

7.0 CULTURAL RESOURCES

Cultural resources that may be encountered during this project can be broadly characterized into two elements: archaeological resources and historic resources. Archaeological resources are buried evidence of human activities during prehistoric or historic periods. The technical studies conducted to identify archaeological resources include *A Phase I Archaeological Resources Report for Proposed Development of the Santa Barbara Cottage Hospital Master Plan* (Western Points, June 2003) and *Archaeological Resources Assessment and Treatment Plan for Site CA-SBa-3684: For Construction of a Child Care Center, Cottage Hospital Modernization and Seismic Compliance Plan* (Western Points, February 2004). Collectively, the surveys discussed in these reports cover the entire project area.

Historic resources are aboveground structures and sites. The technical studies conducted to identify and evaluate historic resources include *Historic Structures Report, Cottage Hospital Master Plan* (San Buenaventura Research Associates, January 2003) and two letter addendums to this report prepared by Preservation Planning Associates. One letter report was dated October 24, 2003, and the other was dated February 20, 2004. In addition, Paula Carr re-conducted peer review of these reports for this EIR and evaluated one of the buildings in the project area for potential historic significance in a report titled *Architectural Evaluation: Medical Office Building, 401 West Pueblo Street, Santa Barbara, California* (October 2004). This section summarizes pertinent information and findings from all of the above reports, and letter addendums, which are included in Appendix D.

7.1 CULTURAL RESOURCES - IMPACT SIGNIFICANCE GUIDELINES

Significant Archaeological and Historical Resources. Criteria for determining sites and structures to be historically significant are provided in the State CEQA Guidelines, City of Santa Barbara Master Environmental Assessment *Guidelines for Archaeological Resources and Historic Sites and Structures* (hereafter MEA), and guidelines for listing resources on the Federal and State historic resource registers. In addition to retaining structural and architectural integrity, criteria for determining historical significance are generally summarized as follows:

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

Significant Impacts on Archaeological and Historical Resources. In accordance with CEQA and City environmental review guidelines, a proposed project would have a significant impact on cultural resources if it would:

- Cause a substantial adverse change to an important archaeological resource
- Cause the loss or a substantial adverse change to an important historical resource
- Disturb any human remains

The City of Santa Barbara MEA *Guidelines* reflect the characterization of significant archaeological and historical impacts in the State CEQA Guidelines Section 15064.5.

- a) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- b) The significance of an historical resource is impaired when a project: (A) demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that conveys its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or (B) demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or (C) demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.
- c) A significant effect on the environment may occur when an important or unique archaeological resource that is not a historic resource is physically demolished, destroyed, relocated, or altered.
- d) Following CEQA Guidelines Section 15064.5(c)(4), if an archaeological resource is neither a unique archaeological nor a [significant] historical resource, the effects of the projects on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

7.2 CULTURAL RESOURCES - METHODOLOGY

Archaeological and historical impacts are evaluated qualitatively by archeologists and historians. First existing conditions on a site are assessed to identify whether important or unique archaeological or historical resources exist, based on specified criteria. If important archaeological or historic resources exist on the site, project changes are evaluated to determine whether they would substantially affect these important resources.

➤ Archaeological Resources

Archaeological resources were identified by Western Points through archival research and an intensive pedestrian survey of the project area. The archival research included review of files, photographs, and/or maps on file at the City of Santa Barbara Community Development Offices, the Santa Barbara Historical Museum, and the Santa Barbara Main Library. In addition, the following resources were reviewed:

- National Register of Historic Places
- National Historic Landmarks
- California Register of Historical Resources
- California Registered Historical Landmarks
- Designated City Landmarks
- Designated City Structures of Merit
- Santa Barbara City Land Use Controls Division Street Records
- City Architectural and Historic Resources Survey
- Sanborn Fire Insurance Maps
- City of Santa Barbara's Bird's Eye View Maps (circa 1877 and 1888)
- City of Santa Barbara Potential Historic Structures/Sites List
- Santa Barbara City Directories

The field survey was conducted by an archaeologist walking parallel transects spaced two meters apart over all unpaved ground surfaces.

