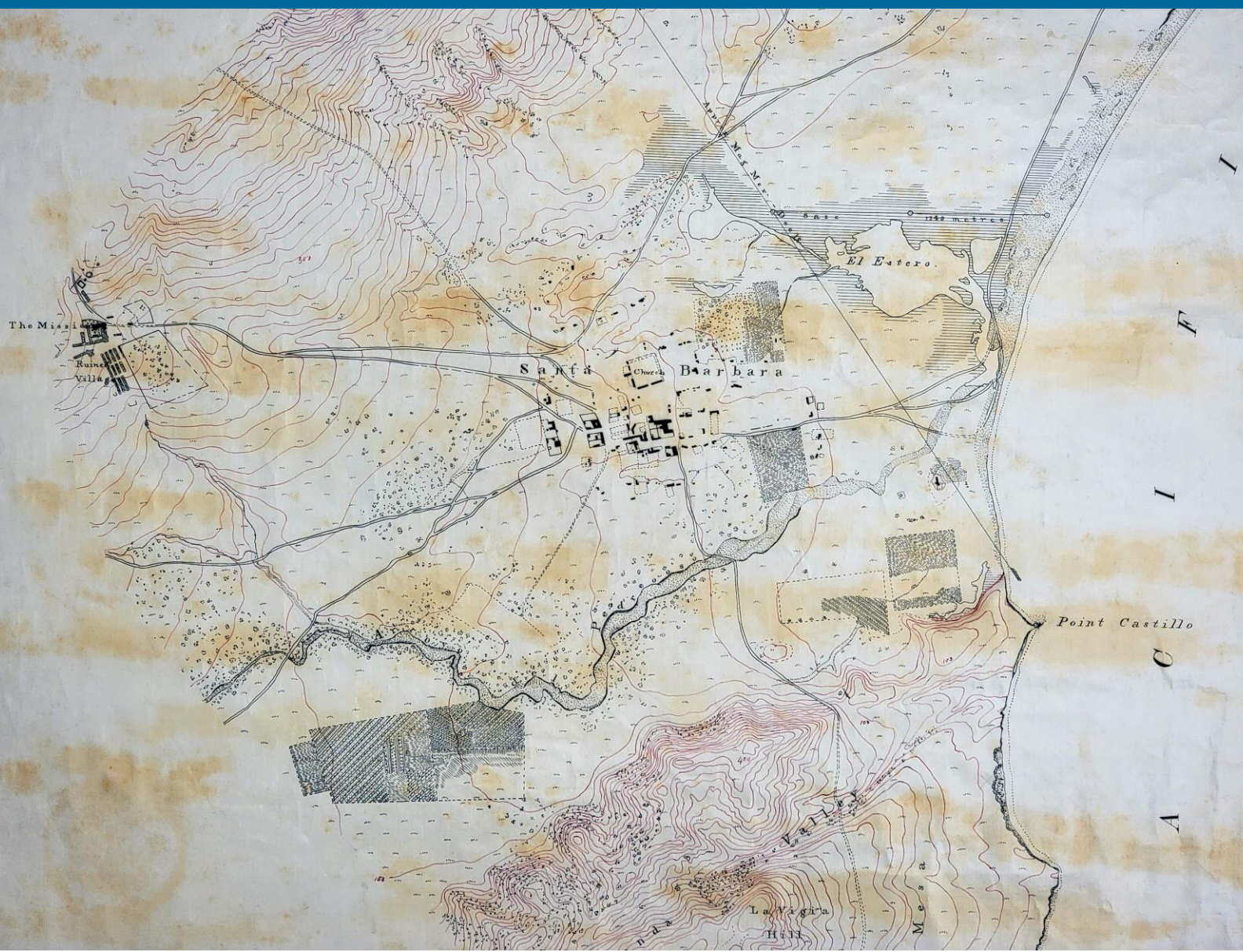




# MASTER ENVIRONMENTAL ASSESSMENT GUIDELINES FOR ARCHAEOLOGICAL RESOURCES

April 2025









## PREFACE TO 2025 EDITION OF THE MEA GUIDELINES

The California Environmental Quality Act (CEQA) Guidelines allow public agencies to prepare a Master Environmental Assessment (MEA) to identify, inventory, and organize environmental information, which may be used to prepare environmental documents and determine if environmental effects are likely to occur (CEQA Guidelines Section 15169). The CEQA Guidelines also specify that an MEA should be reviewed periodically and revised as needed so that it is accurate and current.

The City of Santa Barbara originally adopted a citywide MEA in 1979 that covered multiple environmental resources and has been revised periodically since that time. An Archaeological Resources component was introduced in 1981, and the MEA Guidelines for Archaeological Resources were adopted in 2002 under a separate cover. Since 2002, substantial information relative to the presence and absence of cultural resources has been generated through implementation of the MEA Guidelines for Archaeological Resources.

Previous updates to the MEA Guidelines for Archaeological Resources refined the definition of project development, expressed in terms of the vertical and horizontal extent of ground disturbances, that are reasonably expected to result in potentially adverse impacts to recorded and unknown cultural resources, and refined the geographic areas within the city where resources dating to specific eras of prehistoric and historic period occupation are most likely to exist. The goal of this update is to ensure the continued protection of important and unique archaeological resources within the city. It seeks to more accurately identify areas with known, predicted, or potential archaeological sensitivity, implement process improvements that comply with current local and state regulations, and enhance coordination with tribal representatives regarding the treatment of archaeological and tribal cultural resources.

Building on the cumulative knowledge of approximately 1,850 systematic investigations, of which, 1,150 reports were completed between 2002 and 2024, this update refines the City's understanding of where archaeological resources are likely to exist and where they are less likely to be encountered or disturbed by future development. The Archaeological Resources Sensitivity Areas continue to be an essential tool for determining the type of investigation needed to assess potential cultural resource impacts from a development project. This update identifies types of development that are less likely to result in significant impacts, providing a streamlined process for their assessment.

Previous MEA Guidelines focused exclusively on archaeological and built historic period resources. While local Barbareño Chumash were consulted in developing prior MEA Guidelines, the assessment of *tribal cultural resources*, those resources that have significance to the Chumash community, were not specifically addressed. The City is addressing this need through the development of new MEA Guidelines for Tribal Cultural Resources under a separate cover, to ensure recognition and respect of local Chumash heritage values. The shared interest in preserving these resources necessitates simultaneous assessment of project impacts to both archaeological and tribal cultural resources. Therefore, these guidelines cross-reference the MEA Guidelines for Tribal Cultural Resource as necessary to provide City staff, expert consultants, and the public a comprehensive understanding of their implementation.

This edition of the MEA Guidelines for Archaeological Resources compiles the best available information to improve the City's environmental review processes by continuing to uphold the City's long history of cultural resource protection, maintaining clarity and predictability in the preparation of environmental documents, and ensuring full compliance with CEQA and the appropriate treatment of cultural resources during project planning and implementation.



