

4.4 CULTURAL RESOURCES

4.4.1 PROJECT AREA SETTING

The Orcutt area setting discussion below is taken from the Orcutt Community Plan (OCP) EIR, Volume I, Sections 5.7 (*Archaeological Resources*) and 5.8 (*Historic Resources*), incorporated herein by reference. The OCP EIR (95-EIR-01, State Clearinghouse No. 95031055) is available for review online or at Santa Barbara County's North and South County Planning & Development offices:

- <https://cosantabarbara.app.box.com/s/r2fr8dq9fgxa7shv8xykxfym5p1mas90>
- Planning & Development office, 624 W. Foster Road, Santa Maria, 805-934-6250
- Planning & Development office, 123 E. Anapamu Street, Santa Barbara, 805-568-2000

The prehistory of western Santa Barbara County chronicles the evolution of several major periods of human occupation in North America. Native American Indians are thought to have inhabited the region for at least 9,500 years (Spanne, 1989). Scholars divide the archaeological prehistory of Santa Barbara County into four stages: the Paleo-Indian phase, the Early Period, the Middle Period, and the Late Period. The Paleo-Indian phase began when humans first entered the area, probably around 10,000 years ago, and lasted until the end of the Pleistocene era around 7,500 years ago. No records of these occupations exist in the Santa Barbara Channel mainland, probably due to post-Pleistocene elevated sea levels which could have washed away or buried any evidence. The Early Period lasted from 7,500 years ago until 300 B.C. The use of the midden stone in food processing characterizes this period. The Middle Period, which occurred between 300 B.C. and 1000 A.D., was characterized by the use of fish hooks and expanded trade. The Late Period began around 1100 A.D. and is commonly known as the Chumash period, due to the formulation of the complex Chumash culture, including the development of materialism, the use of social, political, and economic rules and organization, and major expansion and exploitation of the area during this time (Dames and Moore, 1987).

The Orcutt Planning Area was part of the territory of the Purismeno branch of Chumash speaking people, and was probably inhabited thousands of years earlier by their ancestors or other peoples (Kroeber, 1925). The Chumash were hunter-gatherers who occupied the coastline, adjacent interior, and offshore islands of California from Malibu up to San Luis Obispo. At the time of early Spanish exploration in this area, the Chumash occupied two villages in the vicinity of the present-day community of Orcutt. These were the villages of 'Ahwapsh ("in the nettles") and 'Anaquwuk (no translation) (Applegate, 1975). Both are presumed to have been located along Orcutt Creek or Solomon Creek (Spanne, 1989). The Chumash culture quickly entered a state of decline with the mission recruitment program of the Spaniards beginning in 1769. Resistance to religious and political conversion was quickly overcome. The introduction of new diseases also took its toll on native populations. By approximately 1850 the Chumash villages were abandoned and their lands completely usurped (Dames and Moore, 1987). Remaining archaeological sites are most often

found in areas with common topographic and geographic features. The general indicators include proximity to water, such as rivers, creeks, lakes, or natural springs, fairly level slopes as on mesas or floodplains, marsh/wetland areas, and drainage confluences. The Orcutt area contains areas which present all of these features, so the undeveloped parcels represent possible sensitivity to archaeological resources. The Casmalia and Solomon Hills, as well as all creek corridors should be considered highly sensitive archaeological regions with the potential for the future discovery of significant cultural resources. Within the Orcutt area, there are four known pre-historic archaeological sites, three mixed archaeological sites (containing both historic and pre-historic resources), and ten known isolated artifacts.

Land grants first appeared near present day Orcutt after the end of the Mexican War in 1821. Three large Ranchos (ranches) were created and deeded by Mexican governors between 1839 and 1844: Rancho Los Alamos, southeast of Orcutt, Todos Santos y San Antonio, southwest of Orcutt, and Punta de la Laguna, west of Orcutt. Starting in 1848, the California economy and prevalence in the area gradually declined due to several factors: the influx of gold rush immigrants, American acquisition of California from the Treaty of Guadalupe-Hidalgo, and the Lands Act of 1851, which required verification of all Spanish-Mexican claims by the U. S. government. As a result, resentment towards Americans was great within the Californio (Mexican resident) population.