➤ **Historical Resources**

The impacts analysis for the historic resources utilizes the findings of architectural historians as to the potential significance of each existing building in the project area. Buildings were evaluated using criteria a, b, c, and d of the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register). The buildings were also evaluated in accordance with the City of Santa Barbara's criteria for Landmarks and Structures of Merit. Lastly, buildings were evaluated using all of the MEA Guidelines. Evaluation procedures included a visit to each building and research of archives held by SBCH and the University of California, Santa Barbara.

In July 2004, an additional evaluation of 401 West Pueblo was conducted by Architectural Historian Paula Carr because the building was not 50 years of age during the original evaluation. The original evaluation found the building not eligible for the National Register or the California Register because it was not 50 years of age, and it was not found that the building was exceptional. The building was found eligible as a City of Santa Barbara Structure of Merit. Ms. Carr's evaluation (July 2004) revisited the original findings and included additional research at the California State Polytechnic College of Architecture and Environmental Design Library; the California State Polytechnic Kennedy Library; the Santa Barbara Public Library microfilm collection of the *Santa Barbara News-Press*; and the University of California, Santa Barbara Architecture and Design Collection and Arts and Architecture Library. It was concluded that this building does not warrant listing on the National Register or the California Register, but it does qualify as a City of Santa Barbara Structure of Merit. In addition, Ms. Carr reviewed visual simulations of the proposed project in order to determine whether the project would create any visual impacts to historical resources.

The historic resource evaluations also included review of plans, elevations, and photo simulations of the proposed hospital building to assess visual effects to the surrounding

neighborhood. Potential visual effects of the proposed West Pueblo Street garage, the Child Care Center, and the Knapp garage were also assessed.

7.3 CULTURAL RESOURCES - REGULATORY FRAMEWORK

➤ CEQA Guidelines

CEQA details appropriate measures for the evaluation and protection of cultural resources in Section 15064.5 of the CEQA Guidelines. The term used for significant cultural resources in the regulations is “historical resource,” which is defined as any resource that is: (1) listed in or eligible for listing in the California Register of Historical Resources (California Register); (2) listed in a local register of historical resources (as defined at PRC 5020.1[k]); (3) identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code; or (4) determined to be a historical resource by a project’s lead agency (Section 15064.5[a]). The subsection further states that “[a] project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment” (Section 15064.5[b]).

Public Resources Code (PRC) Section 5097.5 also provides for the protection of cultural resources. PRC Section 5097.5 prohibits the removal, destruction, injury, or defacement of cultural and paleontological features on any lands under the jurisdiction of State or local authorities.

➤ City of Santa Barbara Policies

City General Plan. The City General Plan Conservation Element (August 1979) provides for the protection of archaeological and historic resources with the goal that “sites of significant archaeological, historic, or architectural resources will be preserved and protected wherever feasible in order that historic and prehistoric resources will be preserved.”

The policies and implementation strategies state the following:

- Activities and development which could damage or destroy archaeological, historical, or architectural resources are to be avoided.
- In the environmental review process, any proposed project which is in an area indicated on the map as “sensitive” will receive further study to determine if archaeological resources are in jeopardy. A preliminary site survey (or similar study as part of an environmental impact report) shall be conducted in any case where archaeological resources could be threatened.
- Potential damage to archaeological resources is to be given consideration along with other planning, environmental, social, and economic considerations when making land-use decisions.
- Publicly owned areas known to contain significant archaeological resources shall be preserved by limiting access and/or development which would involve permanent covering or disruption of the sub-surface artifacts.

Santa Barbara Municipal Code. In order to protect and preserve archaeological resources, the Santa Barbara Municipal Code, Chapter 22.12, states that “all new development in the City of

Santa Barbara shall be designed and constructed wherever feasible to avoid destruction of archaeological and paleontological resources...” A new ordinance is also under adoption that would establish procedures for review and approval of requests to demolish or alter structures that have been identified as potentially possessing historic significance.

