

5.0 ENVIRONMENTAL IMPACT ANALYSIS

3. CULTURAL RESOURCES

1. INTRODUCTION

This section of the Supplemental Environmental Impact Report (SEIR) analyzes the Modified Project's impacts on cultural resources, including those of archaeological and historic significance, as compared to the State-certified EIR for the 2017 Project. The State-certified EIR determined that the 2017 Project would not result in significant impacts to cultural resources.

The analysis herein relies on the State-certified EIR and relevant updated data from the *CEQA Evaluation of Cultural Resources Survey Reports—Entrada South and Valencia Commerce Center Survey Areas* (Cultural Resources Report) prepared by John Minch and Associates, Inc. (JMA) in August 2023. To support the analysis of whether the Modified Project could result in any new significant or more severe impacts than disclosed in the State-certified EIR, in coordination with tribal representatives from the Fernandeano Tataviam Band of Mission Indians and the Santa Ynez Band of Chumash Indians, JMA conducted Phase I Cultural Resources Surveys of the Modified Project Site as well as a Phase II Cultural Resources Investigation. The results of the Phase I surveys and Phase II testing are incorporated into the Cultural Resources Report included in **Appendix 5.3** of this SEIR.¹

Discussion of tribal cultural resources pursuant to Assembly Bill 52 and an analysis of the Modified Project's impacts to such resources are separately addressed in **Section 5.10**, Tribal Cultural Resources, of this SEIR.

2. ENVIRONMENTAL SETTING

a. Regulatory Setting

An overview of the regulatory setting is provided in **Table 5.3-1**, Cultural Resources Regulatory Overview, beginning on page 5.3-2, and a detailed discussion is provided below.

¹ *The Phase I Cultural Resource Surveys and Phase II Cultural Resources Investigation are on file at the Los Angeles County Department of Regional Planning.*

**Table 5.3-1
Cultural Resources Regulatory Overview**

Issue Area and Relevant Legislation	Applicable Agency
Federal Regulations	
<p>National Register of Historic Places</p> <p>The National Register of Historic Places (National Register) was established by the National Historic Preservation Act of 1966 and recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. A resource must satisfy one of the four criteria detailed below to qualify as a significant resource. In addition to meeting at least one of these criteria, an eligible property must exhibit <i>integrity</i>, which is based on the following seven aspects: location, design, setting, materials, workmanship, feeling, and association. In addition, unless the property possesses exceptional importance as defined in Title 36 of the Code of Federal Regulations (CFR), Part 60, Section 60.4(g), it must be at least 50 years old to be eligible for National Register listing.</p>	National Park Service
<p>Secretary of the Interior's Standards for the Treatment of Historic Properties</p> <p>The National Park Service issued the Secretary's Standards for the Treatment of Historic Properties with accompanying guidelines for four types of treatments for historic resources. The Secretary's Standards are not intended to be prescriptive but, instead, provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every Standard to achieve compliance.</p>	National Park Service
<p>Archaeological Resources Protection Act</p> <p>The Archaeological Resources Protection Act (ARPA) of 1979 governs the excavation, removal, and disposition of archaeological sites and collections on federal and Native American lands. This act was most recently amended in 1988. The ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archeological interest. The ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.^a</p>	National Park Service
<p>Archaeological Data Preservation Act</p> <p>The Archaeological Data Preservation Act (ADPA) of 1974 requires agencies to report any perceived project impacts on archaeological, historical, and scientific data and requires them to recover such data or assist the Secretary of the Interior in recovering the data.</p>	National Park Service
State Regulations	
<p>California Register of Historical Resources</p> <p>In 1992, the California legislature established the California Register of Historical Resources (California Register) "to be used by state and local agencies, private groups, and citizens to identify the state's historical</p>	Office of Historic Preservation

Table 5.3-1 (Continued)
Cultural Resources Regulatory Overview

Issue Area and Relevant Legislation	Applicable Agency
resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.” ^b An archaeological resource is eligible for listing in the California Register if the State Historical Resources Commission determines that it to be significant and to meet any of the relevant criteria for listing in the National Register. ^c As detailed below, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process.	
<p>California Environmental Quality Act</p> <p>The California Environmental Quality Act (CEQA) requires a lead agency to analyze whether the project under review will adversely affect historic and/or archaeological resources. Under CEQA, Public Resource Code (PRC) Section 21084.1, a “project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment.” CEQA Guidelines Section 15064.5 implements this statutory section by setting forth a two-part inquiry. The first involves a determination of whether the project involves a <i>historic</i> resource.^d If so, the lead agency must determine whether the project may involve a “substantial adverse change in the significance” of the resource.</p>	Lead Agency (i.e., County of Los Angeles)
County Regulations	
<p>Los Angeles County Historical Landmarks and Records Commission</p> <p>The Los Angeles County Historical Landmarks and Records Commission (HLRC) reviews and recommends cultural heritage resources in the unincorporated areas of the County for inclusion in the California Register of Historical Resources.³ HLRC considers and recommends to the County Board of Supervisors local historical landmarks worthy of registration by the State of California Department of Parks and Recreation, either as “California Historical Landmarks” or as “Points of Historical Interest,” and it may consider and comment for the Board on applications relating to the National Register.^f</p>	HLRC
<p>Los Angeles County Historic Preservation Ordinance</p> <p>The Los Angeles County Board of Supervisors adopted the County’s Historic Preservation Ordinance (HPO) on September 1, 2015 (Ord. 2015-0033 § 3, 2015). The HPO establishes criteria for designating landmarks and historic districts and provides protective measures for designated and eligible historic resources. The HPO applies to all privately owned property within the unincorporated territory of the County and all publicly owned landmarks, except properties that were not listed prior to the issuance of a demolition permit or properties affiliated with religious organizations. The HPO defines a landmark as “any property, including any structure, site, place, object, tree, landscape, or natural feature, that is designated as a landmark by the Board of Supervisors.” The HPO defines a historic district as, “A contiguous or noncontiguous geographic area containing one or more contributing properties which has been designated as an historic district by the Board of Supervisors.” Landmarks and historic districts may be designated if it is fifty years of age and meets one of the applicable criteria detailed below.</p>	Department of Regional Planning
<p>^a <i>United States Department of the Interior, National Park Service, Technical Brief #20: Archeological</i></p>	

**Table 5.3-1 (Continued)
Cultural Resources Regulatory Overview**

Issue Area and Relevant Legislation	Applicable Agency
<p><i>Damage Assessment: Legal Basis and Methods, 2007.</i></p> <p>^b <i>PRC, Section 5024.1, Subdivision (a).</i></p> <p>^c <i>PRC, Section 5024.1, Subdivision (c).</i></p> <p>^d <i>While terminology in applicable regulations may vary, the terms “historic resources” and “historical resources” are used interchangeably herein.</i></p> <p>^e <i>Los Angeles County General Plan, Conservation and Natural Resources Element October 2015, p. 163.</i></p> <p>^f <i>County of Los Angeles, Historical Landmarks and Records Commission, http://hlrc.lacounty.gov/, accessed February 21, 2024.</i></p> <p><i>Source: Eyestone Environmental, 2024.</i></p>	

(1) Federal Regulations

(a) National Register of Historic Places

The National Register of Historic Places (National Register) was established by the National Historic Preservation Act of 1966 as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.” The National Register recognizes properties that are significant at the national, state, and local levels.

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. A resource must satisfy one of the following four criteria to qualify as a significant resource:

- A. It is associated with events that have made a significant contribution to the broad patterns of our history;
- B. It is associated with the lives of persons significant in our past;
- C. It embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction; or
- D. It yields, or may be likely to yield, information important in prehistory or history.

In addition to meeting at least one of these criteria, an eligible property must exhibit *integrity*, which is based on the following seven aspects: location, design, setting,

materials, workmanship, feeling, and association. To establish historic integrity, a property must possess several, and usually most, of these seven aspects. In addition, unless the property possesses exceptional importance as defined in Title 36 of the Code of Federal Regulations (CFR), Part 60, Section 60.4(g), it must be at least 50 years old to be eligible for National Register listing.

