

COMSTOCK HOMES DEVELOPMENT AND ELLWOOD MESA OPEN SPACE PLAN FEIR

4.11 CULTURAL RESOURCES

Section 4.11

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This section focuses on known cultural resources (archaeological sites and historic resources) in the areas of the proposed Comstock Homes Development site, the Coronado Butterfly Preserve, the Phelps Ditch Trail, and the proposed Ellwood Mesa Open Space Plan area. This section describes known cultural resources (including their potential significance), assesses potential impacts of the proposed residential and open space uses, and recommends mitigation measures to reduce the significance of potential project impacts. Additionally, this section discusses regulatory policies relative to archaeological and historic resources.

4.11.1 Existing Conditions

4.11.1.1 Overview

The areas proposed for residential development and open space under the City of Goleta's jurisdiction have experienced long and significant occupation by humans going back at least 8,000 years. There are a number of remains of this occupation known to be present in the general project region.

4.11.1.1.1 Prehistoric Overview. The creeks, river valleys, and flood plains in the general project area, along with the fringing coastline, have supported a continuous cultural occupation for at least the last 8,000 years. An early Holocene occupation has been identified in the archaeological record that reflects the early emergence of non-agricultural village-based groups in the region. Current archaeological evidence suggests that a relatively small population existed in these areas, but by 2000 years before present (B.P.), populations appear to have expanded considerably into resource-rich coastal and near-shore estuarine environments (Dillon, 1990: 6). Accounts by Juan Rodríguez Cabrillo (Wagner, 1929: 79-93) and Sebastian Vizcaino (Bolton, 1930: 52-103) indicated that by the time of European contact to this area of the California coast, some of the large coastal villages had hundreds of occupants and were engaged in both terrestrial and maritime long distance trade.

Paleoindian Period. The San Dieguito Complex (Warren, 1967; Wallace, 1978: 27) is found throughout southern California and includes non-fluted points such as leaf-shaped projectile points and various leaf-shaped bifacial tools. Unfortunately, there are few reliable published radiometric dates from this period, with most of the artifacts identified as isolated find spots.

One fluted point fragment is known from the Santa Barbara area. The artifact, consisting of a basal fragment from a fluted point, was found at CA-SBA-1951 on the coastal plain to the west of Santa Barbara (Erlandson et al., 1988; Erlandson, 1994: 44).

The Millingstone Period. The Millingstone Period extends to at least 6000 B.P. and probably as far back to 8500 + B.P. (*cf.* Warren, 1968; Wallace, 1955). Hard seed processing became one of the major components of subsistence during this period. Overall, the economy was based on plant collecting, but was supplemented by fishing and hunting, and general exploitation of

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Section 4.11 marine and estuarine resources (Wallace, 1955). Large, heavy ground stone milling tools such as deep basin metates and wedge-shaped manos, and large core/cobble choppers and scrapers, typify the Millingstone Period.

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In the northern Channel Islands, two sites have produced fairly reliable early Holocene dates. Radiometric dates have been obtained from shells at Daisy Cave, on San Miguel Island (Erlandson et al., 1996; Rick et al., 2001), and human remains were found in a secure early Holocene context on Santa Rosa Island at Arlington Springs (the so-called Arlington Woman). Both loci did not have extensive archaeological remains, but nevertheless, these dates put humans on the Channel Islands by at least 9750 B.C., and possibly earlier (circa 11000 for the Arlington Woman).

Along Santa Barbara coastal areas, Millingstone sites are common on terraces and knolls, typically set back from the current coastline (Glassow et al., 1988: 68; Erlandson, 1994: 46). The larger sites usually contain extensive midden deposits, possible subterranean house pits, and cemeteries. Most of these sites probably reflect intermittent use over many years of local cultural habitation and resource exploitation. Erlandson has noted that the typical Millingstone manos/metates are not common on contemporaneous Channel Island sites, possibly reflecting an alternate insular resource exploitation (Erlandson, 1994: 47).

