

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 947896
SACRAMENTO, CA 94296-0007
(916) 223-6524 Fax: (916) 651-9824
caohp@ohp.parks.ca.gov



September 19, 2007

Alex Tuttle
Planner
Santa Barbara County Planning and Development
123 East Anapamu Street
Santa Barbara, CA 93001

- sent by facsimile (805) 568-2030 and United States Postal Services -

Santa Barbara Botanic Garden Vital Mission Plan Draft Environmental Impact Report # 2006041027

Dear Mr. Tuttle:

The State Office of Historic Preservation (OHP) has broad responsibility for the implementation of federal and state historic preservation programs in California. We thank you for the opportunity to comment on the above project. The OHP is concerned with the impacts of the project to the historical and archeological resources and the inadequate resource identification resulting in less than adequate mitigation measures and alternatives. We have been contacted by the concerned public in regard to the above project. Christina McGinnis and Marc Chytilo, and my staff has been in contact with you.

The project is described as an implementation of a series of changes to the existing facilities at the Botanic Garden, an approximately 78-acre site in the unincorporated Mission Canyon area of Santa Barbara County. The project is designed to improve and expand the Garden's facilities to better meet current and future demands for its services. The project's objectives are to fulfill the Botanic Garden's mission to support research, education, horticulture, conservation and species preservation programs by developing and updating Garden facilities, consolidating Garden functions and uses within existing and proposed facilities providing a quality work environment for Garden employees, increasing access opportunities for all visitors to Garden facilities and programs, and providing on-site affordable housing opportunities for critical Garden support staff. (DEIR 1, 1-2)

The physical modifications of the project would consist of changes to the roadways and parking areas, grading for paving of pathways, fencing, lighting, water and drainage changes and building construction and demolitions resulting in a proposed net increase to the floor area of 37,716 square feet (sq. f.) from the existing 40,082 (sq. f.) of floor area. The project also includes the addition of the Cavalli property (13 acres) to the Botanic Garden which currently consists of 65 acres. In addition, there are proposed physical changes to the water and sewer service/system and the drainage facilities, changes to the trail system and the installation of pavers, etc.

The requested discretionary approvals are revisions to the Conditional Use permit to incorporate the Cavalli site into the Botanic Garden, to approve the Development Plan for all existing and proposed development, and to rezone two parcels from single family residential

EXHIBIT 8

and Agriculture to Recreation and a General Plan Amendment from residential and agriculture land use to recreation/open space.

The entire project site (the Garden property) consisting of 78 acres of land has been divided into four sub areas for the purposes of this DEIR. They are called: East of Mission Site, West of Mission Site, Hansen Site, and Cavalli Site. "The Garden facilities are currently located within the East of Mission, West of Mission and Hansen site." The Cavalli site is an undeveloped parcel not included in the Garden's existing Conditional Use Permit." (DEIR 1, 1-2) The project proposal nearly doubles the current square footage in addition to having significant physical impacts to the overall environment through grading, road and parking lot construction, water and drainage needs and construction of employee housing with many direct and indirect impacts to the actual Garden property and its mission as a "Botanic Garden".

Here is a list of our concerns.

Archeological Resources:

The archeological resource identification and the proposed mitigation measures are inadequate. "The entire Garden property is considered sensitive for archeological resources except in those areas that have already experienced subsurface disturbance." (DEIR 4, 4-8) The entire proposed project is expected to impact directly or indirectly CA-SBA-22: demolitions of two residences, relocations of caretaker cottage and woodshed, construction of 5 buildings, grading, road and parking lot constructions, detention basins, and through the introduction of residents in the southern portion of the site a potential increase of vandalism is possible. CA-SBA-22 has been described as a permanent camp midden associated with the Late Period with a probable possibility for human burials.

An extensive Phase I has made some determinations about the site, its boundaries, and its integrity, but no formal evaluation under CEQA using the California Register criteria has occurred. A formal evaluation is required and shall not be deferred to the future. Such a deferral as is proposed in this document is not appropriate as a mitigation measure. It is the lead agency's responsibility to identify and evaluate the cultural resources and determine the project impacts. In addition to being significant under criterion D for its research potential only, a site's significance under criterion A should also be considered.

The DEIR is required to identify the significant adverse effect of the project. This has not occurred. There is no evidence whether the Native American Heritage Commission (NAHC) has been contacted as to identify the presence or absence of any sacred sites. There is no indication that the Central Coastal Information Center (IC) has been contacted either. There is no indication whether proper recordation on DPR 523 forms has occurred and whether the reports and DPR 523 forms have been submitted to the IC.

The preferred manner of mitigation of cultural resources impacted by a project is avoidance and preservation in place by project re-design, followed by capping, and the use of conservation easements. Data recovery is the last option in CEQA and represents the most costly and most time consuming option requiring a data recovery plan to be adopted prior to any excavations.

Historical Resources:

- Inadequate identification of the historical resources
- Thus inadequate identification of the project's impact to the resource(s)
- Thus: inadequate mitigations measures and alternatives.
- Unclear site boundaries
- Lacking Historical Context
- Resource evaluation under limited criteria: architectural mostly
- Overall: evaluation of resource parts and not the resource as a whole

Firstly, CEQA requires determining whether a resource is eligible to the California Register; most resource identifications for the above project appear to have been done following the local County criteria which are much narrower. CEQA's definition of an historical resource is very broad (PRC 21084.1; § 15064.5) and the criteria of the California Register of Historical Places must be used in the evaluation of the extant and presumed historical resources. The findings of this evaluation must be clearly stated in the environmental document.

Secondly, the DEIR has not determined what the historical resource for purposes of CEQA is. The historical resource is Landmark # 24 as amended in the County Board of Supervisors Resolution No. 2003-059 in its entirety. Said Landmark is known as Santa Barbara Botanic Garden, Mission Dam and Aqueduct. This is the key historical resource the above project; how it will be impacted has not been identified. This resource appears to be a district with several historic structures and features and a cultural landscape (Mission Dam and Aqueduct) and a designed garden landscape following the designs of several notable designers and landscape architects such as Lockwood de Forrest Jr. and others with a historic landscape design concept as a traditional botanical garden. It is imperative to very clearly establish the boundaries of said resource, Landmark # 24, in order to determine the project's impacts to the historical resource; its direct and its indirect impacts to the integrity of the resource as a whole, such the setting, etc. Only then can adequate mitigation measures and project alternatives be identified and proposed.

Thirdly, all individual contributors to the resource, the potential district and the designed and other landscape, have to be identified. Again, only then can the impacts, direct and indirect ones, clearly be identified and adequate mitigation measures and alternatives developed.

Fourthly, the project calls out additional historical resources for example such as the Gane House. It is not clear from the materials presented in the DEIR if the Gane House property is part of Landmark # 24 or in which relationship to the Botanic Garden or its development the Gane House property stands. The maps indicate the Gane House to be part of the Hansen Site. Moreover, according to Appendix D, Summary of Cultural Resources Reports the property as a whole in its setting appears not to have been evaluated; (features such as pool and pillars) are found to be not significant. The evaluation looks at the architectural significance, but there is no apparent discussion of other potential resource significance (context).

Fifthly, the currently proposed mitigations measures are inadequate since they are based on an improper baseline.

As indicated by you on the phone, the above project has been under consideration for over ten years; this environmental document represents its first formal application as a project.

Unfortunately, the DEIR is inadequate in its cultural resources analysis and it is not a very readable or user-friendly document. The evaluations of the cultural resources are very inconsistent. The maps for the cultural resource section are inadequate. The Cultural Resources section says "it is based on previously prepared cultural resources studies that have assessed various portions of the Santa Barbara Botanic Garden property and a peer-review of these studies by the EIR consultant." (DEIR 4, 4-1) Ten cultural resources studies have been conducted since 1990. However, there is no peer-review report; there is only a brief summary of the individual reports' findings. There is no indication as to the professional qualification of the so-called peer reviewer.

Four of the reports deal with historical resources and six deal with archeological resources. The focus of the historical resource reports has been the evaluation of buildings and structures, mostly as it appears from the architectural perspective. While several of the buildings appear to have been identified as historical resources, others have not, the historical context for the evaluation is not clear. But the historical resource which does exist, Landmark # 24, the district, the garden, the landscape, etc. as a whole have not been identified or evaluated. Moreover, while this is the first formal project application, it is not clear whether the earlier cultural reports the DEIR is based on are sufficient to deal with the current project's proposed impacts to the resources. There are many incremental changes (project impacts) not clearly outlined, the pavers for instance; additionally, the cumulative impacts analysis is inadequate.

Circulation of supporting materials for meaningful public comment

CEQA requires the circulation of supporting materials for meaningful comment. We are concerned when my office requested copies of the cultural resources reports that the County did not have them. (We are in receipt of only the most recent ones dating from 2002). Pursuant to CEQA's substantial mandate it is the County's responsibility to make independent findings about the identification of cultural resources, their significance and develop appropriate mitigation measures which avoid or mitigate, as feasible, most adverse project impacts. Local governments must deny approval of projects with adverse impacts to the environment if there are feasible alternatives and mitigations that can substantially lessen or avoid those effects (PRC 21002).