(b) Secretary of the Interior's Standards for the Treatment of Historic Properties

The National Park Service issued the Secretary's Standards for the Treatment of Historic Properties with accompanying guidelines for four types of treatments for historic resources: Preservation, Rehabilitation, Restoration, and Reconstruction. The most applicable guidelines should be used when evaluating a project for compliance with the Secretary's Standards. Although none of the four treatments, as a whole, apply specifically to new construction in the vicinity of historic resources, Standards #9 and #10 of the Secretary's Standards provides relevant guidance for such projects. The Standards for Rehabilitation are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired. 2

It is important to note that the Secretary's Standards are not intended to be prescriptive but, instead, provide general guidance. They are intended to be flexible and adaptable to specific project conditions to balance continuity and change, while retaining materials and features to the maximum extent feasible. Their interpretation requires exercising professional judgment and balancing the various opportunities and constraints of any given project. Not every Standard necessarily applies to every aspect of a project, and it is not necessary for a project to comply with every Standard to achieve compliance.

(c) Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 governs the excavation, removal, and disposition of archaeological sites and collections on federal and Native American lands. This act was most recently amended in 1988. The ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archeological interest. The ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.³

² *United States Department of the Interior, National Park Service, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, 2017.*

³ *United States Department of the Interior, National Park Service, Technical Brief # 20: Archeological Damage Assessment: Legal Basis and Methods, 2007.*

(d) Archaeological Data Preservation Act

The Archaeological Data Preservation Act (ADPA) of 1974 requires agencies to report any perceived project impacts on archaeological, historical, and scientific data and requires them to recover such data or assist the Secretary of the Interior in recovering the data.

(2) State Regulations**(a) California Register of Historical Resources**

In California, the term “historical resource” includes, but is not limited to, “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.”⁴ In 1992, the California legislature established the California Register of Historical Resources (California Register) “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.”⁵ An archaeological resource is eligible for listing in the California Register if the State Historical Resources Commission determines that it to be significant and to meet any of the following criteria for listing in the National Register.⁶

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; or
- Is associated with the lives of persons important in our past; or
- 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
- Has yielded, or may be likely to yield, information important in history or prehistory.

⁴ PRC, Section 5020.1, Subdivision (j).

⁵ PRC, Section 5024.1, Subdivision (a).

⁶ PRC, Section 5024.1, Subdivision (c).

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:⁷

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

If nominated for listing and determined to be significant by the State Historical Resources Commission, the California Register may include the following:⁸

- Individual historical resources.
- Historical resources contributing to the significance of an historic district under criteria adopted by the commission.
- Historical resources identified as significant in historical resources surveys, if the survey meets the criteria listed in subdivision (g).
- Historical resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria adopted by the commission.
- Local landmarks or historic properties designed under any municipal or county ordinance.

(b) California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires a lead agency to analyze whether the project under review will adversely affect historic and/or archaeological resources. Under CEQA, Public Resource Code (PRC) Section 21084.1, a “project that may cause a substantial adverse change in the significance of a historic resource is a

⁷ PRC, Section 5024.1, Subdivision (d).

⁸ PRC, Section 5024.1, Subdivision (e).

project that may have a significant effect on the environment.” CEQA Guidelines Section 15064.5 implements this statutory section by setting forth a two-part inquiry. The first involves a determination of whether the project involves a *historic* resource.⁹ If so, the lead agency must determine whether the project may involve a “substantial adverse change in the significance” of the resource.

For purposes of CEQA compliance, CEQA Guidelines Section 15064.5 defines the term “historical resources” to include the following:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register.¹⁰
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC, or identified as significant in a historical resource survey meeting the requirements in Section 5024.1(g) of the PRC shall be presumed to be historically or culturally significant. Public agencies must treat such resources as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register.¹¹

The fact that a resource is not listed in or not determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to PRC Section 5020.1(k)), or not identified in a historical resources survey (meeting the criteria in PRC Section 5024.1(g)) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

Under CEQA Guidelines Section 15064.5(c)(2), an “archaeological site” may also qualify as a “historic site,” provided it meets the criteria discussed above. An

⁹ While terminology in applicable regulations may vary, the terms “historic resources” and “historical resources” are used interchangeably herein.

¹⁰ PRC Section 5024.1; CCR, Title 14, Section 4850 et seq.

¹¹ PRC Section 5024.1; CCR, Title 14, Section 4852.

archaeological site that does not meet the historic site criteria may still qualify for protection under CEQA as a “unique archaeological resource,” as defined in PRC Section 21083.2(g).¹² Unique archaeological resources are discussed further below.

CEQA Guidelines Section 15064.5(b)(1) provides that “[s]ubstantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” Material impairment occurs when a project materially alters or demolishes “those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion” in the California Register or a local historic registry or that justify its eligibility for inclusion.

As stated above, if a cultural resource does not qualify as a “historic site,” it may qualify for protection under CEQA as a “unique archaeological resource.” As used in PRC Section 21083.2(g), “unique archaeological resource” means 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:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

CEQA requires the lead agency to consider whether the project would significantly affect unique archaeological resources or resources eligible for listing in the California Register and to avoid these resources when feasible or to mitigate any effects to less than significant levels.¹³ CEQA Guidelines Section 15126.4(b)(3)(A) states that “[p]reservation in place is the preferred manner of mitigating impacts to archaeological sites.” Preservation in place may be accomplished by, but is not limited to, the following: (1) planning construction to avoid archaeological sites; (2) incorporating the sites within parks, greenspace, or other open space; (3) covering the archaeological sites with a layer of chemically stable soil

¹² CEQA Guidelines Section 15064.5(c)(3).

¹³ PRC Sections 21083.2 and 21084.1.

before building any facilities on top of them; and (4) deeding the site into a permanent conservation easement.¹⁴

CEQA Guidelines Section 15064.5(c)(4) notes that if an archaeological resource is neither a historic resource nor a unique archaeological resource, the effects of the project on those resources shall not be considered a significant effect on the environment.

(3) County Regulations

(a) Los Angeles County 2035 General Plan

As discussed in greater detail in **Section 5.7**, Land Use and Planning, of this SEIR, the County's General Plan directs future growth and development in the County's unincorporated areas and establishes goals, policies, and objectives that pertain to the entire County. The Conservation and Natural Resources Element of the current General Plan, adopted on October 6, 2015, includes relevant policies that focus on the protection and awareness of cultural and historical resources, including but not limited to Policy C/NR 14.1 which calls for the mitigation of all impacts from new development on or adjacent to historic, cultural and paleontological resources to the greatest extent feasible.¹⁵

(b) Santa Clarita Valley Area Plan: One Valley One Vision 2012

The Santa Clarita Valley Area Plan: One Valley One Vision 2012 (Area Plan) ensures consistency between the General Plans of the County and the City of Santa Clarita (City) in the Santa Clarita Valley (Valley) in order to achieve common goals and encourages the coordination of land use plans with public services and other departments or agencies.¹⁶ The Area Plan identifies sites and structures in the Valley identified as having historic or cultural significance based on building characteristics, events that took place at the site, or the site's role in the historical or cultural development of the community.

(c) Los Angeles County Historical Landmarks and Records Commission

The Los Angeles County Historical Landmarks and Records Commission (HLRC) reviews and recommends cultural heritage resources in the unincorporated areas of the

¹⁴ CEQA Guidelines Section 15126.4(b)(3)(B).

¹⁵ Los Angeles County General Plan, Conservation and Natural Resources Element, October 2015, p. 167.

¹⁶ County of Los Angeles, Santa Clarita Valley Area Plan, https://case.planning.lacounty.gov/view/santa_clarita_valley_area_plan, accessed August 19, 2024.