## ACKNOWLEDGEMENTS

This update to the MEA Guidelines for Archaeological Resources was made possible by funding provided to the City of Santa Barbara Community Development Department, Planning Division through the California Office of Historic Preservation (SHPO) Certified Local Government grant program. SHPO administers these funds, which are budgeted by the National Park Service, Department of the Interior, under the National Historic Preservation Act of 1966.

Technical expertise was essential in crafting this update. In addition to David Stone, Registered Professional Archaeologist (RPA), who was contracted by the City to guide this effort, the following archaeologists, comprising the Archaeological Resources Technical Working Group and representing substantial experience in completing archaeological resource investigations in compliance with the MEA Guidelines, graciously provided their time by attending meetings and reviewing preliminary drafts of this document:

- Brian Barbier, MA, Santa Barbara Museum of Natural History Department of Anthropology Curator, and California Historical Resources Inventory System, Central Coast Information Center Coordinator
- Dr. Michael Glassow, RPA, City of Santa Barbara Archaeological Advisor to the Historic Landmarks Commission (HLC), Professor Emeritus, University of California, Santa Barbara
- Colleen Hamilton, RPA, Managing Principal and Principal Archaeologist, Applied Earthworks, Inc.
- Heather McDaniel McDevitt, RPA, Cultural Resources Practice Director, Langan Engineering
- Ken Victorino, RPA, Senior Cultural Resources Manager, Rincon Consultants, Inc.; and
- Michael H. Imwalle, Associate Executive Director of Cultural Resources, Santa Barbara Trust for Historic Preservation

The City wishes to particularly acknowledge Dr. Glassow's decades of volunteer service in his role as City Archaeological Advisor to the Historic Landmarks Commission, during which he has reviewed hundreds of investigation reports and provided the City with his expert determinations on their compliance with the MEA Guidelines.

Mr. Barbier was instrumental in ensuring that the MEA Guidelines for Archaeological Resources incorporated up-to-date and comprehensive geographical data characterizing archaeological site locations. As an extension of SHPO staff, he identified mechanisms in the MEA Guidelines to ensure the confidentiality of this data.

Planning Division staff Julia Pujo, Environmental Analyst, and Jillian Ferguson, Associate Planner, with technical support provided by Adam Nares, Geographic Information Systems Analyst and Nicole Hernandez, Architectural Historian, managed this effort.



Table of Contents

PREFACE TO 2025 EDITION OF THE MEA GUIDELINES..... i

ACKNOWLEDGEMENTS ..... ii

GLOSSARY ..... iv

1.0 OVERVIEW..... 1

2.0 ARCHAEOLOGICAL RESOURCE SETTING.....5

3.0 STEPS FOR DETERMINING REPORT TYPE ..... 10

Table 1. Archaeological Resources Report Requirement Screening ..... 13

4.0 ARCHAEOLOGICAL RESOURCES REPORT REQUIREMENTS..... 19

4.1 City Qualified Archaeologists List ..... 19

4.2 Phase 1 Report ..... 19

4.3 Letter Report Confirming No Archaeological Resources..... 31

4.4 Phase 2 Report ..... 34

4.5 Phase 3 Report ..... 37

4.6 Archaeological Resources Construction Monitoring Report..... 40

Appendices

APPENDIX A – Updates to the 2025 MEA Guidelines for Archaeological Resources

APPENDIX B – Archaeological Resources Sensitivity Areas and Background Research Sources

APPENDIX C – Regulatory Framework

APPENDIX D – Confidentiality of Information

APPENDIX E – Professional Standards for the City of Santa Barbara Qualified Archaeologists List

APPENDIX F – Tribal Outreach Correspondence Format



## GLOSSARY

### A-Horizon Soils

The topmost mineral layer in a soil profile, also referred to as topsoil, characterized by the accumulation of organic matter, making it darker and nutrient-rich compared to underlying layers. The A-Horizon may contain archaeological materials, as it often represents a zone of past human activity. The A-Horizon is also subject to erosion processes.

### Alluvial Deposition

The process by which stormwater erodes surface soils on sloping topography or soil exposures along the banks or bottoms of watercourses including creeks or drainages, causing landforms adjacent to top of water course banks and adjacent floodplains to be buried with a combination of loams, silts, and/or clay. Given that stormwater events have regularly occurred throughout prehistory, alluvial deposits can obscure evidence of buried archaeological sites below existing ground surfaces.

### Archaeological

Pertaining to the study of prior cultures and their lifestyles through the systematic excavation of locations of their past habitation. This includes specific activity areas where artifacts including tools, food resources, and shelters have been deposited in the ground and buried by subsequent natural erosion and/or development.

### Archaeological Resource

Evidence of past cultural occupation, seasonal use, or ephemeral activity reflected in artifacts, food remains, or other evidence that provide insight into past lifestyles and their evolution through time. Prehistoric resources, dating back at least 13,000 years, extend throughout the Santa Barbara Channel, predating European and American colonization. Historic period resources are evidence of the region's cultural shifts from Spanish colonization and Franciscan missions, to subsequent Spanish-Mexican, American settler, and immigrant occupations.

### Archaeological Resources Reports Database

Inventory of archaeological resource reports prepared for the City of Santa Barbara. This database is confidential and not publicly available. Access is restricted to City qualified archaeologists, tribal representatives, and authorized City staff. See Section 2.3 and Appendix D, Confidentiality of Information.

### Archaeological Resources Sensitivity Areas

Geographic areas within the city where topographic, environmental, and historic demographic patterns indicate a reasonable potential for unknown archaeological resources to exist. Each Sensitivity Area is based on the distribution of recorded archaeological sites associated with established periods of occupation, historic archival maps, urban development, and environmental characteristics. See Section 2.1 and Appendix B.1.

### Archaeological Site

The location of a prehistoric or historic period occupation or activity, or former structure, roadway, or trail.



## **B-Horizon Soils**

The mineral layer beneath the A-Horizon topsoil in a soil profile, characterized by denser more compact soils often containing clay, iron, aluminum oxides, and other accumulation materials. The B-Horizon layer has less organic matter.

## **Built Historic Architectural Resources**

Non-archaeological, above-ground features or structures associated with the historic period, such as buildings, roads, walls, or gardens.

## **Central Coast Information Center (CCoIC)**

An office of the California Historic Resources Inventory System (CHRIS) located at the Santa Barbara Museum of Natural History that maintains the archaeological resource database for all investigation reports prepared within Santa Barbara and San Luis Obispo counties.

## **City Archaeological Advisor**

Technical archaeological resources expert who reviews all archaeological resource reports on behalf of the City of Santa Barbara.

## **City Environmental Analyst**

City staff position within the Community Development Department, Planning Division.