Orcutt: The economic focus of the Orcutt area made a major turn from farming to petroleum development. An important contributor to this shift was William Warren Orcutt, a civil and hydraulic engineer, hired as a geologist for Union Oil in 1898. He became known as the "father of modern oil geology," as is said to be the first person to apply the science of geology to petroleum development. His studies led to the discovery of large petroleum deposits throughout the North County region. The first commercial oil discovery in Orcutt was made in 1900, followed by a discovery on the north side three years later. By the end of 1903, there were twenty-two oil wells in the Solomon Hills, producing about 8,000 barrels of oil per day. Oil activity in this region became so great that Orcutt selected and planned a townsite in 1904 to serve as a business center for the burgeoning oil industry.

The town was named after Orcutt by E.W. Clark. It soon became the trading and supply center for the North County's Oil District. Orcutt's heyday began in 1904 with "Old Maud," one of the biggest oil wells that anyone had ever seen. By 1906 Orcutt was the largest trading center in the north county, surpassing Santa Maria. Between 1906 and 1920, Orcutt's oil production rose, fed by demand created by U. S. involvement in World War I. Many of the structures built during this period still exist today in Old Town Orcutt. Starting in the early 1920s, Orcutt began to develop its public electrical and sanitation services. However, during this period, the population in Orcutt began to decline as a result of several factors. The end of World War I reduced the demand for food and thus farmers working to produce it. Union Oil adopted new changes in its operation, reducing its work force and causing many families to relocate. Route #2 (now Highway 101) was moved east of town, completely bypassing Orcutt, and there were several destructive fires that plagued the town. These hardships during the 1920s and 1930s caused the center of trade to move north to Santa Maria. The town of Orcutt held on through the Great Depression and

exploded again in the early forties during World War II. The oil industry was temporarily stimulated by the war effort, and in the late fifties with the building of Camp Cooke, a U. S. military base, many people moved to the area and the economy began to boom again. In 1956, Camp Cooke was chosen to become a new missile training center and was renamed Vandenberg Air Force Base in 1958. Many of the Base's families could not be taken in by the town of Lompoc and spread out to other nearby towns, especially Orcutt. Many subdivision projects had already begun to meet the needs of the Base population during the 1950s and 60s. The population grew from 3000 in 1950 to 19,477 in 1970.

4.4.2 PROJECT SITE SETTING

The OCP EIR, Volume II, Key Site 18 (KS18)/Southpoint Mini-EIR describes the physical setting of 39.73-acre, KS18 as basin-shaped with level lower portions, steep slopes on all sides, and thin level areas abutting Clark Avenue. Orcutt Creek traverses KS18 from east to west. The majority of the OASIS portion of KS18 is located on level topography south of Orcutt Creek. Slopes, including areas that exceed 30 percent, are located near OASIS' southern property line, on the hillside north of Clark Avenue. In addition, the eastern section of the proposed driveway from Foxenwood Lane traverses an area with slopes in excess of 30 percent. Soils are primarily Corralitos loamy sand 0-2% slopes¹. For more information on soil types and geology on the project site, refer to Section 4.6, (Geologic Processes). Vegetation primarily consists of non-native grasslands, riparian vegetation along Orcutt Creek, isolated oak trees near the base of the slope below Clark Avenue, and eucalyptus trees in the southwestern portion of KS18. For more information on biological resources, refer to Section 4.3, (Biological Resources) of this EIR.

Previous Cultural Resources Studies: The historic information for the OCP EIR was acquired from two documents prepared by the Orcutt Historical Society (Nelson 1987 & Simon 1990). The County conducted a record search at the Central Coast Information Center (CCIC) at UCSB in 1995, and historic records and maps housed at the UCSB Library Maps and Imagery Laboratory were examined. A professional archaeological (historic and prehistoric) field survey was conducted by ISERA Group for the County in June 1995 (page 36). The field survey was conducted by traversing the developable area of certain Key Sites, including KS18, at 15 meter transects, and recording and mapping information about resources that were found. Planning & Development consulted with the CCIC further in 2016 to determine if any new information was available for the property. The 2016 CCIC records search confirmed that two Phase 1 surveys have been performed on the site, including the June 1995 ISERA report, *Phase I Archaeological Survey for the Orcutt Community Plan*, ISERA (page 36) and a report prepared in January 1979 (*Orcutt 13, Spanne*), which included archaeological investigation of the Southpoint Estates subdivision (TM 12,679). These reports are on file at UCSB and are not available to the general public.

