

## 4.5 CULTURAL RESOURCES

The information in this section is based on the *San Luis Ranch Project Cultural Resources Study* prepared by Rincon Consultants, Inc. (Rincon) in August 2016 (Appendix G) and the 2014 LUCE Update EIR.

### 4.5.1 Setting

**a. Prehistoric Setting.** The project site is located within what is generally described as the Central Coast archaeological region, which one of eight organizational divisions of California (Jones and Klar 2007, Moratto 1984). The Central Coast archaeological region extends from Monterey Bay to Morro Bay, and includes the County of San Luis Obispo. The prehistoric cultural chronology for the Central Coast is generally divided into six periods: Paleo-Indian (ca. 10,000 - 6,000 B.C.), Milling Stone (6,000 - 3,000 B.C.), Early and Early-Middle Transition (3,000 - 600 B.C.), Middle (600 B.C. - A.D. 1000), Middle-Late Transition (A.D. 1000 - A.D. 1250), and Late (A.D. 1250 - historic contact [ca. A.D. 1769]) (Jones and Klar 2007).

Several chronological sequences have been devised to understand cultural changes along the Central Coast from the Millingstone Period to contact. Jones (1993) and Jones and Waugh (1995) presented a Central Coast sequence that integrates data from archaeological studies conducted since the 1980s. Three periods, including the Early, Middle, and Late periods, are presented in their prehistoric sequence subsequent to the Millingstone Period. More recently, Jones and Ferneau (2002) updated the sequence following the Millingstone Period as follows: Early, Early-Middle Transition, Middle, Middle-Late Transition, and Late periods. The archaeology of the Central Coast subsequent to the Millingstone Period is distinct from that of the Bay Area to the north and Central Valley to the east. The region has more in common with the Santa Barbara Channel area during the Middle and Middle-Late Transition periods, but few similarities during the Late period (Jones & Ferneau 2002).

**b. Historical Setting.** Post-European contact history for California is generally divided into three periods: the Spanish Period (1769-1822), the Mexican Period (1822-1848), and the American Period (1848-present). The Spanish Period brought the establishment of the California mission system, while the Mexican Period is largely known for the division of the land of California into private land holdings. Following the Mexican-American war, the United States purchased California from Mexico; population of the state subsequently increased, particularly during the Gold Rush.

Following the arrival of the first Europeans, Mission San Luis Obispo de Tolosa was founded in 1772 by Padre Junipero Serra. The population of native people at the mission declined rapidly. In 1803, there was a peak of 919 Native Americans residing at the mission, but by 1838 the population had declined to 170. In 1822 California became a Mexican Territory, and the mission lands gradually became private ranchos through Mexican land grants. In 1846, the Bear Flag Rebellion resulted in California's independence from Mexico, and control of the territory soon fell into the hands of the United States.

Beginning in 1873, the County experienced a steady change in land use and recorded more acreage under cultivation each year. The California State Board of Agriculture reported that in 1910 the County had 1,566,660 acres of farmland. Over the following decades, the San Luis Obispo area continued to operate as agricultural and ranching property.



Agriculture in San Luis Obispo. By the early 20th century, the land surrounding Laguna Lake developed into farms, dairies, and ranches (Bertrando 1999a). Wool, flour, and dairy were important income-generating products in the area. Some of the most important agricultural crops in the late 1800s were wheat, barley, and beans. Grain from area ranchos was processed at local mills. Production increased when steam-powered mills were constructed starting in the 1870s. Ranching and agriculture were the region's main commercial enterprises at one time and thus had an impact on the development of the city (Historic Resources Group [HRG] 2013). Because San Luis Obispo was the largest settlement in the area, some ranchers would travel from up to forty miles away to bring their grains into the city to be milled. As a result, roads were constructed throughout the County in the 1870s, primarily by Chinese laborers, leading to increased mobility in the region. In 1872, Captain John Harford began construction on the Pacific Coast Railway which ran just to the east of the Specific Plan Area. The railway improved shipping methods of local crops and products, advancing the economy (HRG 2013).

A dairy industry began developing in San Luis Obispo County in the late 1860s after the drought years of 1862-64. During the 1880s, beans were the primary crop grown south of the city and continued into the early years of the 20th century (Bertrando 1999b). Other significant agricultural crops in the area in the early 20th century included winter peas, celery and flower seed. Japanese farmers in particular were successful with these crops through the 1930s.

Horse Racing in San Luis Obispo. Horse racing was documented to be a popular sport in the region since the time of the Mexican ranchos in the first half of the 19th century (Angel 1883). Historical newspaper articles discuss the establishment of horse racing tracks in the San Luis Obispo area from 1874 through 1887. During this period a ~~half~~one-mile race track was located in the vicinity of Madonna Plaza, which would be slightly to the northeast of the project site (Bertrando 1999a). After 1901, ownership of the portion of the project site with the spectators' barn/viewing stand changed hands, and the spectators' barn/viewing stand was reportedly moved to its current location on the northwest portion of the project site, near Madonna Road. It was reported that when the spectators' barn/viewing stand was moved into the project site, the track was shortened by a half mile (Froom in Bertrando, 1998).

**c. Project Site Historic Context.** The project site is comprised of several lots that were subdivided in 1875, when the Laguna Rancho was sold off into plots for small family farms. Each property consisted of a farm complex with a home (Bertrando 1999a). A horse race track facility, which included stables and a spectators' barn/viewing stand, was originally located in the current agricultural area of the site. After 1910, the horse race track facility was moved to its current location on the northwest portion of the project site, near Madonna Road. A kitchen and cocktail lounge that once existed on opposite ends of the viewing stand were removed and utilized for the construction of a small family residence. The stables that had been associated with the race track were removed from the site and the spectators' barn/viewing stand was further altered by the addition of a dairy, stables and conversion of the spectator seating area to hay storage.

In approximately 1921, the Dalidio family purchased the project site and converted the site to farmed crops such as onions, artichokes, and garbanzo beans, as well as flowers for seed (Bertrando 1999a; Stewart 1999). The agricultural business on the project site was known as Zapata Farms starting in the early 1980s (Bertrando 1999a; Stewart 1999). The property changed ownership again in 2014 and it has recently been known as the San Luis Ranch. For a detailed



history of the region and the San Luis Ranch Specific Plan Area, refer to the Cultural Resources Study in Appendix G to this EIR. The former spectators' barn/viewing stand, as well as other on-site structures, is described in detail in Section 4.5.1(d).