## **City Qualified Archaeologists List**

Maintained by the City, an approved list of archaeological experts who satisfy educational and local experience requirements necessary to maintain professional investigation report standards. See Appendix E, Professional Standards for the City of Santa Barbara Qualified Archaeologists List, for a list of professional standards for qualifying archaeologists and instructions to request inclusion on the City Qualified Archaeologists List.

## **Cultural Resource**

An artifact, object, or structure associated with past human activities and human events. Cultural resources are inclusive of archaeological, tribal cultural, and historic period resources.

## **Ground Disturbance**

Activities that result in the horizontal and vertical displacement of soil, most commonly associated with mechanical or hand excavation. Common examples include: subsurface vegetation brushing requiring removal of roots; soil preparation including excavation, recompaction, and scarification; and excavation for structural foundations, utility corridors, and stormwater retention infrastructure.

## **Historical Resource**

Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. It is defined as a resource that either:



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

See CEQA Guidelines Section 15064.5(a)(3)) for a complete definition of "historical resource". This definition applies to both built architectural resources and archaeological resources.

### **Letter Report Confirming No Archaeological Resources (Letter Report)**

A letter prepared by a City Qualified Archaeologist for projects that are not expected to result in the discovery of prehistoric or historic period archaeological resources or tribal cultural resources. See Section 4.3.

### **Mitigation Measure**

An action or requirement implemented to avoid, reduce, minimize, or rectify a potentially significant adverse impact in the significance of an archaeological resource resulting from project implementation. The lead agency shall ensure that any adopted measures to mitigate significant adverse changes are fully enforceable through permit conditions, agreements, or other measures. See CEQA Guidelines Section 15064.5(b)(4) for additional information.

### **Phase 1 Report**

Report presenting the results of the investigation by a City Qualified Archaeologist designed to identify the presence or absence of any cultural resources within a proposed project site, specifically within the associated impact area (locations of proposed project ground disturbance). See Section 4.2.

### **Phase 2 Report**

Report presenting the results of the investigation (commonly a subsurface excavation gathering a representative sample of subsurface cultural resources) designed to identify the significance of any cultural resources identified during the preceding Phase 1 Report within the associated impact area. See Section 4.4.

### **Phase 3 Report**

Report presenting the results of the investigation (commonly a subsurface excavation gathering additional samples of subsurface cultural resources to address relevant research questions) designed to partially mitigate the unavoidable disturbance of significant cultural resources identified during the preceding Phase 2 Report. See Section 4.5.

### **Previously Disturbed Soils**

Soils that have been subject to previous horizontal and/or vertical displacement thereby resulting in their mixing and potentially limiting the research value of any associated cultural resource identified, as the ability to associate these resources with a specific chronological or geographic context will have been lost.



## Refuse Deposit

A deposit of historic-period artifacts such as glass bottles, metal implements, food remains including cut animal bone, and demolished construction materials, etc. that were disposed in excavated pits, normally on the periphery of project parcels, prior to the implementation of municipal solid waste disposal services in the 1920s.

## Significant Effect

A substantial adverse change in the significance of an historical resource from its physical demolition, destruction, relocation, or alteration or its immediate surroundings such that the significance of an historical resource would be materially impaired. The project's significant effect is when it demolishes or materially alters the physical characteristics of an historical resource that convey its historical significance. See CEQA Guidelines Section 15064.5(b)(1)(2)) for more information regarding determining the significance of impacts to archaeological resources.

## Tribal Cultural Resource

A site, feature, place, and/or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. A cultural landscape is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. See PRC Section 21074 for a complete definition of "tribal cultural resource".

## Tribal Representative

Representatives of the local Chumash community with ancestral affiliation to the project area, as identified by the Native American Heritage Commission.

## Unique Archaeological Resource

An archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

See PRC Section 21083.2(g) for a complete definition of "unique archaeological resource".



## 1.0 OVERVIEW

Santa Barbara contains a prehistory and diverse cultural heritage that is significant to the settlement patterns of California. This heritage is reflected in the broad range of cultural resources that exist within the city. This includes many known archaeological sites and areas of archaeological sensitivity, in addition to numerous tribal cultural resources, historical buildings, structures, sites, objects, and districts. These archaeological resources are irreplaceable and provide important information for scientific research, to educate residents and visitors about the city's past, and to provide a unique sense of place. The city continues to face the challenge of ensuring that development does not negatively impact known and unknown archaeological resources. Without protections in place, development could result in the loss of unique archaeological resources.

Under California Environmental Quality Act (CEQA) Guidelines, Appendix G, Environmental Checklist Form Section V, projects must be analyzed to determine potential effects to archaeological resources. The City's Initial Study/Environmental Checklist contains similar questions. The Master Environmental Assessment (MEA) Guidelines for Archaeological Resources is intended to ensure compliance with CEQA and implement state goals and local policies regarding cultural resource protection. The MEA Guidelines for Archaeological Resources establish screening criteria used for preliminary environmental review, and the methodologies and processes for determining the significance of impacts on archaeological resources that would potentially result from a development project.

The MEA Guidelines are applicable to any development project or permit application that is subject to CEQA. The City of Santa Barbara is typically the CEQA lead agency for projects undertaken within the city, and is charged with reviewing required technical reports for adequacy, including archaeological resource reports.

Archaeological resources may also be tribal cultural resources associated with Barbareño Chumash heritage, and may require both an archaeological assessment and one provided by contemporary Chumash representatives who are descendants from the Barbareño territory within present-day Santa Barbara. The City provides specific guidance for addressing tribal cultural resources within the MEA Guidelines for Tribal Cultural Resources (2025) to ensure that evaluations are comprehensive and respectful of the cultural significance of these resources.

To maintain its utility, the MEA Guidelines for Archaeological Resources and accompanying geographic information system (GIS) data are intended to be reviewed periodically and may incorporate data from archaeological studies compiled after adoption of the current Guidelines. If new data warrants modifications or updates to Archaeological Resource Sensitivity Area boundaries, project screening procedures, or report requirements, the MEA should be revised to reflect new data.

The City of Santa Barbara Community Development Director is authorized to make revisions as needed to the MEA Guidelines for Archaeological Resources to keep document up to date. Changes to these MEA Guidelines reflected in this 2025 update are summarized in Appendix A.

### 1.1 Archaeological Resources

Archaeological resources are the evidence associated with previous occupation and related subsistence activities. This evidence can be identified on the ground surface and potentially extending several feet below the surface depending upon the nature of cultural deposit, and geomorphological processes including erosion that may bury a location with alluvial sediment.



## 1.2 Santa Barbara Prehistory and History

The following overview of Santa Barbara prehistory and history provides contextual background that may inform archaeological investigations for project sites within Santa Barbara.

