

#### 4.5.1.1 Project Impact Analysis

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**Impact CUL-1: Historical Resources (Significance Threshold CUL-1).** Adoption and implementation of the proposed Sustainability Update could indirectly lead to development that could result in a substantial adverse change in the significance of historical built resources. ***(Potentially Significant and Unavoidable)***

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The proposed project would not directly result in new development but could indirectly lead to future development and redevelopment throughout the county, primarily within urban areas within the USL. Future development accommodated by the proposed Sustainability Update could potentially result in a substantial adverse change in the significance of an historical resource. Under CEQA, both prehistoric and historic archaeological sites may qualify based on historical associations as defined above in Section 4.5.4.2. This impact discussion focuses on impacts to historical built environment resources; impacts to archaeological resources are evaluated in Impact CUL-2 below.

Future potential redevelopment of existing developed sites may result in alteration or removal of historical structures, affecting the significance of historical values if the structure is considered an historical resource under CEQA definitions. As indicated above, 75% of the anticipated future development would occur within the urban areas in which historic or older buildings may be located. It is expected that redevelopment of existing properties would occur primarily within the county's urban areas, especially along key transportation corridors, such as Soquel Drive and Portola Drive. However, future development could occur throughout the unincorporated county areas. There are 17 federal- and state-listed historical resources in the unincorporated county, as well as 266 parcels identified by the County as being local historical resources as delineated by the Historic Landmark Combining District. Future development accommodated by the proposed Sustainability Update could be in areas with known historical sites or in areas where structures have not yet been evaluated for historical significance. Buildings that are over the age of 50 years old and are proposed for modification or alteration in the future would require evaluations to determine eligibility for listing in the CRHR and/or NRHP listing, and if so, could be determined to be historically significant.

The proposed ARC Element of the County's General Plan/LCP includes policies that would serve to reduce potential future impacts to historical resources as summarized on Table 4.5-4. No amendments are proposed to SCCC sections that address historical resources. The General Plan/LCP policies outlined in Table 4.5-4 include measures to protect historical resources. For development activities on property containing historic resources, policies require protection, enhancement, and/or preservation of the resource, and plans for protection/preservation are required on properties with a designated historical resource. The proposed project continues to require review of applications for demolition of any structure more than 50 years old to determine whether the structure is an historical resource under CEQA (ARC-8.2p). County policies also protect and preserve historical resources (ARC-3.2.3 and ARC-8.2.4). Additionally, compliance with local regulations provided in SCCC Chapter 16.42 regarding historic alteration or demolition would also serve as the mechanism for review of projects that may alter existing historical resources as designated by the Historic Landmark Combining District.

Compliance with existing and proposed policies and regulations set forth in SCCC Chapter 16.42 regarding protection of historical resources would reduce the potential impact on known County-designated historical resources. However, while historical structures that are listed on federal, state, and local inventories would be subject to County review under existing SCCC Chapter 16.42, future development accommodated by

the Sustainability Update could occur on sites with potentially eligible historic structures that have not been evaluated or are not currently recorded on the County HRI. The Sustainability Update includes a policy to require that any structures proposed for demolition that are more than 50 years old be evaluated for historical significance.

Furthermore, eight of the properties along Portola Drive that are proposed for amendments to existing General Plan/LCP land use and zoning designations contain buildings older than 50 years in age. Typically, structures older than 50 years in age (on sites proposed for development or redevelopment) are evaluated to determine whether the structure meets the CEQA definition of an historical resource, i.e., eligible for listing in the CRHR or local register or inventory, consistent with the Sustainability Update Implementation Strategy ARC 8.2p. If any of the structures on Portola Drive are determined to be an historical resource, redevelopment of the site would potentially result in removal/demolition of the structure, which would be considered a significant impact.