#### **d. Documented Cultural Resources.**

Previously Documented Archaeological and Historical Resources. On January 25, 2016 Rincon requested a search of the cultural resource records housed at the California Historical Resources Information System (CHRIS) Central Coast Information Center (CCIC) located at University of California, Santa Barbara. The search included a review of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California State Historical Landmarks list, the California Points of Historical Interest list, historic building surveys, the Archaeological Determinations of Eligibility list, and the California Inventory of Historical Resources list. The records search provided information about archaeological resources, historic resources, and reports within the project site as well as within a 0.5-mile radius of the project site. The records search identified 51 reports of studies previously conducted within the project site as well as within a 0.5-mile radius of the project site. Of these records, eight previous studies overlap with or were located within the project site. The National Archaeological Database listing summary for these studies is presented in Appendix B of the *Cultural Resources Study* prepared for the project by Rincon in August 2016 (refer to Appendix G to this EIR).

The previous studies conducted within and in the vicinity of the project site did not identify any archaeological resources on the project site. In addition, the CCIC did not list any historic addresses on the project site, nor does the CCIC possess any historical maps that indicate the presence of historic resources on the project site. However, the CCIC records search identified nine previously recorded archaeological and historical resources located within a 0.5-mile radius of the project site, described in detail in Appendix G to this EIR. Of these resources, one identified historic resource is located on the project site: the San Luis Ranch Complex (P-40-041000). The San Luis Ranch Complex, formerly known as the Dalidio Ranch Complex, is located on the northwest portion of the project site, near Madonna Road. Singer and Atwood (1988) conducted a cultural resources survey of the project site in 1988, and identified "two wood frame structures, a large, two-story house and a barn" as having potential historical significance. Betsy Bertrando recorded and evaluated the Complex in 1999 and identified eight historic built environment resources including the Dalidio home, a bungalow, a small shed/bunkhouse, a garage, a water tower, the main barn, a large equipment storage building, and the spectators' barn/viewing stand. The San Luis Ranch Complex presently includes nine structures, described in detail below. The water tower that was recorded on the project site in the 1999 Bertrando analysis was not observed during the investigation for the current project.

#### Archaeological and Historical Resources on the Project Site.

*Archaeological Resources.* Rincon staff conducted a pedestrian field survey of the project site for archaeological resources between March 14, 2016 and March 16, 2016. During this field survey, Rincon identified and recorded three prehistoric archaeological resources on the project site. These resources include one prehistoric archaeological site (SLR-S-01) and two isolated prehistoric artifacts (SLR-I-01 and SLR-I-02). Between August 1, 2016 and August 16, 2016,



Rincon conducted test excavations, including one test unit, two shovel test pits, and 21 auger tests, of archaeological site SLR-S-01 to evaluate the CRHR eligibility of the site.

The three resources identified on the project site include:

- *SLR-S-01*. SLR-S-01 is a prehistoric lithic scatter. The site measures 170 × 315 feet and consists of a surface scatter of lithic artifacts and one fragment of shell, with a subsurface component of redeposited lithic debitage (waste material from stone tool production) extending to 40 centimeters below the surface. During the pedestrian survey, Rincon identified the site as a surface scatter of flaked stone debitage, all composed of cryptocrystalline silicate (CCS) materials including Franciscan and Monterey cherts.
- *SLR-I-01*. SLR-I-01 consists of an isolated prehistoric grayish-brown cortical CCS flake measuring 4.8 x 3.6 x 1 centimeters. The flake exhibits moderate post-depositional damage.
- *SLR-I-02*. SLR-I-02 consists of an isolated prehistoric brownish-red cortical CCS flake measuring 3.0 x 2.3 x 0.7 centimeters. The flake exhibits moderate post-depositional damage.

*Built Environment Resources.* As shown in Figure 4.5-1, the project site currently contains a grouping of nine structures at the northwest end of the property, collectively known as the San Luis Ranch Complex. The San Luis Ranch Complex includes three single-family residences, a garage/shed, a smaller shed, the main barn, a large equipment storage building, a warehouse, and the former spectators' barn/viewing stand, which was converted to farm use. Figures 4.5-2a through 4.5-2e provide photographs of each of these structures.

The following is a summarized description of each of the structures within the San Luis Ranch Complex:

- *Main Residence (Residence #1)*. The main residence is a single-family residence estimated to have been built ca. 1910. It is irregular in plan and built in the Craftsman style. This structure features a high pitched, front-gabled roof, with overhanging eaves and exposed rafter tails. The roof is clad in composition shingles. There is a shed dormer on the northeast side of the roof. On the southwest side a hipped roof extension covers the wrap-around porch and a cantilevered box bay window. The home is clad with shiplap and clapboard siding as well as shingles on the gable face.
- *Residence #2*. This single family home is estimated to have been built ca. 1900-1910. It is rectangular in plan and appears to have a small addition on the east elevation as well as a shed extension on the south. The eastern addition includes a chimney. Both the main portion of the home and the addition feature medium pitched front-gabled roofs and an open eave overhang with fascia boards. The roof is clad with composite shingles. The shed extension features a nearly flat roof partially clad with corrugated panels.
- *Residence #3*. This single family home is estimated to have been built in the 1960s. It is roughly square in plan, clad with reverse board and batten and has a side-gabled roof clad with composition shingles. There are horizontally slatted vents under the gable peaks. The home features aluminum sliding windows surrounded by wood framing on the north and east elevations.



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Built Environment Resources

Figure 4.5-1



**Photo 1:** Main Residence (Residence #1), northwest elevation, view to the southeast.



**Photo 2:** Residence #2, view to the east.

San Luis Ranch Complex  
Structure Photographs

Figure 4.5-2a

City of San Luis Obispo



**Photo 3:** Residence #3, view to the south.



**Photo 4:** Garage/Shed, northwest elevation, view to the southeast.

San Luis Ranch Complex  
Structure Photographs

Figure 4.5-2b

City of San Luis Obispo



**Photo 5:** Shed #2, northwest elevation, view to the southeast.



**Photo 6:** Main barn, north elevation, view to the southwest.

San Luis Ranch Complex  
Structure Photographs

Figure 4.5-2c

City of San Luis Obispo





Photo 7: Equipment storage building, north elevation, view to the south.