### Prehistory

Evidence of indigenous occupation within Santa Barbara and the Santa Barbara Channel dates back over 13,000 years, with early findings on Santa Rosa and San Miguel islands during the Paleoindian Period that extends from approximately (ca.) 13,000 – 11,000 years before present (B.P.).<sup>1</sup> During this time, populations thrived on a diet of marine resources including sea mammals and shellfish, while mainland populations hunted megafauna, including mammoth and bison. Plants and smaller animals were also part of their Paleoindian diet. As the Pleistocene climate shifted, and large game became less available, indigenous populations shifted their subsistence strategies to rely on plants and smaller animals.

The subsequent Early Period (ca. 11,000 – 5,500 B.P.)<sup>2</sup> was marked by a relatively dry climate. Populations relied on seed grinding, utilizing grinding stones including manos and metates, and engaged in shellfish gathering.<sup>3,4</sup> Archaeological evidence shows that indigenous populations occupied southern Santa Barbara County between 10,000 – 8,000 B.P., including present-day Santa Barbara from 8,000 – 8,700 B.P.

The Middle or Intermediate Period (ca. 5,500 – 900 B.P.) is associated with a wetter climate, leading to diet diversification. Oak tree habitats flourished, enabling the introduction of acorn gathering and processing, evidenced by the presence of mortar and pestle grinding implements. Populations also hunted large terrestrial game and marine mammals. The transition from the Middle to Late Period (ca. 1,200 – 650 B.P.), saw a period of dryer and warmer climate, called the Medieval Climatic Anomaly. This period is associated with increased resource scarcity, heightened inter-community conflict, reduced trade, and shifts in leadership structures.<sup>5,6</sup>

The Late Period (ca. 900 – 200 B.P.) was influenced by these environmental stresses and reflects a time of increasing cultural complexity. Populations harvested a variety of shellfish habitats, hunted smaller land animals and birds with the bow and arrow, and engaged in open sea fishing using canoes. Archaeologists suggest that the increasing cultural complexity observed in the Santa Barbara Channel region may have been influenced by population growth and environmental changes. These factors likely created greater demands on available resources, prompting communities to develop innovative

---

1 Erlandson, J. M., T.C. Rick, T.J. Braje, M. Casperson, B.J. Culleton, B. Fulfrost, T. Garcia, D.A. Guthrie, N. Jew, D.J. Kennett, M.L. Moss, L. Reeder, C. Skinner, J. Watts, and L. Willis. 2011. Paleoindian seafaring, maritime technologies, and coastal foraging on California's Channel Islands. *Science*, 221, 1181-1185.

2 These dates, indicating changes in prehistoric cultural development, are based on the study of shell beads recovered from archaeological sites throughout the Santa Barbara Channel area.

3 King, C. D. 1990. *Evolution of Chumash society: a comparative study of artifacts used for social system maintenance in the Santa Barbara Channel region before A.D. 1804*. New York: Garland.

4 Erlandson, Jon M. 1994. *Early Hunters of the California Coast*. Plenum Press. New York.

5 Moratto, Michael, T.F. King, and W.F. Woolfenden. 1978. Archaeology and California's Climate. *Journal of California and Great Basin Anthropology* 5:147-161.

6 Schwitalla, Al W. and Terry L. Jones. 2012. A Land of Many Seasons: Bioarchaeology and the Medieval Climactic Anomaly Hypothesis in Central California. In *Contemporary Issues in California Archaeology*, pp. 93-114. Left Coast Press, Inc. Walnut Creek, CA.



and more energy-intensive methods for sustaining their way of life.<sup>7,8,9</sup>

The Barbareño Chumash, whose ancestral lands encompass present-day Santa Barbara, were among the most populous indigenous groups in California encountered by the Spanish explorers in 1769.<sup>10</sup> With an estimated population of 7,000 Barbareño Chumash living along the Santa Barbara Channel coastline, they developed a rich hunting, gathering, and maritime economy, supported by extensive trade exchange system using shellfish beads. Their social organization included complex chiefdom leadership structures, reflecting a high degree of community coordination and cultural vitality. Barbareño Chumash villages were located near freshwater sources, estuaries, and areas along the Pacific Coast.<sup>11,12</sup>

Archaeological resources in the Santa Barbara area include cave caches, rock art, middens containing artifacts such as ornaments, tools, and shells, providing valuable insights into the past.

## History

In 1542, Portuguese explorer Juan Rodriguez Cabrillo, sailing for Spain, entered the Santa Barbara Channel and recorded the first documented encounter between Europeans and the Barbareño Chumash. European settlement began when the Spanish government established El Presidio de Santa Barbara in 1782. Four years after this fortress and seat of civil government was instituted, Mission Santa Barbara was founded in 1786. By the time Mexico secularized the Missions in 1834, the Barbareño Chumash population had been devastated by disease and European influence.

In 1846, American troops under the command of Colonel John C. Fremont seized Santa Barbara and claimed it for the United States. Santa Barbara subsequently experienced the transition from a Mexican presidio/pueblo to an American city over the next 24 years. When California became a state in 1850, Santa Barbara County was one of the 27 original counties, with the City of Santa Barbara designated as the county seat.<sup>13</sup> During this period, the American-European business district was concentrated along State Street, between Gutierrez and Ortega Streets. Many of the Spanish-American and Mexican-American community members lived near State Street in an eight-block area between Ortega and Figueroa Streets. It was during this period that the first detailed maps of downtown were drawn. The street grid was laid out in 1851; however, because of its rigid grid and the use of faulty surveying equipment, the resulting 1853 map contained many dimensional inaccuracies. The imposition of this grid eventually led to the demolition or truncation of many adobe houses. The adobe building tradition

---

7 Glassow, Michael and Larry Wilcoxon. 1988 Coastal Adaptations Near Point Conception, California, with Particular Regard to Shellfish Exploitation. *American Antiquity* 53:1:36-51.

8 Arnold, Jeanne E. Roger H. Colten and Scott Pletka. 1997. Contexts of Cultural Change in Insular California. *American Antiquity* 62 (2): 300-318.

9 Raab, L. Mark and Daniel O. Larson. 1997. Medieval Climatic Anomaly and Punctuated Cultural Evolution in Coastal Southern California. *American Antiquity* 62 (2): 319-336.

10 Brown, Alan K. 2001. Description of Distant Roads, Original Journals of the First Expedition into California, 1769-1770' Juan Crespi. San Diego State University Press.

11 David Banks Rogers. 1929. Prehistoric Man of the Santa Barbara Coast.

12 Systematic surveys of the landscape within the city and South Coast region began in 1925 with David Banks Rogers, then Curator of Anthropology at the Santa Barbara Museum of Natural History.