Historic Landmarks Commission. The City Historic Landmarks Commission is appointed by City Council and charged with design review approvals for projects within designated Historic Landmark District, and structures designated as City Historic Landmarks. The HLC also reviews and accepts archaeological studies and historic structures reports. The Historic Reports for the SBCH project will require approval by the HLC.

7.4 CULTURAL RESOURCES - EXISTING SETTING

7.4.1 PROJECT SITE CULTURAL RESOURCE CONDITIONS

➤ Archaeological Resources (Existing Conditions)

Prior to European contact, Santa Barbara was occupied by the Chumash Indians. Evidence points to occupation by these Native Americans for the past 9,000 years or possibly more. Archaeological evidence of pre-contact individuals is present in the southern portion of the project area. A pre-contact site, CA-SBa-3684, is located in the area of the proposed Child Care Center near the intersection of Castillo and Los Olivos Streets. Additional sites may be located in the project area, but evidence has been obscured by the long history of development in the area.

➤ Historical Resources (Existing Conditions)

Development on the project site began with construction of the original buildings of the Cottage Hospital in 1891. The Cottage Hospital that exists today at 300–320 West Pueblo Street is situated at the location of these original buildings. By the 1930s, the remainder of the project area was filled with small- to medium-sized bungalows. From the late 1940s to the present, development included the demolition of many original buildings and construction of medical offices. There are currently 16 buildings and a historic tree on the project site.

➤ Buildings Ineligible for Listing as Historical Resources (Existing Conditions)

According to the *Historic Structures Report, Cottage Hospital Master Plan* (San Buenaventura Research Associates, January 2003), four residences were built in the early 1900s and meet the requirements of Criteria 5 and 6 of the MEA Guidelines. However, these residences do not meet the eligibility criteria for the National Register, the California Register, or the Santa Barbara City Landmark or Structure of Merit listings. They are not associated with any important persons or events, and they are a common architectural style. These residences include:

- 2209-11 Castillo Street (constructed in 1916–17)
- 2322 Oak Park Lane (constructed in 1912)
- 2332 Oak Park Lane (constructed in 1913)
- 2336 Oak Park Lane (constructed in 1913)

The *Historic Structures Report, Cottage Hospital Master Plan* (San Buenaventura Research Associates, January 2003) also identified seven medical office buildings that are insufficient in age for listing on the National Register, the California Register, or the Santa Barbara City Landmark or Structure of Merit listings. These buildings include:

- 320 West Pueblo Street, Eye Center Building (constructed in 1962)
- 410-414 West Pueblo Street (constructed in 1986–87)
- 411 West Pueblo Street (constructed in 1984)
- 417 West Pueblo Street (constructed in 1962–63)
- 419 West Pueblo Street (constructed in 1964–65)
- 415-17-21 West Junipero Street (constructed in 1983–84)
- 425 West Junipero Street (constructed in 1971–72)

Two other buildings were originally built in the early 1900s, but due to lack of integrity, they do not meet the eligibility criteria for the National Register, the California Register, or the Santa Barbara City Landmark or Structure of Merit listings. 2301 Castillo Street was constructed in 1912, but faced major alterations in 1959 and 1967. This building is currently used as medical offices. 418-422 West Pueblo Street was constructed in 1923 as a residence, but faced major alterations in 1931–48 and 1980. It is currently used as a day care facility.

➤ **Significant Historical Resources (Existing Conditions)**

Three buildings and a historic tree were identified in the *Historic Structures Report, Cottage Hospital Master Plan* (San Buenaventura Research Associates, January 2003) as eligible for the National Register, the California Register, and/or the Santa Barbara City Landmark or Structure of Merit listings. Each of these buildings is discussed below.

