

4.3 CULTURAL RESOURCES

This section describes the potential cultural resources impacts that could result from construction of the City Fire Station 10.

4.3.1 Existing Setting

Goleta General Plan/Local Coastal Land Use Plan

A summary of the prehistory and history of the general project area, excerpted from the Goleta General Plan FEIR, is provided below.

Prehistory. Evidence exists for the presence of humans in the Santa Barbara coastal area for more than ten thousand years. While some researchers (e.g., Orr 1968) suggest that the Santa Barbara Channel area may have been settled as early as 40,000 years ago, only limited evidence for occupation much earlier than 9,500 years has been discovered. Even so, human prehistory along the Santa Barbara channel area coast may extend back as much as 12,000 years (Erlandson et al. 1987; Erlandson et al. 1996). Approximately 7,500 years ago, prehistoric human settlement in the region appears to have increased rapidly with a number of sites dating to approximately this time, and many more dating subsequent to it (Colten 1987, 1991; Erlandson 1988, 1997; Glassow 1997). At that time, people in the area practiced a mostly gathering subsistence economy, focusing mainly on natural vegetal resources, small animals, and marine resources such as shellfish. One of the major tool types evident in their assemblage was the milling stone and muller (also referred to as mano and metate). This two-part tool was used primarily to process (grind) various kinds of seeds, small animals, and vegetal foodstuffs. The large quantities of these tools found by archaeologists in the sites of these people resulted in the designation of this period as the Milling Stone Horizon (Erlandson 1994).

Beginning at sites dating to approximately 5,000 years ago, archaeologists began to notice differences in some archaeological site assemblages. These differences involved changes in the tool inventory with new tool types indicative of new subsistence technologies. Most significant of these differences were projectile points indicative of hunting activities, and the mortar and pestle suggestive of the utilization of a new vegetal foodstuff, the acorn. Another change involved an increase in fishing and the procurement of marine mammals for food. The use of these new technologies increased during the next approximately 3,000 years, until approximately 2,000 to 1,500 years ago. During this period, prehistoric habitation increased considerably in the Goleta area.

The advent of new technologies and subsistence strategies again became evident approximately 2,000 to 1,500 years ago, signaling a distinctive change in the pattern of prehistoric culture in California. Included in these new technologies were the bow and arrow and, in some areas, ceramics. Burial practices also changed in some areas of California with cremation of the dead supplanting inhumation. The

period is characterized as a time of cultural elaboration and increased sophistication including artistic, technological, and sociological changes (Erlandson and Torben 2002).

Ethnographic Background. At the time of first European contact in 1542, the Goleta area was occupied by a Native American group speaking a distinct dialect of the Chumash language. Historically, this group became known as the Barbareño Chumash (Landberg 1965); the name deriving from the Mission Santa Barbara under whose jurisdiction many local Chumash came after its founding in 1776. The Chumash were hunters and gatherers who lived in an area with many useful natural resources and were politically organized into chiefdoms. They had developed a number of technologies and subsistence strategies that allowed them to maximize the exploitation of these natural resources.

Consequently, before a drastic change caused by disease and other forms of cultural disruptions introduced by the Spaniards, Chumash settlements were numerous, with some containing large residential areas, semi-subterranean houses, and large cemeteries. At the time of Spanish contact, the Goleta area and immediate vicinity was highly populated with at least ten Chumash villages (Johnson, et al. 1982). A number of these settlements were situated around what was in prehistoric times a much larger Goleta Slough. This embayment is considered to have extended to today's 10-foot elevation contour, before massive flooding and siltation in the 1860s (Stone 1982). The estuary provided an abundance of marine resources including shellfish, fish, birds, and marine mammals. Early Spanish explorers, missionaries, and administrators characterized the Chumash as having a strong propensity for trade, commerce, and craft specialization, as well as for intervillage warfare (Erlandson 1994).