Photo 8: Warehouse, east elevation, view to the southwest.

San Luis Ranch Complex  
Structure Photographs

Figure 4.5-2d

City of San Luis Obispo



Photo 9: Former spectator's barn/viewing stand, northwest elevation, view to the southeast.

- *Garage/Shed.* This garage/shed is the larger of two sheds on the property. Estimated to have been built in the 1930s, it is rectangular in plan and is clad with flush, vertical wooden boards. It is covered with a shed roof that has exposed rafter tails and is clad with corrugated metal panels.
- *Shed #2.* Shed #2 is a small rectangular shed. Estimated to have been built in the 1930s, it is clad with vertical wooden boards and has a shed roof clad with corrugated panels.
- *Main Barn.* The main barn is a raised-center-aisle barn estimated to have been built in 1900. It is clad with vertical wooden boards. The roof is clad with corrugated metal panels. The north elevation has a large centered opening with chamfered corners as well as a sliding barn door. The south elevation has a sliding barn door and a large hinged door, as well as a hay carrier and hay doors under the gable peak. The east elevation features four open bays supported by square wooden posts.
- *Equipment Storage Building.* This large building is estimated to have been built in 1938. It has a rectangular footprint and has four open bays on one side. The building is clad with vertical wooden boards. The shed roof is covered with corrugated aluminum panels and is supported by poles enhanced with Y braces.
- *Warehouse.* The large warehouse is estimated to have been built in the 1960s. It is rectangular in plan and is clad with vertical aluminum panels. It has a very low pitched, gabled roof. The east elevation features a single entry door (possibly metal), as well as a metal roll-up garage door and a rectangular vent with horizontal slats. The south elevation also has a metal roll-up garage door. Across the width of the north elevation is a shed supported by round metal poles. It has a flat roof clad with corrugated metal panels.
- *Former Spectators' Barn/Viewing Stand.* The former spectators' barn/viewing stand has been converted to other farm uses. It is estimated to have been built ca. 1887 and is a two-story wood framed building clad with shiplap siding. It has a rectangular plan and a high pitched, side-gabled roof with boxed eaves. The northwest elevation features a strip of angled window openings that indicate the prior use as a race track viewing stand; the slant is likely a result of row seating and the open seating/viewing area was likely enclosed. Beneath this are two window openings which have been boarded over. Under the gable peak is a hay carrier and a pair of hay doors on hinges. A large concrete loading dock wraps around the southeast and southwest sides of the building. Along the southwest side of the building there is an addition that appears to have been constructed at a later date. The structure is clad with vertical wood boards and has a steeply pitched shed roof.

#### **e. Regulatory Setting**

Federal Regulations. The project does not involve federal funding or permitting, and as a result, does not have a federal nexus. Therefore, compliance with reference to the National Historic Preservation Act of 1966 (NHPA) and other federal laws is provided here for informational purposes only.

*National Register of Historic Places.* The NRHP was established by the NHPA to help identify properties that are significant cultural resources at the national, state, and/or local level. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting,



materials, workmanship, feeling, and association. A property is eligible for the NRHP if it meets one or more of the following criteria:

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

As described in the Cultural Resources Study (see Appendix G), San Luis Ranch (formerly Dalidio Ranch) began as a family farm and expanded into a larger agribusiness. The property has retained a complex of ranch buildings and cultivated fields for over a century. The property was owned for many decades by the Dalidio family, who has been involved in the regional dairy industry and agribusiness. Their contributions are believed to be of local significance, not statewide or nationwide. Thus, the Dalidio family's contributions do not make the property or complex eligible for listing in the NRHP. The property and the structures on the property are also not expected to yield important information about prehistory or history and do not demonstrate sufficient historical significance in national, state, or local agricultural development or as a unique property type to warrant listing in the NRHP.

#### State Regulations.

*Assembly Bill 52.* Assembly Bill 52 (AB 52) amends Public Resources Code (PRC) Section 5097.94 (CEQA) and adds eight new sections to the PRC relating to Native Americans. It was passed and signed into law in 2014 and took effect on July 1, 2015. This law establishes a new category of resource called tribal cultural resources (PRC Section 21074) and establishes a process for consulting with Native American tribes and groups regarding those resources. The consultation process must be completed before a CEQA document can be certified. Native American tribes to be included in the process are identified through consultation with the California Native American Heritage Commission (NAHC) (PRC Section 21080.3.1).

Tribal cultural resources are “[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe...” (PRC Section 21074.1). A tribal cultural resource must be on, or eligible for, the CRHR as described above for historical resources, or must be included in a local register of historical resources. Also as discussed above for historical resources, the lead agency can determine that a tribal cultural resource is significant even if it has not been evaluated as eligible for the CRHR or is not on a local register.

Assembly Bill 52 establishes that “A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). The City conducted Native American consultation consistent with Senate Bill 18 and Assembly Bill 52 for the project, which is described in Section 4.5.3(a), *Methodology*.



*Senate Bill 18.* Passed in 2004, Senate Bill 18 (SB 18) requires cities and counties to consult with Native American tribes to help protect traditional tribal cultural places through the land use planning process. Unlike AB 52, SB 18 is not an amendment to, or otherwise associated with, CEQA. Instead, SB 18 requires cities and counties to consult with Native American tribes early during broad land use planning efforts on both public and private lands, prior to site- and project-specific land use decisions. The bill applies to general plan adoption or amendments and to specific plan adoption or amendments.

A Native American tribe is defined as “a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the Native American Heritage Commission” (Governor’s Office of Planning and Research 2005). Traditional tribal cultural places are defined in PRC Sections 5097.9 and 5097.993 to include sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines, or any historic, cultural, or sacred site that is listed on or eligible for the CRHR including any historic or prehistoric ruins, burial grounds, or archaeological site (Governor’s Office of Planning and Research 2005).

Under SB 18, cities and counties must notify the appropriate Native American tribe(s) of intended adoption or amendments to general plans or specific plans, and offer the opportunity for the tribe(s) to consult regarding traditional tribal cultural places within the proposed plan area. Consultation is intended to encourage preservation and protection of traditional tribal cultural places by developing treatment and management plans that might include incorporating the cultural places into designated open spaces (Governor’s Office of Planning and Research 2005).

