

Appendix B
Cultural Resources Memo

March 16, 2023

Ms. Starla Barker
De Novo Planning Group
180 East Main Street #108
Tustin, California 92780

Transmitted via email to sbarker@denovoplanning.com

RE: Cultural Resources Technical Memorandum for the 2354 San Clemente Street Project, Laguna Beach, Orange County, California

Dear Ms. Barker,

PaleoWest, LLC. (PaleoWest) was retained by De Novo Planning Group (De Novo) to conduct a cultural resource record search and archival research for the 2354 San Clemente Street Project (Project) in the city of Laguna Beach, Orange County, California (Appendix A, Figures 1 and 2). The Project site (Assessor's Parcel Numbers [APN]: 656-122-04 and 656-122-05) occupies approximately 0.21 acre, with an existing residence on the Project site proposed to be demolished and replaced. The Project site is located at the terminus of San Clemente Street, adjacent to the terminus of the nearby Lomita Way directly east of the parcel.

PaleoWest understands that the Project is subject to the California Environmental Quality Act (CEQA) and the City of Laguna Beach (City) is CEQA lead agency. This technical memorandum summarizes the findings of the desktop cultural resource analysis. It was prepared to assist in the CEQA-level analysis required for the Project.

PROJECT DESCRIPTION AND LOCATION

The proposed Project involves the construction of a two-story, single-family home with a two-car garage, elevated deck, spa, and pool. Other proposed Project elements include new retaining walls, hardscape, and landscape, as well as a 44-foot-wide cul-de-sac out-of-grade improvement for a fire truck turnaround per City's requirements. The Project design is consistent with surrounding single-family homes.

The Project site is situated in a semi-rural area characterized by mixed-use development. The ground surface exhibits steep slopes that range between 30 and 50 degrees (United States Department of Agriculture Natural Resources Conservation Service 2023). The property is currently occupied by an approximately 500 square foot (sq ft) single-family residence that includes an attached one-car garage, as well as a 500 sq ft detached guest house. The house and accessory buildings are historic in age and were constructed between 1946 and 1953. All of the standing buildings on the site will be demolished prior to the construction of the new residence. Per the City's guidance, the current cultural resources study did not document or evaluate the historic-era buildings for listing on the California Register of Historical Resources (CRHR).



CALIFORNIA ENVIRONMENTAL QUALITY ACT

The proposed Project is subject to compliance with CEQA, as amended. Compliance with CEQA statutes and guidelines requires both public and private projects with financing or approval from a public agency to assess their project's impact on cultural resources (Public Resources Code Sections 21082, 21083.2 and 21084 and California Code of Regulations [CCR] 10564.5). The first step in the process is to identify cultural resources that may be impacted by the project and then determine whether the resources are "historically significant" resources.

CEQA defines historically significant resources as "resources listed or eligible for listing in the California Register of Historical Resources (CRHR)" (Public Resources Code Section 5024.1). A cultural resource may be considered historically significant if the resource is 45 years old or older, possesses integrity of location, design, setting, materials, workmanship, feeling, and association.¹ In addition, it must meet at least one of the following criteria for listing in the CRHR:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. 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,
4. Has yielded, or may be likely to yield, information important in prehistory or history (Public Resources Code Section 5024.1).

Cultural resources are buildings, sites, humanly modified landscapes, traditional cultural properties, structures, or objects that may have historical, architectural, cultural, or scientific importance. CEQA states that if a project will have a significant impact on important cultural resources, deemed "historically significant," then project alternatives and mitigation measures must be considered.

HISTORIC RESOURCES ELEMENT OF THE CITY OF LAGUNA BEACH GENERAL PLAN

The City's General Plan (City of Laguna Beach 2020a) includes three goals and associated policies associated with historic preservation. These include:

¹ The Office of Historic Preservation (OHP) guidelines recognize a 45-year-old criteria threshold for documenting and evaluating cultural resources (assumes a 5-year lag between resource identification and the date that planning decisions are made) (OHP 1995:2). The age threshold is an operational guideline and not specific to CEQA statutory or regulatory codes.