Therefore, while adherence to General Plan/LCP policies and local regulations provided in SCCC Chapter 16.42 would reduce potential adverse effects on known built historical resources, structures that may be eligible historical resources but have not been previously evaluated for historic significance would require preliminary review to determine whether adverse effects may result from future development accommodated by the proposed project. It is noted that the County Planning Department currently evaluates the potential for historical resources as part of the CEQA and discretionary development proposal reviews, and projects that could result in an adverse significant impact to a historical structures typically require preparation of an historical resources assessment. It is therefore assumed that such procedures would continue as part of the CEQA environmental review of future development applications. PRC sections 21083.2(b)-(c) and CEQA Guidelines section 15126.4(b) provide information regarding the mitigation framework for historical resources and indicate that consistency with the Secretary of Interior Standards for the Treatment of Historic Properties would reduce an impact on historical resources to a less-than-significant level. Therefore, a significant historical resource impact could be mitigated to a less-than-significant level if designed to be consistent with these standards. However, since the proposed Sustainability Update is a program-level analysis and no specific development projects are proposed, it is not possible to determine whether individual projects would be able to attain the Secretary of Interior's Standards.

**Table Error! No text of specified style in document.-4. Proposed and Retained General Plan/LCP Policies that Avoid/Minimize Cultural Resources Impacts**

Potential Impact	Policies and Implementation Strategies
<u>Historical Resources</u>	<ul style="list-style-type: none"> <li>• <u>Continue the review of proposed applications for demolition of any structure more than 50 years old that has not been previously surveyed for historic significance, and require a historic report prepared by a qualified historic consultant for structures that may have the potential to qualify as a historic resource as determined by County Planning staff. (ARC 8.2p)</u></li> <li>• <u>Require protection, enhancement and/or preservation of historical values on sites proposed for development. (ARC-8.2.3).</u></li> <li>• <u>Require plans for protection and preservation of historic resource values for development proposals on property containing designated historic resources. (ARC-8.2.4)</u></li> <li>• <u>Environmental review shall be required for any project with the potential to significantly impact historic resources. (ARC-8.2.8)</u></li> </ul>

	<ul style="list-style-type: none"> <li>• <u>Protect cultural and historical resources throughout the parks system. (PPF-2.3.2)</u></li> </ul>
<b><u>Archaeological Resources</u></b>	<ul style="list-style-type: none"> <li>• <u>Protect archaeological sites until evaluated. (ARC -8.1.1)</u></li> <li>• <u>Require archaeological site survey for projects within sensitive archaeological areas. (ARC-8.1.1)</u></li> <li>• <u>Protect identified archaeological areas from development. (ARC-8.1.3)</u></li> <li>• <u>Require evaluation of resource significance for development proposals on identified archaeological site. (ARC-8.1.4)</u></li> <li>• <u>Cease activities upon accidental discovery of archaeological resources. (ARC-8.1.5)</u></li> <li>• <u>Require environmental review for any project with the potential to significantly impact archaeological or tribal cultural resources. (ARC-8.1.6)</u></li> </ul>
<b><u>Disturb Human Remains</u></b>	<ul style="list-style-type: none"> <li>• <u>Cease activities upon accidental discovery of human remains. (ARC-8.1.5)</u></li> </ul>
<b><u>Tribal Cultural Resources</u></b>	<ul style="list-style-type: none"> <li>• <u>Prohibit disturbance of Native American sites cultural sites or tribal cultural resources without appropriate permit. (ARC-8.1.1)</u></li> <li>• <u>The County shall consult with Native American tribes that request notice of projects pursuant to PRC 21073 and 21080 and work with affected tribe to identify appropriate mitigation measures if tribal cultural resources are found. (ARC-8.1.7)</u></li> <li>• <u>Tribal consultation prior to amendment to the General Plan. (ARC-8.1.8)</u></li> </ul>

In summary, future development projects facilitated by the Sustainability Update would be required to undergo project-level environmental review to analyze potential impacts to historical resources and mitigate any impacts to the extent feasible. Through compliance with federal, state, and local regulations, and implementation of mitigation measures identified through project-level CEQA reviews and County-required historical evaluations for any structure over 50 years old, the potential for adverse effects to historical resources would be identified, and mitigation would be required if a significant impact were identified. Nonetheless, preservation, reuse, maintenance, and/or avoidance of historical resources may not always be feasible, especially with potential redevelopment and intensification of uses in the USL, and recordation of a significant historical resource, alone, would not constitute adequate mitigation for a substantial adverse change to that resource. Therefore, because the potential for future development accommodated by the Sustainability Update to cause a substantial adverse change to an historical resource cannot be precluded, impacts to historical resources are conservatively considered *potentially significant*.