Furthermore, the absence of the previous cultural resources reports from the DEIR does not allow for meaningful public comment; the summary statements of the previous studies are inadequate. Information that is incorporated by reference, "shall be considered to be set forth in full as part of the text of the EIR. . . .The EIR. . . shall state where the incorporated documents will be available for inspection." (CEQA Guidelines § 15150(a) (b)) While it is not ethical to release sensitive information in environmental documents circulated for public review such as archeological site information redacted reports should be made available in the technical appendix to an EIR. Summarized technical data, maps, and other relevant information shall include enough relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and the public. (CEQA Guidelines § 15148) This DEIR has not done this; the provided information for meaningful public comment is not available; the document is unreadable and inadequate.

SB 18

The project requires as part of its approvals a General Plan amendment, but it is not clear whether SB 18 consultation has occurred or is underway. SB 18 requires government-to-

Mr. Alex Tuttle
September 19, 2007
Page 5

government consultation between local governments and Native American tribes when a General Plan amendment is proposed. This consultation must include all federally recognized and non-federally recognized tribes. If this consultation has not yet been initiated, we highly recommend doing this soon, since the goal of SB 18 is to establish meaningful ongoing consultations in the land planning process for the purpose of protecting cultural places and resources.

In summary, we strongly recommend that the County recirculate the DEIR and appropriately identify existing and potential historical and cultural resources and evaluate them using the California Register criteria. Only then can the many direct and indirect project impacts of this complex project be identified and adequate mitigation measures and alternatives which avoid most adverse project impacts, if feasible, developed. Please submit a separate copy of the recirculated DEIR to this office for comments.

Again, we thank you for the opportunity to comment on the above project. Due to unforeseen circumstances our comments arrive past the commenting deadline. Please understand that our comments herein are specifically related to the environmental review process and adequacy of documents prepared for the environmental review purposes. We do not take positions in support of or against projects, but rather focus on the environmental review process itself.

If you have any further questions, please don't hesitate to contact Michelle C. Messinger, Historian II, CEQA Coordinator Local Government Unit at (916) 653-5099 or at mmessinger@parks.ca.gov.

Sincerely,

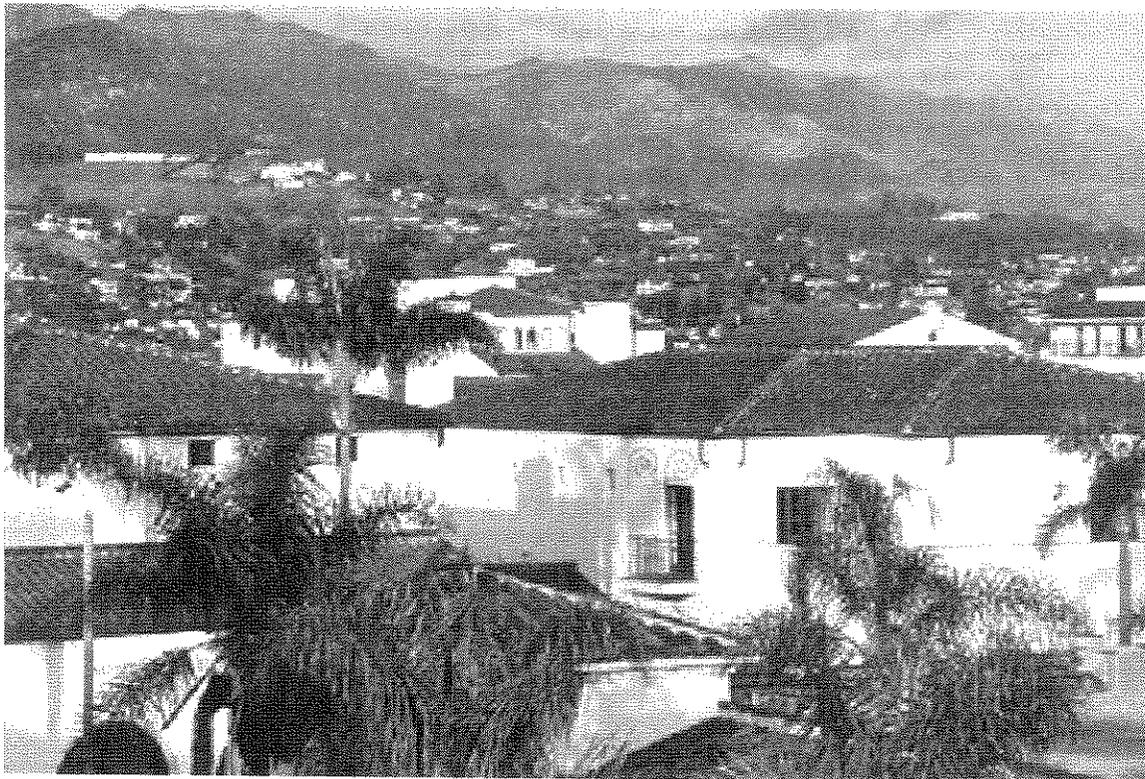


Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

CC: Christina McGinnis
Marc Chytilo
Dr. Michael Glassow, Coordinator, Central Coastal Information Center

*City of Santa Barbara
Fire Department*

Wildland Fire Plan



Prepared by: City of Santa Barbara
Fire Department
January 21, 2004

existing high fire hazard area (Figure 18). The new high fire hazard area is separated into 4 fire hazard zones (See Figure 19). Each fire zone is described below.

2.5 Fire Hazard Zones

The results of the hazard and risk assessment were used to determine fire hazard zones within the high fire hazard area. Four fire hazard zones were identified; 1) Extreme Foothill Zone, 2) Foothill Zone, 3) Coastal Zone, and 4) Coastal Interior Zone (See Figure 19, Fire Hazard Zones). The risk factors for each fire hazard zone are outlined in Tables 2, 3, 4, and 5 add the end of this chapter.

A physical location and description of each fire hazard zone is outlined below, along with a rating of the potential fire behavior that can be expected in this zone.

2.5.1 Extreme Foothill Zone - 771 acres (See Table 2)

The Extreme Foothill Zone is found along the northern boundary of the City where large expanses of heavy decadent fuels from National Forest Lands border the City. Areas include West Mountain Drive, upper Gibraltar Road, Parma Park and area north of the park, Coyote Road, upper San Roque Road, and upper Santa Teresita Drive.

This zone has the potential for extreme fire behavior. It is defined by areas that have a combination of heavy, decadent chaparral and oak forests, steep slopes greater than 30 percent, many slopes with south and southwest aspects; and drainages that are directly aligned to frequent severe, hot dry wind conditions. These combined hazards make this zone vulnerable to extreme fire behavior.

Risk factors in this zone are outlined in Table 2 at the end of this chapter.

This zone is strategically important to the Fire Department, since it is the last line of defense for fire protection resources to suppress a wildfire before it enters more highly populated areas of the City.

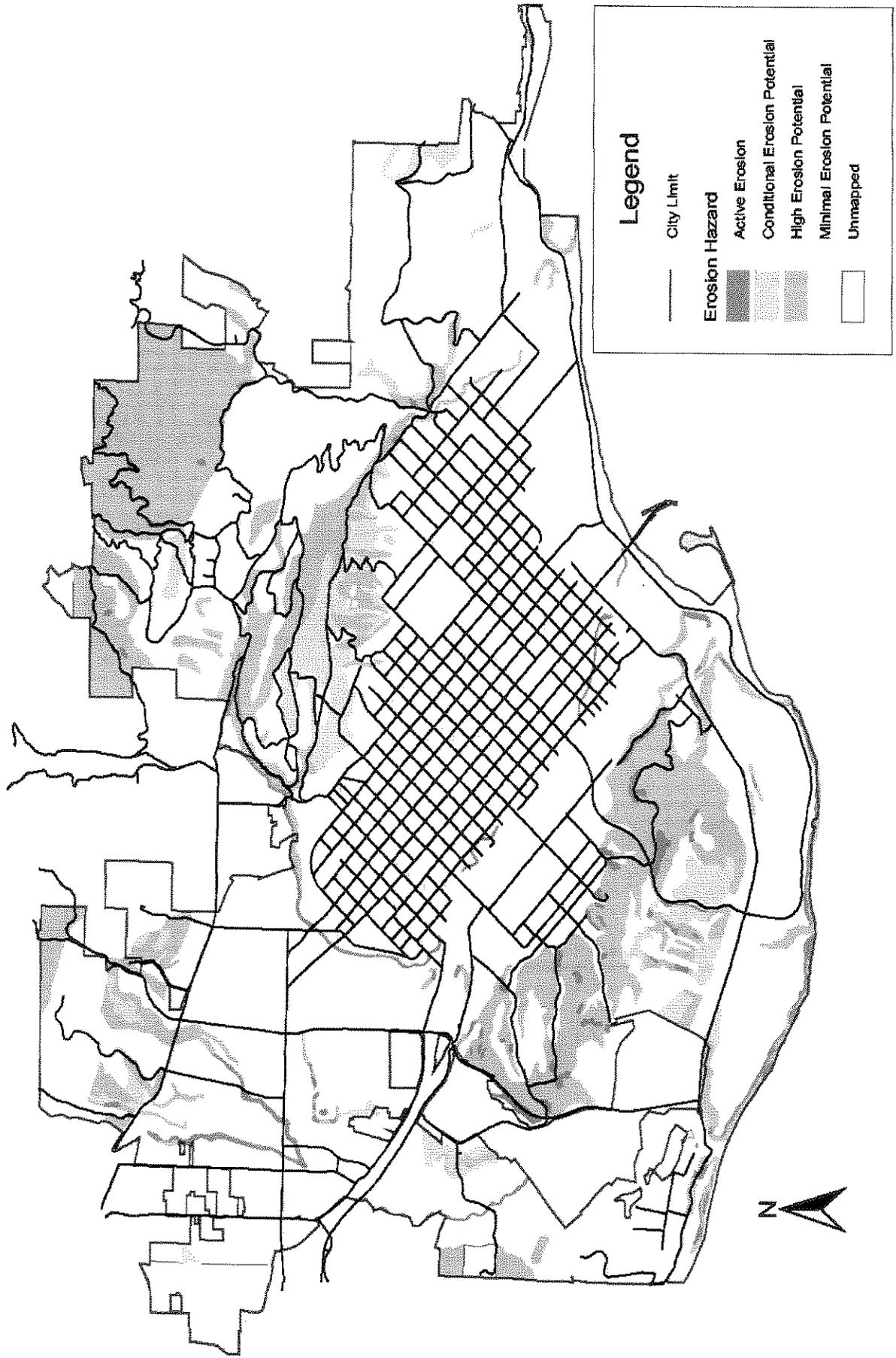
2.5.2 Foothill Zone 2,498 acres (See Table 3)