2400 Bath Street, the Knapp Building, is a Spanish Colonial Revival building that was constructed in 1923 and expanded in 1928. It was designed by Carlton Winslow, a key figure in the architectural transformation of Santa Barbara after the 1925 earthquake. Construction was funded by George Owens Knapp, a major benefactor to Cottage Hospital. It was dedicated to his wife, Louise Savage Knapp. This building meets the eligibility criteria for the National Register, the California Register, and the Santa Barbara City Landmark or Structure of Merit listings as a fine example of Spanish Colonial Revival style architecture, and due to its historic association in making significant contributions to the broad patterns of Santa Barbara history as the former Knapp College of Nursing, and due to its association with George Owen Knapp, Louise Savage Knapp, and Dr. William Samsun. In addition, it meets the requirements of Criteria 5, 6, and 8 of the City MEA Guidelines pertaining to its connection with the City's social and educational history and as a structure that conveys an important sense of time and place and contributes to the overall visual character of the neighborhood.

300–320 West Pueblo Street, Cottage Hospital, is located at the original Cottage Hospital site. The original Cottage Hospital was designed by Peter Barber and completed in 1891, but this original structure no longer remains. After World War II, there was pressure to expand the hospital, and in the 1960s, the hospital was enlarged and the remaining structures were modernized. Throughout the 1970s and 1980s, additional expansion occurred, and the last remaining buildings from the original hospital were demolished. Due to lack of integrity, the

Cottage Hospital buildings are not eligible for listing in the National Register or the California Register, nor do they meet the City MEA criteria. Most of the hospital buildings were constructed within the last 40 years. The hospital site was found eligible to be designated as a City Site of Merit, as it is associated with important, historical events (such as the discovery of insulin by Dr. Sansum) and the heritage of the City. The buildings, however, are excluded from the significance of the site.

Moreton Bay Fig is a large tree associated with the hospital that was planted in 1919. Because it is the only landscape feature to remain from the early hospital construction, it was found to qualify as a City Object of Merit.

401 West Pueblo Street, the MRI building, was designed by Henry W. Howell and Wallace W. Ardent to emulate the style of Frank Lloyd Wright. It was constructed between 1954 and 1955, and interior renovations were made in 1987–89 for use as an MRI Center. This building does not warrant listing on the National Register, the California Register, or the Santa Barbara City Landmark listings, but recent evaluation has found that it appears to qualify for listing as a City of Santa Barbara Structure of Merit under the criteria pertaining to architectural merit and association with the firm of Howell and Ardent.

To summarize, the project area contains one potentially significant archaeological site, CA-SBa-3684 and the potential exists for additional sites to be discovered during demolition of the existing buildings and construction of the proposed buildings. There are four significant historical resources: (1) 2400 Bath Street, the Knapp Building, (2) 300–320 West Pueblo Street, Cottage Hospital, (3) Moreton Bay Fig, and (4) 401 West Pueblo Street. The remaining buildings have been found not to meet any of the eligibility criteria and are therefore not considered historic resources.

7.4.2 SURROUNDING CULTURAL RESOURCE CONDITIONS

➤ Archaeological Resources (Surrounding Conditions)

The Chumash culture extends far beyond Santa Barbara. Evidence of this culture is found in San Luis Obispo and Ventura Counties as well as on the northern Channel Islands. In the immediate surrounding vicinity, a very large site, CA-SBa-23, has been identified. This site spans roughly four city blocks. As on the project site, additional evidence in the surrounding vicinity has been obscured by development.

➤ Historical Resources (Surrounding Conditions)

When Cottage Hospital was originally constructed in the late 1800s, walnut orchards surrounded the hospital for nearly three blocks in every direction. By 1906 development was beginning to encroach upon the hospital area with a few scattered homes and graded streets appearing. The surrounding neighborhood began to fill in with working-class, modest sized bungalows between 1910 and 1930. Beginning in the 1950s, medical offices gradually began replacing residences bordering the hospital on Bath, West Junipero, and Pueblo Streets. In addition, several two-story, multiple family dwellings replaced bungalows in the surrounding Oak Park neighborhood. Although medical buildings and multiple family buildings have encroached upon the surrounding vicinity, the neighborhood continues to reflect its original 1910–1930 working-class residential character.