### **Mitigation Measures**

Implementation of CUL-1 would require the review of listed, eligible, or unevaluated sites or structures over 50 years old to determine whether an historical resource exists, and if so, provide mitigation to reduce potentially significant impacts to a less-than-significant level. This would ensure adequate review of potential historical resources for any structure that is older than 50 years, consistent with County policies. With the addition of appropriate project conditions to ensure compliance with the Secretary of the Interior Standards pursuant to CEQA guidelines 15064.5(b)(3), any future impacts associated with Impact CUL-1 would be less than significant with mitigation. However, if a future development project were not found to be compliant with the Secretary of Interior Standards and other protection measures were not available or demolition of the structure were proposed to facilitate redevelopment of a site, the impact would remain significant and unavoidable.

Implementation of Mitigation Measure CUL-2 provides on-site preservation guidance, and in the event that a structure or resource cannot be preserved, it ensures that actions would be taken to appropriately record

and document an identified historical resource. Through compliance with existing federal, state, and local regulations, and implementation of mitigation measures, the potential for adverse effects to historic resources would be substantially reduced. However, preservation, reuse, maintenance, and/or avoidance of historical resources may not always be feasible, and recordation of a significant historic resource does not constitute adequate mitigation for a substantial adverse change to that resource.

Because sites for future development have not been identified, except for the 10 parcels proposed for land use and zoning map changes along transportation corridors, for which site-specific historical evaluations have not been prepared because no development proposals are part of the proposed project, it is possible that there may be future impacts to historical resources on these sites or other locations in the county due to potential substantial alteration or demolition of a building, indirectly resulting from the proposed project that cannot be mitigated to a less-than-significant level. Therefore, because the potential for permanent loss of a historic resource cannot be precluded, it is conservatively concluded that the proposed project's impact to historical resources would be *potentially significant and unavoidable*.

**MM CUL-1: Historic Resources Assessment and Project-Level Mitigation.** Require preparation of an historic resources evaluation for any development proposal containing a structure or structures 50 years old or older and that are not identified as historic resources in the County HRI. If the structure(s) may potentially meet the criteria for listing as an historic resource, and proposed development would have the potential to impact the historic significance of the structure(s), the development applicant shall provide an historic assessment of the structure(s) prepared by a qualified historic consultant. The historic assessment shall include a completed DPR 523a form<sup>1</sup> and a letter prepared by the historic consultant stating whether the property has historic significance. If it is determined by the Community Development & Infrastructure Department based upon the historic assessment that a development would impact a structure that is eligible as an historic resource under CEQA definitions, the County shall consider measures that would enable the project to avoid direct or indirect impacts to the building or structure, including designs consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. If the building or structure can be preserved, but remodeling, renovation or other alterations are required, this work shall be conducted in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

**MM CUL-2: Resource Documentation.** If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, the County shall ensure that a qualified architectural historian thoroughly documents the building and associated landscape and setting. Documentation shall include still and video photography and a written documentary record/history of the building to the standards of the Historic American Building Survey or Historic American Engineering Record, including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. The record shall be prepared in consultation with the State Historic Preservation Officer and filed with the Office of Historic Preservation. The record shall be accompanied by a report containing site-specific history and appropriate

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<sup>1</sup> A form of California State Parks used to record/evaluate potential historical resources.

contextual information. This information shall be gathered through site specific and comparative archival research, and oral history collection as appropriate.