County for inclusion in the California Register of Historical Resources.¹⁷ HLRC considers and recommends to the County Board of Supervisors local historical landmarks worthy of registration by the State of California Department of Parks and Recreation, either as “California Historical Landmarks” or as “Points of Historical Interest,” and it may consider and comment for the Board on applications relating to the National Register.¹⁸

(d) Los Angeles County Historic Preservation Ordinance

The Los Angeles County Board of Supervisors adopted the County’s Historic Preservation Ordinance (HPO) on September 1, 2015 (Ord. 2015-0033 § 3, 2015). The HPO establishes criteria for designating landmarks and historic districts and provides protective measures for designated and eligible historic resources. The HPO applies to all privately owned property within the unincorporated territory of the County and all publicly owned landmarks, except properties that were not listed prior to the issuance of a demolition permit or properties affiliated with religious organizations. The HPO defines a landmark as “any property, including any structure, site, place, object, tree, landscape, or natural feature, that is designated as a landmark by the Board of Supervisors.” The HPO defines a historic district as, “A contiguous or noncontiguous geographic area containing one or more contributing properties which has been designated as an historic district by the Board of Supervisors.” Landmarks and historic districts may be designated if it is fifty years of age and meets one of the following criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of the history of the nation, State, County, or community in which it is located;
2. It is associated with the lives of persons who are significant in the history of the nation, State, County, or community in which it is located;
3. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the nation, State, County, or community in which it is located; or possesses artistic values of significance to the nation, State, County, or community in which it is located;

¹⁷ *Los Angeles County General Plan, Conservation and Natural Resources Element October 2015, p. 163.*

¹⁸ *County of Los Angeles, Historical Landmarks and Records Commission, <http://hlrc.lacounty.gov/>, accessed February 21, 2024.*

4. It has yielded, or may be likely to yield, significant and important information regarding the prehistory or history of the nation, State, County, or community in which it is located;
5. It is listed, or has been formally determined eligible by the United States National Park Service for listing, in the National Register, or is listed, or has been formally determined eligible by the State Historical Resources Commission for listing, on the California Register;
6. If it is a tree, it is one of the largest or oldest trees of the species located in the County; or
7. If it is a tree, landscape, or other natural land feature, it has historical significance due to an association with an historic event, person, site, street, or structure, or because it is a defining or significant outstanding feature of a neighborhood.

No Board-designated resources under the HPO are located within the Modified Project Site.

b. Environmental Setting

Both the Entrada South and VCC survey areas lie in the foothills immediately to the west of the Interstate 5 corridor within the north-easternmost extent of the Santa Susana Mountains near Valencia. The elevations across the survey areas range between approximately 1,000 feet and 1,400 feet above sea level.

Entrada South Planning Area

The main canyons and drainages in the Entrada South survey area trend north-northwest to south-southeast and eventually drain into the Santa Clara River to the north. The terrain consists of low rolling hills that are dissected by canyons and secondary side canyons. Water flows in the larger canyon bottoms only ephemerally, that is following heavy winter rains. Currently, no permanent water sources occur in the Entrada South survey area, although prehistoric hydrologic systems likely would have been much different as modern land use, particularly agriculture, residential, and commercial development have all altered the landscape for many decades.

The Entrada South survey area is dissected by numerous dirt roads that provide access to Southern California Edison's (SCE's) power transmission line towers and decommissioned oil wells. There are currently no inhabited buildings within the footprint of the Entrada South survey area. Historical development and disturbance of the Entrada South survey area included oil and gas development and agricultural activities.

Surrounding off-site properties around the Entrada South survey area have been disturbed by the development of Six Flags Magic Mountain, residential/commercial uses, and local roadways and infrastructure. Magic Mountain Parkway, which traverses the Entrada South survey area, has been previously disturbed and constructed in accordance with the approved Mission Village project.

The hills, ridges, and canyons in the Entrada South survey area are vegetated by both chaparral and coastal sage scrub plant communities that are common to southern California.

VCC Planning Area¹⁹

The main canyons and drainages in the VCC survey area trend north-to-south and drain into Castaic Creek, just upstream of its confluence with the Santa Clara River to the southwest. The terrain consists of low hills that are dissected by canyons and secondary side canyons. Water flows in the smaller canyon bottoms only ephemerally, that is following heavy winter rains. The Castaic Creek riverbed and flood plain is a prominent natural feature that borders the VCC survey area on the east and south of the survey area. Prehistoric hydrologic systems likely would have been much different as modern land use, particularly the damming of Castaic Creek to create Castaic Lake Reservoir, agriculture, residential and commercial development have all altered the landscape. Lithic raw material in the area is dominated by exposures of the Saugus Formation geological unit, which dates from the late Pliocene to the early Pleistocene.

Species comprising the chaparral and coastal sage scrub plant communities noted above typify the native vegetation of the VCC survey area, with riparian species relatively more dominant as the result of the influence of the adjoining Castaic Creek.

Historical development and disturbance within the VCC survey area included oil and gas development and agricultural activities. Approximately nine million square feet of industrial/business park development has already been completed for the overall VCC development. Other surrounding off-site properties around the VCC survey area have been disturbed by the development of Six Flags Magic Mountain, residential/commercial uses, and local roadways and infrastructure. The VCC survey area currently features land interspersed with industrial buildings and associated parking facilities.

¹⁹ *It is noted that the VCC survey area discussed herein is broader than the VCC Planning Area currently proposed for development as part of the Modified Project. Refer to Figure 2 in the Cultural Resources Report for a map of the VCC survey area.*

c. Cultural Setting

(1) Prehistoric Cultural Setting

As described in the Cultural Resources Report, the Early period generally coincides with the Millingstone Horizon which dates from around 7,000 to 4,000 years before present (B.P.). The Early period is characterized by an increase in population densities along the coastal mainland, artifact assemblages consisting mostly of large millingstones, such as manos, metates, and stone bowls, and a general scarcity of finely flaked stone tools. Archaeological evidence from this period shows an increase in diversification of food resources, such as shellfish, birds, and small mammals. Early mainland coastal groups exploited bay and estuary marine habitats, but the diet from this period appears to have relied heavily on the processing and milling of hard seeds. Sites in the general Santa Clara River Valley region are purported to be rare, but two sites located near Vasquez Rocks give evidence of an Early period occupation. The temporal designations for the Vasquez Rocks sites are based on the presence of a small number of *Olivella sp.* barrel beads. However, the apparent lack of Early period sites in the region remains controversial.

The Middle period (3,500 to 1,500 years B.P.) followed and is identified by a shift to mortars and pestles for processing plant foods and an increase in the density of hunting-related tools in artifact assemblages recovered from archaeological sites. It is during the Middle period that the archaeological record exhibits the development of ritual specialists and increased ceremonial integration in the Chumash region. Evidence for a vast network of trade and exchange emerged during the Middle period. Items such as shell beads manufactured on the Channel Islands appear in inland sites on the mainland. In exchange, obsidian was traded from the inland deserts to the coastal regions and both the northern and southern Channel Islands. It is likely that these materials were traded through the Santa Clara River Valley drainage system, which makes the survey area a highly significant corridor for contact between coastal and inland populations. The Santa Clara River Valley served as a conduit for the exchange of material, people, and ideas linking the coast with areas far to the east, including Tataviam, Kitanemuk, and Serrano tribes.

Evidence of Middle period occupation comes from radiocarbon, obsidian hydration, and typological dating from a number of sites in this region. For example, the Agua Dulce village complex's occupation extends back to this period and represents a time marked by increasing population size and the beginning of significant exploitation of mid-altitude environments. With the Middle period in this area came major expansion in settlement, the establishment of large site complexes, and larger areas of environmental exploitation. Three sites in the vicinity of the survey areas have been dated to the Middle period: LAN-2133, LAN-2233, and LAN-2235. According to some researchers, the Middle period represents the first significant occupation of the Upper Santa Clara River Valley drainage area.

Late Prehistoric period sites are more plentiful in this region. This period (from 1,500 to about 200 years B.P.) marks a time of a continuing increase in population size. In fact, the Agua Dulce village complex's population grew to approximately 200 to 300 people around A.D. 1500 to 1600. Along the coast the Late period is characterized by a notable increase in coastal settlements and marine subsistence, particularly fishing. An intensification of fishing is observed in coastal sites, along with significant changes in technology and social organization. Technological changes to marine subsistence patterns include the introduction of the circular shell fishhook and net weights, which allowed for coastal populations to significantly expand their diet. Inland populations developed innovations in lithic technology which allowed for intensified hunting, and further diversified their subsistence with an increase in acorn production, pulpy tubers and roots, as well as marine resources. There was also an increase in artifact specialization and diversification, with the change from spear points to bow and arrow points in projectile point technology being perhaps the most notable shift. An increase in sedentism occurs in this period as evidence of extended occupation is observed in archaeological records, particularly in the coastal region. By the beginning of the Late period, mortuary practice was significantly more homogeneous throughout the Chumash region compared to the Early and Middle periods. Wealth and status differentiation are apparent in mortuary assemblages and more elaborate ornamentation is observed, suggesting a change in social and political complexity. This feature accompanies evidence of an increase in trade and exchange between coastal and inland populations.