In the Gaviota Creek area, Early Holocene evidence from this period has been excavated at CA-SBA-97 by Stephen Bowers (Erlandson et al., 1992; Erlandson, 1994: 39), while at nearby CA-SBA-96, a Milling Stone or 'Oak Grove' site noted by D.B. Rogers has been identified (Rogers, 1929: 256; Erlandson, 1994: 40).

The Intermediate Period. The Intermediate period has also been called the "Hunting Period" or "Middle Horizon." About 5000 years B.P., the Millingstone traditions, with their heavy reliance on vegetal food sources, began to gravitate more toward animal proteins and marine resources. Procurement of plants for caloric intake was not necessarily replaced in kind by game hunting, but rather the local Millingstone dietary regimen began to transition toward other/alternate resources. Mortars and pestles predominate the tool kit, rather than manos and metates. Glassow has hypothesized that, in the Santa Barbara geographic setting, this could reflect greater use of acorns (Glassow et al., 1988). In the Santa Barbara area, the reliance on shellfish probably declined during the Intermediate Period, as the maritime and coastal marine exploitations expanded into the aforementioned terrestrial resources (Erlandson, 1988). Intermediate period sites appear locally, such as those in the environs of Gaviota Creek (e.g., CA-SBA-97).

The Late Prehistoric Period. The Late Prehistoric Period probably began sometime around the B.C./A.D. transition, but expanded culturally around A.D. 500 with the introduction of bow and arrow technology (Meighan, 1954). The end of the period is recognized as the end of the 18th Century, when full implementation of the Spanish mission system took effect on the native populations.

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The Santa Barbara coastal areas, along with the western areas of Ventura and the Los Angeles Basin, were occupied during the Late Prehistoric Period by the so-called “Canaliño” culture (Rogers, 1929). During this period, the coastal populations expanded greatly and probably took advantage of a wide variety of ecological niches, especially marine resources. Small projectile points, frequently side-notched, are typical in the bow and arrow-based toolkit. Specialty items such as basketry, ollas or large water vessels, shell and stone beads, and shell and bone fish hooks appear, as does elaborate rock painting (Grant, 1965). Anthropologists believe that the Chumash are directly descended from the Canaliño culture of the archaeological record.

During the Late Prehistoric Period, a highly advanced fishing and hunting strategy developed that included the exploitation of a wider variety of fish and shellfish. These new subsistence strategies, coupled with the appearance of the bow and arrow, enabled a substantial increase in local populations, the development of permanent settlements, and a “money” economy based on the shell trade.

The Late Prehistoric Period Chumash, with a Hokan linguistic stock, lived in large villages along the coastal bay and the wide valleys leading into the California interior. This was an ethnohistoric boundary group situated between the Chumash to the northwest and the Gabrieliño to the south and east. In the archaeological record, the Gabrieliño material culture (Johnston, 1962; Blackburn, 1963; Bean and Smith, 1978) is often (but not always) indistinguishable from the Chumash (Landberg, 1965; Grant, 1965, 1978a,b).

The Chumash were highly sea oriented. Given the presence of earlier sites on the offshore islands, this evidence suggests that there was a maritime tradition at least partially carried over from the Millingstone and Intermediate Period cultures (Harrington, 1978). By at least 1000 B.P., the Chumash were relying on blue-water vessels in an exploitation strategy partially based on deep-sea fishing and marine mammal hunting.

4.11.1.1.2 Chumash Ethnography. The following summary discussion has been synthesized primarily from Dillon (1990), Bean and Smith (1978), Moratto (1984), and Grant (1978a,b). Specific citations are indicated, where appropriate.

Europeans first encountered the Chumash in 1542, when Cabrillo landed on the shores of Ventura. The Spanish later contacted the Chumash in 1602, when Vizcaíno entered the Santa Barbara Channel (Grant, 1978a: 505). The pre-European-contact Chumash probably had between 10,000 and 15,000 individuals. Anthropologists and linguists note that the Hokan language stock of the Chumash appears to be one of the oldest language groups in California, suggesting that Chumash ancestors must have been present in the area for at least several thousand years prior to European contact.