13 California State Association of Counties. 2014. *The Creation of Our 58 Counties*. <https://www.counties.org/general-information/creation-our-58-counties>



lasted until the early 1860s and was common in Santa Barbara due to the city's isolated geography, which made the transportation of wood and other building materials difficult. By 1870, the influence of the Mexican-American population over the economic and cultural life of the City had significantly diminished.

From 1870 to 1900, the city experienced rapid development and urbanization. During this time, the street grid originally laid out in the 1850s was largely completed. Construction of Stearns Wharf in 1872 along with the Southern Pacific Railroad connection at the end of the century, removed previous commercial and social barriers, facilitated access to a variety of building materials, and attracted residential immigration. Notably, Chinese and subsequent Japanese immigrants settled in the region, seeking employment in the growing American economy, including fishing, farming, and domestic service.<sup>14</sup> The Chinatown and Japantown neighborhoods were established along the 800 Block of Anacapa Street and the 100 Block of East Canon Perdido Street, in a community centered on State Street. The late 19th and early 20th centuries saw the peak of Santa Barbara's Chinatown, which housed businesses, schools, and social organizations.

The city continued to become progressively more urbanized in the early part of the twentieth century, with the construction of more residential tracts. The arrival of the automobile, which spurred the construction of sales rooms, garages, and other related businesses, transformed the lower areas of State and Chapala Streets. Important economic and social transitions were also taking place, conforming to similar changes in other areas of the West.

A key historical event during this period was Santa Barbara's 1925 earthquake, which resulted in the rebuilding and architectural redesign of the central business district. This rebuilding displaced the original Chinatown community. Efforts to retain the remaining Chinese population led to the establishment of "New Chinatown" near the Presidio area in the late 1920s.<sup>15</sup> Archaeological excavations, particularly associated with the Paseo Nuevo shopping complex (between State, Chapala, Ortega, and Canon Perdido streets), have recovered substantial evidence of historic Chinatown culture from the late 19th to early 20th centuries.

Archaeological resources within the City of Santa Barbara date to as recently as 1925. After this time, municipal sewer lines conveying wastewater and solid waste collection had been implemented throughout the city; this eliminated the need for residents, and commercial/industrial tenants to discard their refuse within their properties (i.e., in refuse pits, etc.). As a result, historic period archaeological sites within the urban community are not associated with activities after this time.

---

14 Sambajon, Troy. 2022. *What Happened to Santa Barbara's Forgotten Chinatown and Japantown. The Bottom Line UCSB*. May 22. <https://thebottomline.as.ucsb.edu/2022/05/news-what-happened-to-santa-barbaras-forgotten-chinatown-and-japantown>

15 Santa Barbara Trust for Historic Preservation. 2024. A History of Chinatown. <https://www.sbthp.org/a-history-of-chinatown>



## 2.0 ARCHAEOLOGICAL RESOURCE SETTING

The City of Santa Barbara recognizes that new development can impact archaeological and tribal cultural resources in any location where they exist, or when the potential for unknown resources to exist is reasonably probable. This Chapter presents information sources that may inform the presence of, or the potential for, prehistoric and historic period archaeological resources to exist within a proposed development site.

### 2.1 Archaeological Resources Sensitivity Area Maps

These MEA Guidelines include Archaeological Resources Sensitivity Area Maps that cover the distribution of recorded archaeological sites associated with established periods of occupation, and the geographic areas where environmental factors and historic period development patterns indicate that other unknown cultural resources may exist. The Sensitivity Area Maps are based on:

1. Locations of recorded prehistoric and historic period resources identified in archaeological investigations completed within the city;
2. Data and records from the California Historical Resource Information System (CHRIS), Central Coast Information Center (CCoIC); and,
3. Historic maps, literature, and photographs outlining the development history of the city.

Sensitivity Area Maps have been developed for each of the following periods:

- Prehistoric Resources Period
- Mission Complex and Waterworks Period (1786-1835)
- Spanish Colonial and Mexican Periods (1782-1849)
- Early American Transition Period (1850-1870)
- American Period (1870-1900)
- Early Twentieth Century (1900-1925)

Appendix A, Updates to the 2025 MEA Guidelines for Archaeological Resources, outlines the rationale behind the 2025 updates to the Sensitivity Area Maps. These Maps may continue to be periodically updated to incorporate the results of future investigations conducted within the City of Santa Barbara.

#### 2.1.1 Prehistoric Resources Period

The Sensitivity Area encompasses the period when Chumash populations established a complex settlement system across the south coast of the Santa Barbara Channel, including present-day Santa Barbara. With a few exceptions, prehistoric archaeological sites have been recorded within 300 feet of drainages, bluffs, and estuaries, where saltwater and freshwater from perennial creeks extend inland from the Pacific Ocean coastline. This settlement pattern is especially evident for larger, permanent villages or campsites located where deep soils (up to over 5 feet) have formed from the organic decomposition of prehistoric food remains (midden). Access to a permanent freshwater source was a major factor in prehistoric settlement, while proximity to the coastline and inland estuaries provided access to coastal food resources like shellfish, fish, and waterfowl. Accordingly, this Sensitivity Area includes all recorded prehistoric archaeological sites and an approximate 100-meter (330-foot) buffer around environmental features that are known to have influenced prehistoric settlement, including existing perennial creeks, estuary boundaries, and bluffs overlooking the Pacific Ocean.



Smaller, special activity areas used for gathering and hunting were less influenced by environmental factors and are often limited to low density scatters of food resources (e.g., shellfish fragments) and artifacts (e.g., chipped stone tool manufacturing flakes and/or tools) on the ground surface. Development within the city over the past 150 years has likely disturbed or destroyed evidence of these relatively small, shallow cultural deposits (generally less than one foot deep). These types of sites have not been recorded on slopes of over 20 percent and are not expected to occur in such areas, as the steep topography discouraged these activities.

The Prehistoric Resources Sensitivity Area also incorporates the results from systematic archaeological surveys conducted over the past 30 years. Surveyed areas with no evidence of cultural resources indicate a lower potential for unknown resources to exist. The current Sensitivity Area reflects these findings. Additionally, this Sensitivity Area has the potential to contain tribal cultural resources, as outlined in the MEA Guidelines for Tribal Cultural Resources.

### 2.1.2 Mission Complex and Waterworks Period (1786-1835)

This Sensitivity Area includes areas identified on archival affiliated with the Mission Santa Barbara, including the Mission quadrangle, church, cemetery, and neophyte (Chumash laborers) village. This includes structures involved with day-to-day subsistence activities including the waterworks system (aqueducts, including the Upper Reservoir, Lower Reservoir, and Filter House), Grist Mill, and orchards, extending from the Mission quadrangle. The location of these structures are documented by early 20<sup>th</sup> century surveys by local historians, and numerous archaeological resource investigations including surface surveys and excavations. Recent investigations have identified the extent of the aqueduct system extending southward from Rattlesnake Canyon and Mission Canyon to the Mission. The full extent of these two aqueduct corridors has been projected based on segments identified during investigations; however, the ability to determine the presence of this resource on some parcels is challenging where downslope alluvial erosion may have buried the tiles, cobbles, and plaster.