The Foothill Zone includes the northwest and northeast portions of the City's high fire hazard area. Neighborhoods include Cielito, Riviera, Lower Riviera, Eucalyptus Hill, Foothill, San Roque area north of Foothill Road, and the area surrounding Stevens Park.

The potential fire behavior in this zone is considered high to extreme depending on weather and fuel conditions. This zone is defined as areas within the City where a combination of flammable chaparral, oak forest, riparian vegetation, eucalyptus groves, and landscaped fuels intermix with residential areas to pose a significant fire threat. The eucalyptus groves within this area are extensive, dense, and have significant accumulations of dead fuel that threaten the areas surrounding them. Slopes range from between 20 to 40 percent, and many slopes have southeast, south, and southwest aspects. Canyons within this zone are directly aligned to severe, hot dry wind conditions.

EROSION HAZARD MAP

Figure 17



EXISTING HIGH FIRE HAZARD AREA

Figure 18

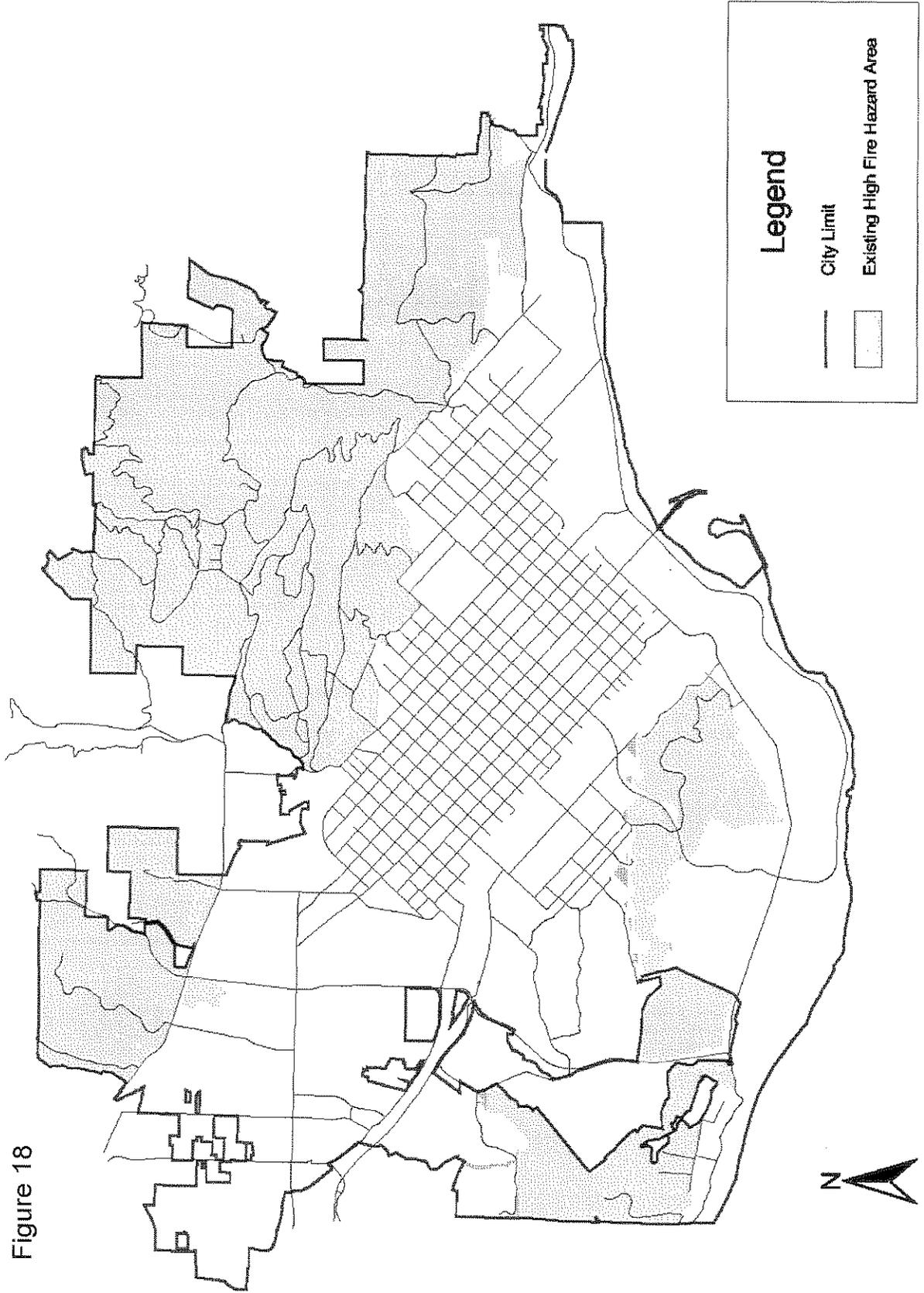


Table 3: Risk – Foothill Zone

RISK FACTOR	RISK FINDINGS
Roof Type	<ul style="list-style-type: none"> • The risk of structures igniting as a result of roof type is moderate. • Out of the 4,308 structures identified in this zone, 130 have combustible roofs. • Combustible roofs according to neighborhoods are: <ul style="list-style-type: none"> ○ Riviera - 2,823 structures identified / 70 with combustible roofs. ○ Eucalyptus Hills - 911 structures identified / 41 with combustible roofs. ○ Northridge/Santa Theresita/Ontare/Stevens Park - 574 structures identified / 19 with combustible roofs.
Density of Structures	<ul style="list-style-type: none"> • The risk of structure loss due to the density of homes in this zone is considered high. • Areas of highest density are: <ul style="list-style-type: none"> ○ Between Alamar Road and Laurel Canyon above Foothill Road ○ Area surrounding Stevens Park ○ Riviera area south of Alameda Padre Serra ○ Area directly along Alameda Padre Serra ○ Area surrounding the County Bowl ○ Area north of Alameda Padre Serra ○ West of Barker Pass Road ○ Westmont Road area • Many of these higher density areas are located on steep slopes that increase the potential for radiant heat exposure. • The remaining structures in the Foothill zone range from moderate to very low density.
Road Systems	<ul style="list-style-type: none"> • The risk in this area related to road systems is high . • The main roads are a mixture of conforming and existing non-conforming. • Many roads (both residential and main) are further narrowed due to vegetation encroachment and do not meet the Fire Department’s access standards. • Portions of this zone have long, steep, inadequately addressed driveways that pose a significant safety hazard, however, the majority of homes in this zone have adequate addressing. • Approximately 20 bridges exist throughout this zone, a number of these bridges are considered existing non-conforming due to weight limitations.
Water Supply	<ul style="list-style-type: none"> • Adequate water supply in this zone makes the risk in this area low. • Fire hydrants meet Fire Department Water Supply Standards. Fire hydrants within this zone are located every 500 feet and meet Fire Department standards. • Lauro Reservoir is located just north of this zone, but would be used for helicopter aerial operations.
Fire Response Times	<ul style="list-style-type: none"> • This zone is considered at moderate risk related to fire response. • The majority of areas within this zone are within the Fire Department’s 4-minute response time. • Two areas, Westmont Road, and the eastern area of Eucalyptus Hill area, are outside the 4-minute response time. • Montecito Fire Station 2 is located within a 4-minute response time to these areas and would respond under the City Mutual Aid Agreement to an emergency in this area.
Fire Ignitions	<ul style="list-style-type: none"> • Fire ignitions within this zone are low. • Because of the population density and diverse public uses in this zone, the risk of a large fire becoming established is moderate under high fire danger weather.

normal upslope wind, on a 30 percent slope, covered with heavy brush, would consume 10 acres within the first 6 minutes and 41 acres within 12 minutes.