At the time of contact, the Chumash ranged from San Luis Obispo to Malibu Canyon along the coast, inland as far as the southwestern margin of the southern San Joaquin Valley, and out to the Channel Islands. There were at least six Chumash languages. The project area is located within the ethnographic boundaries of the coastal Barbareño Chumash. The Chumash were

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incorporated rather quickly into the Spanish mission system. This precipitated the rapid demise of their native culture and language, enough so that by the time anthropologists were interviewing Chumash individuals, most of their culture had long since disappeared. By the early 1800s, nearly the entire Chumash population, except for individuals who had escaped to the interior, was incorporated into the mission system (Grant, 1978a: 505).

The early Spanish travelers provided valuable details concerning Chumash dwellings. The huts were described as hemispherical in shape, with many containing internal subdivisions, possibly for privacy. Some of the larger dwelling structures could house up to 70 people, and the Spanish noted that many villages also contained sweathouses.

The Chumash were comprised of patrilineal descent groups, with most villages having one “chief,” and three or four “captains” (Grant, 1978b: 510). Most Chumash marriages were monogamous, except for village chiefs. Puberty rites are not well known. Girls entering puberty were not allowed to eat meat and could not look into a burning fire. Boys were taken out at night and given a psychotropic concoction made from *Datura* root to induce visions (Harrington, 1942: 36-37 in Grant, 1978b: 511).

The Chumash had a high level of material culture and craftsmanship, including intricate basketry, woodcarving, fine stone objects, well-developed rock art, and excellent ocean-going plank canoes (*tomol*) that highly impressed Spanish explorers. The Coastal Chumash had an extensive trading network that reached well beyond the Santa Barbara Channel region. Most Chumash lived in permanent villages, composed of large round houses up to 50 feet in diameter, which might be home to as many as 10 families. The dietary staple for all Chumash groups was the acorn, though the addition of pine nuts, soap root, berries, mushrooms, seeds, mollusks, fish, and game varied the diet.

Coastal Chumash village sites were often located at the mouths of creeks and rivers, usually on higher ground just above the shoreline (Grant, 1978b: 510). Smaller hunting camps and resource exploitation sites were located in smaller perennial creek areas, in the upper elevations, and in the immediate interior (Landberg, 1965: 89).

In 1775, Spaniard Pedro Fages commented that the Chumash were very inclined to trade, barter, and general commerce (Erlandson, 1994: 48-49). Johnson also notes that the Spanish observed persistent Chumash intervillage warfare (McLendon and Johnson, 1999: 29-39), possibly due to raids of neighboring groups’ stored resources (Landberg, 1965: 89).

The project area is located between what were two intensive areas of Chumash settlement: the Goleta Slough area and the mouth of Dos Pueblos Creek. Juan Crespi noted seven ethnohistoric villages in the general area of the Goleta estuary (Johnson, 1989: 2). However, only four ethnohistoric villages, *S’axpilih*, *beliyik*, *Helo’*, and *Alkash*, are recorded in the Spanish mission documents (Grant, 1978b: 509, 510; Johnson, 1989: 4). Johnson notes that this is probably due to the existence of smaller (or satellite) communities that were grouped together under a higher village identity (1989: 4). Of these villages, *Helo’*, which was located on Mescalitan Island, was

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the largest. There, Crespi observed (probably generously) approximately 100 houses and between 600-800 residents. On the north side of the lagoon, north of the present Santa Barbara Airport, was the village of *S'axpilil*. This village site was located near the present intersection of Hollister and Fairview Avenue. Johnson also notes that more inhabitants were baptized from *S'axpilil* than any other Chumash village except *Mikin*, situated at Dos Pueblos (*ibid.*). In general, the Goleta Slough villages probably had at least 2,000 inhabitants, over 100 houses, and more than 16 plank canoes (Grant, 1978b: 510). Twin villages named *Mikin* and *Kuyamu* occupied the banks of Dos Pueblos Creek at its confluence with the Pacific, giving the creek its name. Crespi gives the population of the two villages together at 1,100, with 120 houses and 10 plank canoes (Grant, 1978b: 510).