7.5 CULTURAL RESOURCES - PROJECT FEATURES

PF 14-1 Architectural Design (Chapter 14, Visual Aesthetics) identifies that the project proposes Spanish and California Bungalow styles of architecture, intended to be compatible with the historic character of the neighborhood and nearby historically significant structures.

7.6 CULTURAL RESOURCES - LONG-TERM AND CONSTRUCTION IMPACTS

Impacts to archaeological and historical resources would occur during the demolition, site preparation, and construction of the project, and would constitute long-term (permanent) impacts. Hospital operations would not involve any potential for further impacts to archaeological or historical resources.

This section analyzes impacts on subsurface archaeological resources and aboveground historical structures from development of the proposed hospital, from potential build out of the Specific Plan, and from cumulative projects. As was discussed in the existing setting, there is one archaeological site, the potential for additional archaeological sites, and four significant historical resources in the project area.

7.6.1 PROJECT CULTURAL RESOURCES IMPACTS

➤ Project Archaeological Resources Impacts

Soil-disturbing activities such as grading remove the artifacts and/or features that compose an archaeological site out of their original context, thereby lessening the data potential of those materials. Per the MEA and CEQA guidelines, altering an archaeological resource may be considered a significant environmental impact (see Section 7.1 [c]). The following archaeological resources would be directly impacted during project construction:

Archaeological Site CA-SBa-3684. CA-SBa-3684 was discovered in the southernmost portion of the study area and would be disturbed during Construction Phase I. If this site is determined significant per the criteria in Section 7.3, construction would cause a potentially significant impact.

Archaeological survey and monitoring during pavement removal in the area around the site (Mitigation Measures CR-1 and CR-2) and development of a testing program to assess the site's significance (Mitigation Measure CR-4) would be required. If the site is not found significant, the finding will be documented in a report (Mitigation Measure CR-6) and project impacts will be less than significant. Should the site be found significant, additional mitigation such as data recovery (Mitigation Measure CR-5) would be required to reduce impacts to less than significant levels. These mitigation measures are specified in greater detail below.

Potential for Other Archaeological Sites. Much of the study area could not be surveyed due to the presence of buildings, pavement, or dense vegetation. Due to the presence of CA-SBa-3684 and other resources in the surrounding area, the potential exists for additional archaeological sites to be discovered during demolition and clearing activities. If previously unknown archaeological sites are discovered during construction, a potentially significant impact could occur if such sites were determined significant per the criteria in Section 7.3.

Similar to the mitigation for CA-SBa-3684, archaeological survey and monitoring during pavement removal and all ground disturbance (Mitigation Measure CR-1) would be required, and the finding would be documented in a report (Mitigation Measure CR-6). In addition, the General Contractor and all construction personnel would be made aware of the potential for archaeological resources prior to construction (Mitigation Measures CR-2 and CR-3). If no sites are encountered, then impacts will be less than significant. If sites are encountered, a testing program to assess significance (Mitigation Measure CR-4) would be required and additional mitigation such as data recovery (Mitigation Measure CR-5) would be required as necessary to reduce impacts to less than significant levels. These mitigation measures are specified in greater detail below.

➤ **Project Historical Resources Impacts - Direct Impacts**

Per the MEA and CEQA, demolition and/or alteration of important historic resources may be considered significant environmental impacts (see Section 7.1[a] and 7.1[b]). The following historical resources would be directly impacted during project construction:

401 West Pueblo Street. This building would be demolished during Construction Phase I. It does not meet the eligibility criteria for the National Register, the California Register, or Santa Barbara City Landmarks. However, it does meet the criteria for a City of Santa Barbara Structure of Merit (see report in Appendix D). ***Because 401 West Pueblo was found eligible as a Structure of Merit, demolition of this building could be considered a significant impact. However, mitigation in the form of documentation through photos and measured drawings (Mitigation Measure CR-7) would reduce impacts to a less than significant level.***