History. The first European contact to the Santa Barbara coastal region was by the Portuguese explorer Juan Rodriguez Cabrillo in 1542, whose voyage up the California coast under the flag of Spain was the first expedition to explore what is now the west coast of the United States. It was, however, Spanish explorer Sebastian Vizcaino, sailing though the region in December 1602, retracing Cabrillo's voyage, who christened the channel Santa Barbara in honor of Saint Santa Barbara, whose day in the Catholic calendar is December 4 (Guinn 1907). After 1602, there is no verified documentation of European contact in the region until Portolá's expedition along the coast of California in route to Monterey Bay in 1769. Accompanying Portolá was Sergeant José Francisco Ortega, who would become the first commandante of the Santa Barbara Presidio, constructed in 1781–82 (Whitehead 1996). Mission Santa Barbara was founded on December 4, 1786, and in the first year of commission, 186 Chumash people were baptized, 83 of which were from the Goleta region (Johnson, et al. 1982:20). In 1803, a proportionally large number of baptisms occurred throughout the five missions located within the Chumash territory, putting such a strain on the missions that the newly baptized were allowed to remain in certain native villages which were renamed after saints (Johnson, et al. 1982). In the Goleta area, there were at least two of these communities, San Miguel and San Francisco, the native villages of

Mescalitan (Helo'), (*S'axpili*) and Cieniguitas (*Kaswa'*), respectively (Johnson, et al. 1982:21).

In the time between the establishment of the Santa Barbara Mission and Presidio and the end of Spanish rule in California in 1822, the Goleta area was primarily used by the Franciscan fathers for grazing cattle and sheep (County of Santa Barbara 1993). In 1806, a measles epidemic took many lives and marked the beginning of the decline of both the Mission Santa Barbara and the native population (Johnson, et al. 1982). In 1822 and 1823, the most severe drought in mission history occurred, resulting in two very poor harvest years. A Chumash revolt occurred in 1824, possibly influenced by the lack in food supply (Johnson et al. 1982:25). Many of the Chumash population dispersed into the mountains and to the southern San Joaquin Valley. After two Mexican expeditions into the interior, many of them were persuaded to return to Santa Barbara (Blakley and Barnette 1985).

Although Mexico had gained independence from Spain in 1822, it was not until 1835 that secularization of the missions occurred, the mission became a parish church, and the Chumash were made free citizens (Johnson, et al. 1982). The policy of the Mexican government was to grant the mission lands and other unclaimed property to prominent citizens who were required to develop the properties and to build homes on them (EIP Associates 2004).

The American period began in 1848, when Mexico signed a treaty ceding California to the United States. Santa Barbara County was one of the original counties of California, formed in 1850 at the time of statehood. In 1851, a land act was passed that required the confirmation of ownership of Spanish land grants, although the process took many years to complete. Daniel Hill received a patent for La Goleta on March 10, 1865, and Los Dos Pueblos was patented to N. A. Den on February 23, 1877, 15 years after his death (California Secretary of State 2000).

The 1870s saw the characterization of the Goleta area began to shift from sparsely populated cattle ranches to farmsteads and towns. The area of La Goleta north of Hollister Avenue was subdivided into 38 parcels, ranging from 31 to 258 acres each (King 1982:51), and a town taking on the name of Goleta was established in the southwestern portion of the old La Goleta land grant. Early pioneers during this time include J. D. Patterson, Richard Sexton, B. A. Hicks, Ira A. Martin, John Edwards, and Isaac Foster (King 1982). By 1890, the population of Goleta had grown from 200 in 1870 to 700 people (King 1982:51).