(2) Historic Setting—Spanish Period (1769–1822)

The first European presence in the in the Santa Clara River Valley occurred during the Portolá expedition of 1769. As then Governor of Baja California, Captain Gaspar de Portolá led a 63-member expedition north from the Spanish settlement of San Diego to Monterey. San Diego was the first Spanish settlement in Alta California, established as a presidio, or military encampment, earlier in 1769 by Captain Portolá and Franciscan Father Junipero Serra. The establishment of the Mission San Diego de Alcalá later in 1769 marked the beginning of the Mission Period in Alta California where 21 missions were built at the demand of the church and Spaniards, using subjugated indigenous peoples' labor across the western region of what is now present-day California.

The Portolá expedition traveled through the San Fernando Valley and Newhall Pass naming canyons, water sources, and other geographic features, and camped at the confluence of the Santa Clara River and Castiac Creek in the area of present-day Castaic Junction. Here, Portolá encountered residents of a populous village of corral-like huts, interpreted as a seasonal Tataviam encampment. This visit was documented on August 8, 1769, which details the encounter and was named the "Beginning of the Hollow of Saint Clare, *la Cañada de Santa Clara*". Portolá continued on through the Santa Clara River Valley to Ventura and failed to reach Monterey Bay. The expedition party returned south

along a different, more southerly route, and arrived back in San Diego on January 24, 1770.

As Spanish intrusion into the area continued the Santa Clara River Valley remained relatively isolated due to the rough topography and distant proximity to other colonial activities in the region. Missions San Buenaventura, established in 1782, and Mission San Fernando, established in 1797, greatly increased Spanish presence to the west and south of the Santa Clara River Valley.

However, The Spanish Royal Road, El Camino Real, was established through the western San Fernando Valley and continued north providing a coastal route along what is now the Highway 101 corridor, linking travel throughout the system of Spanish Missions. This route kept most travel and activity to the south of the Santa Clara River Valley.

As the mission system grew, external ranchos, or estancias, were needed for cattle grazing. Estancia San Francisco Xavier was established in 1804 and served as the estancia for Mission San Fernando where many of the Tataviam were then residing within the mission system. The estancia comprised the Upper Santa Clara River Valley and extended westward to Piru, a parcel of land that would later comprise the Newhall Ranch. Headquarters for the Estancia San Francisco Xavier was developed at Castaic Junction south of the confluence of the Santa Clara River and Castaic Creek. This outpost developed into a sub-mission, or Asistencia in 1810 and represents the first European settlement in the valley.

The primary function of the Asistencia de San Francisco Xavier (LAN-926H) was as a ranching outpost, but as a sub-mission, it likely served religious purposes as well. The Asistencia is described as two rectangular adobe buildings with an arched gateway. The site of the Asistencia remains preserved in place near the northeast overflow parking area of Six Flags Magic Mountain.

(3) Historic Setting—Mexican Period (1822–1848)

In the years after the Mexican Revolution against Spain (1810–1821) the Spanish land holdings throughout Alta and Baja California were recognized as part of the new Mexican Republic. Both Alta and Baja California were designated territories of the Mexican State in 1821, and as the pueblo of Los Angeles grew in size and population, it was elevated to city status and designated as state capital in 1835. These events, along with the gradual decline in authority of the missions after the revolution, led to the secularization of the missions by Mexico in 1833, and finalized by the Alta California legislature in 1834. Lands previously under mission control were divided and gifted to private citizens, mostly

veterans, soldiers, and wealthy politicians, thus beginning the rancho movement and a brief pastoral era in California.

(a) Del Valle

Antonio Del Valle was a lieutenant in the army of Spain, and as a member of a wealthy family from the Mexican State of Jalisco, served as mayordomo, or administrator, of the Mission San Fernando in the early years of the rancho period.²⁰ Del Valle coveted the Asistencia at Castaic Junction and petitioned then Governor Juan B. Alvarado for the land grant to the northern reaches of the Mission San Fernando. Del Valle was granted the Rancho San Francisco by Governor Alvarado on January 22nd, 1839. Antonio resided in the Asistencia with his wife Jacoba Felix and two children, managing the pastures of cattle and sheep at Rancho San Francisco until his death in 1841.

Del Valle died without a formal last will and testament, and the rancho was divided into eastern and western sections. Ygnacio Del Valle, Antonio's oldest and estranged son, was awarded 13,599 acres on the western end of the Santa Clara River Valley, and in 1853 established the 1,800-acre Rancho Camulos near Piru along present-day State Route 126, approximately 10 miles west of Interstate 5. Ygnacio, then serving as mayor of Los Angeles and state legislator, moved into the adobe at Rancho Camulos permanently in 1861.

(4) Historic Setting—American Period (1848–present)

Following the Mexican-American War (1846–1848), the Treaty of Guadalupe Hidalgo gave the United States ownership of California, along with Mexican territories in the southwestern states. On July 4th, 1848, the treaty was ratified, essentially ending the Mexican Period and pastoral era in California. The rancho soon suffered many years of drought leading to massive losses of cattle. Del Valle was deeply in debt and lost Rancho San Francisco to his creditors, who sold the property to oil prospectors. The rights to the land were ultimately purchased by Henry Mayo Newhall 1875, a railroad investor from San Francisco.

Henry Mayo Newhall was born May 13, 1825, in Saugus, Massachusetts. He journeyed to California as an ambitious young man seeking fortune in the California Gold Rush of 1849. After a failed stint at gold prospecting, Newhall became a successful auctioneer and partner at an auction house in San Francisco. Newhall was a nearly investor and founder of the Southern Pacific Railroad Company, and eventually parlayed his

²⁰ *The rancho period overlaps with the Mexican Period but is not distinguished as a formal period.*

success in the railroad business into real estate. Newhall purchased five of the former Mexican land grant ranchos in California: Rancho Santa Rita, Rancho Piojo/San Miguelito, Rancho Suey, Rancho Todo Santos, and Rancho San Francisco.

Newhall continued the use of Rancho San Francisco for cattle ranching and farming. Although a wide variety of crops were attempted, the farmland was primarily used to grow wheat which provided abundant harvests through the 1880s. Henry Newhall suffered an untimely death after a horse-riding accident in 1882. He died at age 56 after failing to recover from the accident, and a year later his five sons incorporated The Newhall Land and Farming Company (Newhall Land), operating the ranch as a family business into the 20th Century.

Oil was discovered on the ranch after years of failed investigations, offering new industry to the area during the years of community development in Southern California. Newhall Land went public in the 1950s and developed the new town of Valencia as a new master-planned community. Housing became the company's primary business as Newhall Land continued to grow with the surrounding community.

Other significant events besides the growth of Newhall Land occurred during the early 20th Century. Perhaps the best known being the St. Francis Dam disaster of 1928 which produced a catastrophic flash flood through San Francisquito Canyon as a wall of water travelled downstream from the canyon and through the Santa Clara River Valley. The curved concrete gravity dam was part of the Los Angeles Aqueduct infrastructure designed by the General Manager and Chief Engineer of the Bureau of Water Works, William Mullholland. The tragic event was the second-greatest loss of life in the history of California with as many as 600 fatalities. Only the 1906 San Francisco Earthquake and subsequent fire resulted in more deaths than the dam failure. The flood gouged the landscape as the rushing waters carried trees and concrete debris downstream as far as Santa Paula.