*California Environmental Quality Act.* CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC], Section 21084.1). A historical resource is a resource listed, or determined to be eligible for listing, in the CRHR; a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (State CEQA Guidelines, Section 15064.5[a][1-3]). A resource may be eligible for inclusion in the CRHR if it meets one or more of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The San Luis Ranch Complex is eligible for listing in the CRHR under Criterion 1 for its association with the early agricultural development of San Luis Obispo. The San Luis Ranch property has retained the complex of ranch buildings and cultivated fields for over a century. The property is also representative of an early 20th century farm with its associated buildings, agricultural fields and ancillary structures. The buildings reflect the distinctive characteristics of the early 20th century vernacular agricultural architecture, making the San Luis Ranch Complex also eligible for listing in the CRHR under Criterion 3.



Individual buildings within the San Luis Ranch Complex also embody distinctive characteristics of a type, period, region, or method of construction. The main residence (Residence # 1) is constructed in a Craftsman style and retains many of its character-defining features such as clapboard and shiplap siding, shingles in the gable face, overhanging eaves and exposed rafter tails, decoratively cut knee braces and rafter tails, a wrap-around porch supported by square pillars, a shed-roofed dormer window, and various original wood windows. The main barn also embodies the raised-center-aisle type of barn. This structure retains its barn doors, hay doors, hay carriers and hardware, thus retaining much of its integrity. Therefore, the main residence and main barn are individually eligible for listing in the CRHR under Criterion 3.

In addition, if a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b], and [c]).

PRC, Section 21083.2(g) defines a *unique archaeological resource* as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

According to CEQA, all buildings constructed over 50 years ago and that possess architectural or historical significance may be considered potential historic resources. Most resources must meet the 50-year threshold for historic significance; however, resources less than 50 years in age may be eligible for listing on the CRHR if it can be demonstrated that sufficient time has passed to understand their historical importance.

*Codes Governing Human Remains.* Section 15064.5 of the CEQA Guidelines also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. The disposition of human remains is governed by Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98, and falls within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified within 48 hours and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

Local Regulations. The project is subject to local measures, including the City's Historic Preservation Ordinance, the City's General Plan, and the San Luis Obispo Municipal Code. These regulations are discussed below.



*Historic Preservation Ordinance.* In 2010, the City of San Luis Obispo passed a Historic Preservation Ordinance to identify and protect important historic resources within the city (City of San Luis Obispo 2010). When determining if a property should be designated as a listed Historic or Cultural Resource, the Cultural Heritage Commission and City Council are to consider this ordinance and SHPO standards. To be eligible for designation, the resource shall exhibit a high level of historic integrity, be at least 50 years old (less than 50 if it can be demonstrated that enough time has passed to understand its historical importance) and satisfy at least one of the following criteria:

- A. Architectural Criteria: 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.
  - (1) Style: Describes the form of a building, such as size, structural shape and details within that form (e.g. arrangement of windows and doors, ornamentation, etc.). Building style will be evaluated as a measure of:
    - a. The relative purity of a traditional style;
    - b. Rarity of existence at any time in the locale; and/or current rarity although the structure reflects a once popular style;
    - c. Traditional, vernacular and/or eclectic influences that represent a particular social milieu and period of the community; and/or the uniqueness of hybrid styles and how these styles are put together.
  - (2) Design: Describes the architectural concept of a structure and the quality of artistic merit and craftsmanship of the individual parts. Reflects how well a particular style or combination of styles are expressed through compatibility and detailing of elements. Also, suggests degree to which the designer (e.g., carpenter-builder) accurately interpreted and conveyed the style(s). Building design will be evaluated as a measure of:
    - a. Notable attractiveness with aesthetic appeal because of its artistic merit, details and craftsmanship (even if not necessarily unique);
    - b. An expression of interesting details and eclecticism among carpenter-builders, although the craftsmanship and artistic quality may not be superior.
  - (3) Architect: Describes the professional (an individual or firm) directly responsible for the building design and plans of the structure. The architect will be evaluated as a reference to:
    - a. A notable architect (e.g., Wright, Morgan), including architects who made significant contributions to the state or region, or an architect whose work influenced development of the city, state or nation.
    - b. An architect who, in terms of craftsmanship, made significant contributions to San Luis Obispo (e.g., Abrahams who, according to local sources, designed the house at 810 Osos - Frank Avila's father's home - built between 1927 - 30).
- B. Historic Criteria:
  - (1) History - Person: Associated with the lives of persons important to local, California, or national history. Historic person will be evaluated as a measure of the degree to which a person or group was:
    - a. Significant to the community as a public leader (e.g., mayor, congress member, etc.) or for his or her fame and outstanding recognition - locally, regionally, or nationally.



- b. Significant to the community as a public servant or person who made early, unique, or outstanding contributions to the community, important local affairs or institutions (e.g., council members, educators, medical professionals, clergymen, railroad officials).
- (2) History – Event: 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. Historic event will be evaluated as a measure of:
  - a. A landmark, famous, or first-of-its-kind event for the city - regardless of whether the impact of the event spread beyond the city.
  - b. A relatively unique, important or interesting contribution to the city (e.g., the Ah Louis Store as the center for Chinese-American cultural activities in early San Luis Obispo history).
- (3) History-Context: Associated with and also a prime illustration of predominant patterns of political, social, economic, cultural, medical, educational, governmental, military, industrial, or religious history. Historic context will be evaluated as a measure of the degree to which it reflects:
  - a. Early, first, or major patterns of local history, regardless of whether the historic effects go beyond the city level, that are intimately connected with the building (e.g., County Museum).
  - b. Secondary patterns of local history, but closely associated with the building (e.g., Park Hotel).
- C. Integrity: Authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance. Integrity will be evaluated by a measure of:
  - (1) Whether or not a structure occupies its original site and/or whether or not the original foundation has been changed, if known.
  - (2) The degree to which the structure has maintained enough of its historic character or appearance to be recognizable as an historic resource and to convey the reason(s) for its significance.
  - (3) The degree to which the resource has retained its design, setting, materials, workmanship, feeling and association.