Neither study identified significant cultural resources (prehistoric or historic) or uses on KS18.

¹ Natural Resources Conservation Service, United States Department of Agriculture. Web Soil Survey, <https://websoilsurvey.sc.egov.usda.gov/>.

4.4.3 REGULATORY SETTING

A cultural resource may be designated as significant by National, State, or local authorities. State historic preservation regulations include the statutes and guidelines contained in CEQA (Public Resources Code Sections 20183.2 and 21084.1 and Section 15064.5 of the CEQA Guidelines). CEQA requires lead agencies to carefully consider the potential effects of a project on historical resources.

California Health and Safety Code, Section 7050.5 and Public Resources Code Sections 5097.94 and 5097.98: These sections govern the disposition of human remains.

The Native American Heritage Commission (NAHC): The NAHC has jurisdiction over human remains.

SB 18 (2004): SB18 amended the California Government Code to require local and tribal intergovernmental consultation when a project involves adoption or amendment of their General Plan. SB 18 requires local governments to notify the appropriate tribal representatives of the opportunity to conduct a consultation with them regarding sacred places located on land that would be affected by adoption/amendment of the proposed General Plan. Local governments must request the contact list for tribal representatives from the Native American Heritage Commission (NAHC). The consultation for SB 18 is a government to government process and must be initiated by the local governmental agency, not the archaeologist working on the project.

Santa Barbara County Land Use and Development Code (LUDC) Section 35.60.040: This section describes the County's resource protection standards that relate to historical and archaeological resources in the inland area as well as the coastal zone. Policies, actions, and development standards related to cultural resources in the Orcutt area are described in Section IV.E of the Orcutt Community Plan (OCP).

4.4.4 PREVIOUS ENVIRONMENTAL REVIEW – OCP EIR

OCP EIR Volume I, Section 5.7 (*Archaeological Resources*) and Section 5.8 (*Historic Resources*) examined the cultural and historical setting of the project region and the potential impacts resulting from development under the OCP. The OCP EIR identified significant impacts to archaeological and historic resources from OCP buildout, including:

- **Impact ARCH-1:** Impacts related to destruction of resources from grading.
- **Impact ARCH-2:** Increased incidents of pilferage and vandalism.
- **Impact ARCH-3:** Cumulative impacts from grading and pilferage/vandalism.
- **Impact HIST-1:** Construction of structures, roads, paths and trails, utility lines, and parks on historic sites could result in destruction of historic resources which is potentially significant.
- **Impact HIST-2:** Development in the Solomon Hills where Old Maud and the Newlove Schoolhouse still stand, and where the remains of former residences lay scattered, could have a potentially significant impact on their integrity by removing them from their historical context or significantly altering their surroundings.
- **Impact HIST-3:** Removal of historically significant and prominent structures in the Old Town would remove the last remaining historical structures that mark the beginning of this community and is a potentially significant impact.
- **Impact HIST-4:** The construction of homes and other structures that are not consistent with the density and style of the remaining historic structures could have a potentially significant impact the historic character of the Old Town.

The EIR identified 10 mitigation measures to address community-wide archaeological impacts. Two of the mitigation measures were incorporated into the Plan and the other eight measures were determined to be covered by County, state, and federal archaeological/historical guidelines, by standard County development review practices, and by standard conditions of project approval. The OCP identified four additional measures to address historic resources. The following standards address potential archaeological and tribal cultural resources

- **Policy HA-O-I:** Archaeological and historic resources in the Orcutt Planning Area shall be protected and preserved to the maximum extent possible.
- **DevStd HA-O-I.1:** Development on Key Sites that have not been surveyed by a County qualified archaeologist should be surveyed and mitigated in accordance with State and County archaeological and historic guidelines.