As the early 1900s progressed Anglo-American settlement continued apace and agricultural development of the west valley ensued. The agricultural flavor of the San Fernando Valley remained somewhat intact until after World War II. Following the end of the war residential and commercial development relentlessly expanded across the length of the valley.

d. Archival Research and Summary

(1) Archival Record Search

JMA conducted a record search of the California Historical Resources Inventory System (CHRIS) at the South Central Coastal Information Center (SCCIC) at California State University Fullerton. Results of the record search included reports of previous cultural resource studies, surveys, reports, as well as site records of known archaeological sites, isolated artifacts, historic structures, historic maps, etc., as provided in the JMA Phase I reports for Entrada South and VCC.²¹

Results of the CHRIS record search revealed that the tracts of land of the respective survey areas had been surveyed for cultural resources in the past but that there were no previously recorded archaeological sites within either of the survey areas. With the exception of newly discovered archaeological sites associated with Tract 61105 (Mission Village) project, the closest previously recorded cultural resources are located approximately one kilometer north of the Entrada South survey area boundary. These are the location of the original Newhall Ranch headquarters buildings, CA-LAN-961H, the structures of which having been previously removed, and the Asistencia adobe ruins; i.e., LAN-962H. As discussed in the Cultural Resources Report, JMA also evaluated previously completed surveys of the Entrada South and VCC Planning Areas.

(2) Sacred Lands File Search

JMA conducted a Sacred Lands File search with the California Native American Heritage Commission (NAHC). The results of the 2019 Sacred Lands File search revealed that no sacred Native American places had been recorded with the NAHC within the boundaries of the Entrada South survey area.

In December 2021 the Principal Investigator conducted a record search of the NAHC Sacred Lands File regarding the VCC Survey Area. The results of the 2021 Sacred Lands File search revealed that one or more Native American sacred places have been recorded with the NAHC within the boundaries of the survey area. Subsequently, all Native American Tribes and interested individuals on the contact list provided by the NAHC were sent a letter soliciting any information or comments regarding the survey area that they wished to share. The Principal Investigator received responses from representatives of

²¹ *The results of the Phase I Cultural Resource Surveys and Phase II Cultural Resources Investigation are incorporated into the Cultural Resources Report included in Appendix 5.3 of this SEIR. The Phase I Cultural Resource Surveys and Phase II Cultural Resources Investigation are on file at the Los Angeles County Department of Regional Planning.*

three tribes and engaged in consultation with these parties. Although the NAHC reported the presence of one or more sacred places in their Sacred Lands File, no further information was obtained through direct Tribal consultation regarding the location or nature of any sacred place within the VCC Survey Area, and therefore no resource was identified within the VCC Survey Area.

(3) Previous Investigations

The tracts of land comprising the respective survey areas have been previously surveyed for cultural resources. Specifically, in 2001, W&S Consultants conducted a survey of 942 acres of land that included the Entrada South survey area. No archaeological sites or cultural resources were identified within the portion of the 2001 survey area that comprises the current Entrada South survey area.

e. Cultural Resource Surveys

The following summarizes the cultural resources surveys and results from the Cultural Resources Report.

Entrada South Planning Area

The State-certified EIR did not identify any known significant cultural resources in the Entrada South Planning Area but did identify the potential to encounter unknown cultural resources within in the Planning Area.²² As discussed above, JMA completed additional cultural resources surveys to evaluate impacts associated with the Modified Project, as detailed in the Cultural Resources Report. A pedestrian Phase I survey of the Entrada South Planning Area was conducted by JMA in coordination with tribal representatives from the Fernandño Tataviam Band of Mission Indians and the Santa Ynez Band of Chumash Indians.²³

During the on-foot survey, special attention was paid to geomorphological conditions that affect the preservation of archaeological remains. Three potential archaeological sites and ten isolated potential artifacts were identified and discovered as a result of the pedestrian survey. An archaeological site is preliminarily defined as a concentration of three or more artifacts within approximately five meters of each other, and an isolated artifact is defined as an artifact found singly and not in association with other artifacts or

²² *State-certified EIR, Final EIR, April 2010, p. 4.10-21.*

²³ *The JMA survey covered the portion of the Entrada South Planning Area that was not previously addressed by the Mission Village EIR. The extension of Magic Mountain Parkway has been completed and was covered pursuant to the State-certified EIR and the certified Mission Village EIR.*

features. Of the ten isolated potential artifacts, eight were found to be lithic flakes or lithic cores, and the other two were a scraper plane and an unshaped expedient pestle, which were determined to be potential cultural artifacts.

Based on the results of the Phase I Survey, a Phase II Cultural Resources Investigation of the Entrada South Planning Area was conducted by JMA in coordination with tribal representatives from the Fernandeano Tataviam Band of Mission Indians and the Santa Ynez Band of Chumash Indians for the three identified potential archaeological sites. The investigation entailed an excavation testing program in order to identify and evaluate any subsurface archaeological deposits.

Excavation units were placed at various locations within each site in order to sample the horizontal extent of potential resources in the Entrada South Planning Area. When potential artifacts were encountered, they were collected, photographed, and recorded. Additional examination was conducted in the lab. A summary of the findings at these sites is provided below, and additional details are provided in **Appendix 5.3** of this SEIR.

- Site 1—A prehistoric archaeological site, Site 1 is a lithic scatter site situated in the Entrada South Planning Area within a small side canyon along a north-south trending ridge.
- Site 2—An archaeological site, Site 2 is a lithic scatter site in the Entrada South Planning Area extending along a north south trending ridge.
- Site 3—An archaeological site, Site 3 is a low-density lithic scatter with flaked stone artifacts widely distributed along a ridge trending generally northeast-southwest in the Entrada South Planning Area.

For the three sites, the combination of observed surface artifacts and subsurface deposits suggests that these sites were primarily locations where lithic raw material was surface quarried and expediently flaked in order to test their suitability as tool stone. In addition, a limited amount of plant food processing may have occurred as suggested by one larger flake with micro flake scars (indicating it was used as a tool for scraping other material(s)), the possible grinding slab/metate, and the mano. In addition, several pieces of marine shell were observed and through radiocarbon dating determined to be from over 43,000 radiocarbon years before present; thus, they represent fossil remnants rather than cultural artifacts.

VCC Planning Area

A pedestrian survey of the VCC survey area (inclusive of the VCC Planning Area) was conducted by JMA in coordination with tribal representatives from the Fernandeano

Tataviam Band of Mission Indians and the Santa Ynez Band of Chumash Indians. There were no historic or archaeological sites identified within the VCC Planning Area as a result of the pedestrian survey. Four isolated artifacts were identified, recorded, and collected within the portion of the survey area located outside of the VCC Planning Area currently proposed for development. Three of the four isolated artifacts are lithic flakes or lithic cores. The fourth isolated artifact appeared to be a possible fragment of a broken metate (i.e., grinding slab).

3. SUMMARY OF IMPACTS FOR THE 2017 PROJECT

Section 4.10, Cultural Resources, of the State-certified EIR analyzed impacts to cultural resources, including historic and archaeological resources as well as human remains, resulting from the development of the Entrada South and VCC Planning Areas. A summary of the impacts related to archeological resources from the State-certified EIR is provided below.²⁴

Entrada South Planning Area

Based on the surveys and analysis completed for the State-certified EIR, the State-certified EIR concluded that no known historic resources, archaeological resources, or unique archaeological resources are located within the Entrada South Planning Area.

However, the State-certified EIR determined there was the potential that ground-disturbing activities conducted within the Entrada South Planning Area could uncover previously undetected cultural resources, and disturbance of an unrecorded archaeological site would result in a significant impact without mitigation. The State-certified EIR concluded such impacts could be reduced to a less than significant level with implementation of Mitigation Measure RMDP/SCP-CR-5, which requires that ground-disturbing activities be halted immediately and redirected should cultural resources be encountered until a qualified archaeologist and Native American representative complete an evaluation of the eligibility of the resources pursuant to criteria established by the California Register and National Register.

VCC Planning Area

The State-certified EIR found that no known historic resources, archaeological resources, or unique archaeological resources are located within the VCC Planning Area.

²⁴ As discussed in the Modified Project's Initial Study included as Appendix 1 of this SEIR, impacts related to historic resources and human remains were determined to be less than significant and thus are not further evaluated in this SEIR.

However, the State-certified EIR determined there was the potential that ground-disturbing activities conducted within the VCC Planning Area could uncover previously undetected cultural resources, and disturbance of an unrecorded archaeological site would result in a significant impact without mitigation. The State-certified EIR concluded that such impacts could be reduced to a less than significant level within the VCC Planning Area with implementation of Mitigation Measure RMDP/SCP-CR-5.