Goal #1 Preserve and enhance buildings and structures of historical significance in Laguna Beach. Assure that neighborhoods which have a preponderance of older homes and which greatly contribute to the village atmosphere be maintained as cohesive neighborhood units through consistency of size, scale, and character.”

Policies:

- 1.1 Implement an outreach program to promote the listing of historic structures on the Historic Register and improve the City’s recognition program for owners of listed historic structures to acknowledge exemplary maintenance and preservation efforts.
- 1.2 Protect historic buildings through the implementation and expansion of incentive programs specifically designed to encourage rehabilitation and preservation. Incentive programs could include flexible development standards, fee waivers, and property tax reductions.
- 1.3 Expand the Mill’s Act Contract program to include all Historic Register structures.
- 1.4 Provide a process for the City to initiate the rescission of registered structures that have been illegally modified so that they no longer meet the criteria for a historic resource.
- 1.5 Continue the current City policy to discourage the demolition of historic resources by providing incentives for relocation.
- 1.6 Ensure the preservation of historic homes by requiring the owners to record a document acknowledging their obligation and responsibilities.

Goal #2 Continue and expand programs practices that encourage an appreciation of history and historic preservation in Laguna Beach.

Policies:

- 2.1 Require Heritage Committee review when design review is required for modifications to a historic resource.
- 2.2 Support the requirement that the Design Review Board emphasize compatibility, including historic character and context within deliberations of new or remodeled structures.
- 2.3 Provide specific guidelines for the rehabilitation of historic structures, including “how-to” and pictures of illustrations of successful projects.
- 2.4 Foster community pride through identification and aesthetic improvement of historic sites and areas, such as plaque programs and historically relevant brochures.
- 2.5 Require the City to identify and list all eligible City-owned structures on the Historic Register.



- 2.6 Prepare a manual showing techniques of preservation to help property owners understand what to expect during remodeling/restoration process and to provide information on how preservation can be accomplished within local ordinances.
- 2.7 Disseminate information on the provisions of the Historic Preservation Ordinance.
- 2.8 Promote the use of the State Historical Building Code.

Goal #3 Promote community awareness of local history and historic architecture and enhance recognition of the City's historic role as an important art colony and seaside resort.

Policies:

- 3.1 Increase awareness and appreciation for Laguna Beach's cultural and historic heritage through activities and events, such as designating May, as the City's Heritage Month.
- 3.2 Appoint a City staff person to monitor remodeling activity of historic homes to ensure compliance with approvals.
- 3.3 Appoint a City staff person as a "Historic Preservation Administrator," to act in an advisory role to the Heritage Committee and Design Review Board.
- 3.4 Identify specific City owned vacant properties where historic buildings could be relocated when threatened with demolition.
- 3.5 Encourage property owners to seek listing for appropriate properties on the National Register of Historic Places and the California State Register of Historical Resources.
- 3.6 Work with local Historic Preservation groups to develop a program that informs new buyers of historic homes of the benefits and responsibilities of owning a historic resource.

LAGUNA BEACH MUNICIPAL CODE (LBMC) ORDINANCE NUMBER 1670

In addition to the goals and policies of the General Plan, the City has also enacted Ordinance No. 1670 of the Laguna Beach Municipal Code (LBMC) as part of their historic preservation program (City of Laguna Beach 2022). The ordinance was amended in 2022 to further protect cultural resources. The intent and purpose of the ordinance is described below:

25.45.002 Intent and Purpose. The purpose of this chapter is to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation, and use of improvements, buildings and their settings, structures, objects, monuments, sites, places, and areas within the City that reflect special elements of the City's architectural, artistic, cultural, engineering, aesthetic, historical, political, social, and other heritage to achieve the following objectives:

- (A) Safeguard the heritage of the City by encouraging the voluntary protection of historic resources representing significant elements of its history;



- (B) Enhance the visual character of the City by encouraging and providing for the voluntary preservation of those buildings that reflect unique and established architectural traditions that contribute to the older neighborhoods of the City;
- (C) Foster public appreciation of and civic pride in the beauty of the City and the accomplishments of its past;
- (D) Strengthen the economy and improve property values of the City by protecting and enhancing the City's attraction to residents and visitors;
- (E) Promote the private and public use of historic resources for the education, prosperity, and general welfare of the people;
- (F) Stabilize and improve property values within the City; and
- (G) Achieve historic preservation through the encouragement and promotion of voluntary additions to the City's Historic Register.
- (H) Recognize that the previous historic resource inventory (adopted by Ordinance No. 82.111) is ineffective for the purposes of creating a presumption of historicity of any property identified thereon.

The following changes are key components of Ordinance No. 1670:

- (1) Inclusion of the definition of the term "Historic resource" as consistent with California State law, and ensuring that the definition is not expanded beyond what is mandated by law;
- (2) Addition of "owner consent" as criteria for eligibility for local register purposes;
- (3) Elimination of references to the outdated 1981 Historic Resources Inventory;
- (4) Expanded historic preservation incentives, such as the Mills Act being expanded to all Historic Register properties, density bonuses being included in additional zones, and relaxed open space or rear setback standards being offered to historic properties

CULTURAL RESOURCES RECORD SEARCH

PaleoWest conducted an in-person search of cultural resource records housed at the California Historic Resources Information Center (CHRIS), South Central Coastal Information Center (SCCIC) at California State University, Fullerton on March 1, 2023. The purpose of the record search was to identify all previous cultural resource work and previously recorded cultural resources within a half-mile (mi) radius of the Project area. A summary of the findings is provided below and in Appendix A. A Native American Heritage Commission Sacred Land File search and Native American outreach is being conducted as part of a separate effort by the De Novo Planning Group (Starla Barker, personal communication, March 16, 2023).



Previous Studies

The SCCIC records search identified five previous studies within a half-mi radius of the Project area. One of the previous surveys (OR-04179) included portions of the Project site. The study consisted of a historic resource inventory of buildings within the city of Laguna Beach (City of Laguna Beach 2008). A list of previous studies and their relation to the Project area is included as Table 1.

Table 1. Previous Cultural Resource Studies within a Half-mi Radius of the APE

Report Number	Author	Year	Title	Proximity to Project Area
OR-00567	Crabtree, Robert H.	1976	Scientific Resources Survey (Archaeology and Paleontology) of Arch Beach Heights - Portafina Project, Laguna Beach, California.	0.1 mi north
OR-01147	Whitney-Desautels, Nancy A. and Sundberg, Fred	1991	Archaeological Survey of the Diamond/Crestview Study Area Laguna Beach Orange County, California	0.1 mi north
OR-01926	Ezell, Paul H. and Carrico, Richard L.	1977	Archaeological Survey Report of Aliso Water Management Agency Project Committees 7, 11-A and 15	0.2 mi southwest
OR-02815	Shepard, Richard S.	2002	Historic Property Survey Report for the Laguna Beach Urban Runoff Diversion Project Laguna Beach, Orange County California	0.45 mi west
OR-04179*	City of Laguna Beach	2008	Laguna Beach Historic Resources Inventory	Within Project area

*Within or intersecting the Project area

Previously Recorded Cultural Resources

Six cultural resources are recorded within a half-mi of the Project area. These include two prehistoric shell midden sites, two historic-era buildings eligible for listing in the NRHP, a section of the South Coast Highway, and one historic-era sewer utility building (Table 2). None of these resources are within or adjacent to the Project area.