Because of the potential for extreme fire behavior in this zone, structures must be able to stand alone in a wildfire event. Fuels management, defensible space, non-combustible building construction, water supply, and access for fire s become particularly important in this zone.

From a fire protection standpoint, this zone is strategically important to the Fire Department because it provides the last line of defense for fire suppression of a fire burning from the National Forest into more highly populated areas of the City.

A number of staging areas were identified within this zone. Staging areas are strategic locations where fire equipment (fire engines, dozers, and suppression equipment) can be safely placed while awaiting a tactical assignment on the fire. Many staging areas are located outside the boundaries of this zone, but are close enough for a rapid response into the fire. These areas are Skofield Park, Westmont College, Lauro Reservoir, Cater Filtration Plant, La Colina Junior High School, Cold Springs Elementary School, Sheffield Reservoir, and Earl Warren Showgrounds (large scale staging area).

3.1.2 Foothill Zone

This zone has a mixture of heavy brush, heavy canopy fuels from oak and eucalyptus trees, decadent riparian fuels, and landscape vegetation. Slopes range from 20 to 40 percent, with many southeast, south, and southwest aspects and canyons directly aligned to severe, hot dry wind conditions.

The majority of this zone is within the Fire Department's 4-minute response time, except for four areas, Westmont Road, the eastern Eucalyptus Hill Road, Alston Road, and Camino Viejo Road areas. Montecito Fire Station 2 is located within a 4-minute response time to these areas and would respond under the City Mutual Aid Agreement to an emergency in this area.

Like the Extreme Foothill Zone, the department has the same number of engines available to respond and would rely heavily on the cooperating fire agencies and aerial fire suppression resources for fire protection support through Mutual Aid Agreements. This zone has no volunteer fire department.

Fire behavior in this zone, under high fire danger weather or Sundowner/Santa Ana winds, would be high to extreme. The 1977 Sycamore Canyon Fire and the 1964 Coyote Fire burned into this zone under Sundowner wind conditions and produced extreme fire behavior conditions, with heavy spotting up to 1 mile ahead of the main fire front. The heavy canopy cover in this area, especially from eucalyptus trees, increases the amount and size of burning embers that can be carried in down canyon wind conditions, threatening areas well ahead of the fire. Fire behavior predictions completed for this zone (See Appendix D), under a 30 mile per hour Sundowner wind condition, on a 30 percent slope, covered with eucalyptus fuels, indicate that the fire would consume less than 1 acre within the first 6 minutes and again less than 1 acre within 12 minutes. This prediction does not adequately address potential fire behavior that is seen from historic fires in our area under extreme wind conditions. This is due to the inability of the model to predict extreme fire behavior conditions, such as crowning and torching of tree canopies. Fire behavior

predictions completed for a 10 mile per hour normal upslope wind, on a 30 percent slope, covered with eucalyptus fuel indicate that the fire would consume 1/10 of an acre within the first 6 minutes and 3/10 of an acre within 12 minutes. A fire under these conditions would most likely burn along the ground, consuming ground litter and pockets of dead fuel. In heavy brush fuels within this zone, fire behavior predictions would be the same as the Extreme Foothill Zone predictions.

Staging areas in this zone are Skofield Park, Westmont College, Lauro Reservoir, Cater Filtration Plant, La Colina Junior High School, Cold Springs Elementary School, Santa Barbara Tennis Club, Santa Barbara Women's Club, Jefferson School (Brooks Institute), Cleveland Elementary School, Sheffield Reservoir, and Earl Warren Showgrounds (large scale staging area).

3.1.3 Coastal Zone

The Coastal Zone has many diverse pockets of chaparral, oak forests, coastal sage shrub, landscape vegetation, agricultural lands, and eucalyptus groves. Slopes in this zone range from 10 to 35 percent with varying aspects and many dissecting canyons. These canyons are not in direct alignment to receive hot dry winds, although these winds are funneled through many of these areas. The ocean influence dominates the weather pattern in this zone for most of the year. Still, under down canyon wind conditions, the potential for a catastrophic fire exists.

The majority of this zone is within the department's 4-minute response time. However, two areas Campanil Hill and the upper part of Sea Ranch Road are outside the department's 4-minute response time.

Like the other three zones, the department has the same number of engines available to respond and would rely heavily on the cooperating fire agencies and aerial fire suppression resources for fire protection support. This zone has no volunteer fire department.

Fire behavior in this zone would be moderate for the majority of the year, due mainly to the ocean influence. Fires in this zone would be mainly slope and fuel driven fires within the pockets of open space that exist in this area. Fires would typically have short burning periods no longer than 1 day. During hot dry wind conditions, winds are funneled through the canyons in this zone, but not with the same intensity as canyons in the foothill high fire hazard zones. Under high fire danger weather or a down canyon wind condition, fire behavior in this zone would be moderate. No history of large fire occurrence has been found in this zone. Fire behavior predictions completed for this zone (See Appendix D) for a 10 mile per hour on shore wind, on a 30 percent slope, covered with moderate to light fuels, indicate the fire would consume 1 acre within the first 6 minutes and 2 acres within 12 minutes. Under a down canyon wind condition of 30 miles per hour, on a 30 percent slope, covered with moderate to light fuels, fire behavior predictions indicate the fire would consume 12 acres within the first 6 minutes and 48 acres within 12 minutes.

Staging areas within this zone are Arroyo Burro Beach overflow lot, Las Positas Park, along Cliff Drive, Santa Barbara City College, Vic Trace Reservoir, Shoreline Community Church (935 San Andres St.), Business Park at 800 Miramonte Drive, La Cumbre Junior High, and Earl Warren Showgrounds (large scale staging area).

Table 3: Undesirable Plant List

Certain plants are considered to be undesirable in the landscape due to characteristics that make them highly flammable. These characteristics can be either physical or chemical. Physical properties would include large amounts of dead material retained within the plant, rough or peeling bark, and the production of profuse amounts of litter. Chemical properties include the presence of volatile substances such as oils, resins, wax, and pitch. Certain native plants are notorious as species containing these volatile substances.

Plants with these characteristics should not be planted in High Fire Hazard areas. They are referred to as target species since their partial or complete removal is a critical part of hazard reduction. The following is a list of plants that should be avoided within the landscape zones defined in Table 1.

Undesirable Plant Species

Natives	Domestics
<i>Adenostoma fasciculatum</i> – Chamise	<i>Acacia</i> species
<i>Adenostoma sparsifolium</i> – Red Shank	<i>Casuarina</i> species - Beefwood
<i>Artemesia californica</i> – California Sagebrush	<i>Cortadera</i> species – Pampas Grass
Baccharis species (low growing form OK)	<i>Cupressus</i> species – Cypress
<i>Eriogonum fasciculatum</i> – Common Buckwheat	<i>Eucalyptus</i> species – Eucalyptus
<i>Olneya tesota</i> - Iron wood	<i>Juniperous</i> species – Juniper (except species which grow less than 1 foot)
	<i>Melaleuca</i> species
	<i>Pennisetum</i> - Fountain Grass
	<i>Pinus</i> species – Pine
	<i>Schinus molle</i> – California pepper tree (within 50 feet of structure)

Other plants may be considered undesirable because of their ability to naturalize and become a pest. These types of plants should be avoided, especially in sensitive riparian or coastal areas where they could become established and compete with native vegetation.

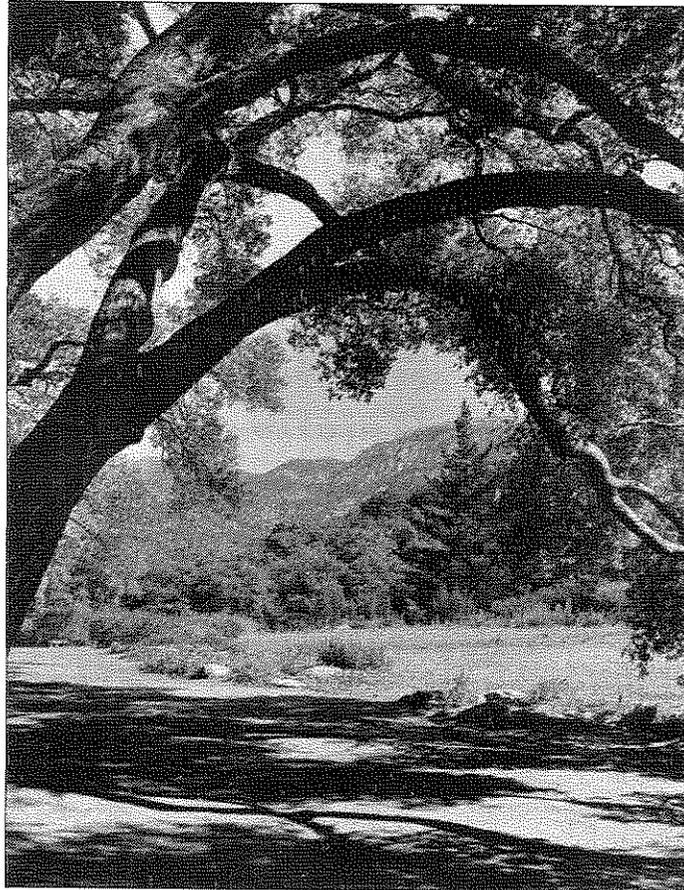
On steep slopes care should be taken to avoid erosion problems created or enhanced by vegetation removal. Deep rooted ground covers and landscape plants should be utilized to hold soil in place. Avoid shallow rooted ground covers. For example, iceplant while an effective ground cover on flat surfaces would be undesirable on a steep slope because its shallow rooted nature may increase erosion when the root zone becomes saturated during heavy rains, exposing bare soil. In areas where target species compromise the total vegetation, partial removal is recommended to obtain Fire Department “Minimum Brush Clearance Requirements.”

