”

This statement implies that existing archaeological studies are incomplete or somehow inadequate. The statement does not reference any examples of these limitations, nor does it preface the assertion with the fact that studies undertaken under City’s permitting authority are limited to evaluating only the areas where proposed project has the potential for impact. It also does not refer to the City’s existing Cultural Resource Guidelines that provide a protocol for undertaking boundary testing through Extended Phase 1 excavations, where possible. The assertion that existing archaeological studies do not address the integrity of cultural resources has no basis in fact. Cultural resource integrity is an integral aspect of potential significance as defined in CEQA Guidelines Section 15064.5. Studies undertaken in support of development project assessment always are mindful of the potential effects of past development on resource integrity.

The Statement can accurately acknowledge that the nature of recorded archaeological site throughout the City of Goleta have been subject to variable levels of professional investigation. Therefore, it is not possible at this time to fully evaluate their significance, let alone their horizontal and vertical extent. If this statement is made, it is critical to acknowledge that archaeological sites that have been subject to systematic assessment since the City’s incorporation do provide these critical aspects of professional recordation and characterization. As noted previously, this current Statement effort has failed to review these studies for many of the most important cultural resources in the existing inventory.

Goals and Priorities

The introduction to this section accurately reflects the diversity and complexity of cultural resource within the City’s jurisdiction. It fails to describe or acknowledge the efforts that characterize the assessment of archaeological resources associated with proposed development in the City. As noted above, the recommendations presented are expressed with a total disregard to the City’s existing protocols. They therefore do not provide any sense of how the existing City’s protocols may need improvement.

As a professional responsible for preparing studies within the City for 35 years, including several recent investigations for major projects in the City of Goleta, I can provide the following. The determination of whether a particular project may require a cultural resource study is determined in a conservative manner. The City requests from the CCIC any existing data that may be available. If those data are not available, the CCIC staff archaeologist identifies the potential for an unknown archaeological resources to exist. The planner takes this information into account in determining the need for an investigation. I can attest studies have been required in a multitude of contexts, including those in urban commercial neighborhoods (i.e., along the Calle Real Shopping Center corridor) that may have been substantially disturbed by previous development.

Where investigations have identified cultural resources, the City has retained an outside archaeological advising consult to peer review the investigation and determine if the study is professionally acceptable. This has allowed City staff to retain appropriate expert counsel, in the absence of having a professional archaeologist on staff.

Any recommendations presented in this Statement should be based on this acknowledgment.

“1. Establish a peer review committee of archaeologists, Native Americans, city planners, and historians for all archaeological projects within the city boundaries;”

The professional peer review is already provided under the City’s protocols. There is no evidence provided that the current peer review is inadequate or has contributed to the lack of professional assessment and treatment of City cultural resources. In addition, the feasibility of establishing such a peer review committee is not addressed. There is no other such committee that exists in any Central Coast jurisdiction because of this very lack of feasibility. This recommendation must be deleted.

“2. Establish archaeological research designs for both prehistoric and historical resources

with primary emphasis on current and potential future avenues of data potential and evaluation of integrity Research designs should be regularly updated every five years by the peer review committee;”

The Statement background research has not included review of any Phase 2 Significance Assessment or Phase 3 Data Recovery investigation for which a well-developed Research Design has been provided, as required by existing City of Goleta Cultural Resource Guidelines. The review of such a Research Design is presently required by the City’s local cultural resource expert that is retained to peer review this product. Research designs must be fluid and are based on the ongoing review of published reports in a particular area. They cannot be effectively developed over a 5-year period by committee. They need to be developed on a site-by-site basis, acknowledging the location and characteristics of the site in question. The current protocol works extremely well in the City. This recommendation does not improve upon it, and must be deleted.

“3. Evaluate and then designate one or more facilities for curation of all collections of artifacts including materials previously excavated and which may be located outside the county;”

City of Goleta Cultural Resource Guidelines currently require curation of cultural materials at a **LOCAL** facility such as the Repository at UCSB or the Santa Barbara Museum of Natural History. Local curation is critical to ensure the feasible access to researchers who study Santa Barbara Channel prehistory. This is another example of how the current Statement fails to address existing City Cultural Resources Guidelines, and does not provide any rationale for modifying the successful protocol. This suggestion must be deleted.