In 1887, the Southern Pacific Railroad connected Santa Barbara County to Los Angeles and in 1901 to San Francisco, bringing with it the expansion and growth of ranching and agriculture in the Goleta Valley (Grenda, et al. 1994). Goleta in the early 1900s was described by J. M. Guinn as "a small village eight miles to the northwest of Santa Barbara. The country around to a considerable extent is devoted to walnut-growing and olive culture" (1907:422). Joseph Sexton, who had developed the softshell walnut, inspired many additional area farmers to plant their

land with walnuts and a grower's association was formed (King 1982). In the early 1870s, Sherman Stow planted lemon, walnut, and almond orchards; the lemon orchards were the first commercial lemon planting in California (Tompkins 1966; Grenda, et al. 1994). The lemon industry continued to develop, and in the 1930s, a lemon packing plant was constructed. Today agriculture in the Goleta foothills consists mainly of lemons and avocados (King 1982; Goleta Valley Urban Agriculture Newsletter 2002).

Oil production along the Goleta coast began in the 1920s and boomed in 1928 with the discovery of the Ellwood oil fields. After 1937, oil production began to decline; however, natural gas was also discovered along the coast and is still being tapped today (County of Santa Barbara 1993). Suggestions that the Goleta Slough be turned into a harbor first originated in the early 1920s and persisted into the 1960s, although this plan eventually disintegrated with the infilling of marshlands in 1930s and 1940s in order to accommodate an airport. In 1941, the City of Santa Barbara bought Mescalitan Island and the surrounding tide flats (King 1982; County of Santa Barbara 1993). The 1950s and 1960s brought tremendous change to the Goleta area, as the construction of Cachuma dam provided a relief to the area's problem of a reliable water source and fueled rapid growth and commercial and residential development (Grenda, et al. 1994; County of Santa Barbara 1993).

Project Site Setting

Soils formed within deposits in the Project area have been previously mapped as the Milpitas-Positas Fine Sandy Loam soil series type (USDA-NRCS 2015). Based on observation of the soil profiles exposed during this phase of investigation, the local soils (where not disturbed by historic land modification) generally consist of a surface A horizon (and underlying E horizon) with potential for the presence of cultural deposits underlain by sub-surface soil horizons (Bt and C horizons). The sub-surface soils are of sufficient geologic age (greater than 12,000 years) and composition such that they are not considered to have potential for bearing cultural deposits and, therefore, should be considered archaeologically sterile.

Background Research

An archaeological site records and literature search of the California Historic Resources Information System (CHRIS) at the Central Coast Information Center (CCIC), University of California Santa Barbara, identified 10 investigations that have been undertaken within 0.5 mile of the proposed Project site, and seven archaeological sites recorded in the vicinity.

The closest archaeological site, the prehistoric village CA-SBA-70, is recorded north of U.S. 101. The site was recorded by D.B. Rogers in 1929. Rogers identified chipped stone flakes, hammer stones, and grinding implements (i.e., manos used to process hard seeds). Circular structures roughly 12 -14 feet in diameter and a few fragmentary human remains near the southern boundary of the site were also identified.

In 2013, two previously unknown intact prehistoric archaeological deposits were encountered during construction of the Caltrans Hollister Avenue Overcrossing Replacement Project (Kajankoski *et al.* 2013). The deposits were located approximately 100 and 145 feet north and northwest, respectively, of the Fire Station 10 Project area. Ensuing data recovery excavations identified sparse deposits up to 80 cm (2.6 feet) below surface, including shellfish, animal bone, ground stone implements (hammerstones and pestle), and chipped stone (one core, flake tools, and flakes). No intact features of human remains were identified. Since no "meaningful amounts of fish, bird, or mammal bone" were recovered from the "very edge of [the]... now mostly destroyed" site, the two deposits were not found to contribute to the eligibility of CA-SBA-70 with respect to National Register of Historic places or the California Historic Resources criteria (Kajankoski *et al.* 2013).