- **Policy HA-O-2:** Structures of historic significance in Old Town Orcutt, as shown on Figure 38, shall be preserved unless this would prevent reasonable development of a property. If any of these structures are not designated as a historic structure by the County Landmarks Commission, it should be considered for such a designation as part of the Old Town Implementation Study.
- **Action HA-O-2.1:** Where feasible, historic structures should be incorporated within development proposals.
- **Action HA-O-2.2:** If significant impacts to historic resources in the rural areas of Orcutt cannot be feasibly mitigated onsite, the County should consider the appropriateness of offsite mitigation consisting of improvements to the character and integrity of structures in Old Town.
- **Action HA-O-2.3:** In cooperation with private citizens, the County should establish a Historic District in Old Town Orcutt with the intent of protecting and restoring the community's most valuable historic homes through a combination of incentives and regulations, and maintaining and enhancing the overall historic character of Old Town. The boundaries of this district should be North A venue, Gray Street, Clark A venue, Highway 135, Pinal A venue, Dyer Street, Rice Ranch Road, and Marcum Street.
- **Action &-0-2.4:** As funding becomes available, the County shall consider adopting an ordinance or modifying Section 35-243.1 of Article III of the County Zoning Ordinance for Orcutt to prevent demolition of historically significant structures (see [OCP] Figure 38) by neglect, and avoid demolition without examining alternative methods for preserving the resources including relocating structures. The ordinance should include incentives for the protection of historic structures such as encouraging uses consistent with the preservation of the building (e.g., bed and breakfast, museum, library).
- **Action &-0-2.5:** To encourage the preservation of historic resources, the County shall actively pursue potential funding from federal, state and local sources to provide monetary assistance for applicants undertaking preservation and renovation projects for historic structures.

The findings for adoption of the OCP concluded that direct impacts to pre-historic archaeological resources and historic resources could be mitigated to insignificant levels. However, indirect and cumulative impacts related to pre-historic resource destruction, pilferage, and vandalism and impacts related to Orcutt's overall historic character and development in the Solomon Hills would remain potentially significant and are not subject to feasible mitigation (Class I).

With respect to the OASIS property, the KS18 Mini-EIR includes some site-specific impact analysis, including for the OASIS portion of KS18. The Mini-EIR determined that there were no known pre-historic archaeological sites on a number of the Key Sites including KS18, based upon the findings of surveys conducted prior to 1995 and based upon the 1995 ISERA survey of the OCP Key Sites.

Further, although there is a low probability that KS18 contains archaeological resources, the EIR concluded that *“impacts could occur to undiscovered archaeological sites below the ground surface on OCP Key Sites, as a result of grading, other construction related activities or future development.”* This finding was based upon the Key Site’s geographic location and the associated potential for unidentified *“prehistorical resources to exist below ground surface.”* This impact was considered potentially significant, but mitigable. Required mitigation included a measure to address discovery of unexpected resources that may be encountered during grading, construction, landscaping or other construction-related activity. The KS18 Mini-EIR did not identify any historic structures, historic landscapes, or uses (e.g., ceremonial use of the site) associated with KS18.

4.4.5 IMPACT ANALYSIS

Methodology and Significance Thresholds

The significance of a cultural resource and impacts to the resource is determined by whether or not that resource can increase our knowledge of the past. The primary determining factors are site content and degree of preservation. A finding of archaeological significance follows the criteria established in the *CEQA Guidelines* and the *County of Santa Barbara Environmental Thresholds and Guidelines Manual*.

The California Environmental Quality Act (CEQA) declares that the State of California will “take all steps necessary to provide the people of this state with [...] enjoyment of [...] historic environmental qualities.” The CEQA definition of “environmental qualities” includes objects of historic, archaeological, aesthetic significance [Public Resources Code (PRC) 21001] (Gammage, Jones, and Jones, 1975).

CEQA Guidelines Section 15064.4, *Determining the Significance of Impacts to Archaeological Resources*, states:

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 of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

- (A) *Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;*
 - (B) *Is associated with the lives of persons important in our past;*
 - (C) *Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or*
 - (D) *Has yielded, or may be likely to yield, information important in prehistory or history.*
- (4) *The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.*
- (b) *A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.*

Any cultural resource, whether it is archaeological, historic (built environment), or a tribal cultural resource, that is evaluated as significant under CEQA criteria, is termed an historical resource.