TECHNICAL REPORT

Historic Resources Assessment

Santa Barbara Botanic Garden

Santa Barbara, California



Prepared for:
County of Santa Barbara

Prepared by:
HISTORIC RESOURCES GROUP, LLC
1728 Whitley Avenue
Hollywood, CA 90028-4809

October 2008

EXHIBIT 10

TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
1.1	PURPOSE AND OBJECTIVES	1
1.2	METHODOLOGY	2
2.0	PROPOSED PROJECT	3
2.1	SETTING.....	3
2.2	EXISTING CONDITIONS.....	3
3.0	REGULATORY REVIEW.....	4
3.1	HISTORICAL RESOURCES UNDER CEQA.....	4
3.2	HISTORIC DESIGNATIONS	4
3.3	IDENTIFIED HISTORICAL RESOURCES ON THE PROJECT SITE.....	11
4.0	HISTORIC CONTEXT	12
4.1	BACKGROUND	12
4.2	FORMATION OF THE SANTA BARBARA BOTANIC GARDEN.....	13
4.3	SITE HISTORY.....	18
4.4	GARDEN DEVELOPMENT: 1937-1950.....	24
4.5	GARDEN DIRECTORS AND ASSOCIATED IMPROVEMENTS: 1950-2008.....	32
5.0	EVALUATION OF POTENTIAL HISTORIC RESOURCES.....	38
5.1	THE HISTORIC BOTANIC GARDEN	38
5.2	OTHER POTENTIAL HISTORIC RESOURCES	44
5.3	RESOURCES NOT EVALUATED	48
6.0	POTENTIAL IMPACTS	49
6.1	SIGNIFICANCE THRESHOLD	49
6.2	POTENTIAL IMPACTS TO THE HISTORIC GARDEN	50
6.3	POTENTIAL IMPACTS TO THE GANE HOUSE.....	54
6.4	IMPACTS BEFORE MITIGATION.....	54
7.0	RECOMMENDED MITIGATION MEASURES	56
7.1	PROJECT DESIGN.....	56
7.2	DOCUMENTATION	57
7.3	IMPLEMENTATION	57
7.4	TRAINING AND INTERPRETATION	58
	BIBLIOGRAPHY.....	59
	APPENDIX A: COMMON CHARACTERISTICS OF BOTANIC GARDENS	61
	APPENDIX B: PREVIOUSLY PREPARED CULTURAL RESOURCE STUDIES ...	62
	APPENDIX C: MAP OF EXISTING AND PROPOSED ROADS AND PATHS.....	64

1.0 INTRODUCTION

1.1 Purpose and Objectives

The Santa Barbara Botanical Garden has developed a proposed *Santa Barbara Garden Vital Mission Plan* (Garden Plan) to guide future improvements and expanded services within the approximately seventy-eight (78) acre Santa Barbara Botanic Garden (the Garden) site. The purpose of this technical report is to determine if historical resources as defined by the California Environmental Quality Act (CEQA) are present on the property and, if so, to identify potential impacts to historical resources caused by the proposed Garden Plan. This report is intended to provide information to the County of Santa Barbara to inform environmental review of the proposed Garden Plan.

The research, analysis, and conclusions contained in this report are focused on the following objectives:

- Identification and analysis of the Garden as a cultural/historic landscape, focusing on the spatial organization, public spaces, landscape characteristics, buildings, and objects that contribute to the Botanic Garden's potential historic significance.
- Identification of additional potential historic resources located on the Garden property that have been analyzed and evaluated in previous studies.
- Analysis of potential impacts to historical resources that may result upon implementation of the proposed Garden Plan.
- Identification of potential mitigation measures or project modifications which may alleviate or address these impacts.

This report was prepared using primary and secondary sources related to the Garden's development. Materials included archival minutes of Botanic Garden Board of Directors meetings, historic maps and photos, building permits, field observations, brochures, and previously published histories.¹ This report contains a description of the existing setting, a review of regulations regarding historic resources, a summarized history and chronology of Garden development, and an assessment of the historical significance of the Garden using established criteria developed for cultural landscapes.

Previous research, studies and environmental documents were invaluable in the preparation of this report. The *NOTICIAS* 2004/Spring 2005 Issue, and the Santa Barbara Landmarks Number 24 application (and associated Garden comments, 2002), were critical to establishing the history and context for the site.

The analysis contained in this report focuses primarily on the Garden — including its landscape characteristics, buildings, and objects — as a collective historic resource.

¹ Primary resources were reviewed with the assistance of Botanic Garden archival staff.

Previous studies that evaluated the historical significance of resources within the Garden site individually were used for this analysis. The findings of additional studies evaluating individual resources located on Garden property are summarized here and incorporated as appropriate.

1.2 Methodology

This report was compiled using the basic format for Cultural Resource Reports established by the National Park Service (NPS). This approach is based upon current professional methodology standards and procedures developed by the NPS, the California Office of Historic Preservation (OHP), and standard preservation practice.

Research

Historic Resources Group (HRG) assembled information regarding botanic gardens as a distinct property type and identified examples of historic botanic gardens in the United States. Information on the history of the Santa Barbara Botanic Garden was taken primarily from "A Garden for All Times: The Santa Barbara Botanic Garden" from the Winter 2004/Spring 2005 issue of *NOTICIAS*, the quarterly magazine of the Santa Barbara Historical Society. The 2002 *Nomination of the Santa Barbara Botanic Garden for Historical Landmark Status*, Garden responses to the Nomination, and Annual reports from the Garden archives, also provided invaluable historic information.

Historic map analysis was conducted to establish the development pattern of planted sections and trails. Historic photos from the Garden's archives were reviewed to identify alterations to the landscape, original location of garden elements, and the scope and nature of new construction over time.

Context Development

The research listed above informed the development of a historic context statement following NPS and OHP standards. The context summarizes the Garden's development history, identify important people and events, and highlight significant physical changes to the Garden property.

Field Work

HRG conducted several site visits to determine existing conditions, verify significant built resources, and identify patterns of development still evident in the landscape. The condition of planted sections, foot trails, important design features and recent alterations were also noted.

Analysis and Evaluation

Drawings provided by the County were reviewed by HRG to understand the nature and scope of the proposed project. HRG also consulted with Garden administration to verify the components of the proposed project, and understand the Garden's needs and objectives. This information was used to identify potential impacts to historic resources within the Garden that may result from proposed new buildings and the extent of new paving, fencing, and other potential impacts.

2.0 PROPOSED PROJECT ²

The Santa Barbara Botanic Garden is an accredited museum by the American Association of Museums, a member of the American Public Garden Association and of the Center of Plant Conservation. Its function is to promote and maintain public programs, collections and exhibits that provide opportunities for research, education and interpretation, conservation and display. Since its foundation in 1926, alterations to the Botanic Garden property have occurred primarily with incremental construction of various minor structures and additions to existing facilities to accommodate Garden programs and uses.

The proposed *Santa Barbara Botanic Garden Vital Mission Plan* would implement a series of changes to the existing facilities of the Botanic Garden, which is located within an approximately 78-acre site in the unincorporated Mission Canyon area of Santa Barbara County. The proposed project is designed to improve and expand the Garden's facilities to better meet current and future demands for its services. It includes the demolition of some existing structures; renovation, relocation, and modification of other existing structures; construction of new structures and ancillary facilities; and improvements to the facility's circulation system, parking, fencing, and lighting. New structures are devoted to affordable housing for full-time Garden employees, additional horticulture and plant propagation area, conservation, research and education space, general support facilities, and additional visitor and events facilities.

2.1 Setting

The Santa Barbara Botanic Garden is located in the County of Santa Barbara. The Garden is currently approximately 78 acres in size at 1212 Mission Canyon Road. The Botanic Garden comprises 18 parcels. Major regional access to the Garden is provided by the 101 Freeway and local roads. The Garden is located north of Foothill Road on the east and west sides of Mission Canyon Road. The main entrance is provided via Mission Canyon Road.

2.2 Existing Conditions

The proposed project area consists primarily of ridge and ravine topography in the foothills of the Santa Ynez Mountain Range. Natural vegetation in this area consists of riparian woodland along Mission Creek and Las Canoas Creek with areas of chaparral on the steeper slopes and ridgelines. Plantings within the Botanic Garden and small areas of annual grassland resulting from past cultivation also exist throughout the property. The Santa Barbara Botanic Garden includes a number of structures and features.