A Phase 1 Archaeological Resource Survey consisting of an intensive systematic pedestrian survey and the excavation of seven Extended Phase 1 backhoe trenches was carried out (Macfarlane 2010). No cultural materials were identified on the site surface during the survey. The seven backhoe trenches, ranging from 1.04 and 2.15 meters (3.4 and 7.1 feet) deep, were located within the Fire Station No. 10 building footprints in the central portion of the project area. No prehistoric or historic cultural materials were observed in the excavated and screened backhoe trench soils. The intensive, systematic pedestrian survey and the backhoe trench excavations determined that there was no potential for archaeological resources or impacts within the Fire Station No. 10 building footprints proposed at the time. No direct or indirect impacts to archaeological resources were anticipated and development for the Project would have "result[ed] in no adverse, cumulative or residual effects on extant cultural... resources" (Macfarlane 2010).

Extended Phase 1

A Supplemental intensive ground surface Phase 1 and subsurface Extended Phase 1 Archaeological Investigation was performed by Dudek in 2015 in order to determine the potential presence of any of prehistoric archaeological materials in the westerly portions of the Project site that were not assessed during the 2010 study (Dudek 2015, Confidential Appendix D).

The intensive Phase 1 survey western portion of the Project area was intensively All ground surfaces in the western half of the project area were walked in parallel 2-meter (6-foot) parallel transects. Ground vegetation was sparse annual grasses and coyote bush shrubs providing fair to good visibility (40 to 60 percent). An area of dark brown silty loam, approximately 25 square meters (260 square feet) in area, was identified along the western Project area property boundary in the area identified as GP 2 on Figure 3. A number of young evergreen trees had been planted in this area, with plastic PVC irrigation pipe and emitters placed to supply irrigation to the trees. Several fragments of estuarine shell (*Chione* sp.) were identified within the silty loam soil, which was characteristic of prehistoric site

midden material. Irrigation drip line emitters were identified in the dark midden soil. Soils were carefully exposed by systematic shovel scrapes in the immediate vicinity of the emitter installation. The PVC was found to be placed at the bottom of approximately 10 cm (4 inches) of the midden soil; the irrigation pipe had been placed directly on the native Topsoil A Horizon, below the imported prehistoric midden soils. Erosion control mechanisms (jute fabric roles) had also been placed within the midden soils, clearly associated with planting and irrigating the evergreen trees.

The shallow placement of the midden soil on top of the non-cultural Topsoil A Horizon, burying the PVC irrigation pipe and erosion control devices, indicated that these had been placed in association with planting of the evergreen tree landscaping. The midden soils were limited in their expanse and depth to this single area of the Project area. The landscaping was completed by Caltrans in 2013, subsequent to completion of the Cathedral Oaks Overpass project (Claudia Dato, personal communication 2015).

Evidence of the gas station remediation identified in the previous Extended Phase 1 report, including placement of over 2 feet of soils in the central Project site area, imported pea gravels, and irregular topography, was noted throughout much of the remaining western Project area. Three isolated pieces of shellfish including Pismo clam (*Tivela stultorum*) and Venus clam (*Chione* sp).

(*Chione* sp.) were identified in the proximity of the northwestern project boundary in the vicinity of GP 7 and Trench 6 on Figure 3. These shell fragments were not found in the dark midden soils described above, but were within soils that had been identified in the 2010 Extended Phase 1 Investigation (Macfarlane 2010) Trench 6 as Stratum I, imported fill. The soils had substantial pea gravel inclusions and construction debris that were consistent with the fill designation.

The southerly UPRR cut bank was carefully inspected during the intensive survey. Exposures were feasibly surveyed except for areas to the west of the Project site. These exposures provided for excellent visibility (100 percent), revealing the identical stratigraphy as noted during the Phase 3 Data Recovery excavations on the north side of the UPRR cut (Kaijankoski et al. 2013: Figure 9), except no shell fragments were observed within the Topsoil A1 and A2 horizons silty loam horizons.