300–320 West Pueblo Street, Cottage Hospital. Portions of this building would be demolished and other portions would be remodeled during Construction Phases II, III, and IV. Due to a lack of integrity, the Cottage Hospital buildings are not determined eligible for listing in the National Register or the California Register. In addition, they do not meet the requirements of Criteria 5, 6, 7, or 8 of the MEA Guidelines. Most of the hospital buildings were constructed within the last 40 years. The hospital site was found eligible as a City Site of Merit, as it is associated with important local historical events and the heritage of the City. ***The hospital would continue as a use at the site, and therefore would not adversely affect the site's significance or its Site of Merit eligibility.*** A recommended measure is identified for proceeding with City Site of Merit designation, and including a plaque or other feature to memorialize the historic significance of the site to the heritage of the City.

The hospital buildings themselves are excluded from site significance because they are either less than fifty years old and modern institutional and/or undistinguished in design, or have been altered substantially and do not retain historic integrity. ***Impacts from demolition of the buildings at 300–320 West Pueblo Street would be less than significant because the buildings themselves have been determined not historically significant, and have been excluded from the identified significance of the location.***

Moreton Bay Fig Tree. The large Moreton Bay Fig Tree is the only landscape feature to remain from the early hospital construction. It was found to qualify as a City object of merit. It is not anticipated that the Moreton Bay Fig Tree would be removed, but construction activities during Construction Phase III would create stressful conditions and could threaten the tree's health. These impacts would be potentially significant.

Tree protection measures would be required during construction activities (Mitigation Measures B-1, B-2, B-5, B-7, and B-10), and during landscape design and maintenance (Mitigation Measures B-3, B-4, B-6, B-9, and B-13). *These measures would reduce impacts to less than significant levels.* These mitigation measures are described briefly in the Project Construction Mitigation Measures below and in full detail in Chapter 6.0, Biological Resources.

➤ **Project Historical Resources - Indirect Impacts**

Per the MEA and CEQA guidelines, altering the immediate surroundings of an important historic resource in a manner that substantially affects that resource's significance may create a significant environmental impact. The following historic resources may be impacted indirectly through visual changes to the existing historic setting.

2400 Bath Street, Knapp Building. Visual impacts may occur during Construction Phase I. This building meets the eligibility criteria for the National Register, the California Register, and the Santa Barbara City Landmark or Structure of Merit listings. In addition, it meets the requirements of Criteria 5, 6, and 8 of the Master Environmental Guidelines. However, several project features were designed to avoid significant visual impacts. These include the Spanish style architecture planned for the proposed hospital and parking structures, the compatible size, scale, proportions, and massing for the parking structure proposed behind 2400 Bath Street, the setback of the parking garage from 2400 Bath Street and its simplified design elements. *As demonstrated by the visual simulations (see Chapter 14.0), the visual impacts to this resource from project development would be less than significant as they would not cause deterioration of the historic setting to such a degree that the historic integrity of the Knapp building would be compromised.*

7.6.2 PROJECT CULTURAL RESOURCES MITIGATION MEASURES

As was discussed above, potentially significant impacts to archaeological and historical resources include: (1) the potential destruction of archaeological site CA-SBa-3684; (2) the potential destruction of previously unrecorded archaeological sites; (3) the demolition of 401 West Pueblo Street; and (4) damage to the Moreton Bay Fig Tree. The following mitigation measures would prevent or reduce potential impacts to these resources to a less than significant level.

CR-1 Archaeological Survey and Monitoring. Prior to the issuance of building permits, the Owner/Applicant shall contract with a qualified archaeologist from the City-approved list of archaeologists to conduct an Extended Phase I surface survey following demolition and removal of existing paved areas and to monitor all ground-disturbing activities. The contract shall establish a schedule for monitoring, consultation as needed with a qualified Native American representative as a subconsultant to the archaeologist, procedures per the City MEA in the event resources are discovered, and a report to the City Environmental Analyst on the findings of the monitoring. Contract(s) shall be subject to the review and approval of the Environmental Analyst.

CR-2 Archaeological Pre-Construction Conference. Prior to the issuance of building permits, a pre-construction conference shall be held by the General Contractor at which archaeological

procedures shall be reviewed. The conference shall include representatives from the Public Works Department, Building Division, Planning Division, the Property Owner, and Contractor.