The Barbareño Chumash were integrated into the Santa Barbara Mission system, where they became members of the Catholic church and worked as laborers constructing Mission infrastructure, including the waterworks system. As a result, this Sensitivity Area has the potential to contain tribal cultural resources, as outlined in the MEA Guidelines for Tribal Cultural Resources.

### 2.1.3 Spanish Colonial and Mexican Period (1782-1849)

This Sensitivity Area encompasses the core area of Spanish and Mexican settlement during and after the Mission Period. It includes the remains and reconstruction of the Spanish Presidio, and the location of adobes built by Spanish-American and Mexican-American families including the De la Guerra, Hill-Carrillo, Oreña, and Santiago De la Guerra adobes. The Spanish-American and Mexican-American community was located in a six-block area between Carrillo and Ortega Streets, and Chapala and Laguna Streets. The locations of those currently standing adobes, the locations of demolished adobes, and property ownership during this period, are documented on archival maps drawn in the early 1850s.<sup>16</sup> The adobes may also be identifiable on contemporary topographic maps.<sup>17</sup>

---

<sup>16</sup> Presidio map from the Vischer Papers; Wackenrueder Nos. 1 and 2.

<sup>17</sup> 1852 and 1853 U.S. Coast Survey Maps, and those created in subsequent decades - 1870 U.S. Coast Survey Map; 1886 and 1888 Sanborn Fire Insurance Maps.



### 2.1.4 Early American Transition Period (1850-1870)

This Sensitivity Area includes areas within the city that reflect the transition from a Mexican-American pueblo to a growing urban center after California statehood establishment and Santa Barbara's incorporation in 1850. It was during this period that the first detailed maps of downtown were drawn. The street grid was laid out in 1851 by Salisbury Haley. City street names were crafted by a committee of prominent citizens who had been important figures on the *ayuntamiento*, the Mexican governing body that had preceded cityhood and reflected some of those committee members (i.e., Carrillo, De La Guerra, Figueroa), while others reflected the fact that Spanish was the dominant language spoken at that time.<sup>18</sup> The resulting map, however, contained many inaccuracies because of its rigid grid and faulty surveying. The imposition of this street grid on the pre-existing distribution of Mexican family adobes eventually led to the demolition or truncation of many of these structures. The adobe building tradition, however, continued until the early 1860s due to an absence of an effective mode (either by land or by water) to transport building materials to the city.

By the late 1860s, American style building techniques became common, and the American-European business district was extended along State Street between Gutierrez and Ortega streets. By 1870, the influence of the Mexican-American population over the economic and cultural life of the city had been effectively marginalized. This Sensitivity Area is composed of three non-contiguous areas: one roughly bisected by State Street extending from Islay Street to the waterfront; another encompassing the area along Milpas Street between Haley Street and Calle Puerta Vallarta; and a small area centered on the intersection of Anapamu Street and Milpas Street. The urban development is documented on several archival documents including: U.S. Coast Survey Maps for 1852, 1853 and 1870, and the Sanborn Fire Insurance Maps for 1886 and 1888.

### 2.1.5 American Period (1870-1900) and Early Twentieth Century (1900-1925)

This Sensitivity Area covers two historical era periods that geographically overlap and have been combined in the 2025 update to the MEA Guidelines.

#### American Period (1870-1900)

Substantial urbanized growth occurred during the late 19<sup>th</sup> century, resulting in the near buildout of the Haley 1851 street grid, extending from the waterfront to Mission Street. Archival maps documenting the city's development during this time include: 1878 and 1888 Birds Eye Maps of Santa Barbara 1878 and 1888; 1888 U.S. Coast Survey Map; and 1886 through 1903 Sanborn Fire Insurance Maps. Construction of Stearns Wharf in 1872 and the Southern Pacific Railroad connection to the city at the end of the century removed previous commercial and social barriers, allowing for access to construction materials and attracted residential immigration.

Notably, Chinese immigrants began settling in the area beginning in 1860, seeking employment in the growing American economy and engaging in fishing, farming, and domestic services. By 1890, Japanese immigrants also established a presence.<sup>19</sup> These communities formed an Asian-American

---

<sup>18</sup> Redmon, Michael. 2014. The History Behind Street Names. *The Santa Barbara Independent*. November 21. <https://www.independent.com/2014/11/21/history-behind-street-names/>

<sup>19</sup> Sambajon, Troy. 2022. What Happened to Santa Barbara's Forgotten Chinatown and Japantown. *The Bottom Line UCSB*. May 22. <https://thebottomline.as.ucsb.edu/2022/05/news-what-happened-to-santa-barbaras-forgotten-chinatown-and-japantown>



neighborhood along the 800 Block of Anacapa Street and the 100 Block of East Canon Perdido Street, near State Street.

African American and Black populations within the city experienced significant growth during this period. As the African American and Black community expanded, they established businesses, organizations, and social groups, contributing to the city's cultural and economic landscape.<sup>20</sup> However, despite their presence, archaeological evidence documenting this period is limited.<sup>21</sup>

### Early Twentieth Century (1900-1925)

The introduction of the automobile was a significant growth stimulus in the early 20<sup>th</sup> century, resulting in increased independence from the prior streetcar network. Residential areas expanded above the downtown area into the Riviera, and eastward along the waterfront adjacent to the Santa Barbara Zoo. The 1925 Santa Barbara Earthquake is considered the turning point of this time frame, as it resulted in substantial destruction of previous structural development, and establishment of "El Pueblo Viejo" promoting redevelopment consistent with the Spanish Colonial Revival architectural style. Sanborn Fire Insurance Maps for 1903-1931 illustrate the city's growth during this time.

## 2.2 Central Coast Information Center (CCoIC)

Archeological site records and maps, and completed project investigation and construction monitoring reports are maintained at the CCoIC, located at the Santa Barbara Museum of Natural History, Santa Barbara, California. This is the official regional repository of the California Historical Resources Information System (CHRIS) Santa Barbara County, including the City of Santa Barbara. Access to and use of these data maps is governed by CHRIS regulations and is limited to registered professional archaeologists and Native American tribal representatives.<sup>22</sup>

## 2.3 Archaeological Resources Reports Database

The Archaeological Resources Reports Database includes the inventory of archaeological resource reports submitted to and accepted by the City. The Database includes electronic files of archeological resource investigations and construction monitoring reports for project sites located within the city. The use of the Archaeological Resources Reports Database is restricted to:

- Authorized City staff who have completed training and have signed a Confidentiality Statement;
- Archaeological Consultants on the City Qualified Archaeologists List; and
- Local Native American tribal representatives who have concerns about the physical remains of their heritage.