In order to supplement the previous Extended Phase 1 investigations within the westerly portion of the project area, ten solid core, 2-inch diameter (direct push) geoprobes were excavated spaced approximately 40-feet apart throughout the western Project area that had not been previously investigated in 2010. The geoprobes were excavated to a 6-foot depth and evaluated by Mitch Bornyasz, PG, a specialist with over 25 years' experience assessing the stratigraphy of archaeological sites in Santa Barbara. The Supplemental Extended Phase 1 Archaeological Investigation, including the intensive ground surface survey, conclusively verified the absence of intact cultural materials within the Fire Station

No. 10 Project site. The geoprobe excavations did not identify any intact prehistoric cultural material within the western portion of the Project area nearest to the intact CA-SBA-70 archaeological deposits identified in 2013, at least 100 feet south of the Project site. One of the geoprobes sampled the 6-inch layer of archaeological soils in the western portion of the Project site. These dark, silty loam soils were limited to this recently planted landscaped area. Below the four inches of soil, the lighter brown Milpitas-Positas fine sandy loam identified naturally on-site were identified. The subsurface excavation verified that these surface cultural soils were redeposited, most likely during excavation of the Cathedral Oaks Overpass, and were spoils from areas of CA-SBA-70 disturbed during that activity. As a result, there is substantial evidence from seven backhoe trenches and ten geoprobes excavated to below soils greater than 12,000 years old, that no prehistoric resources associated with CA-SBA-70 exist on-site.

Native American Consultation

The two archaeological studies conducted on the Project site were circulated to local Chumash tribal representatives for comment. The EIR Notice of Preparation was also circulated to 39 Chumash representatives (see Appendix A) who are listed by the Native American Heritage Commission (NAHC) as having knowledge of heritage resources in the Project region.

4.3.2 Regulatory Setting

California Environmental Quality Act (CEQA). Section 15064.5 of the CEQA Guidelines states that a resource shall be considered “historically significant” if it meets one of the criteria for listing in the California Register of Historical Resources (CRHR) (Pub. Res. Code §§5024.1; 14 CCR § 4852). A resource may qualify for CRHR listing if it:

- (A) Is associated with events that have made a significant contribution to the broad patterns of California’s history of cultural heritage;
- (B) Is associated with the lives of persons important in our past;
- (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (D) Has yielded, or may be likely to yield, information important in prehistory or history.

Cultural resources meeting one or more of these criteria are defined as “historical resources” under CEQA. Included in the definition of historical resources are prehistoric archaeological sites, historic archaeological sites, historic buildings and structures, traditional cultural properties important to a tribe or other ethnic group, cultural districts and landscapes, and a variety of other property types.

Impacts to “unique archaeological resources” are also considered under CEQA as described under Public Resources Code § 21083.2. This section defines a “unique archaeological resource” as:

“an archaeological artifact, object, or site, about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person (Pub. Res. Code § 21083.2(g)).

Potential impacts to identified cultural resources need only be considered if the resource is an “important” or “unique archaeological resource” under the provisions of CEQA Guidelines §15064.5 and 15126.4 and the eligibility criteria. If a resource cannot be avoided, then the resource must be examined pursuant to CEQA Guidelines §15064.5 and 15126.4 and pursuant to the eligibility criteria as an “important” or “unique archaeological resource.”

A non-unique archaeological resource is an archaeological artifact, object, or site that does not meet the above criteria. Impacts to non-unique archaeological resources and resources that do not qualify for listing on the CRHR receive no further consideration under CEQA.