The project site is not currently within the City limit. Therefore, neither the project site nor any structures on the site are currently listed as a Historic or Cultural Resource according to the above criteria. However, the San Luis Ranch property exemplifies an important period of local history, being established as a family farm and developing into a valuable local agribusiness industry. The property is representative of early 20<sup>th</sup> century agricultural and industrial development. The San Luis Ranch Complex, as well as cultivated fields, has existed on the property for over a century. The San Luis Ranch Complex is a rare remaining and intact example of a farm complex representing the early agricultural history of San Luis Obispo. Therefore, it is eligible for designation as a City of San Luis Obispo historic resource under Criterion B.2 (Event) and Criterion B.3 (Context).

The main Craftsman style residence (Residence #1) and the main barn both embody the distinctive characteristics of Craftsman and vernacular agricultural architecture, retaining the majority of their character-defining features and integrity. As such, these two structures are individually eligible for designation as City of San Luis Obispo historic resources under Criterion A.1 (Style).





*City of San Luis Obispo General Plan.* The Conservation and Open Space Element of the General Plan addresses historic and architectural Resources within the City. New development is evaluated for consistency with the following adopted goals and policies relating to archaeological and historical resources:

**Goal 3.2. Historic and Architectural Resources.** *The City will expand community understanding, appreciation, and support for historic and architectural resource preservation to ensure long-term protection of cultural resources.*

**Policy 3.3.1. Historic Preservation.** *Significant historic and architectural resources should be identified, preserved, and rehabilitated.*

**Policy 3.3.2. Demolitions.** *Historically or architecturally significant buildings shall not be demolished or substantially changed in outward appearance, unless doing so is necessary to remove a threat to health and safety and other means to eliminate or reduce the threat to acceptable levels are infeasible.*

**Policy 3.3.3. Historical Documentation.** *Buildings and other cultural features that are not historically significant but which have historical or architectural value should be preserved or relocated where feasible. Where preservation or relocation is not feasible, the resources shall be documented and the information retained in a secure but publicly accessible location. An acknowledgement of the resources should be incorporated within the site through historic signage and the reuse or display of historic material and artifacts.*

**Goal 3.4. Historic and Architectural Resources.** *The City will expand community understanding, appreciation, and support for archaeological resource preservation.*

**Policy 3.5.1. Archaeological Resource Protection.** *The City shall provide for the protection of both known and potential archaeological resources. To avoid significant damage to important archaeological sites, all available measures, including purchase of the property in fee or easement, shall be explored at the time of a development proposal. Where such measures are not feasible and development would adversely affect identified archaeological or paleontological resources, mitigation shall be required pursuant to the Archaeological Resource Preservation Program Guidelines.*

**Policy 3.5.2. Native American Sites.** *All Native American cultural and archaeological sites shall be protected as open space wherever possible.*

**Policy 3.5.3. Non-Development Activities.** *Activities other than development which could damage or destroy archaeological sites, including off-road vehicle use on or adjacent to known sites, or unauthorized collection of artifacts, shall be prohibited.*

**Policy 3.5.4. Archaeological Sensitive Areas.** *Development within an archaeologically sensitive area shall require a preliminary site survey by a qualified archaeologist knowledgeable in Native American cultures, prior to a determination of the potential environmental impacts of the project.*

**Policy 3.5.5. Archaeological Resources Present.** *Where a preliminary site survey finds substantial archaeological resources, before permitting construction, the City shall require a mitigation plan to protect the resources. Possible mitigation measures include: presence of a*



*qualified professional during initial grading or trenching; project redesign; covering with a layer of fill; excavation removal and curation in an appropriate facility under the direction of a qualified professional.*

***Policy 3.5.6. Qualified Archaeologist Present.*** *Where substantial archaeological resources are discovered during construction or grading activities, all such activities in the immediate area of the find shall cease until a qualified archaeologist knowledgeable in Native American cultures can determine the significance of the resource and recommend alternative mitigation measures.*

***Policy 3.5.7. Native American Participation.*** *Native American participation shall be included in the City's Guidelines for resource assessment and impact mitigation. Native American representatives should be present during archaeological excavation and during construction in an area likely to contain cultural resources. The Native American community shall be consulted as knowledge of cultural resources expands and as the City considered updates or significant changes to its General Plan.*

***Policy 3.6.3. Construction within Historic Districts.*** *The Cultural Heritage Committee and Architectural Review Commission will provide specific guidance on the construction of new buildings within historic districts.*

*Municipal Code.* In addition to the City of San Luis Obispo's requirements to designate a Historic or Cultural Resource, the City Municipal Code contains specific requirements for the demolition and relocation of structures listed in the inventory of historic resources. These requirements are stated in Municipal Code sections 14.01.100 and 14.01.110.

The City Municipal Code states that the Cultural Heritage Committee (CHC) shall review and make recommendations to the City Council regarding demolition applications for structures listed in the inventory of historic resources. An application for demolition of a listed historic resource shall be approved only if the proposed demolition is found consistent with the general plan and 1) the historic resource is a hazard to public health or safety, and repair or stabilization is not structurally feasible; or 2) denial of the application will constitute an economic hardship as described in section 14.01.100(J)(1-3) of the municipal code. Additional procedures regarding the timing of the demolition, documentation and acknowledgment of the historic resource are also delineated.

Likewise, the relocation of a structure listed on the inventory of historic resources is subject to review by the CHC and Architectural Review Commission (ARC). Relocation shall be permitted only when relocation is consistent with the goals and policies of the general plan, any applicable area or specific plans, and the Historic Preservation Program Guidelines, as well as additional criteria defined in Municipal Code Section 14.01.110(B)(1-6). The timing, plan, procedures and documentation are also delineated.

*City of San Luis Obispo Archaeological Resource Preservation Guidelines.* The Archaeological Resource Preservation Guidelines (part of the City's Environmental Guidelines) developed by the San Luis Obispo CHC are used to determine whether a project complies with CEQA, as well as the information needed to evaluate a project's effects on archaeological sites and artifacts. The Guidelines call for a three-step approach to historical resources: preparation of an Archaeological and Architectural Resource Inventory (ARI); Subsurface Archaeological



Resource Evaluation (SARE); and Archaeological Resource Impact Mitigation (ARIM). These steps parallel the CEQA process.