The mitigation measure referred to herein is provided in full below in Subsection 8, Mitigation Measures.

4. REGULATORY REQUIREMENTS AND PROJECT DESIGN FEATURES

There are no specific regulatory compliance measures or project design features applicable to the Modified Project related to cultural resources.

5. THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the CEQA Guidelines and other relevant criteria, the Los Angeles County Department of Regional Planning has determined that a project would have a significant impact related to cultural resources based on the following criteria:

- Threshold 5.3-1:** Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?
- Threshold 5.3-2:** Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?
- Threshold 5.3-3:** Would the Project disturb any human remains, including those interred outside of formal cemeteries?

As discussed in the Initial Study prepared for the Project, provided in **Appendix 1** of this SEIR, the Modified Project would result in less than significant impacts related to historic resources and human remains. Therefore, no further discussion of Thresholds 5.3-1 and 5.3-3 is provided herein.

6. ENVIRONMENTAL IMPACTS OF THE MODIFIED PROJECT

a. Methodology

This assessment of the Modified Project's impacts on archaeological resources is based on the Cultural Resources Report prepared by JMA in 2021, provided in **Appendix 5.3** of this SEIR, which is in turn based on the Phase I Cultural Resources Surveys and

Phase II Cultural Resources Investigation and National Register Eligibility Evaluation prepared by JMA in 2019 and 2020. The Phase I Surveys included SLF and SCCIC records searches, pedestrian surveys of the Entrada South and VCC Planning Areas, and a review of historical documents and studies regarding the archaeology, history, and ethnography of the region. The surveys were planned, developed, and implemented according to the highest pedestrian survey protocols and archaeological professional standards, with participation by JMA personnel as well as members of the Fernandeano Tataviam Band of Mission Indians and the Santa Ynez Band of Chumash Indians. Additional Phase II testing was completed for three archaeological sites identified within the Entrada South survey area, and the National Register eligibility of those resources, and whether the resource presented characteristics of a unique archaeological or historic resource under CEQA, was evaluated.

b. Project Impacts

Threshold 5.3-2: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

VCC Planning Area

The Modified Project's ground disturbance activities within the VCC Planning Area are consistent with the State-certified EIR's analysis of the 2017 Project. The Modified Project would not alter the buildout of the VCC Planning Area. As previously indicated, no previously designed landmarks or historic districts under the County's HPO are located on the VCC Planning Area. Furthermore, as previously indicated, no new historical or unique archeological sites were identified during the updated pedestrian survey of the VCC survey area. Three flaked stone artifacts and one ground stone (metate) artifact were identified, recorded, collected, and subsequently determined not to be potentially significant archaeological resources. The flaked stone artifacts are consistent in nature and appearance with artifacts observed within the lithic scatters and/or found as isolated artifacts in adjoining areas. The metate, associated with plant food processing activities, serves as an example of a somewhat rarer class of artifact, but is entirely consistent with other ground stone implements found at neighboring sites. It is further noted that the isolated metate artifact was found in the broad VCC survey area, but not within the VCC Planning Area current proposed for development under the Modified Project. Additionally, the NAHC has no Native American Sacred Sites in the survey area on file in their Sacred Lands Inventory. As concluded in the Cultural Resources Report, development within the VCC survey area is not expected to have a significant adverse effect on historical or unique archeological resources.

Entrada South Planning Area

The Modified Project's ground disturbance activities within the Entrada South Planning Area are consistent with the State-certified EIR's analysis of the 2017 Project. The Modified Project would reduce the total number of residential units constructed and increase the non-residential square footage in the Entrada South Planning Area, resulting in a net reduction of 3,187 square feet of total development in comparison to the amount analyzed in the State-certified EIR. As previously discussed, no previously designed landmarks or historic districts under the County's HPO are located in the Entrada South Planning Area. Furthermore, as previously indicated, JMA completed updated surveys of the Entrada South survey area in coordination with tribal representatives from the Fernandeano Tataviam Band of Mission Indians and the Santa Ynez Band of Chumash Indians. As a result of the survey, ten isolated artifacts and three archaeological sites were identified. JMA determined that three sites (lithic scatters) warranted additional testing through a Phase II investigation. The three sites were also evaluated for eligibility in the National Register and whether the resource presented characteristics of a unique archaeological or historic resource under CEQA.

(1) Site 1 (LAN-4897)

Site 1 (LAN-4897) is a lithic scatter site. No temporally diagnostic artifacts or datable cultural material were detected during the Phase II testing program at Site 1. Based on not detecting datable material and thus the ability to demonstrate its historical context, the potential for Site 1 to yield additional information important in prehistory is lacking. Nevertheless, Site 1 was evaluated for eligibility in the National Register, and whether the resource presented characteristics of a unique archaeological or historic resource under CEQA.

(a) Criterion A—Properties which are associated with events that have made a significant contribution to the broad patterns of our history

Typically, archaeological sites or districts which qualify as Traditional Cultural Properties and/or locations associated with Traditional Cultural Values or a pattern of events are eligible under National Register Criterion A. "Traditional" in National Register context refers to "those beliefs, customs, and practices of a living community of people that have been passed down through generations, usually orally, or through practice." Accordingly, a Traditional Cultural Property is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community. Typically, the identification of Traditional Cultural Properties and/or locations associated with Traditional Cultural Values arises from consultation with Tribes and/or through conducting Oral Histories. There is no specific association with a known ethnographic village. In the absence of relevant oral history, Site 1 does not meet National Register eligibility Criterion

A and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(b) Criterion B—Properties which are associated with lives of significant persons in the past

Tataviam oral history traces individually named ancestors of contemporary tribal members to certain ethnographically identified and named villages. Most pertinently, named individuals important to the Tataviam are associated with the village of Chaguayanga (Tsawayung). Site 1, being a lithic scatter with no indication of having been a permanent village, is not likely associated with an ancestral village. Based on the above, Site 1 does not meet National Register eligibility Criterion B and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(c) Criterion C—Properties which embody the distinctive characteristics of type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

Sites that exhibit or contain important representations of the aesthetic values of a group are eligible under Criterion C. Typical archaeological examples include pictographs (rock paintings), petroglyphs (carvings on rock), and effigy mounds. Based on the above, Site 1 does not meet National Register eligibility Criterion C and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(d) Criterion D—Properties that have yielded or may be likely to yield, information important in history of prehistory

The vast majority of archaeological sites which are determined to be eligible for inclusion meet the standard based on Criterion D. In terms of Criterion D: Information Potential, a primary consideration is our ability to “reconstruct the sequence of archaeological cultures for the purposes of identifying and explaining continuities and discontinuities in the archaeological record for a particular area.” To be able to provide information that bears on such questions, patterned behavior needs to be placed in some temporal or chronologic framework and given some historical context. Without that ability the importance of a resource’s information potential is more difficult to establish. Thus, the evaluations against Criterion D provided here largely involve the potential for these sites and the information they contain to be placed in a temporal context. In this case the issue is strongly dependent on the ability to obtain datable material, either temporally diagnostic

artifacts (e.g., projectile points, time-sensitive shell beds) or radiocarbon-datable material (e.g., shell, wood or bone).

Sixteen flakes and one tested cobble/core were recovered from the test units at Site 1. This result could be considered a substantial subsurface deposit. However, as noted above, no temporally diagnostic artifacts or datable cultural material were detected during the Phase II testing program at Site 1. A single shell fragment recovered from Site 1 was determined by radiocarbon dating to be a fossil specimen and therefore not associated with the cultural assemblage at this archaeological site. Based on the failure to detect the presence of a datable material and thus the ability to demonstrate its historical context, the potential for Site 1 to yield additional information important in prehistory is lacking. Accordingly, Site 1 does not meet National Register eligibility Criterion D and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(e) Integrity

Following an evaluation of a property's significance according to the criteria discussed above, an important consideration pursuant to the National Register is how well a property retains the ability to convey its historic or archaeological significance. This is referred to as a property's integrity. As noted above, in prior decades the land area of the Entrada South survey area had been developed as an oil field with the construction of attendant access roads and graded pads for oil wells and pumps, as well as major utility corridor for SCE and Southern California Gas Company facilities along the southern boundary of the Modified Project Site.