CR-3 Unanticipated Archaeological Resource Discovery. Prior to the start of any vegetation or paving removal, demolition, trenching, or grading, contractors and construction personnel shall be alerted to the possibility of uncovering unanticipated subsurface archaeological features or artifacts associated with past human occupation of the parcel and required procedures for responding. This mitigation measure shall be specified on the project construction plans submitted for building permits.

CR-4 Archaeological Resources Significance Assessment and Mitigation. If cultural resources are encountered or suspected during project construction, project work in the vicinity of the find shall be halted immediately and the City Environmental Analyst notified. The project archaeologist shall assess the nature, extent, and significance of any discoveries and develop appropriate management recommendations for archaeological resource treatment, including but not limited to redirection of grading and/or excavation activities. If resources are potentially significant, a Phase III mitigation program (which may entail measures such as project redesign to avoid resources, documentation and capping of resources in place, or recovery) shall be prepared and accepted by the Environmental Analyst and the Historic Landmarks Commission and implemented. That portion of the Phase III program that requires work on site shall be completed prior to continuing construction in the affected area. If prehistoric or other Native American remains are encountered, a Native American representative shall be contacted and shall remain present during all further subsurface disturbance in the area of the find. If human remains are discovered or suspected, the County Coroner shall be informed immediately, and applicable State Health and Safety Code and Public Resources Code procedures shall be followed. This mitigation measure shall be specified on the project construction plans submitted for building permits.

CR-5 Archaeological Resource Supplemental Mitigation. If cultural resources were discovered in the course of construction and monitoring, any study and mitigation measures determined necessary to mitigate potentially significant impacts to insignificant levels shall be completed prior to the issuance of the Certificate of Occupancy (Final Inspection).

CR-6 Archaeological Resources Monitoring Report. A final report on the results of the archaeological monitoring shall be submitted to the Environmental Analyst within 180 days of completion of the monitoring and receive approval prior to the issuance of the Certificate of Occupancy (Final Inspection).

CR-7 Historic Photographic Documentation. Prior to issuance of a demolition permit for 401 West Pueblo Street, the building at 401 West Pueblo Street shall be documented photographically and with measured drawings in accordance with City historic preservation standards, and under the direction of a qualified preservation professional. This photo documentation shall be submitted by the project applicant to the City Historian for review and approval.

Moreton Bay Fig Mitigation. The mitigation measures required to reduce impacts to the Moreton Bay Fig Tree to a less than significant level are provided in Chapter 6, Biological Resources. Specifically, there shall be protection from falling debris (Mitigation Measure B-1), design modification recommendations by a Registered Consulting Arborist (Mitigation Measure B-2), and landscaping consistent with tree preservation policies (Mitigation Measure

B-3). In addition, fencing shall be placed at the dripline plus 6 feet (Mitigation Measure B-5), a landscape maintenance individual shall be designated (Mitigation Measure B-6), the tree shall be examined twice monthly for signs of stress (Mitigation Measure B-7), the amount of paving and other non-permeable surface encroachment under the canopy/dripline shall be minimized (Mitigation Measure B-9), and the root system shall be protected from smothering and compaction (Mitigation Measure B-10).

7.6.3 SPECIFIC PLAN CONSTRUCTION IMPACTS

➤ Archaeological Resource Impacts (Specific Plan)

If SBCH were to propose reconstruction of a portion of the hospital as a fourth nursing pavilion as allowed by the proposed Specific Plan, ground disturbance would occur as part of the reconstruction, and there is potential to impact previously unknown archaeological sites. ***If archaeological sites are discovered during construction, a potentially significant impact could occur if such sites were determined to be significant per the criteria in Section 7.3.***