4.11.1.1.3 Historic Background. The first known European entry into the area was the expedition of Juan Cabrillo who sailed north up the California coast from Mexico in 1542. His two ships reached the Santa Barbara Channel in October 1542 and after several tries, were able to round Point Conception and sail as far north as San Francisco Bay (Chesnut, 1993).

A second Spanish expedition arrived in the area in 1602, which consisted of two ships under the command of Sebastian Vizcaino. His aim was to follow Cabrillo's route and reassert Spanish claims to the area. Naming local landmarks after saint's days on which they were discovered, he named the harbor of Santa Barbara on St. Barbara's feast day (December 4), and Point Conception on the Feast of the Immaculate Conception (December 8). Vizcaino sailed as far north as Monterey Bay, eventually returning to Acapulco.

In the 1760s, the Spanish government decided to establish a series of military establishments called presidios and missions along the California coast between the two great natural harbors of San Diego and San Francisco (Weber, 1982, 1992). These establishments countered against feared occupation of the coast by Russian or English forces.

As a function of this effort by the Spanish government to establish military presence on the West Coast, an expedition left the colony at San Diego in the summer of 1769 under the command of Don Gaspar de Portola, the governor of Baja, California. The objective was to locate an overland route to Monterey Bay and prospect for presidio locations along the route. Portola's expedition passed through the area on its return to San Diego (Chesnut, 1993).

Following Portola's expedition, Spanish visits and activity increased. An expedition led by Juan Bautista de Anza passed through the area in spring of 1776. A presidio was established at Santa Barbara in 1782 to fill the gap between the previously established presidios in Monterey and San Diego. This established a permanent European presence in the area, and was shortly followed by the establishment of the Missions at Santa Barbara in 1786. This mission had a strong effect on the Chumash in the general project area.

It seems certain that a number of the Chumash left for the missions, though chapels were built for those remaining in rancherias in the Goleta area. The Chumash who did move to the missions worked in agriculture or herding, and steps were taken to assimilate them to European

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styles of life. This also proved to be dangerous to the health of the Chumash populations, as they were exposed to European diseases to which they had no immunity. Chumash populations went into a steep decline.

When Mexico gained its independence from Spain in 1821, Alta California - and the subject (including residential and open space component areas) - became part of the new country. Approaches to church control changed as government control devolved to Mexico City and to the Mexican territorial and state governors.

It had never been the intention of the Spanish and the successor Mexican government that the missions would remain as permanent entities controlling the economy of the frontier areas (Weber, 1982). With independence, the Mexican government began a process of secularization of mission properties that was concluded in 1833. Missions were turned into parish churches and regional commissions were established to dispose of the properties and resettle the Indians affiliated with the missions. Mexican government policy was to give mission properties and other unclaimed land to prominent citizens who would be required to build homes and facilities and develop the properties. The period of California history known as the Rancho Period began as a class of wealthy landowners known as 'rancheros' controlled the state. They built large ranches based on cattle hide and tallow production.

Approximately 40 of these land grants were made in Santa Barbara County during this period (Tompkins, 1976, 1987; Chesnut, 1993; Avina, 1973). The project area was originally located within the Rancho De Los Dos Pueblos grant. The grant was made to Nicolas A. Den, a native Irishman, in 1842.

The United States and Mexico went to war in 1846 over the annexation of Texas. With the end of the war in 1848, the Treaty of Guadalupe-Hidalgo (Weber, 1982) ceded California to the United States. The annexation of California dislocated the dominant Hispanic culture due to the change in government control and the influx of large numbers of Anglo-Americans. Land titles were a major source of conflict between the two cultures. In 1851, a land act was passed that required the Mexican and American courts to confirm Spanish land grants. Many of the ranchos were broken up, as owners were unable to produce sufficient documentation to satisfy the courts.