“4. Institute Native American consultation on a regular basis for each project within the city above and beyond AB-52 requirements.”

This recommendation is presented without any discussion of AB52 requirements, or how the City of Goleta currently undertakes consultation. There is no explanation of how, for example, the BBCI has been effectively integrated in decision making for the recent Heritage Ridge apartment project. Without an analysis of how AB52 consultation and existing City protocols are inadequate, there is no justification for this recommendation. This suggestion must be deleted.

“5. Require bonds for each project to ensure that archaeological reports, updated site records, and curation agreements are completed and submitted;”

This recommendation is again presented without any discussion of how the City of Goleta currently conditions the completion of archaeological reports. The review of final reports by City staff to ensure compliance with Conditions of Approval occurs prior to final permit signoff. A recommendation to ensure that all final archaeological reports provide evidence of site record updates and curation at an acceptable local repository would be appropriate. My recommendation follows:

“5. ~~Require bonds for each~~ Ensure that project conditions of approval include specifications including the following with all to ensure that final archaeological reports:, new or updated site Records, and satisfaction of curation agreements are completed and including submitted collections;”

“6. Require Native American reports for each project in which consultation is needed;”

This recommendation is again presented without any discussion of how the City of Goleta currently conditions the completion of archaeological reports. City Cultural Resource Guidelines require a statement on the behalf of Chumash representatives who are participating in the archaeological investigation. The Statement recommendation is made without any discussion as to why it is required. For example, there is no discussion as to how the BBCI, contributors to this statement, may desire or not such a requirement. It is critical for each archaeological investigation to reflect the manner in which local Chumash representatives have been consulted and integrated in the planning process. This is currently addressed by incorporating the monitoring forms completed by the Chumash observers, and ensuring that the monitor has reviewed and has agreed with the findings and recommendations of the report. A more reasonable and effective recommendation follows:

“6. Require Native American reports for each project in which consultation is needed;” Native American participation in archaeological investigations shall be documented by the inclusion of all monitoring field notes and acknowledgement that the report’s findings and conclusions accurately reflect Native American heritage values and considerations.

“7. Establish a fund for all future projects within the City of Goleta for archaeological research, Native American projects, public outreach, educational opportunities, and museum exhibits which could be modeled on Public Arts program funding that some cities have. Ideally, this would involve some percentage of the project total and managed by a City commission on cultural resources possibly tied to the Peer Review Committee.”

There is no discussion as to the rationale or nexus of this recommendation. Collections of fees is an extremely problematic mitigation or condition to implement. For example, how is the extent of the fee determined for each project? How is the extraction of a fee determined to be commensurate with the potential project contribution to the cumulative impact on cultural resources? How would funds be distributed or allocated? How can the implementation of proposals that might compete for these funds be verified and documented? A much more feasible approach to this compensatory mitigation might be considered as follows, though the implementation of developing such a program is considered programmatic.

7. Recommend the mitigation of incremental project contributions to cumulative impacts on local Chumash heritage values by identifying existing educational/heritage programs that can be benefitted by specific project funding. Such funding shall be tied to a specific initiative or action such that the mitigation contribution can be effectively implemented and verified.”

“8. Because of the archaeological sensitivity of the city, it is recommended that all ministerial permits contain a provision to halt construction if archaeological remains are encountered. The city would be notified, and appropriate treatment be considered for preservation in place, evaluation of significance, and mitigation if warranted.”

This measure reflects existing guidance identified in CEQA Guidelines Section 15064.5(f):

“As part of the objectives, criteria, and procedures required by Section 21082 of the Public Resources Code, a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction. These provisions should include an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be an historical or unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be available. Work could continue on other parts of the building site while historical or unique archaeological resource mitigation takes place.”

The ability of the City to apply such a condition to ministerial permits that do not include conditions may be problematic. However, this is a standard condition that is currently applied for projects where an archaeological investigation is required and no cultural resources are identified. This existing protocol must be reflected in this Statement, consistent with the direction emphasized above.

Thank you for the opportunity to comment on this Draft Statement. I hope to have the opportunity to review the manner in which the Statement addresses my comments as well as other professional archaeologists who collectively have actively supported the City’s efforts to respect and preserve its cultural heritage.

David

David Stone, RPA

Senior Project Manager, Cultural Resources Manager
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