² The description included in this section was excerpted from the [Santa Barbara Botanic Garden Vital Mission Plan Draft Environmental Impact Report](#) (June 2007), and is intended as a general summary of the project.

3.0 REGULATORY REVIEW

3.1 Historical Resources under CEQA

A resource is considered historically significant, and therefore an "historical resource" under the California Environmental Quality Act (CEQA), if it falls into one of the three following categories as defined by Section 21084.1 of the California Public Resources Code:

- *Mandatory historical resources* are resources "listed in, or determined to be eligible for listing in, the California Register of Historical Resources."
- *Presumptive historical resources* are resources "included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1" of the Public Resources Code, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.
- *Discretionary historical resources* are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.³

The fact that a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, does not preclude a lead agency from determining that the resource may be a "historical resource" for purposes of CEQA.

Properties formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register.⁴ Properties designated by local municipalities can also be considered historical resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

3.2 Historic Designations

A property may be designated as historic by federal, state, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

National Register of Historic Places

The National Register of Historic Places is an authoritative guide used by federal, state, and local governments, private groups and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection

³ California PRC, Section 21084.1.

⁴ California PRC, Section 5024.1(c).

from destruction or impairment.⁵ Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects; eligibility for federal tax benefits; and qualification for federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or listed in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of a historic resource. State and local regulations may apply to properties listed in the National Register.

The criteria for listing in the National Register are the established guidelines for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.⁶

In addition to meeting any or all of the criteria listed above, properties nominated must also retain *integrity*, the ability of a property to convey its significance. Grounded in an understanding of a property's physical features, and how they relate to its significance, the National Register criteria recognizes the seven aspects or qualities that a property must mostly possess to retain its historic integrity:

- *Location* is the place where the historic property was constructed or the place where the historic event occurred.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.⁷

⁵ 36CFR60, Section 60.2.

⁶ 36CFR60, Section 60.4.

- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.

Age Threshold

A 50-year age threshold has become standard in historic preservation. The National Park Service, which provides guidance for the practice of historic preservation, has established that a resource 50-years of age or older may be considered for listing on the National Register of Historic Places:

*A property that has achieved significance within the past 50-years can be evaluated only when sufficient historical perspective exists to determine that the property is exceptionally important. The necessary perspective can be provided by scholarly research and evaluation, and must consider both the historic context and the specific property's role in that context.*⁸

In the County of Santa Barbara, there is no requirement that a resource be a certain age before it can be designated. In general, enough time needs to have passed since the resource's completion to provide sufficient perspective that would allow an evaluation of its significance within a historical context.

Cultural Landscape Definition

The National Park Services defines for the purposes of identification, evaluation, nomination to the National Register of Historic Places, planning, treatment and management four general types of cultural or historic landscapes. This method of organizing information that includes individual features such as buildings, structures, or sites that are present within landscapes, is used by cultural resources professionals all over the United States.⁹

A cultural landscape is defined as "a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values."¹⁰

⁷ *National Register Bulletin 15: How to Apply the National Register Registration Criteria for Evaluation*. Washington D.C.: National Park Service, U.S. Department of the Interior, 1997. p. 45.

⁸ *National Register Bulletin 15*, p. 42.

⁹ *National Register Bulletin 18 How to Evaluate and Nominate Designed Historic Landscapes*, Prepared by J. Timothy Keller, ASLA, and Genevieve P. Keller Land and Community Associates for the National Parks Service, U.S. Department of Interior, From the Internet: <http://www.nps.gov/history/nr/publications/bulletins/nrb18/>, 17 April 2008, p. 1-2; *General Guidelines for Identifying and Evaluating Historic Landscapes*, Prepared by the Environmental Program, California Department of Transportation, Sacramento, California, 1999, From the Internet: <http://www.dot.ca.gov/ser/downloads/cultural/languide.pdf>, 26 May 2008, p. 1-3; and *Cultural Landscapes and Corridors*, Prepared by the California State Parks, From the Internet: http://www.parks.ca.gov/default.asp?page_id=22854, 26 May 2008.

¹⁰ *Brief 36: Protecting Cultural Landscapes Planning, Treatment and Management of Historic Landscapes*, Prepared by Charles A. Birnbaum, ASLA for the Technical Preservation Services, National Parks Service, U.S. Department of the Interior, From the Internet: <http://www.nps.gov/history/hps/TPS/briefs/brief36.htm>, 17 April 2008.

The four general types of cultural landscapes, which are not mutually exclusive, are:

Historic Designed Landscape--a landscape that was consciously designed or laid out by a landscape architect, master gardener, architect, or horticulturist according to design principles, or an amateur gardener working in a recognized style or tradition. The landscape may be associated with a significant person(s), trend, or event in landscape architecture; or illustrate an important development in the theory and practice of landscape architecture. Aesthetic values play a significant role in designed landscapes. Examples include parks, campuses, and estates.

Historic Vernacular Landscape--a landscape that evolved through use by the people whose activities or occupancy shaped that landscape. Through social or cultural attitudes of an individual, family or a community, the landscape reflects the physical, biological, and cultural character of those everyday lives. Function plays a significant role in vernacular landscapes. They can be a single property such as a farm or a collection of properties such as a district of historic farms along a river valley. Examples include rural villages, industrial complexes, and agricultural landscapes.

Historic Site--a landscape significant for its association with a historic event, activity, or person. Examples include battlefields and president's house properties.

Ethnographic Landscape--a landscape containing a variety of natural and cultural resources that associated people define as heritage resources. Examples are contemporary settlements, religious sacred sites and massive geological structures. Small plant communities, animals, subsistence and ceremonial grounds are often components.¹¹

Cultural or historic landscapes include:

residential gardens and community parks, scenic highways, rural communities, institutional grounds, cemeteries, battlefields and zoological gardens. They are composed of a number of character-defining features which, individually or collectively contribute to the landscape's physical appearance as they have evolved over time. In addition to vegetation and topography, cultural landscapes may include water features, such as ponds, streams, and fountains; circulation features, such as roads, paths, steps, and walls; buildings; and furnishings, including fences, benches, lights and sculptural objects.¹²

Designed and vernacular landscapes as cultural landscapes are differentiated from other cultural resources such as historic structures because they are dependent on

¹¹ Brief 36.

¹² Brief 36; and The Secretary of the Interior's *Guidelines for the Treatment of Cultural Landscapes*, National Park Service, U.S. Department of Interior, From the Internet: http://www.nps.gov/history/hps/hli/landscape_guidelines/organization.htm, 17 April 2008.

natural resources. These types of cultural resources are interconnected systems of land, air and water, vegetation and wildlife which have dynamic qualities.¹³

Historic Landscape

A **historic designed landscape** as defined by the National Park Services in the "National Register Bulletin 18: How to Evaluate and Nominate Designed Historic Landscapes" (Bulletin 18"), includes botanic gardens, arboreta, formal and display gardens, estates, cemeteries, plazas/malls and other public spaces, parkways, parks, campus and planned communities.¹⁴

The Secretary of the Interior's "Guidelines for the Treatment of Cultural Landscapes" ("Guidelines") and "Bulletin 18" outline how to analyze landscapes in general and specifically historic designed landscapes. The landscapes include but are not necessarily limited to a discussion of the following features:

- large organizational elements (spatial organization and land patterns)
- Individual features that may contribute to a landscape's historic character, such as:
 - Typography – natural or artificially created
 - Vegetation – plants or groups of plants
 - Circulation – roads, trails and canals
 - Water features - aesthetic or functional, fountains, streams and aqueducts
 - Structures – bridges, roads and dams
 - Buildings
 - Furnishings and objects – benches, signage, works of art

Evaluation of the arrangement and interrelationship of these character-defining features in a historic designed landscape are done based on the way they existed during the period of significance. The boundaries of the landscape should encompass but not exceed the full extent of the contributing elements and natural features. A concentration or continuity of the historic landscapes features predominate and occur throughout the landscape. Although some features are more important than others in a particular landscape, these features should always be assessed and considered in terms of their relationship to the property as a whole. The intangible qualities, and a landscape's feeling and association such as sensory qualities and cultural values should also be considered in the evaluation and description of a cultural landscape property.¹⁵

The period of significance to evaluate a historic designed landscape or property is "the time period when the property achieved the qualities that [would] make it eligible for the National Register." The period of significance encompasses the time period when the property was associated with its important events, activities, persons, groups, or land use, or when it attained its important physical qualities and characteristics. Fifty years ago from the present can be used as an end date for the period of significances, if a specific closing date cannot be identified. The distinctive

¹³ Brief 36.

¹⁴ National Register Bulletin 18, p. 2.