This history of land use has resulted in different levels of disturbance respective to each site. Levels of disturbance have been noted on the Site Record Forms and sketch maps for each site, and these should be consulted regarding the integrity of each site pursuant to National Register guidelines.

Evidence suggests that archaeological Site 1 has been disturbed by historical development and disturbance within the Entrada South survey area for oil, gas, and agricultural activities, and areas in the vicinity have been disturbed by historical development or recent mechanical grading only along one of its margins; the remainder appears completely intact and undisturbed. Subsurface testing revealed no indications of disturbance to the site; however, the lack of other evidence described above does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(f) Summary of Site 1 Eligibility Criteria

Based on the above, Site 1 does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(2) Site 2 (LAN-4898)

Site 2 (LAN-4898) is a lithic scatter site. No temporally diagnostic artifacts or datable cultural material were detected during the Phase II testing program at Site 2. Based on not detecting datable material and thus the ability to demonstrate its historical context, the potential for Site 2 to yield additional information important in prehistory is lacking. Nevertheless, Site 2 was evaluated for eligibility in the National Register and whether the resource presented characteristics of a unique archaeological or historic resource under CEQA.

(a) Criterion A—Properties which are associated with events that have made a significant contribution to the broad patterns of our history

Similar to the considerations regarding Traditional Cultural Properties and/or locations associated with Traditional Cultural Values discussed above, in the absence of relevant oral history, Site 2 does not meet National Register eligibility Criterion A and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(b) Criterion B—Properties which are associated with lives of significant persons in the past

Site 2, being a lithic scatter with no indication of having been a permanent village, is not likely associated with an ancestral village. Based on the above, Site 2 does not meet National Register eligibility Criterion B and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(c) Criterion C—Properties which embody the distinctive characteristics of type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

Similar to Site 1, Site 2 does not include pictographs (rock paintings), petroglyphs (carvings on rock), effigy mounds, or any other important representations of the aesthetic values of a group. Based on the above, Site 2 does not meet National Register eligibility Criterion C and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(d) Criterion D—Properties that have yielded or may be likely to yield, information important in history of prehistory

Five flakes were recovered from the test units at Site 2. This result would not be considered a substantial subsurface deposit. In addition, as noted above, no temporally diagnostic artifacts or datable cultural material were detected during the Phase II testing program at Site 2. Based on the failure to detect the presence of a substantial subsurface deposit or datable material, the potential for Site 2 to yield additional information important in prehistory is lacking. In the absence of further evidence, Site 2 does not meet National Register eligibility Criterion D and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(e) Integrity

Due to its out-of-the-way location along a ridge with steeply sloped sides and no direct evidence of modern activity within the site boundaries, it seems as though this site may not have undergone any significant modern disturbance. It appears to be essentially intact although artifacts have likely migrated slightly downslope over time. Subsurface testing revealed no evidence of disturbance to the site; however, the lack of other evidence described above does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(f) Summary of Site 2 Eligibility Criteria

Based on the above, Site 2 does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(3) Site 3 (LAN-4899)

Site 3 (LAN-4899) is a lithic scatter site. Based on not detecting datable material and thus the ability to demonstrate its historical context, the potential for Site 3 to yield additional information important in prehistory is lacking. Nevertheless, Site 3 was evaluated for eligibility in the National Register, and whether the resource presented characteristics of a unique archaeological or historic resource under CEQA.

(a) Criterion A—Properties which are associated with events that have made a significant contribution to the broad patterns of our history

Similar to the considerations regarding Traditional Cultural Properties and/or locations associated with Traditional Cultural Values discussed above, in the absence of relevant oral history, Site 3 does not meet National Register eligibility Criterion A and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(b) Criterion B—Properties which are associated with lives of significant persons in the past

Site 3, being a lithic scatter with no indication of having been a permanent village, is not likely associated with an ancestral village. Based on the above, Site 3 does not meet National Register eligibility Criterion B and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(c) Criterion C—Properties which embody the distinctive characteristics of type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

Similar to Sites 1 and 2, Site 3 does not include pictographs (rock paintings), petroglyphs (carvings on rock), effigy mounds, or any other important representations of the aesthetic values of a group. Based on the above, Site 3 does not meet National Register eligibility Criterion C and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(d) Criterion D—Properties that have yielded or may be likely to yield, information important in history of prehistory

Sixteen flakes and four tested cobbles and/or cores were recovered from the test units at Site 3. This result could be considered a substantial subsurface deposit. However, no temporally diagnostic artifacts or datable cultural material were detected during the Phase II testing program at Site 3. The shell fragments recovered from Site 3 were determined by radiocarbon dating to be a fossil specimen and therefore not associated with the cultural assemblage at this archaeological site. Based on the failure to detect the presence of a datable material and thus the ability to demonstrate its historical context, the potential for Site 3 to yield additional information important in prehistory is lacking. In the absence of further evidence, Site 3 does not meet National Register eligibility Criterion D and does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(e) Integrity

Site 3 sprawls over ridges and gently sloped terrain. Evidence suggests that there has been some disturbance in one particular area of the site, as the Entrada South survey area has historically been developed and disturbed by oil, gas, and agricultural activities, and areas in the vicinity of the survey area have been developed. Evidence of a small amount of modern debris was found in two adjacent excavation units. This area may have been previously graded and/or used in relation to the oilfield activities of previous decades.

The other areas of the site appear to have not undergone significant levels of modern disturbance; therefore, the majority of the site appears to retain substantial integrity; however, the lack of other evidence described above does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(f) Summary of Site 3 Eligibility Criteria

Based on the above, Site 3 does not present the characteristics for eligibility as a historic resource or unique archeological resource under CEQA.

(4) District Eligibility

Although none of the three sites were determined to be individually eligible for the National Register, JMA also evaluated the potential of the sites to be eligible as an archeological district. According to the National Register, “[a] district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.” All three sites are linked in terms of general function (i.e., lithic procurement and/or lithic reduction), and therefore each archaeological site could be considered a contributing element to a designated district. The issue of if or how closely the sites were temporally united is determined by radiocarbon dating. Lacking datable cultural material in each site and relying on the lithic assemblages themselves, it is difficult to establish continuity of association. The Entrada South survey area’s integrity is limited by historical development and disturbance of the survey area from oil and gas extraction activities and agricultural uses, as well as historical and recent development activities in the vicinity of the survey area. Therefore, the three sites do not meet the threshold for National Register eligibility applicable to an archaeological district and do not support the sites being a unique archaeological or historic resource under CEQA.

(5) Summary

Entrada South Planning Area

As previously discussed, no previously designed landmarks or historic districts under the County’s HPO are located in the Entrada South Planning Area.

JMA completed updated surveys of the Entrada South Planning Area in coordination with the tribal representatives from the Fernandeano Tataviam Band of Mission Indians and the Santa Ynez Band of Chumash Indians. Based on the survey results and the JMA analysis summarized above, the Modified Project within the Entrada South survey area is not expected to result in any new significant impact to a historical or unique archeological resource under CEQA. As was the case for the State-certified EIR, the potential exists for

unearthing unidentified historical or archaeological resources during excavation and grading activities, which has the potential to encounter unidentified resources, and therefore impacts are considered significant without mitigation. Implementation of mitigation measures outlined in Subsection 8, Mitigation Measures, below (RMDP/SCP-CR-3 through RMDP/SCP-CR-5) in coordination with tribal archaeologists and tribal monitoring representatives would ensure that construction activities associated with the Entrada South survey area would be monitored and mitigated. Specifically, RMDP/SCP-CR-3 requires monitoring by a qualified archeologist and Native American monitor of all earth disturbances within 300 feet of any known archaeological and addresses unanticipated archeological discoveries; RMDP/SCP-CR-4 requires temporary fencing to create 50-foot buffer around any known archeological site during construction within the 300-foot buffer; and RMDP/SCP-CR-5 and RMDP/SCP-CR-6 establish standards for stopping or redirecting construction work and applying appropriate mitigation if cultural resources or human remains are discovered during construction. With the implementation of mitigation measures RMDP/SCP-CR-3 through RMDP/SCP-CR-5, the Modified Project would not result in any new significant adverse impacts to historical or unique archeological resources under CEQA within the Entrada South survey area. Accordingly, consistent with the analysis presented in the State-certified EIR, impacts from the Modified Project would be less than significant with the implementation of mitigation measures identified in the State-certified EIR (RMDP/SCP-CR-3 through RMDP/SCP-CR-5).