Codes Governing Human Remains. Section 15064.5 of the CEQA Guidelines also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. The disposition of human remains is governed by Health and Safety Code § 7050.5 and Public Resources Code §§ 5097.94 and 5097.98, and falls within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified within 48 hours and there should be no further disturbance to the site where the remains were found. If the remains are determined by the County Coroner to be Native American, the County Coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to Public Resource Code § 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

City of Goleta. Cultural resources information and policies applicable to the project are found in the Open Space Element (Chapter 3) and the Visual and Historic Resources Element (Chapter 6) of the Goleta General Plan. The following selected policies would apply:

Open Space Element Policy 8.1: Cultural resources include Native American archaeological sites and areas of the natural landscape that have traditional cultural significance. Archaeological sites include prehistoric sites that represent the material remains of Native American societies and their activities and ethnohistoric sites that are Native American settlements occupied after the arrival of European settlers in California. Such archaeological sites may include villages, seasonal campsites, burial sites, stone tool quarry sites, hunting sites, traditional trails, and sites with rock carvings or paintings. Areas of traditional cultural significance include Native American sacred areas where religious ceremonies are practiced or which are central to their origins as a people, as well as areas traditionally used to gather plants for food, medicinal, or economic purposes.

Open Space Element Policy 8.2: The City shall coordinate with UCSB's Central Coast Information Center to identify archaeologically sensitive areas within city boundaries. To prevent artifact gathering and other forms of destruction, the exact location of sensitive sites may remain confidential.

Open Space Element Policy 8.3: The City shall protect and preserve cultural resources from destruction. The preferred method for preserving a recorded archaeological site shall be by preservation in place to maintain the relationship between the artifacts and the archaeological context. Preservation in place may be accomplished by deed restriction as a permanent conservation easement, avoidance through site planning and design, or incorporation of sites into other open spaces to prevent any future development or use that might otherwise adversely impact these resources.

Open Space Element Policy 8.4: For any development proposal identified as being located in an area of archaeological sensitivity, a Phase I cultural resources inventory shall be conducted by a professional archaeologist or other qualified expert. All sites determined through a Phase 1 investigation to potentially include cultural resources must undergo subsurface investigation to determine the extent, integrity, and significance of the site. Where Native American artifacts have been found or where oral traditions indicate the site was used by Native Americans in the past, research shall be conducted to determine the extent of the archaeological significance of the site.

Open Space Element Policy 8.5: If research and surface reconnaissance shows that the project area contains a resource of cultural significance that would be adversely impacted by proposed development and avoidance is infeasible, mitigation measures sensitive to the cultural beliefs of the affected population shall be required. Reasonable efforts to leave these resources in an undisturbed state through capping or covering resources with a soil layer prior to development shall be required. If data recovery through excavation is the only feasible mitigation, the City shall confer with the affected Native American nation or most likely descendants, as well as agencies charged with the responsibility of preserving these resources and organizations having a professional or cultural interest, prior to the removal and disposition of any artifacts.

Open Space Element Policy 8.6: On-site monitoring by a qualified archaeologist and appropriate Native American observer shall be required for all grading, excavation, and site preparation that involves earth moving operations on sites identified as archaeologically sensitive. If cultural resources of potential importance are uncovered during construction, the following shall occur:

- a. The grading or excavation shall cease and the City shall be notified.
- b. A qualified archeologist shall prepare a report assessing the significance of the find and provide recommendations regarding appropriate disposition.
- c. Disposition will be determined by the City in conjunction with the affected Native American nation.

Visual and Historic Resources Element Policy 5 Objective: To identify, protect, and encourage preservation of significant architectural, historic, and prehistoric sites, structures, and properties that comprise Goleta's heritage.

4.3.3 Impact Analysis

Methodology and Significance Thresholds

The significance of a cultural resource and impacts to the resource is determined by whether or not that resource can increase our knowledge of the past. The primary determining factors are site content and degree of preservation. A finding of archaeological significance follows the criteria established in the CEQA Guidelines and the City's Environmental Thresholds and Guidelines Manual. According to the City Guidelines, a project would have a significant impact on a cultural resource if it results in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of such a resource would be materially impaired.

Project Impacts and Mitigation Measures

Potential impacts on cultural resources and associated mitigation measures are discussed below.

Impact CR-1: Based on surface and subsurface archaeological investigations conducted on-site, no intact archaeological resources are present. Proposed ground disturbances would not likely disturb unknown cultural resources, but the vicinity is considered sensitive.