The County Cultural Resource Guidelines provide local criteria for determining the significance of archaeological resources. County criteria for “important archaeological resource” are identical to the CEQA criteria listed above.

In the event that resources cannot be preserved, “unique archaeological resources” can only be excavated as mitigation if they are threatened with damage or destruction by the proposed project. The time and cost limitations that may apply to the excavation of archaeological resources do not apply to activities that determine whether the archaeological resources are “unique” [PRC 15064.4 (c)(3)].

If an archaeological resource does not meet either the historic resource or the more specific “unique archaeological resource” definition, impacts do not need to be mitigated [13 PRC 15064.4 (e)]. Where the significance of a site is unknown, it is presumed to be significant for the purpose of the EIR investigation.

As found in the County of Santa Barbara Historic Element, a significant resource:

- a) Possesses integrity of location, design, workmanship, material, and/or setting;
- b) Is at least fifty years old; and
- c) Demonstrates one or more of the following:
 - i) Association with historic events, architecture, construction, traditional lifeways, historic themes, or
 - ii) Conveyance of a time and place.

In the OCP EIR, potentially significant impacts on historic resources were considered to be present when the historic character and integrity of a resource could be diminished as a result of development policies included in the OCP. The historic character and integrity of a resource was considered to be inclusive of all visual qualities that establish its links to historic associations, including architectural style and the historic uses of land, structures, and setting. On a parcel-specific basis, potentially significant environmental impacts were considered to be present when the proposed policies and land use designations: a) represented a change from a historic use of a structure or property, b) encouraged an increase in development densities, or c) permitted alterations to the historic character of land uses or structures.

PROJECT IMPACTS

The project's physical impacts on the environment would result from the proposed construction and long-term use of the OASIS property. Also refer to discussion in section 6.1 (Growth Inducing Effects) regarding increased development potential related to the General Plan Amendments, Lot Line Adjustment, and Government Code consistency requests.

No potentially significant cultural resources have been identified on or are known to be associated with the project site, including but not limited to archaeological or historic artifacts, structures or features and the site is not associated with cultural ceremonies, related uses, or an historical landscape.

Impact CR-1: The project would not impact historic resources.

There are no structures, historic or otherwise, located on the OASIS property or located elsewhere on KS18 that would be impacted by the project requests (e.g., the single family home in the northeast corner near Foxenwood Lane). Further the site is not associated with historic structures, landscapes or ceremonial uses.

As required by SB 18, because the project includes a request to amend the Santa Barbara County General Plan (specifically the Orcutt Community Plan), a tribal contact list was requested and received from the NAHC. The NAHC list was used to send a letter to each NAHC identified tribal representative from the Planning & Development Director, extending an invitation to discuss any concerns they may have about the proposed project.

In an email dated May 6, 2016, Freddie Romero, Cultural Resources Coordinator for the Santa Ynez Band of the Chumash Indians requested this consultation with Planning & Development's former Director, Dr. Glenn Russell. Mr. Romero also requested and received copies of archaeological investigations performed for the OASIS property and larger KS18 area (ISERA Santoro and Toren, Phase I Survey for Orcutt Community Plan June 1995; Spanne, January 1979). Neither of these reports identifies the presence or likelihood of significant archaeological resources onsite, including in the areas of proposed earth disturbance for the OASIS development. On June 16, 2016, Mr. Romero and former County Archaeologist Joyce Gerber met at the project site to view the property and to identify the project components, including the proposed areas of ground disturbance. Mr. Romero did not identify concerns with the project and did not request additional archaeological survey work (e.g., extended Phase I).

As discussed earlier in this section, the project site is not known to contain cultural resources. However, the Orcutt Community Plan identifies the potential to encounter undiscovered resources during earth disturbance activities (e.g., grading, construction, landscaping, etc.).