¹⁵ National Register Bulletin 18, p. 4; and General Guidelines..., p. 8-9, 11.

qualities of the property should be a good representative of its type, period or method of design or construction, and how it relates to the development, and philosophy of its designed landscape type.¹⁶

For a property to be eligible for the National Register it must not only be significant under National Register criteria but it also must have integrity. Integrity is defined in National Register Bulletin 18 as "the ability of a property to convey its historically significant appearance or associations." The potential historic designed landscape must have retained integrity of *design, materials, workmanship, feeling, association, location and setting*.¹⁷

California Register of Historical Resources

The California Register is an authoritative guide in California used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.¹⁸

The criteria for eligibility for listing in the California Register are based upon National Register criteria. These criteria are:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

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

- California properties listed in the National Register and those formally Determined Eligible for the National Register.
- California Registered Historical Landmarks from No. 0770 onward.
- Those California Points of Historical Interest that have been evaluated by the Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources which may qualify for listing in the California Register include:

- Individual historical resources.

¹⁶ *National Register Bulletin 18*, p. 4-5; and *General Guidelines...*, p. 11.

¹⁷ *National Register Bulletin 18*, p. 6.

¹⁸ California PRC, Section 5024.1(a).

- Historical resources contributing to the significance of an historic district.
- Historical resources identified as significant in historical resources surveys, if the survey meets the criteria listed in subdivision (g) of Section 21084.1 in the California Public Resources Code.
- Historical resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria.
- Local landmarks or historic properties designated under any municipal or county ordinance.¹⁹

Local Designation Programs

On recommendation of the Historic Landmarks Advisory Commission, the Board of Supervisors designates Places of Historic Merit or Landmarks located within the unincorporated area of Santa Barbara County. Chapter 18A-3 of the County of Santa Barbara Code defines a Place of Historic Merit or Landmark as any place, site, building, structure, or object using the following criteria:

- (a) It exemplifies or reflects special elements of the county's cultural, social, economic, political, archaeological, aesthetic, engineering, architectural or natural history; and/or
- (b) It is identified with persons or events significant in local, state or national history; and/or
- (c) It embodies distinctive characteristics of a style, type, period or method of construction or is a valuable example of the use of indigenous materials or craftsmanship; and/or
- (d) It is representative of the work of a notable builder, designer, or architect; and/or
- (e) It contributes to the significance of a historic area, being a geographically definable area possessing a concentration of historic, prehistoric, archaeological, or scenic properties, or thematically related grouping of properties, which contribute to each other and are unified aesthetically by plan or physical development; and/or
- (f) It has a location with unique physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the County of Santa Barbara; and/or
- (g) It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation; and/or

¹⁹ California PRC, Section 5024.1(e).

(h) It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particularly transportation modes or distinctive examples of park or community planning; and/or

(i) It is one of the few remaining examples in the county, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.²⁰

Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for Place of Historic Merit or Landmark status. Buildings may be eligible for Place of Historic Merit or Landmark if they retain their historic design and materials. Those that are intact examples of past architectural styles or that have historical associations may meet the criteria in the Landmark ordinance.

3.3 Identified Historical Resources on the Project Site

As discussed earlier, a resource is considered a "historical resource" under CEQA, if it is "listed in, or determined to be eligible for listing in, the California Register of Historical Resources," or is "included in a local register of historical resources," as defined by the Public Resources Code.

Resources Listed on the National Register of Historic Places

The Mission Dam, located in the northwestern portion of the Botanic Garden property is currently listed in the National Register under criteria A and C.

Resources Listed on the California Register of Historical Resources

The Mission Dam is also listed on the California Register under criteria 1 and 3. The Mission Canyon Bridge, located in southern portion of the Botanic Garden property is also listed under criterion 3.

Resources Designated as Santa Barbara County Historic Landmarks

A twenty-three acre portion of the Santa Barbara Botanic Garden, listed as the Santa Barbara Botanic Garden, Mission Dam and Aqueduct, has been designated as Landmark Number Twenty-four²¹ in Santa Barbara County based on criteria (a), (b), (c), (d), (e), (f), (g), and (i).²²

The Santa Barbara County Landmark designation includes twenty-three acres of the Santa Barbara Botanic Garden, the Mission Dam, the Aqueduct, Indian Steps, Entry Steps, the Information Kiosk, the Caretaker's Cottage, the Blaksley Library, and the Campbell Bridge.

²⁰ Santa Barbara County Code, Chapter 18A-3, From the Internet: <http://bpc.iserver.net/codes/stbarb/>, 4 June 2008.

²¹ Resolution of the Santa Barbara Board of Supervisors, Number 2003-59.

²² Ibid.

may be significant in a rural area” (*CEQA Guidelines* §15064, 2001). Appendix G of the *CEQA Guidelines* describes impacts that the California Resources Agency has determined are normally considered significant. These guidelines require that physical changes in the environment be evaluated based on factual evidence, reasonable assumptions supported by facts, and expert opinion based on fact.

4.1.1 Significance Criteria

Analysis of each project alternative was conducted to determine if there would be an impact to a particular environmental resource. This review included a determination of whether an impact occurring from the implementation of an alternative would be rated as “significant” under CEQA. **Exhibit 4-1**, on the following two pages, summarizes the significance of temporary, long-term, and cumulative environmental impacts of the Doyle Drive Project alternatives under CEQA. Levels of significance stating “less than significant with mitigation incorporated” are based on the application of successful mitigation measures, meaning the impact would not be diminished until mitigation successfully accomplishes the desired goals.

Chapter 3 of this document provides a detailed discussion of the impacts for each resource category. Significant impacts were not identified for the No-Build Alternative which is used as the baseline for comparison with other alternatives.

4.2 Potentially Significant Impacts

This section discusses the resources which will experience significant impacts as a result of the Doyle Drive Project.

4.2.1 Cultural Resources

As outlined in Appendix G of the *CEQA Guidelines*, would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Significant cultural resources for the purposes of CEQA are those resources that are eligible for or are listed in the *California Register of Historical Resources* (CRHR). All resources that have been determined eligible for or are listed in the *National Register of Historic Places* (NRHP) are automatically eligible for the CRHR and as such, are considered historical resources for the purposes of CEQA. In addition, cultural resources included in local registers of historical resources, as defined in *Public Resource Code* (PRC) 5020.1(k) or 5024.1(g), are also considered to be historical resources for the purposes of CEQA. CEQA states that “a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.”

Exhibit 4-1
Determination of the Level of Significance for Environmental Impacts of the Doyle Drive Project under CEQA

ENVIRONMENTAL ISSUE	PERMANENT IMPACTS		TEMPORARY IMPACTS		CUMULATIVE IMPACTS	
	REPLACE AND WIDEN	PRESIDIO PARKWAY & PREFERRED ALT	REPLACE AND WIDEN	PRESIDIO PARKWAY & PREFERRED ALT	REPLACE AND WIDEN	PRESIDIO PARKWAY & PREFERRED ALT
GEOLOGY AND SOILS: SEISMIC	Significant, less than mitigation incorporated	Less than Significant	Less than Significant			
GEOLOGY AND SOILS: SERPENTINITE	Less than Significant	Significant Unavoidable	Less than Significant	Significant Unavoidable	Less than Significant	Significant Unavoidable
HYDROLOGY, WATER QUALITY, STORM RUNOFF	Less than Significant	Significant, less than mitigation incorporated				
HAZARDOUS WASTE	Significant, less than mitigation incorporated					
AIR QUALITY	Less than Significant	Less than Significant	Significant, less than mitigation incorporated	Significant, less than mitigation incorporated	Less than Significant	Less than Significant
NOISE AND VIBRATION	Less than Significant	Less than Significant	Significant, less than mitigation incorporated	Significant, less than mitigation incorporated	Less than Significant	Less than Significant
ENERGY	Less than Significant					
WETLANDS	Significant, less than mitigation incorporated					

**Exhibit 4-1
Determination of the Level of Significance for Environmental Impacts of the Doyle Drive Project under CEQA — Continued**

ENVIRONMENTAL ISSUE	PERMANENT IMPACTS		TEMPORARY IMPACTS		CUMULATIVE IMPACTS	
	REPLACE AND WIDEN	PRESIDIO PARKWAY & PREFERRED ALT	REPLACE AND WIDEN	PRESIDIO PARKWAY & PREFERRED ALT	REPLACE AND WIDEN	PRESIDIO PARKWAY & PREFERRED ALT
VEGETATION	Significant; less than significant with mitigation incorporated					
WILDLIFE	Significant; less than significant with mitigation incorporated					
PARKS, RECREATION AREAS	Less than Significant					
LAND USE, PLANNING AND GROWTH	Significant Unavoidable	Significant Unavoidable	Less than Significant	Less than Significant	Less than Significant	Less than Significant
COMMUNITY IMPACTS (SOCIAL, ECONOMIC) AND ENVIRONMENTAL JUSTICE	Less than Significant					
UTILITIES AND EMERGENCY SERVICE	Less than Significant					
TRAFFIC/TRANSPORTATION/ PEDESTRIAN AND BICYCLE FACILITIES	Less than Significant					
VISUAL/AESTHETICS	Significant Unavoidable	Less than Significant	Significant Unavoidable	Significant Unavoidable	Significant Unavoidable	Less than Significant
HISTORIC RESOURCES	Significant Unavoidable					
ARCHAEOLOGICAL RESOURCES	Less than Significant	Significant Unavoidable	Less than Significant	Less than Significant	Less than Significant	Less than Significant

The significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that conveys its historical significance and justifies its inclusion in, or eligibility for, the CRHR. Essentially, this means that if a project demolishes an entire historical resource, or alters it adversely so that it would no longer be eligible for the *California Register* or be considered to be a historical resource, the project would have a substantial adverse change to that resource. However, after project construction, if the resource would still possess historical significance such that it would still be eligible, there would be no substantial adverse change.