Den's claim to Rancho De Los Dos Pueblos was confirmed, and it remained in his control until his death in 1862. Thereafter, it was subdivided into a number of different ranches, two of which were owned by his sons Alphonse and August. Most prominent among these subsequent owners was William W. Hollister, after whom Hollister Avenue is named. The properties passed through several hands through the balance of the 19th Century. In 1919, a retired British army officer, Colin Campbell, purchased the majority of the property near Coal Oil Point to develop a major country estate. Many of the features of this estate developed in the 1920s and 1930s, such as the access road and mansion, are present today. The Devereux Foundation purchased the Campbell Ranch in 1945 and opened the Devereux School.

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4.11.1.1.4 Previously Recorded Cultural Resources. A file and records search for the project area was conducted at the Central Coastal Information Center (CCIC) of the California Historical Resources Information System. The mapped locations of previous cultural resource surveys that are on file at the CCIC are presented on Figure 4.11-1. This search showed a single prehistoric archaeological site previously recorded in the project area. There are no sites on the National Register of Historic Places (NRHP) or the California State Historic Resources Inventory in the project area (i.e., Comstock Homes Development site, Coronado Butterfly Preserve, Phelps Ditch Trail, or the proposed Ellwood Mesa Open Space Plan area). This file and records search also showed that virtually the entire area has been covered by a recent field survey.

Information on the one previously recorded archaeological site is summarized below. The location of this site is shown in Confidential Appendix A.

CA-SBA-1321. This site was originally recorded in 1974, and was initially seen as a surface scatter of marine shell and ground stone artifacts. Oil wells and an oil refining operation were conducted within the site area and have apparently heavily damaged the site. Test excavations were conducted on the site (Onken, 1997) for Santa Barbara County Parks Department. Results of this work show that deposits extend to a depth of 60cm but that they have been heavily disturbed by the oil extraction operations. This disturbance and the sparse returns of material prompted the evaluation that this site is not eligible for the California Register of Historic Resources (CRHR) (Onken, 1997: 15).

4.11.2 Regulatory Framework

4.11.2.1 Federal Authorities and Administering Agencies

The National Historic Preservation Act addresses the protection of archaeological, cultural, and historic resources. In addition, the American Religious Freedom Act directs regulators to protect sacred sites for all Americans including American Indians.

4.11.2.2 State Authorities and Administering Agencies

4.11.2.2.1 CEQA, Public Resources Code §21000 et seq. The basic goal of the California Environmental Quality Act (CEQA) is to develop and maintain a high-quality environment now and in the future. The CEQA Guidelines provide a framework for the analysis of impacts to Archaeological Resources.

In considering impact significance under CEQA, the significance of the resource itself must first be determined. At the state level, consideration of significance as an “important archaeological resource” is measured by cultural resource provisions considered under CEQA Sections 15064.5 and 15126.4, and the draft criteria regarding resource eligibility to the CRHR.

Generally under CEQA, a historical resource (these include built-environment historic and prehistoric archaeological resources) is considered significant if it meets the criteria for listing on

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Section 4.11 the CRHR. These criteria are set forth in CEQA Section 15064.5 and defined as any resource that:

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- 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 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
- d) Has yielded, or may be likely to yield, information important in prehistory or history

Section 15064.5 of CEQA also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed under California Public Resources Code (PRC) Section 5097.98.

Impacts to "unique archaeological resources" and "unique paleontological resources" are also considered under CEQA, as described under PRC 21083.2. A unique archaeological resource implies 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 one of the following criteria:

- a) The archaeological artifact, object, or site contains information needed to answer important scientific questions, and there is a demonstrable public interest in that information
- b) The archaeological artifact, object, or site has a special and particular quality, such as being the oldest of its type or the best available example of its type
- c) The archaeological artifact, object, or site is directly associated with a scientifically recognized important prehistoric or historic event or person

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

Under CEQA Section 15064.5, a project would potentially have significant impacts if it would cause substantial adverse change in the significance of one of the following:

- a) A historical resource (i.e., a cultural resource eligible for the CRHR)
- b) An archaeological resource (defined as a unique archaeological resource which does not meet CRHR criteria)
- c) A unique paleontological resource or unique geologic feature (i.e., where the project would directly or indirectly destroy a site)
- d) Human remains (i.e., where the project would disturb or destroy burials)

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Figure 4.11-1

Previous Cultural Resource Surveys

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A non-unique archaeological or paleontological resource is given no further consideration other than the simple recording of its existence by the CEQA lead agency.