ARCHIVAL RESEARCH

The desktop cultural resource analysis conducted by PaleoWest also included archival research of available online sources and regional overviews. Resources examined as part of this effort include the National Register of Historic Places (NRHP), the California Historical Landmarks (CHL) list, and the Laguna Beach Historic Register. Available historical U.S. Geological Survey (USGS) 7.5-, 15-, and 30-minute quadrangle maps and aerial photographs were also reviewed.

National Register of Historic Places (NRHP)

On March 6, 2023, PaleoWest conducted a review of the U.S. Department of the Interior, National Park Service (NPS) online National Register of Historic Places (NRHP) Interactive Map (NPS 2014). One NRHP-listed resource was identified within 1 mi of the Project site. The resource consists of the Villa Rockledge which is located approximately 0.2-mi southwest of

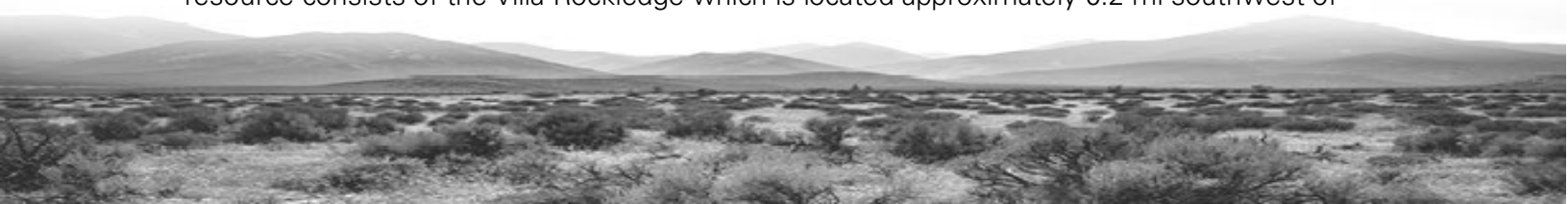


Table 2. Previously Recorded Cultural Resources within a Half-mi Radius of the Project Area

Primary Number	Trinomial	Description	NRHP/CRHR Eligibility Status	Year Recorded (Recorder)	Relationship to Project Area
P-30-000576	CA-ORA-576	Prehistoric site consisting of shallow shell midden exposed along Bluebird Canyon and in gardens of adjacent residences. Likely destroyed by the construction of Bluebird Canyon Pumping Station.	Insufficient information	2017 (I. Strudwick)	Approximately 0.45-mi northwest
P-30-001683	–	Prehistoric site consisting of abundant shell in a cultural midden. Possible Fire-altered rock and one flake. Likely destroyed during construction of Mozambique restaurant parking lot.	Insufficient information	2017 (I. Strudwick)	Approximately 0.46-mi northwest
P-30-0157935	-	Historic period Ibesen home. Located at 2475 South Coast Highway and consists of a Hawaiian Colonial style two-story board and batten beach house.	3S; Eligible to be listed in the NRHP	1980 (Les)	Approximately 0.30-mi south/southwest
P-30-0157936	-	Historic period Villa Rockledge, also known as the Frank Miller Home. Located at 2529 South Coast Highway. Property consists of a Spanish Mediterranean style estate with a complex of tile gabled buildings.	3S; Eligible to be listed in the NRHP	1981 (Les)	Approximately 0.30-mi south/southwest
P-30-015939	-	Historic period South Coast Highway is a primary roadway through the City of Laguna Beach. The roadway was originally devoted largely to beach cottages and was an important commercial roadway starting in the mid-1920s. Buildings along this road were built as early as 1888.	Insufficient information	1981 (Les)	0.16-mi southwest
P-30-0177630	-	Historic period Sewer Station No. 5 for the City of Laguna Beach. Located at the end of Pearl Street, adjacent to and above Pearl Street beach access stairs. Consists of a small utility building housing a sewer station; flat-roofed with slight overhang.	6S; Ineligible to be listed in the NRHP	2016 (Demcak)	Approximately 0.35-mi west

Source: SCCIC, March 2023.

the Project site. Three additional NRHP-listed properties in the vicinity of the Project site include: St. Francis-by-the-Sea American Catholic Church approximately 2 mi to the north/northwest; the Griffith, Edward, and America House, approximately 3 mi to the south/southeast; and the Crystal Cove Historic District approximately 4 mi to the northwest.