The following analyzes the impacts of the Doyle Drive Project on six properties considered historical resources for the purposes of CEQA. These include the Presidio National Historic Landmark District (NHLD), the Golden Gate Bridge to which Doyle Drive is a contributor, the Doyle Drive Marina and Presidio Viaducts (individually NRHP eligible and historical resources under CEQA), archaeological site CA-SFR-6/26, and the Palace of Fine Arts.

The Replace and Widen Alternative would impact the Presidio NHLD through the removal and replacement of Doyle Drive, which is a contributing element of the Presidio NHLD. The Replace and Widen Alternative, No-Detour Option would impact the Presidio NHLD through the alteration of the following contributing elements: Battery Blaney Road, Veterans Boulevard (Highway 1), Lincoln Boulevard, and Crissy Field Avenue. In addition, there would be impacts to the cultural landscape of the Presidio NHLD due to the alteration or removal of existing cultural landscape features and the addition of new non-historic features into the cultural landscape.

The With Detour Option would additionally impact the Presidio NHLD through the removal of Buildings 1182, 1183, 1184, and 1185 (four of the seven Mason Street warehouses), which are contributing elements of the district. These impacts would not result in a substantial adverse change in the NHLD because it will still retain sufficient integrity to convey its historical significance and would remain eligible for the *California Register* and be considered an historical resource under CEQA.

The Replace and Widen Alternative, both With Detour and No-Detour Options, would cause an impact to the Golden Gate Bridge through the destruction of Doyle Drive, which is also eligible for the NRHP as a contributor to the Golden Gate Bridge. This alternative would also cause indirect impacts to the Golden Gate Bridge by introducing new visual elements in place of existing contributing elements. These impacts would not result in a substantial adverse change in the Golden Gate Bridge because it will still retain sufficient integrity to convey its historical significance and would remain eligible for the *California Register* and be considered an historical resource under CEQA.

The Replace and Widen Alternative, both With Detour and No-Detour Options, would cause a substantial adverse change to the Marina and Presidio Viaducts of

Doyle Drive (determined individually NRHP eligible and are historical resources under CEQA) because they would be demolished.

The Replace and Widen Alternative, both With Detour and No-Detour Options, would not result in substantial adverse change to the Palace of Fine Arts, nor would archaeological site, CA-SFR-6/26, experience substantial adverse change because the area will be designated as an Environmentally Sensitive Area (ESA) and protected during construction.

The Presidio Parkway and Preferred Alternatives will impact the Presidio NHL through the destruction of the following contributing elements of the Presidio NHL: Doyle Drive (including the high-viaduct and low-viaduct), Building 201, Building 204, Building 230, Building 670, and Building 1151 (under the Presidio Parkway Alternative, Circle Drive Option only), as well as Bank Street, Veterans Boulevard (Highway 1), Battery Blaney Road, Crissy Field Avenue, Cowles Street (under the Presidio Parkway Alternative, Hook Ramp Option and Preferred Alternative only), Girard Road, Gorgas Avenue, Halleck Street, Marshall Street, and Lincoln Boulevard.

Under the Preferred Alternative, Buildings 230 and 670 will be demolished to make way for the parkway. The top story of Building 201 will be removed, stored during construction of the project, and then relocated and restored at its original Halleck Street location. Building 204, which had been previously moved to its current location and a portion of the building removed when Doyle Drive was originally built, will also be removed with useable building components salvaged. Building 228 will be affected by the raising of the west end of Halleck Street. The raising of Halleck Street in order to cross over a tunnel segment of Doyle Drive will have an effect on the setting of Building 228 and the Halleck Street area. A final decision as to the treatment of buildings will be determined prior to the completion of the *Programmatic Agreement* (PA).

In addition, both the Presidio Parkway and Preferred Alternatives will cause indirect impacts to the Presidio NHL by introducing visual elements that will diminish the integrity of the linkage and physical plan of the district, i.e., the cultural landscape. These impacts will not result in a substantial adverse change in the NHL because it will still retain sufficient integrity to convey its historical significance and will remain eligible for the *California Register* and be considered an historical resource under CEQA.

The Presidio Parkway and Preferred Alternatives will cause a direct impact to the Golden Gate Bridge through the destruction of Doyle Drive, which is a contributing element of the bridge property. These alternatives will also cause an indirect impact to the Golden Gate Bridge because it will introduce new visual elements in place of existing contributing elements of the bridge.

These impacts will not result in a substantial adverse change in the Golden Gate Bridge because it will still retain sufficient integrity to convey its historical significance and will remain eligible for the *California Register* and be considered an historical resource under CEQA.

Both the Presidio Parkway and Preferred Alternatives would cause a substantial adverse change to the Marina and Presidio Viaducts of Doyle Drive (determined individually NRHP eligible and are historical resources under CEQA) because the viaducts will be demolished.

Based on available information, the Presidio Parkway and Preferred Alternatives will not have an impact on the Palace of Fine Arts property; however, there are concerns about possible vibration impacts to the buildings and the lagoon. Although the project meets standards for acceptable vibration levels in proximity of fragile historic structures, additional vibration testing and the preparation of a *Historic Structures Report* for the Palace of Fine Arts will be implemented to ensure that the property will not be damaged during construction of the roadway.

The archaeological site, CA-SFR-6/26, will not experience substantial adverse change because the area will be designated as an environmentally sensitive area and protected during construction. Because the large underground parking facility has been eliminated from the Preferred Alternative, potential impacts to unknown archaeological sites will be less than those identified for the Presidio Parkway Alternative in the DEIS/R. If prehistoric or historic period archaeological sites are identified prior to or during construction, then the construction of any build alternative may cause substantial adverse change to the significance of these resources.

This project also requires compliance with *PRC 5024* which requires state agencies to formulate policies to preserve and maintain, when prudent, all state-owned historical resources under its jurisdiction, to give a notice and a summary of the proposed project's effects on state-owned historic properties to the State Historic Preservation Officer (SHPO) for review and comment, and adopt prudent and feasible measures that will eliminate or mitigate the adverse effects. Doyle Drive is a state-owned facility. Caltrans will consult with the SHPO in compliance with *PRC 5024* concurrently with its *Section 106* consultation.

The impacts associated with the Replace and Widen, Presidio Parkway and Preferred Alternatives will result in **unavoidable significant impacts** under CEQA since all build alternatives would require the demolition of the historic Marina and Presidio Viaducts of Doyle Drive. Other historic resources such as the Golden Gate Bridge, Presidio NHLD and Palace of Fine Arts will not be adversely impacted and will remain eligible for the *California Register* and be considered an historical resource under CEQA. In addition, none of the build alternatives will impact archaeological site CA-SFR-6/26.

4.2.2 Visual

As outlined in Appendix G of the *CEQA Guidelines*, would the project have a substantial adverse effect on a scenic vista?

Within and around the project area, views of the Golden Gate Bridge, Marina headlands and the bay are accessible, particularly from areas within the Presidio. The existing Doyle Drive facility consists of high- and low-viaducts that currently

obstruct some views of these scenic resources. Under the Replace and Widen Alternative, No-Detour Option the low-viaduct would be raised approximately two meters (six feet), with an almost doubling of the width of the roadway which would result in an **unavoidable significant impact** under CEQA (increased view blockage and visual dominance) primarily when viewed from the Main Post area.

4.2.3 Soils and Geology: Serpentinite

As outlined in Appendix G of the *CEQA Guidelines*, would the project result in the loss of availability of locally-important mineral resource delineated on a local general plan, specific plan or other land use plan?

Construction of the Presidio Parkway and Preferred Alternatives will result in removal of a portion of the geologic materials in the bluff area (Serpentinite) that comprise a designated resource as defined in the *Presidio Trust Management Plan* (PTMP). In accordance with the criteria established in the PTMP, the removal of these materials is considered an **unavoidable significant impact** under CEQA.

4.2.4 Land Use and Planning

As outlined in Appendix G of the *CEQA Guidelines*, would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

All project alternatives will conflict with various aspects of the plans analyzed as part of the project. Specifically, the No-Build Alternative would conflict with elements of the *General Management Plan Amendment* (GMPA), *Presidio Trust Management Plan* (PTMP), *San Francisco General Plan*, and *San Francisco Bay Plan*. The Replace and Widen Alternative would conflict with elements of the GMPA, PTMP, *Vegetation Management Plan* (VMP), and *San Francisco General Plan* while the Presidio Parkway and Preferred Alternatives would conflict with various aspects of the PTMP, VMP, and *San Francisco General Plan*. The conflicts between the alternatives and various planning documents are considered **unavoidable significant impacts** under CEQA.

4.3 Impacts Mitigated to Less than Significant

This section discusses the resources which will experience less than significant impacts as a result of the Doyle Drive Project.

4.3.1 Air Quality

As outlined in Appendix G of the *CEQA Guidelines*, would the project expose sensitive receptors to substantial pollutant concentrations?