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Potential impacts to identified cultural resources need only be considered if the resource is an “important” or “unique archaeological resource” under the provisions of CEQA Sections 15064.5 and 15126.4 and the eligibility criteria. If a resource cannot be avoided, then the resource must be examined vis-à-vis the provisions of CEQA Sections 15064.5 and 15126.4 and of the eligibility criteria as an “important” or “unique archaeological resource.” In many cases, determination of a resource’s eligibility can only be made through extensive research and archaeological testing. No mitigation measures are required unless previously undiscovered cultural resources are detected. Mitigation under CEQA must address impacts to the values for which a cultural resource is considered important. To mitigate adequately, it must therefore be determined what elements make a site eligible for the CRHR. The first line of mitigation is complete avoidance, when feasible, of all cultural resources.

4.11.2.2.2 California Coastal Act §30000 et seq. As described in Section 1.0, the Coastal Act is the only set of policies that applies to development projects within the City of Goleta’s Coastal Zone, pending certification of the City of Goleta’s Local Coastal Plan. The California Coastal Act includes requirements to protect cultural resources and mitigate the impacts of development upon them (§30244). Guidelines to implement this requirement have also been published (California Coastal Commission, 1981).

4.11.2.3 Local Authorities and Administering Agencies

4.11.2.3.1 City of Goleta Coastal Zoning Ordinance. As described in Section 1, the County of Santa Barbara’s Coastal Zoning Ordinance and other implementing ordinances (including subdivision, and grading ordinances) were adopted by the City of Goleta but have not been certified by the California Coastal Commission. The City of Goleta’s Article II Coastal Zoning Ordinance provides guidance for those areas of the City of Goleta within the Coastal Zone. Applicable procedures require avoidance of impacts to archaeological and cultural sites (35-65.1), mitigation of impacts to these sites where unavoidable (35-65.2), consultation with Native Americans regarding developments with cultural impacts (35-65-3), and require open space areas within PRD zoning areas to consider the protection of archaeological sites (35-75.16(b)).

4.11.3 Project Impacts and Mitigation

4.11.3.1 Thresholds of Significance

The Santa Barbara County Environmental Thresholds and Guidelines Manual (Thresholds Manual) (County of Santa Barbara, 2002) has been adopted by the City as an administrative guideline for conducting CEQA analysis, pending the City of Goleta’s development of new thresholds specific to the City of Goleta. The Thresholds Manual provides Cultural Resources Guidelines to implement CEQA Appendices G and K.

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The Guidelines contain three elements: Historical, Ethnic, and Archaeological. The Historical Element pertains to historical structures and buildings and is not relevant to this project. The Ethnic Element of the Guidelines is addressed indirectly by incorporating Appendix 3.10-F into the EIR. Appendix 3.10-F outlines procedures and policies for identifying, evaluating, and mitigating potential impacts on archaeological resources on a project-by-project basis and stipulates a variety of steps that shall be undertaken if the site is important to Native Americans. The Archaeological Element, relevant to this project, contains a framework for developing research questions to improve the understanding of Santa Barbara County prehistory, pursuant to CEQA Appendix K Criteria A.2, B, and E. These criteria are also significance criteria in this EIR and are used to determine the project's impact on archaeological resources.

CEQA Appendix K also includes a process in the event that human remains are encountered during construction. The procedure includes contacting the coroner, who determines whether an investigation into the cause of death is required. If the remains are Native American in origin, then the descendant of the individual represented by the human remains is contacted to develop a procedure for the material's disposition. The Native America Heritage Commission serves to identify a most likely descendant when one has not been identified originally. The human remains disposition plan is carried out in consultation with the landowner.