California Historical Landmarks

There are 26 CHLs recorded within Orange County, California (California Office of Historic Preservation 2023). One of these resources (CHL Number 1050, Crystal Cove Historic District) is within the City of Laguna Beach. The resource is located 5.4 mi from the Project site.



Laguna Beach Historic Register

There are 74 properties listed in the Laguna Beach Historic Register (City of Laguna Beach 2020b). The closest property to the Project area is a single-family residence at 454 Alta Vista Way. This property is located approximately 0.1 mile south of the Project area.

Review of Historical Maps and Aerial Photographs

PaleoWest reviewed historic period topographical maps to confirm the Project Area's land use history. The 1902 USGS topographic map for *Corona, California* (1:125,000) shows the Project site as undeveloped at the turn of the century. Aerial images from 1938 and 1946, as well as a 1942 USGS topographic map for *Santa Ana, California* (1:62,500), also depict no development in the immediate vicinity of the Project site though a road is shown running from the South Pacific Coast Highway north towards the Project area. A single-family residence, garage, and detached guest house are shown on a 1949 USGS topographic map of *Laguna Beach California* (1:24,000). Historic aerials confirm that the residence, garage, and detached guest house appeared by 1953, so sometime between 1942 and 1949, this property was constructed. The most recent 2012 USGS topographic map for *Laguna Beach, California* (1:24,000) shows that the entire area surrounding the Project site is moderately developed. On this map, San Clemente Street is shown leading to its terminus at the Project site.

DISCUSSIONS AND RECOMMENDATIONS

The findings of the desktop analysis indicate that the Project area exhibits a low potential for containing archaeological resources. Results of the records search and archival research identified no previously documented cultural resources within or adjacent to the Project area. Additionally, the steep slopes that characterize the property suggest it is unlikely that archaeological remains would be encountered during ground-disturbing activities.

According to historical maps and aerial photographs, the single-family residence, garage, and guesthouse were built on the Project site between 1946 and 1949. As such, the property meets the OHP's (1995) age guidelines to be documented as a cultural resource and evaluated for listing on the CRHR. Per the City's guidance, the historic buildings on the property do not require documentation or evaluation for the proposed Project. As such, no further cultural resources management is recommended for the Project.

Please do not hesitate to contact PaleoWest if you have any questions regarding these findings or recommendations.

Sincerely,

PALEOWEST



Paige Kohler, M.A.
Project Manager



Kevin Hunt
Office Principal



Attachments

Attachment A: References

Attachment B: Figures

Attachment C: SCCIC Records Search Results



Attachment A: References



REFERENCES

City of Laguna Beach

- 2008 Laguna Beach Historic Resources Inventory. OR-04179. On file at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.
- 2020a City of Laguna Beach Historic Resources Element. Electronic document. Accessed on March 14, 2023 at:
<https://www.lagunabeachcity.net/home/showpublisheddocument/8150/638001342413000000>.
- 2020b Laguna Beach Historic Register. Electronic document. Accessed on March 15, 2023 at:
<https://www.lagunabeachcity.net/home/showpublisheddocument/9102/637527417362100000>.
- 2022 Ordinance No. 1670: An Ordinance of the City of Laguna Beach, California Amending Chapters 25.45, 25.05, 25.17, 25.18, 25.22, 25.38, 25.54, and 7.70 of the Laguna Beach Municipal Code Relating to Historic Preservation. Electronic document. Accessed on March 16, 2023 at:
<https://lagunabeachgis.net/PublicAccess/api/Document/ASR41uo1a4e9uk2ÁQQBÁtG7sk0pnnTwTVws57kVF3WRRGMÁCRKNUtZ36jhaIZbZTaRNhZ0EOmBA3MIIKQNZJoOg%3D/>.