See Appendix D regarding authorized access to the Archaeological Resources Reports Database. Locational information related to archaeological sites is considered confidential and the CHRIS Operation Manual indicates that archaeological reports must not be disseminated to the general public.

---

20 Page and Turnbull. 2022. Santa Barbara African American and Black Historic Context Statement. Prepared for the City of Santa Barbara. September. <https://santabarbaraca.gov/sites/default/files/2022-09/African%20American%20Black%20Context%20Statement%20-%20Final.pdf>

21 To address this gap, the City of Santa Barbara commissioned the African American/Black Historic Context Statement, which provides a comprehensive history of the African American and Black community and identifies potential historic resources representing their legacy.

22 Office of Historic Preservation. 2016. *California Historical Resources Information System Information Center Rules of Operation Manual*.



## 2.4 Designated Historic Resources Lists and Historic Resource Inventory

The City of Santa Barbara maintains an electronic list and digital map of the following designated historic resources lists:

- National Historic Landmarks
- National Register of Historic Places (NRHP)
- California Registered Historical Landmarks (CRHL)
- California Register of Historical Resources (CRHR)
- City of Santa Barbara Landmarks
- City of Santa Barbara Structures of Merit
- Historic Resources Inventory
- Contributing historic resources to a Landmark and Historic District.

An archaeological resource may be listed on the NRHP or CRHR. Other designated historic resources lists above are typically associated with built architectural resources. It is important to note however, that a historical period archaeological resource, such as a trash pit, could be located on a parcel where a National Historic Landmark, CRHL, City of Santa Barbara Landmark, Structure of Merit, or a contributing resource to a Landmark or Historic District is recorded. If present, such archaeological resources could hold greater significance due to its association with an important person or event in Santa Barbara history. Therefore, it is essential to review background resources to determine if any historic built architectural resources exist on a project parcel.

## 2.5 Regulatory Framework

Evaluation and protection of archaeological resources is governed by city, state, and federal policies, laws, and regulations. City policies related to the protection of archaeological resources are found in the Historic Resources Element of the Santa Barbara General Plan, the Coastal Land Use Plan, and the Santa Barbara Municipal Code Chapter 22.12. In addition, the Historic Landmarks Commission (HLC) has a role in the designation and protection of archaeological resources. State protections include CEQA, the California Coastal Act, and the Public Resources Code.

Federal legislation concerning cultural resources applies when a project involves federal funds, land, or jurisdictional permitting authority. For such projects, compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA) of 1966 is required.

Project examples in Santa Barbara may include, but are not limited to:

- Transportation projects on U.S. Highway 101 overseen by the California Department of Transportation (Caltrans)
- Affordable housing projects funded by federal Housing and Urban Development (HUD)
- Federally funded City projects
- Projects requiring permits from a federal agency such as the U.S. Army Corps of Engineers

In some cases, the City may act as the NEPA lead agency and ensure compliance with federal historic preservation requirements under Section 106 of the NHPA. See Appendix C, Regulatory Framework.



### 3.0 STEPS FOR DETERMINING REPORT TYPE

City staff are responsible for determining whether a project requires an archaeological resources report, and the appropriate report type. This Chapter outlines the steps to determine whether a Phase 1 Archaeological Resources Report (and Tribal Resources Report as applicable, [herein referred to as a Phase 1 Report]), a Letter Report Confirming No Archaeological Resources (Letter Report), or no report is required for a proposed development project. This determination occurs during the initial staff review of a planning application or at the start of the CEQA review process. Typically, archaeological resources reports are submitted, reviewed, and accepted by either the Historic Landmarks Commission (HLC) or the City Environmental Analyst prior to a planning application being deemed complete.

#### STEP 1.

---

##### Review Archaeological Resources Sensitivity Area Maps

The Planning Division provides public access to Archaeological Resources Sensitivity Area Maps via GIS mapping that identifies a project location relative to by address or Assessor's Parcel Number (APN). Staff must identify the location of a project site relative to Archaeological Resources Sensitivity Areas. The presence of a project site within a Sensitivity Area and amount of proposed ground disturbance will determine the type of archaeological resources report required for a project and background resources that must be incorporated in the archaeological investigation (see Step 3 and Appendix B.2 for additional details).

In addition, if unusual circumstances exist within a project site located outside of the mapped Sensitivity Areas that would significantly impact archaeological resources, the City Environmental Analyst may require an archaeological investigation in order to demonstrate compliance with CEQA.

#### STEP 2.

---

##### Identify the Extent of Project Ground Disturbance

Staff must identify the approximate extent of all ground disturbances proposed as part of the project, both horizontally and vertically. These are activities that result in the displacement of soil, commonly associated with mechanical or hand excavation. Common examples include:

- Subsurface structures such as subterranean garages and spas;
- Vegetation removal requiring removal of roots;
- Soil preparation including excavation, recompaction, and scarification; and
- Excavation for structural foundations, utility corridors, and stormwater retention infrastructure.

The extent of proposed ground disturbance can be identified in project plans, grading plans, utility plans, technical reports, supporting figures, and/or photos. Project plans must clearly demonstrate the depth and area of proposed disturbance. If project information is unclear, staff should request additional information from the project applicant to determine the extent of proposed disturbance. Project elements potentially contributing to ground disturbances include the following:



- **New Structures or Additions to Existing Structures.** Plans must clearly identify the gross and net ground floor areas.
- **Site Grading.** Grading may be proposed as part of a project. Examples of projects that may contain substantial grading include a new pool or spa, hardscaping and landscaping, driveways, and/or public right-of-way improvements. Plans must clearly identify the location and extent of proposed grading.
- **Structural Foundations.** The conventional depth for 1-story foundations is 1.5 feet below existing grade, while the depth for 2-story foundations is 2.0 feet. Structures of greater height normally require 3 or more feet of disturbance for foundations. Project site and grading plans may provide cross-sections of proposed foundation design and their depth extending below surface.
- **Soil Preparation.** A project-specific geotechnical soils report prepared by a registered geotechnical or civil engineer is generally required for all new structures and additions larger than 500 sq. ft. The soils report provides recommendations based on testing within the proposed structural footprint. Soils below and beyond structural foundations often require excavation and recompaction (scarification) dependent on soil conditions to provide engineering stability per state and local building code specifications. Soils reports, or communications with the project engineer, must be considered when available to account for the amount of additional ground disturbance resulting from these actions.
- **Utilities and Stormwater Requirements.** Staff should check if utility upgrades or extensions are included in the project scope of work and consider the location of proposed utilities and stormwater infrastructure, and their depths. These include extension of sewer, water, electrical, gas and cable lines, and extend at least 1.5 feet or deeper below existing grade; sewer lines requiring gravity feed can extend well over 3 feet below existing grade. Sedimentation and/or retention basins, swales, or other drainage conveyance structures required for stormwater retention may require excavation over several feet below existing grade. Stormwater Management Plans require information regarding the type and location of proposed stormwater best management practices (BMPs). If applicable, staff must request utility information to be shown on the project site plan.
- **Landscaping.** The project landscaping plan provides the location and size of ornamental plantings. Most ornamental landscaping, including shrubs and small tree specimens, will not require excavation below 1.5 feet from existing grade. Larger, mature trees (trunks exceeding 6 inches in diameter measured 4 feet from the ground) that have been grown or transplanted in over 24-inch boxes will require excavation of several feet below this depth. The area of proposed landscaping must be considered when estimating the area of proposed ground disturbance.
- **Retaining Walls, Decks, and Fences.** The location of retaining walls, fences, and decks, and depth of these foundations must be provided on the project site plan. These structures can be constructed with a continuous subterranean foundation 1.5 feet wide and at least that deep, or by caissons placed regularly (e.g., every 10 feet) along their length, based on soil characteristics.