VCC Planning Area

As previously discussed, no previously designed landmarks or historic districts under the County's HPO are located in the VCC Planning Area.

JMA completed updated surveys of the VCC Planning Area in coordination with the tribal representatives from the Fernandeano Tataviam Band of Mission Indians and the Santa Ynez Band of Chumash Indians and did not identify prehistoric or historic archaeological sites. Based on the survey results and the JMA analysis, the Modified Project within the VCC survey area is not expected to result in any new significant impact to historical resources or unique archaeological resources under CEQA. As was the case for the State-certified EIR, the potential exists for unearthing unidentified historical resources or unique archaeological resources during excavation and grading activities, which has the potential to encounter unidentified resources, and therefore impacts are considered significant without mitigation. Implementation of mitigation measures outlined below (RMDP/SCP-CR-3 through RMDP/SCP-CR-5) in coordination with tribal archaeologists and tribal monitoring representatives would ensure that construction activities associated with the VCC survey area would be appropriately monitored and mitigated. Specifically, RMDP/SCP-CR-3 requires monitoring by a qualified archeologist and Native American monitor of all earth disturbances within 300 feet of any known archaeological and addresses unanticipated archeological discoveries; RMDP/SCP-CR-4

requires temporary fencing to create 50-foot buffer around any known archeological site during construction within the 300-foot buffer; and RMDP/SCP-CR-5 and RMDP/SCP-CR-6 establish standards for stopping or redirecting construction work and applying appropriate mitigation if cultural resources or human remains are discovered during construction. Accordingly, with the implementation of mitigation measures RMDP/SCP-CR-3 through RMDP/SCP-CR-5, the project would not result in any new significant adverse impacts to historical or unique archeological resources under CEQA within the VCC survey area. Accordingly, consistent with the analysis presented in the State-certified EIR, with the implementation of mitigation measures identified in the State-certified EIR, impacts from the Modified Project would be less than significant.

Conclusion

The Modified Project would not increase the ground disturbance footprint within the Entrada South or VCC Planning Areas, as compared to the 2017 Project. As such, the Modified Project's refinements would not result in any adverse changes or consequences to historical resources or unique archaeological resources compared to the 2017 Project. Further, mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project (refer to Subsection 8, Mitigation Measures, below). Nevertheless, new surveys were completed by JMA, in consultation with tribal monitors. JMA concluded that the Modified Project would not result in new significant impacts to historical resources or unique archaeological resources. With implementation of mitigation measures, the Modified Project would not result in any new or substantially more severe significant impacts related to historical resources or unique archaeological resources as compared to the State-certified EIR for the 2017 Project.

7. CUMULATIVE IMPACTS

The geographic context for the cumulative impact analysis of cultural resources is the general Project vicinity. This is because cultural resource impacts, if any, occur in the particular geographic areas where such resources are located. As such, impacts are typically localized. The related projects considered in this analysis are identified in **Table 4.2-1**, Related Projects, and **Figure 4.2-1**, Related Projects Map, in **Section 4.2**, Cumulative Impacts Methodology, of this SEIR.

As was the case for the State-certified EIR, the potential exists for the Modified Project to encounter previously unidentified resources during excavation and grading activities. Therefore, the Modified Project's impacts would be cumulatively considerable without mitigation. However, with the adoption of mitigation measures (refer to Subsection 8, Mitigation Measures, below), the Modified Project's contribution would be reduced to less than cumulatively considerable. The Modified Project would not increase cumulative impacts to historical resources or unique archaeological resources as compared to the

2017 Project because the Modified Project's ground disturbance activities would be consistent with the analysis in the State-certified EIR and the analysis presented above demonstrates that the Modified Project would not result in any new or substantially more severe significant impacts compared to the State-certified EIR for the 2017 Project.

Therefore, the Modified Project would not result in any new or substantially more severe significant impacts related to historical resources or unique archaeological resources.

8. MITIGATION MEASURES

A complete list of mitigation measures to be implemented under the Modified Project is provided in the Mitigation Monitoring and Reporting Program in **Appendix 2** of this SEIR. Previously adopted mitigation measures that require no further action as part of the Modified Project (generally because the measure has already been completed or would be achieved or exceeded through compliance with current regulatory requirements) or that are not applicable to the Modified Project are listed in **Appendix 3** of this SEIR.

a. Previously Approved Mitigation from the State-certified EIR

The following mitigation measures from the State-certified EIR are applicable to the Modified Project to address impacts related to cultural resources. As indicated above, any previously adopted mitigation measures that require no further action as part of the Modified Project (generally because the measure has already been completed or would be achieved or exceeded through compliance with current regulatory requirements) or that are not applicable to the Modified Project are listed in **Appendix 3** of this SEIR.

RMDP/SCP-CR-3: Pursuant to the requirements of the Tataviam Agreement, a qualified archaeologist and a Native American monitor shall monitor all earth disturbances, including scarification and placement of fill, within 300 feet of any known archaeological site. If archaeological discoveries are made, earth disturbing activities will be diverted to other locales while the archaeological resources are exposed, mapped, evaluated, and recovered, as appropriate.

RMDP/SCP-CR-4: During any earth disturbance within 300 feet of any known archaeological site, the area of the site and a 50-foot buffer shall be temporarily fenced with chain link flagged with color to ensure construction avoidance.

RMDP/SCP-CR-5: In the event that cultural resources are encountered during grading anywhere in the Project area, work shall be stopped immediately or redirected until a qualified archaeologist and

Native American representative pursuant to the requirements of the Tataviam Agreement are retained by the applicant to evaluate the eligibility of the resources pursuant to CRHR and NRHP criteria. If the remains are found to be significant, they shall be subject to a Phase III data recovery mitigation program consistent with federal, state, and county guidelines and funded by the applicant to the extent allowed by law (see, Pub. Resources Code § 21083.2).

RMDP/SCP-CR-6:

If, during any phase of Project construction, there is the discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps, which are based on Public Resources Code section 5097.98 and State CEQA Guidelines section 15064.5(e), shall be taken:

1. There will be no further excavation or disturbance of the site or any nearby area reasonably susceptible to overlying adjacent human remains until:
 - a. The Los Angeles County Coroner is contacted to determine that no investigation of the cause of death is required; and
 - b. If the Coroner determines the remains to be Native American:
 - (i) The Coroner shall contact the Native American Heritage Commission within 24 hours;
 - (ii) The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendant from the deceased Native American; and
 - (iii) The most likely descendent may make recommendations to the Project applicant for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98, or,
2. Where the following conditions occur, the Project applicant, or its designee, shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance:
 - a. The Native American Heritage Commission is unable to identify a most likely descendant or the most likely descendant failed to make a recommendation within 24 hours after being notified by the Commission;

- b. The descendant identified fails to make a recommendation; or

The Project applicant, or its designee, rejects the recommendation of the descendant, and mediation by the Native American Heritage Commission fails to provide measures acceptable to the Project applicant.

b. Previously Approved Mitigation from the VCC EIR

Mitigation Measures VCC-CR-1 and VCC-CR-2 were previously adopted by the County for the VCC Planning Area as part of the County-certified VCC EIR. However, these measures are no longer applicable to the Modified Project and are no longer necessary to mitigate impacts to less than significant levels. VCC-CR-1 has been complied with as it is superseded and fully implemented by RMDP/SCP-CR-5. VCC-CR-2 has been completed as field surveys have been conducted and can be found in **Appendix 5.3** of this SEIR; the measure has therefore been fully implemented. See **Appendix 5.3** of this SEIR for additional information.

c. Proposed Mitigation for the Modified Project

No additional mitigation measures are required for the Modified Project.

9. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the mitigation measures listed above would reduce impacts associated with cultural resources to a less than significant level. This determination is consistent with that set forth in the State-certified EIR. Therefore, no new or substantially more severe significant impacts relating to cultural resources have been identified, as compared to those identified for the 2017 Project in the State-certified EIR.