Given the evidence derived from the two Extended Phase 1 Archaeological Investigations (Macfarlane 2010, Dudek 2015) no evidence of prehistoric occupation exists within the Fire Station No. 10 Project area. There is the potential, though remote, that resources may exist outside of areas that were sampled during the subsurface excavations, although the spacing of trenches and geoprobes of

less than 50 feet was conservative. If unknown resources were encountered, potential impacts on cultural resources would be *potentially significant*.

Mitigation Measures and Residual Impacts

The following standard condition would be implemented to address the unlikely potential for encountering unknown significant resources during construction:

- CR-1** A City-approved archaeologist and local Chumash observer shall monitor the initial grading and excavation activities until such time as sufficient subsurface soil has been uncovered/excavated to ascertain that no prehistoric archaeological/cultural resources are located on the project site.

In the event archaeological remains are encountered during grading, work shall be stopped immediately or redirected until the City-approved archaeologist and Phase 2 investigation standards set forth in the City Archaeological Guidelines. The Phase 2 shall be funded by the applicant. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program consistent with City Archaeological Guidelines. The Phase 3 shall be funded by the applicant. If human remains are identified, the finds shall be handled consistent with Public Resources Code 5097.98.

Plan Requirements and Timing: This requirement shall be printed on all plans submitted for any CDP, building, grading, or demolition permits. The applicant shall enter into a contract with a City approved archaeologist and local Chumash observer and shall fund the provision of on-site archaeological/cultural resource monitoring during initial grading, excavation, and/or demolition activities prior to LUP issuance.

Monitoring: City staff shall conduct periodic field inspections to verify compliance during ground disturbing activities. City staff shall conduct periodic field inspections to verify compliance during ground disturbing activities and shall ensure preparation of any necessary Phase 2 and/or Phase 3.

With implementation of the above mitigation measures, remote potential residual impacts to unknown and as-yet undetected archaeological resources would be reduced to *adverse, but feasibly mitigated to less than significant* (Class II).

4.3.4 Cumulative Impacts

Region of Influence

The Region of Influence for the assessment of cumulative impacts on cultural resources is the entire City of Goleta's jurisdiction, as archaeological resources

and associated heritage concerns are located throughout the landscape. The greatest concentration of these resources is adjacent to sensitive biological habitats including the Goleta and Devereux Slough and watersheds draining into these estuaries.

Impact Assessment

Past development within the City of Goleta has substantially impacted the inventory of cultural resources through incremental urbanization and associated ground disturbances. Though no quantitative assessment is available, all of the substantial Chumash village sites surrounding the Goleta and Devereux sloughs, for example, have been subject to extensive disturbances. In addition to past development, recently approved and proposed related development in the Goleta Valley would continue to disturb areas that may potentially contain cultural resources, including archaeological resources. Recently built projects including the Marriot Residence Inn and Willow Springs II Apartments were responsible for such impacts to prehistoric cultural resources. The expansion of the Cathedral Oaks Road/U.S. 101 Overpass also impacted prehistoric resources in the proposed Project vicinity. The approved Cortona Apartments project was identified as having impacts on cultural resources as well.

Probable future development projects may also have the potential to impact cultural resources. Existing City policies and regulations would maximize the preservation of unknown cultural resources. City policies require protection of cultural resources through, techniques including: foundation and site design; avoidance or/ or capping of identified resources; archaeological excavation data recovery; monitoring of grading activities in archaeologically sensitive areas; and consultation with local Chumash tribal representatives. Potential impacts associated with individual development projects will be addressed on a case-by-case basis in accordance with City requirements. Though minimized, the incremental impact on cultural resources is considered cumulatively considerable.

As the proposed Project would not have the potential to impact intact, significant cultural resources, its contribution to these cumulative impacts on cultural would be *less than cumulatively considerable*.