Impact CR-2: Undiscovered subsurface cultural resources could reasonably be encountered during earth disturbance activities associated with the project requests (e.g., grading, construction, landscaping, etc.). (Class II)

Consistent with the OCP EIR Volume 2 Mini-EIR for KS18, the potential for encountering undiscovered subsurface cultural resources is considered a potentially significant impact. In addition, consistent with State law, if cultural resources are encountered during excavation for the project, which include human remains, all work must halt, and the County Coroner must be notified pursuant to the California Health and Safety Code (Section 7050.5). The coroner will determine if the remains are of forensic interest. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, the coroner will contact the NAHC. The NAHC will designate the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the Public Resources Code. The MLD must make his/her recommendations within 48 hours of their notification by the NAHC. This recommendation may include A) the nondestructive removal and analysis of human remains and items associated with Native American human remains; (B) preservation of Native American human remains and associated items in place; (C) relinquishment of Native American human remains and associated items to the descendants for treatment; or (D) other culturally appropriate treatment.

CUMULATIVE IMPACTS

The OCP EIR found that OCP buildout, together with development within the City of Santa Maria boundaries and on Vandenberg Air Force Base, could have a cumulatively significant impact on the remaining cultural resources in the region through destruction during construction of structures, roads, paths, trails, and public infrastructure (including pipelines, flood control basins, etc.). Increased population near significant cultural sites was also identified as likely to increase incidents of pilferage and vandalism which is also considered a significant cumulative impact. With regard to the OASIS project requests, no known cultural resources have been identified on KS18, based on consultation with the CCIC at UCSB, two previous archaeological reports, consultation including a site visit with Joyce Gerber (former County Archaeologist) and Freddie Romero (Cultural Resources Coordinator for the Santa Ynez Band of the Chumash Indians). Further Freddie Romero did not recommend additional archaeological survey work onsite (e.g., an extended Phase I investigation). Feasible mitigation has been identified in this section in the event that undiscovered cultural resources are unexpectedly encountered during project earth disturbance activities. This mitigation would reduce this impact to less than significant levels. Because no significant cultural resources are known to be associated with KS18 and feasible mitigation would reduce unlikely but potential impacts from earth disturbance to less than significant levels, the project would not contribute considerably to reasonably foreseeable cumulative archaeological resource impacts from OCP buildout in the project area and would not substantially alter the historic setting of existing historic structures in Old Town. Cumulative impacts to cultural resources would be less than significant.

Approval of the General Plan Amendment components, Recorded Map Modifications and Government Code 65402 Consistency requests may encourage similar requests for the other Southpoint Estates (KS18) open space parcels, as well as for other designated open space

parcels in the Orcutt area or elsewhere in the County. Approval of such requests would increase the development potential of additional open space areas, which were set aside as part of past land use decisions for the purpose of preserving resources and offsetting various environmental impacts of development projects. The amount and types of increased development that could result from similar requests throughout the County's unincorporated area are not specifically known. However, conversion of such open space areas to development and other uses would generally result in the potential for impacts to cultural resources, including impacts to historic structures, historic landscapes, pre-historic archaeological resources, individual human remains/cemeteries, or any tribal cultural resource. The potential type and extent of impacts to cultural resources would be dependent on the specific resources associated with particular sites proposed for development as well as the details proposed of development. (Also see Section 6.1, Growth Inducing Effects).

4.4.6 MITIGATION

The following mitigation measure would be required to reduce potentially significant impacts to cultural resources:

CR-1 CulRes-09 Stop Work at Encounter. The Owner/Applicant and/or their agents, representatives or contractors shall stop or redirect work immediately in the event potential archaeological remains are encountered during grading, construction, landscaping or other construction-related activity. Cultural resource remains may include artifacts, shell, bone, features, foundations, and trash pits, etc. The Owner/Applicant shall retain a P&D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with the provisions of Phase 2 and Phase 3 investigations of the County Archaeological Guidelines. All work shall be funded by the Owner/Applicant. **PLAN REQUIREMENTS:** This condition shall be printed on all building and grading plans. **MONITORING:** P&D permit processing planner shall check plans prior to issuance of Zoning Clearance and P&D compliance monitoring staff shall spot check in the field throughout grading and construction.

IMPACTS AFTER MITIGATION

Impact CR-1: The project would not impact historic resources.

Impact CR-1 would not require mitigation as the site is not associated with historic resources.

Impact CR-2: Undiscovered subsurface cultural resources could reasonably be encountered during earth disturbance activities associated with the project requests (e.g., grading, construction, landscaping, etc.). (Class II)

Impact CR-2 would be reduced to a less than significant level by implementation of mitigation measure CR-1.