Where a project may adversely affect a unique archaeological resource, Section 21083.2 of CEQA requires that the Lead Agency (i.e., City of Goleta) treat that effect as a significant environmental effect. When an archaeological resource is listed in or eligible to be listed in the California Register of Historical Resources, Section 21084.1 of CEQA requires that any substantial adverse effect to that resource be considered a significant environmental effect.

4.11.3.2 Project Impacts

As there are no known cultural resources that are eligible for the CRHR there are no anticipated project impacts on known cultural resources. Direct impacts are typically associated with construction activity and have the potential to immediately alter, diminish, or destroy all or part of the character and quality of historic and archeological resources. Construction of the proposed Comstock Homes Development and ground disturbance within the Ellwood Mesa Open Space Plan area is not expected to result in direct impacts to the known cultural resource base.

Impact Cultural-I: Grading activities associated with site preparation at the Comstock Homes Development site, trail improvements and restoration activities in the Open Space Plan area, and/or excavations associated with potential hazardous waste remediation activities in the project area could impact previously undiscovered cultural resources. In the event that project related activities impact a previously undiscovered CRHR eligible cultural resource, this impact would be considered *significant but feasibly mitigated (Class II)*.

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4.11.3.3 **Cumulative Impacts**

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Impact Cultural-2: The proposed project, in combination with other proposed projects and a general increase in population and use intensity in the Open Space Plan area, would cumulatively add to a long-term trend of increased public use, access or activities in the Open Space Plan area. This increase in public use, access and activity could result in disturbance or looting of previously undiscovered CRHR eligible sites. The project's contribution to this cumulative impact is considered *significant but feasibly mitigated (Class II)*.

4.11.3.4 **Mitigation Measures**

There are no expected impacts on known cultural resources by the proposed project, and therefore no site-specific mitigation measures are recommended. However, there is a moderate to high likelihood of buried cultural resources in the project area. Any ground-disturbing activity in the project area should be monitored by a professional archaeologist.

Mitigation Cultural-1. All earth disturbances within the construction area shall be monitored by a City of Goleta qualified archaeologist and a Native American Consultant pursuant to City of Goleta Archaeological Guidelines.

Plan Requirements and Timing. Prior to initiating work, a contract or Letter of Commitment between the applicant and the archaeologist, consisting of a project description and scope of work, shall be prepared. The contract must be executed and submitted to the City of Goleta for review and approval prior to the receipt of the Land Use Permits.

Monitoring. The City of Goleta shall confirm monitoring by the qualified archaeologist and grading inspectors shall spot check fieldwork.

Mitigation Cultural-2. In the event that archaeological remains are encountered during grading, work shall be stopped immediately or redirected until City of Goleta qualified archaeologist and Native American representatives evaluate the significance of the find pursuant to Phase 2 investigations of the City of Goleta Archaeological Guidelines. If remains are found to be significant, they shall be subject to the Phase 3 mitigation program consistent with Archaeological Guidelines funded by the applicant.

Plan Requirements and Timing. This condition shall be printed on all building and grading plans.

Monitoring. The City of Goleta shall check plans prior to approval of Land Use Permits and shall spot check in the field.

Mitigation Cultural-3. Implementation of the proposed Ellwood Mesa Open Space Plan shall avoid placement of open space improvements in areas of known cultural resources and shall include measures (e.g. interpretive signs and trailhead information) designed to increase

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Section 4.11 public awareness and appreciation of cultural resources, thus diminishing the risk of intentional or unintentional disturbance or looting. The Comstock Homes Development shall develop and provide to homeowners, educational material related to resource protection policies and practices within the Ellwood Mesa Open Space Plan area, and within common open space areas of the development footprint.

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Plan Requirements and Timing. This condition shall be printed on all building and grading plans for both the residential development and the open space improvements. Educational materials shall be provided to the City of Goleta for review and approval prior to approval of Land Use Permits.

Monitoring. The City of Goleta shall review educational materials developed for landowners and shall check plans prior to approval of Land Use Permits and shall spot check in the field.

4.11.3.5 Residual Impacts

With implementation of the above mitigation measures, the residual impact associated with Impact Cultural-1 and Impact Cultural-2 would be less than significant.