#### 4.5.2 Previous Program-Level Environmental Review

The 2014 Land Use and Circulation Elements Update EIR (LUCE Update EIR) previously analyzed Citywide impacts to cultural resources, including those associated with development on the San Luis Ranch Specific Plan Area, related to the adoption and implementation of the Land Use and Circulation Element policies and programs. The LUCE Update EIR cultural resources analysis determined that the intensification of land uses anticipated to occur in certain areas of the City under the Land Use and Circulation Element update, including the San Luis Ranch Specific Plan area, could have an adverse effect on historic structures, as well as identified and previously unidentified archaeological and paleontological resources, including human remains. However, the LUCE Update EIR concluded that implementation of LUCE Update EIR Mitigation Measures CR-1 through CR-3, which changed the language of General Plan Conservation and Open Space Policies 3.3.2, 3.3.5, 3.5.10 to be more stringent in order to better facilitate the protection of the City's historical resources, as well as various other General Plan policies regarding cultural and paleontological resources, would reduce impacts to historic structures and archaeological and paleontological resources to a less than significant level.

#### 4.5.3 Impact Analysis

**a. Methodology and Significance Thresholds for Cultural Resources.** If a project may cause a substantial adverse change in the characteristics of a resource that convey its significance or justify its eligibility for inclusion in the CRHR or a local register, either through demolition, destruction, relocation, alteration, or other means, then the project is judged to have a significant effect on the environment (CEQA Guidelines, Section 15064.5[b]). The following thresholds are based on Appendix G of the *State CEQA Guidelines*. Impacts would be significant if the project would:

1. *Cause a substantial adverse change in the significance of a historic resource as defined in §15064.5;*
2. *Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;*
3. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;*  
*or*
4. *Disturb any human remains, including those interred outside of formal cemeteries.*

The Initial Study determined that the project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Therefore, Threshold 3 is not discussed further in this section. Refer to Section 4.14, *Issues Addressed in the Initial Study*, for a discussion of this issue.

Direct impacts can be assessed by identifying the types and locations of proposed development, determining the exact locations of cultural resources within the project area, assessing the significance of the resources that may be affected, and determining the appropriate mitigation. Removal, demolition, or alteration of historical resources can permanently impact the historic fabric of an archaeological site, structure, or historic district.



*Methodology.* The analysis within this section builds upon the conclusions identified in the LUCE Update EIR, as described in Section 4.5.2. Where applicable, this analysis includes mitigation that implements applicable City policies for the protection of archaeological and historical resources.

A Cultural Resources Study of the project site and vicinity was completed in August 2016 (Appendix G). As described in Section 4.5.1(d), as part of the Cultural Resources Study, a records search was obtained from the CCIC. The search was conducted to identify previous cultural resources evaluations and previously recorded cultural resources on the project site as well as within a 0.5-mile radius of the project site. In addition to the records search, the Cultural Resources Study included archival research for the project site. The methodology for the archival research focused on the review of primary and secondary source materials related to the history and development of the project site and vicinity. Sources for this research included historic maps, aerial photographs, and written histories of the area.

In addition, Rincon staff conducted a pedestrian survey of the project site for archaeological resources between March 14, 2016 and March 16, 2016. On March 15, 2016 Rincon staff also conducted survey of the project site for historic resources, which included examination, documentation, photographing, and evaluating the built environment features on the project site. Between August 1, 2016 and August 16, 2016, Rincon staff conducted test excavations to evaluate the CRHR eligibility of the prehistoric lithic scatter located on the western edge of the project site (SLR-S-01). During archaeological testing all identified surface artifacts were also collected for temporary storage, cataloging, and analysis. All data was recorded on standard archaeological forms. All excavations were backfilled upon completion of testing.

Rincon conducted Native American consultation consistent with Senate Bill 18 and Assembly Bill 52 for the project to identify potential concerns or issues associated with Native American cultural resources within the project vicinity. Rincon contacted the NAHC to determine whether any sites recorded in the NAHC's Sacred Lands File occur in or near the project site. The NAHC responded on January 27, 2016 stating that the search of the sacred land files "failed to indicate the presence of Native American cultural resources in the immediate project area." In addition, the NAHC provided a list of Native American groups and individuals who may have knowledge of cultural resources within the project site. The Native American scoping did not identify any identify any specific resources important to the consulted groups within the project site. However, several contacts noted that the area is sensitive. All Native American parties contacted about the project site are described in the Cultural Resource Study (Appendix G).

**b. Impacts and Mitigation Measures.**

<i>Threshold 1</i>	<i>Would the project cause a substantial adverse change in the significance of a historic resource as defined in §15064.5?</i>
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**Impact CR-1** The project would result in the relocation, demolition, and removal of structures on the San Luis Ranch property which are individually identified as historic resources. In addition, the project would eliminate the San Luis Ranch Complex, which is eligible for listing as a historic resource. Relocation, demolition, and/or removal of these historic resources would permanently alter the historic context of the project site and on-site



**structures. This impact would be Class I, significant and unavoidable.**

As described in Section 4.5.1(d), the San Luis Ranch property, which includes the San Luis Ranch Complex, is eligible for listing as a City landmark, and is eligible for listing in the CRHR under Criterion 1 (association with early agricultural development in San Luis Obispo) and Criterion 3 (distinctive characteristics of early 20th century vernacular agricultural architecture). The characteristics and history of the San Luis Ranch property make it eligible for designation as a City of San Luis Obispo landmark property under Criterion B.2 (event) or B.3 (context).

In addition, the main residence and the main barn that are within the San Luis Ranch Complex are individually eligible for listing as City landmarks, and are eligible for listing under CRHR Criterion 3 (distinctive characteristics of early 20th century vernacular agricultural and Craftsman architecture). In addition, the characteristics and history of the main residence and main barn make these structures eligible for designation as City landmark properties under Criterion A.1 (style). As such, the San Luis Ranch Complex, as well as the individual main residence and main barn structures are considered historic resources under CEQA.

The project includes the adaptive reuse and relocation of the existing main residence and the former spectators' barn/viewing stand to new locations on the site within the Agricultural Heritage and Learning Center. The project would also result in the demolition or off-site relocation of the remaining building and structures included in the San Luis Ranch Complex, including the historic main barn. Salvageable materials from the main barn are proposed to be reused to the greatest extent possible in the construction of a new barn in the project's proposed Agricultural Heritage and Learning Center. The main residence and former spectators' barn/viewing stand are proposed to be restored and adaptively reused following the Secretary of the Interior's Standards. These proposed actions of the project would be subject to the requirements of the City Municipal Code Sections 14.01.100 and 14.01.110, which include requirements for the demolition and relocation of structures listed in the inventory of historic resources. Although the project site is not currently listed by the City as a historic resource because the project site is currently outside of the City limit, the project applicant seeks annexation by the City. Therefore, with annexation of the project site into the City, Municipal Code Sections 14.01.100 and 14.01.110 would apply to removal of the San Luis Ranch Complex and relocation of the main residence and spectators' barn/viewing stand structure.