Office of Historic Preservation (OHP)

- 1995 Instructions for Recording Historical Resources. Electronic document. Accessed on March 14, 2023 at: <https://ohp.parks.ca.gov/pages/1054/files/manual95.pdf>.

United States Department of Agriculture Natural Resources Conservation Service

- 2023 Web Soil Survey. Website accessed on March 15, 2023 at:
<https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.



Attachment B: Figures



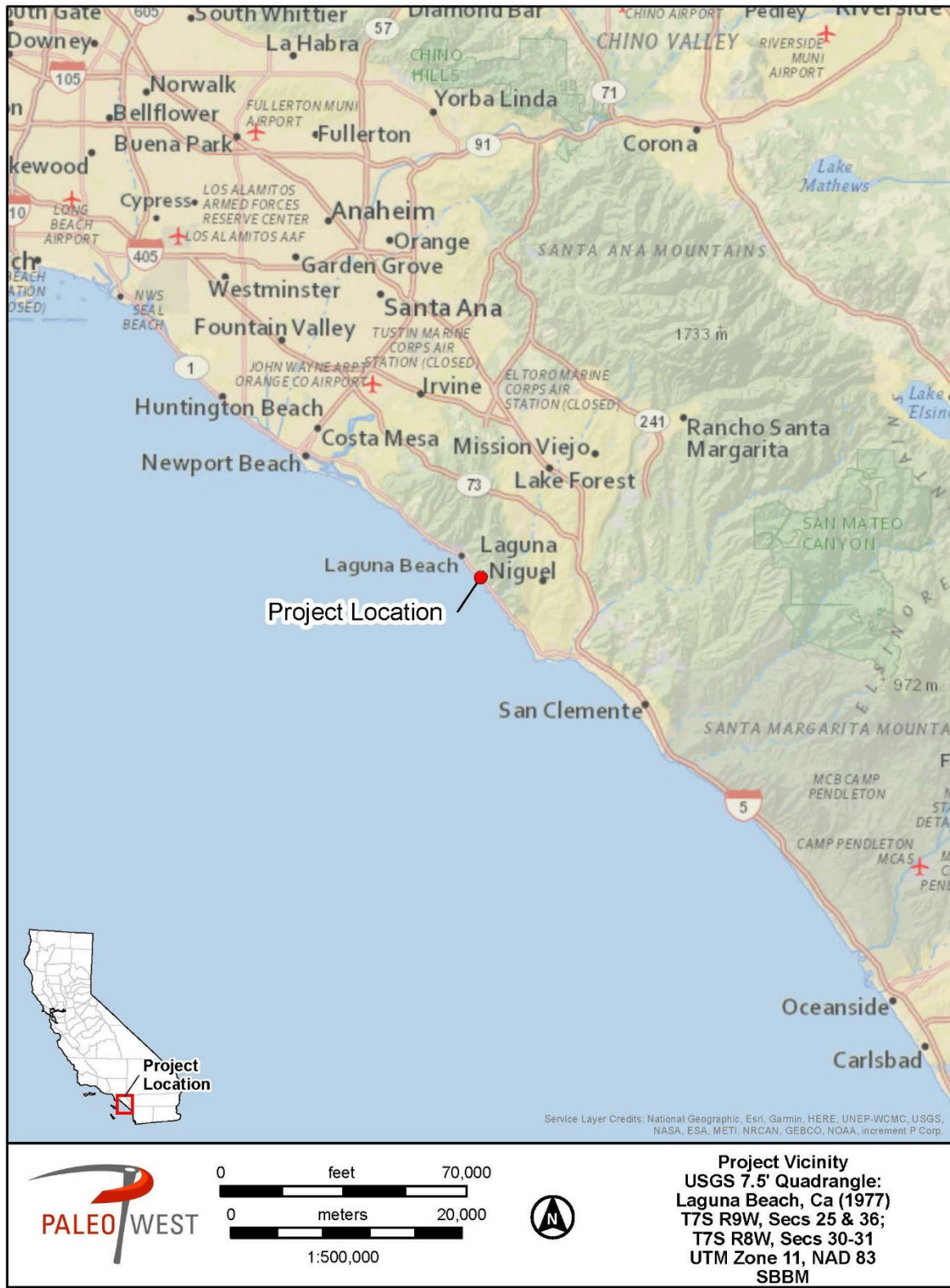


Figure 1. Project vicinity map





Figure 2. Project location map



Attachment C: SCCIC Records Search Results



SCCIC Resource Table

PrimaryString	TrinomialString	ResourceName	ResType	Age	Attribs	ResourceDisclosure	RecordingEvents	Reports	Address
P-30-000576	CA-ORA-000576	Site 1	Site	Prehistoric	AP02; AP15	Not for publication	1975 (LEONARD); 2017 (Ivan Strudwick, LSA)	OR-01926, OR-01995, OR-03937	1590-1900 S Coast Hwy Laguna Beach 92651
P-30-001683	CA-ORA-001683	AWMA-1	Site	Prehistoric	AP02; AP15	Not for publication	1976 (R. C. Carrico, Westec); 2017 (Ivan Strudwick, LSA)	OR-01926, OR-03937	Agate and Pacific Coast Hwy Laguna Beach; 1710-1740 S Coast Hwy Laguna Beach 92651
P-30-157935		Ibesen Home	Building, Element of district	Historic	HP02	Unrestricted	1981 (Kathleen Les, Environmental Coalition)		2475 S Coast Hwy Laguna Beach
P-30-157936		Frank Miller Home, Villa Rockledge	Building, Element of district	Historic	HP03; HP29	Unrestricted	1981 (Kathleen Les, Environmental Coalition); 1983 (Kathleen Les, Heritage Orange County)		2528 S Coast Hwy Laguna Beach