Archaeological survey and monitoring during pavement removal and all ground disturbance (Mitigation Measure CR-1) would be required, and the findings documented in a report (Mitigation Measure CR-6). In addition, the general contractor and all construction personnel would be made aware of the potential for archaeological resources prior to construction (Mitigation Measures CR-2 and CR-3). If no sites are encountered, then impacts will be less than significant. If sites are encountered, a testing program to assess significance (Mitigation Measure CR-4) and additional mitigation such as data recovery (Mitigation Measure CR-5) would be applied to reduce impacts to less than significant levels. Each of these measures was specified in greater detail under the project construction mitigation measures. ***With these measures, potentially significant effects to archaeological resources from Specific Plan build-out would be mitigated to less than significant levels.***

➤ Historical Resource Impacts (Specific Plan)

Any additional buildings would replace existing structures and would be limited to 60 feet in height, thereby reducing the potential to cause visual or auditory impacts to historical resources. ***No significant impacts to historical resources would be caused by additional development within the Specific Plan area, such as demolition of Building K and construction of a fourth 100-bed nursing pavilion.***

7.6.4 CUMULATIVE CULTURAL RESOURCES IMPACTS

➤ Archaeological Resources

Impacts to archeological sites outside the project construction limits, but within the City of Santa Barbara, are mitigated on a project-by-project basis. The mitigation measures for the proposed project discussed in the project construction mitigation measures section include archaeological survey and monitoring during pavement removal and all ground disturbance (Mitigation Measure CR-1), notification to the General Contractor and all construction personnel regarding the potential for archaeological resources (Mitigation Measures CR-2 and CR-3), development of a testing program to assess the significance of any identified sites

(Mitigation Measure CR-4), additional mitigation such as data recovery (Mitigation Measure CR-5), and a monitoring report (Mitigation Measure CR-6). Implementation of these mitigation measures would reduce the impacts of the proposed project upon archaeological resources during construction to a less than significant level. ***Therefore, development on the project site would not substantially contribute to a significant cumulative impact on archaeological resources from past, present, and reasonably foreseeable projects.***

➤ **Historical Resources**

401 West Pueblo Street. Pre-demolition photo-documentation (Mitigation Measure CR-7) is discussed in the project construction mitigation measures and would reduce impacts to this building to a less than significant level. No known reasonably foreseeable future projects in the vicinity involve demolition of buildings of similar architectural style, so the project development would not contribute to a significant cumulative impact.

300–320 West Pueblo Street. These buildings were determined not historically significant, and potential future development would not contribute to a significant cumulative impact on historical resources.

Knapp Building. The proposed Cottage Hospital and associated buildings and structures would be designed to avoid visual impacts to the Knapp Building. No other projects are known within viewshed of the building. ***Therefore, there would be no cumulative visual impacts to this resource.***

Moreton Fig. The mitigation measures discussed in the project construction mitigation measures section include protection from falling debris (Mitigation Measure B-1), design modification recommendations by a Registered Consulting Arborist (Mitigation Measure B-2), landscaping consistent with tree preservation policies (Mitigation Measure B-3), placement of fencing at the dripline plus 6 feet (Mitigation Measure B-5), designation of a landscape maintenance individual (Mitigation Measure B-6), twice monthly examination of the tree for signs of stress (Mitigation Measure B-7), minimization of the amount of paving and other non-permeable surface encroachment under the canopy/dripline (Mitigation Measure B-9), and protection of the root system (Mitigation Measure B-10). These mitigation measures would reduce impacts to the Moreton Bay Fig Tree to a less than significant level. Because the tree mitigation plan involves protecting the tree from damage, the tree shall remain in place, and there would be no loss of significant historical landscape elements. Therefore, the mitigation measures for this resource also serve to avoid cumulative impacts.

7.7 SUMMARY OF CULTURAL RESOURCES IMPACTS

This project would not cause any significant unavoidable adverse impacts on archaeological or historical resources. While the project has the potential to significantly impact archaeological site CA-SBa-3684, other unidentified archaeological sites, 401 West Pueblo Street, and the Moreton Bay Fig Tree, implementation of Mitigation Measures CR-1 through CR-7, B-1 through B-3, and B-5 through B-10 would reduce these impacts to less than significant levels.