*Mitigative Components of the Specific Plan and Impact Conclusion.* The San Luis Ranch Specific Plan proposes programs and policies intended to reduce impacts to historical resources to the maximum extent practicable. Specific Plan Policy 2.5 states that the Specific plan would "Protect associated structures such as the Dalidio Home, Laguna Race Track viewing stand, barn, and water tower." Specific Plan Program 2.5.1 would require evaluation of the historic structures on the site for the purposes of preservation and protective reuse. The Specific Plan proposes relocation of the main residence and spectators' barn/viewing stand to the Agricultural Heritage and Learning Center area for permanent preservation, and specifies that both structures would be subject to historic documentation by a qualified historian prior to relocation, including being photographed and recorded consistent with professional historical standards, and a qualified historic preservation architect would be consulted during relocation planning to ensure that significant historic materials and fabric are retained and reconstructed



appropriately. The Specific Plan also specifies that the associated structures in the San Luis Ranch Complex would be photographed and recorded before they are removed from the site.

Removal of the San Luis Ranch Complex and relocation, demolition, and/or removal of the historic main residence and main barn as part of the project would result in adverse changes to individually identified historic structures as well as the historic context of the San Luis Ranch property, which is collectively identified as historically significant. Additionally, demolition of the historic main barn, which is part of the San Luis Ranch Complex, would conflict with Conservation and Open Space Element Policy 3.3.1, *Historic Preservation*, which states that significant historic and architectural resources should be identified, preserved, and rehabilitated, as well as Conservation and Open Space Element Policy 3.3.2, *Demolitions*, which prohibits demolition or substantial changes in outward appearance of historically or architecturally significant buildings, unless doing so is necessary to remove a threat to health and safety and other means to eliminate or reduce the threat to acceptable levels are infeasible. For these reasons, the project would result in a potentially significant impact to historic resources and mitigation would be required.

**Mitigation Measures.** The following mitigation measures would reduce project impacts on historical resources to the maximum extent practicable.

**CR-1(a) Historical Structure Relocation and Reconstruction Plan.** In order to implement Specific Plan Policy 2.5, a relocation and reconstruction plan for the former spectator's barn/viewing stand, ~~and~~ and main residence, and main barn shall be developed by a qualified historic architect. The plan shall include a structural/architectural report documenting existing integrity and conditions and include detailed treatment methods and measures to ensure that historic integrity is retained and that all identified character defining features will be preserved.

**CR-1(b) Archival Documentation of Historic Buildings.** The applicant shall provide archival documentation of the San Luis Ranch Complex in as-built and as-found condition in the form of a Historic American Building Survey (HABS) Level II documentation. The documentation shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation (NPS 1990), and shall include large-format photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History (NPS 1983). The original archival-quality documentation shall be offered as donated material to the History Center of San Luis Obispo County. Archival copies of the documentation shall also be submitted to the San Luis Obispo County Library.

**CR-1(c) Informational Display of Historic Resources.** A retrospective interpretive display detailing the history of the San Luis Ranch



Complex and the project site, its significance, and its important details and features shall be developed by the applicant. The information should be incorporated into a publicly-accessed building on the project site, such as the proposed Agricultural Heritage Facilities and Learning Center, or a publicly-accessed outdoor location. The display shall include images and details from the HABS documentation described in Mitigation Measure CR-1(b) and any collected research pertaining to the historic property. The content shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History (NPS 1983).

Plan Requirements and Timing. The project applicant shall prepare the relocation and reconstruction plan for the main residence and the spectators' barn/viewing stand to the satisfaction of the Community Development Director prior to the issuance of project grading permits. Project grading plans shall detail phasing and include sufficient detail to demonstrate the sequencing and completion of the relocation and reconstruction plan. The applicant shall complete archival documentation of the San Luis Ranch Complex prior to the removal, relocation, reconstruction, and/or demolition of the structures on the project site to the satisfaction of the Community Development Director. The applicant shall develop and install an informational display of the site's identified historical resources prior to opening of the Agricultural Heritage Facilities and Learning Center to the public.

Monitoring. The City shall confirm completion of and approve the relocation and reconstruction plan and archival documentation. The City shall confirm submittal of the documentation to the History Center of San Luis Obispo County and the San Luis Obispo County Library. The City shall also review applicable plans for compliance with recommendations of the relocation and reconstruction plan and periodically inspect the site to ensure compliance. The information display shall be prepared in accordance with recommendations of a qualified historic consultant and shall be approved by the Community Development Director.

**Residual Impacts.** Mitigation Measure CR-1(a) would ensure that the main residence and barn/viewing stand would retain their individual integrity and character defining features. Mitigation Measure CR-1(a) would mitigate impacts to this individually significant resource to the maximum extent feasible.

In addition, Mitigation Measures CR-1(b) and CR-1(c) would reduce significant direct impacts to the remainder of the historically significant San Luis Ranch Complex, including the individually significant historic main barn, to the maximum extent feasible. However, the removal and/or demolition of the historically significant main barn and the relocation, demolition, and removal of other structures in the San Luis Ranch Complex would change the



historic context of the San Luis Ranch property. Furthermore, mitigation would not avoid the removal of the main barn, despite the proposed reuse of salvageable materials from the structure to the greatest extent possible in the construction of a new barn in the project's proposed Agricultural Heritage and Learning Center. Therefore, the potential impact to the San Luis Ranch Complex and the main barn individually would remain significant and unavoidable despite implementation of the required mitigation.

Threshold 2	Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
Threshold 4	Would the project disturb any human remains, including those interred outside of formal cemeteries?