P-30-177630		Pearl1; Sewer Station No. 5, City of Laguna Beach	Building	Historic	HP09	Unrestricted	2016 (Carol Demcak, ARMC)	OR-04625	Pearl St Laguna Beach 92651

SCCIC Report Table

ReportNum	Authors	CityYear	CityTitle	CityPublisher	ReportType	Resources
OR-00967	Crabtree, Robert H.	1976	Scientific Resources Survey (Archaeology and Paleontology) of Arsh Beach Heights - Portafina Project, Laguna Beach, California	Archaeological Research, Inc.	Archaeological, Field study	
OR-01147	Whitney-Desautels, Nancy A. and Sundberg, Fred	1961	Archaeological Survey of the Diamond/Cresview Study Area Laguna Beach Orange County, California	Scientific Resource Surveys, Inc.	Archaeological, Field study	
OR-01926	Ezell, Paul H. and Carrico, Richard L.	1977	Archaeological Survey Report of Aliso Water Management Agency Project Committees 7, 11-A and 15	Westec Services, Inc.	Archaeological, Field study	30-00009, 30-00074, 30-000109, 30-000280, 30-000281, 30-000283, 30-000286, 30-000304, 30-000335, 30-000576, 30-000577, 30-000578, 30-000583, 30-000596, 30-001683
OR-02815	Shepard, Richard S.	2002	Historic Property Survey Report for the Laguna Beach Urban Runoff Diversion Project Laguna Beach, Orange County California	Chambers Group, Inc.	Archaeological, Field study	19-000755
OR-04179	unknown	2008	Laguna Beach Historic Resources Inventory	City of Laguna Beach	Architectural/Historical	30-157939