**Impact CR-2 Identified archaeological resources on the project site are ineligible for listing in the CRHR and NRHP, and disturbance of these resources would not constitute a significant impact. However, the potential remains for the project to result in impacts to previously unidentified archaeological resources. Therefore, this impact would be Class II, significant but mitigable.**

As described in Section 4.5.1(d), one prehistoric archaeological site (SLR-S-01) has been identified and recorded on the project site. SLR-S-01 is highly disturbed by repeated plowing, planting, harvesting, and other activities associated with crop cultivation. Although subsurface artifacts are present, they are limited to disturbed sediments above 40 centimeters below the surface, and do not represent an intact deposit. Based on the finding of the Cultural Resources Study (Appendix G), it is likely that the subsurface component consists of artifacts that were previously located on the surface scatter and have been redeposited due to remixing of sediments caused by agricultural activities. SLR-S-01 is not directly associated with important events or any persons significant in our past and, due to the absence of an intact subsurface component and lack of specific, interpretable context, the site is unlikely to yield important information about prehistory or history. As such, SLR-S-01 is not significant under CRHR Criteria 1, 2, 3 or 4. Therefore, the site is ineligible for listing in the CRHR and NRHP and requires no further management consideration under CEQA or the NHPA.

Two prehistoric isolated artifacts (SLR-I-01 and SLR-I-02) have also been identified and recorded on the project site. Under CEQA, the isolates are not eligible for listing in the CRHR. The information potential of isolates SLR-I-01 and SLR-I-02 and site SLR-S-01 has been exhausted by their recordation and analysis as part of the Cultural Resources Study.

The surface of the project site has been previously disturbed by over 100 years of agricultural activities including planting, harvesting, and other activities associated with crop cultivation and thus the possibility of encountering undisturbed archaeological resources during construction is unlikely. However, prehistoric archaeological deposits could be preserved at depth beneath the project site. Construction of the project involves grading and excavation in areas that could contain subsurface archaeological remains. Unanticipated discovery of human remains during project excavation would require compliance with Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98. Compliance with Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98 would ensure that unanticipated discovery





of human remains during project excavation would be addressed appropriately by the County Coroner and NAHC (if required), and would not constitute a significant impact.

*Mitigative Components of the Specific Plan and Impact Conclusion.* The San Luis Ranch Specific Plan includes requirements intended to protect archaeological resources. Specific Plan Policy 3.5.4 requires a preliminary site survey for development within archaeologically sensitive areas. As described in Section 4.5.1(d), the Cultural Resources Study (Appendix G) includes an evaluation of known archaeological resources on the project site, and determined that these resources are not intact or otherwise archaeologically significant. However, excavation associated with the project grading plan would have the potential to encounter buried archaeological deposits. Therefore, mitigation is required to ensure that any discovered resources would be protected and curated if encountered during project construction.

**Mitigation Measures.** The following measures would reduce potential impacts to archaeological resources to a less than significant level.

- CR-2(a) Retain a Qualified Principal Investigator.** In accordance with Conservation and Open Space Policies 3.5.6 and 3.5.7, a qualified principal investigator, defined as an archaeologist who meets the Secretary of the Interior's Standards for professional archaeology (hereafter qualified archaeologist), shall be retained to carry out all mitigation measures related to archaeological resources.

Monitoring shall involve inspection of subsurface construction disturbance at or in the immediate vicinity of known sites, or at locations that may harbor buried resources that were not identified on the site surface. A Native American monitor shall also be present because the area is a culturally sensitive location. The monitor(s) shall be on-site on a full-time basis during earthmoving activities, including grading, trenching, vegetation removal, or other excavation activities.

- CR-2(b) Unanticipated Discovery of Archaeological Resources.** In the event that archaeological resources are exposed during construction, all work shall be halted in the vicinity of the archaeological discovery until a qualified archaeologist can visit the site of discovery and assess the significance of the cultural resource. In the event that any artifact or an unusual amount of bone or shell is encountered during construction, work shall be immediately stopped and relocated to another area. The lead agency shall stop construction within 100 feet of the exposed resource until a qualified archaeologist/paleontologist can evaluate the find (see 36 CFR 800.11.1 and CCR, Title 14, Section 15064.5[f]). Examples of such cultural materials might include: ground stone tools such as mortars, bowls, pestles, and manos; chipped stone tools such as projectile points or choppers; flakes of stone not consistent with the immediate geology such as obsidian or fused shale; historic trash pits containing bottles and/or ceramics; or structural remains. If the resources are found to be significant, they



must be avoided or will be mitigated consistent with State Historic Preservation Office (SHPO) Guidelines.

Plan Requirements and Timing. The project applicant shall retain a qualified principal investigator and Native American monitor prior to the issuance of grading permits. The requirement that construction work be stopped in the event of discovery of archaeological resources shall be included on construction plans prior to the issuance of grading permits.

Monitoring. The City shall confirm the qualifications of and approve the applicant's choice of a qualified principal investigator and Native American monitor. The City shall also inspect the site periodically during grading and demolition to ensure compliance with this measure. The City shall review construction plans and periodically inspect project construction to ensure compliance with this measure.

**Residual Impacts.** Implementation of Mitigation Measures CR-2(a) and CR-2(b) would reduce impacts to archaeological resources to a less than significant level.

**c. Cumulative Impacts.** Planned buildout of the City of San Luis Obispo under the General Plan, including buildout of previously approved (Margarita and Orcutt) or proposed (San Luis Ranch, Avila Ranch, Madonna) specific plans, would cumulatively increase the potential for adverse effects on historic and archaeological resources in the City. The project would incrementally contribute to this cumulative effect. Impacts to historic and archaeological resources are generally site-specific. Accordingly, as required under applicable laws and regulations, potential impacts associated with cumulative developments would be addressed on a case-by-case basis.

As discussed in Section 4.5.2, the San Luis Ranch Specific Plan, as well as other approved and proposed plans in the City, is required to comply with existing General Plan Conservation and Open Space Element Policies 3.3.1, 3.3.2, 3.3.3, 3.5.1, 3.5.2, 3.5.3, 3.5.4, 3.5.5, 3.5.6, 3.5.7, and 3.6.3, which address the protection of historical and archaeological resources within the City. As described in Impact CR-2, the project would not result in the loss of any significant archaeological resources and, therefore, would not contribute substantially to the cumulative loss of archaeological resources in the City. However, the project would result in a significant and unavoidable impact associated with the removal, relocation, or reconstruction of individually historic structures that are part of the historically significant San Luis Ranch Complex. As such, the project would contribute to the cumulative loss of historic resources in the City. Therefore, the project would also result in a Class I, significant and unavoidable, cumulative impact to historical resources.