If the project will result in any ground disturbance, additional required screening steps are identified below; proceed to Step 3. If no ground disturbance is proposed, no report is required.



## STEP 3.

---

### Determine the Archaeological Report Type and Requirements

Table 1, Archaeological Resources Report Requirement Screening Table 1 below identifies whether a Phase 1 Archaeological Resources Report (and Tribal Cultural Resources Report, as applicable, [herein referred to as a Phase 1 Report]), Letter Report Confirming No Archaeological Resources (Letter Report), or no report is required based on the extent of proposed ground disturbance and project location. Based on the Sensitivity Area, staff must determine the type of investigation that may be needed for the project. This determination is dependent on the Archaeological Resources Sensitivity Area in which the project site is located, and the extent of vertical and horizontal ground disturbance. The basis for report requirements within Table 1 is provided in Appendix A, Updates to the 2025 MEA Guidelines for Archaeological Resources.

The report types are as follows:

- **Phase 1 Report.** A report presenting the results of a cultural resource investigation to identify the presence or absence of any cultural resources within a project site. A Phase 1 Report includes background research including a records search from the CCoIC, fieldwork, assessment of potential archaeological resource impacts, tribal outreach, and recommendations or mitigation measures. A Phase 1 Report may be appropriate in areas where there is a potential to encounter significant archaeological resources. See Section 4.2 for more information.
  - **Letter Report.** A letter report format may be appropriate for projects that are not expected to result in impacts to archaeological resources. A Letter Report includes background research consisting of archival research and literature review, fieldwork, and confirmation that archaeological resource impacts are anticipated to be less than significant.<sup>23</sup> A Letter Report may be prepared in place of a Phase 1 Report under certain circumstances, as described in Table 1 and Step 4. See Section 4.3 for more information.
- **Phase 2 Report.** A Phase 2 Report may be required if cultural resources are identified during a preceding Phase 1 Report, in order to assess the significance of the resource and determine project impacts. See Section 4.4 for more information.
- **Phase 3 Report.** A Phase 3 Report includes subsurface excavation and data recovery to partially mitigate unavoidable impacts to significant cultural resources identified during the preceding investigation. See Section 4.5 for more information.

---

<sup>23</sup> A records search from the CCoIC or tribal outreach, is typically not required for a Letter Report.



**TABLE 1****ARCHAEOLOGICAL RESOURCES REPORT REQUIREMENT SCREENING**

<b>SENSITIVITY AREA (TIME PERIOD)</b>	<b>PROPOSED GROUND DISTURBANCE<sup>1</sup></b>	<b>PHASE 1 REPORT<sup>2</sup></b>	<b>LETTER REPORT</b>	<b>NO REPORT</b>
PREHISTORIC RESOURCES	ANY	✓ <sub>3</sub>		
MISSION COMPLEX & WATERWORKS (1786-1835)	ANY	✓ <sub>3</sub>		
SPANISH COLONIAL & MEXICAN PERIOD (1782-1849)	ANY	✓ <sub>3</sub>		
EARLY AMERICAN TRANSITION PERIOD (1850-1870)	LESS THAN 2,000 TOTAL SQ. FT.			✓
	2,000 OR MORE TOTAL SQ. FT.		✓ <sub>4</sub>	
AMERICAN PERIOD (1870-1900) AND EARLY 20TH CENTURY (1900-1925)	LESS THAN 2,000 TOTAL SQ. FT.			✓
	2,000 OR MORE TOTAL SQ. FT.		✓ <sub>4</sub>	

1. The City has determined that 2,000 square feet of proposed ground disturbance generally represents the division between small projects, and medium or large projects. See Appendix A for additional details. If substantial evidence or a reasonable potential exists that a project could significantly impact an important or unique archaeological resource, the City Environmental Analyst may require a Phase 1 Report, even if these MEA Guidelines would typically allow for a Letter Report or no report to be prepared.
2. Outreach to local Chumash tribal representatives is required for all Phase 1 Reports:
  - a. Email the Draft Phase 1 Report to local Chumash tribal representatives who have ancestral affiliation to the project area, as identified by the NAHC, requesting review and comment. Provide 2 weeks for comment.
  - b. If no comments are received after 2 weeks from the initial email, provide a follow-up email and an additional 2 weeks for comment.
  - c. Summarize any comments and recommendations from Chumash tribal representatives regarding potential impacts to tribal cultural resources received after 2 weeks from the follow-up request (4 weeks from the initial request), including the report distribution dates, tribal representatives contacted, and any responses provided.
3. In some scenarios, a Letter Report may replace the requirement for a Phase 1 Report. Prior land modification, the amount of proposed disturbance, and the results of prior archaeological investigations should be considered in determining the appropriate report requirement, in consultation with the City Environmental Analyst, as detailed in Step 4.
4. Prior land modification and the results of prior archaeological investigations completed within the same area of disturbance should be considered in determining if an archaeological report is required, in consultation with the City Environmental Analyst and as detailed in Step 4.



## STEP 4.

---

### Further Considerations in Determining Report Type

Once the need for an archaeological resources report is determined based on Table 1, staff should consider additional information in order to make a final determination on the appropriate report type.

Site specific circumstances can affect the requirements for an archaeological report or indicate that no report is necessary given the absence of potential for impacts on unknown archaeological resources. The City Environmental Analyst, in consultation with the case planner or other City staff, the City Archaeological Advisor, and/or the CCoIC will determine whether a Phase 1 Report, Letter Report, Addendum to a prior report, or no report is required, based on the following:

- Previously Completed Archaeological Reports on the Same Project Site
- Previously Completed Archaeological Reports in the Vicinity of the Project Site
- Prior Land Modification on the Project Site
- Minimal Proposed Area and Depth of Disturbance

### Previous Report on the Same Project Site

Authorized staff may review the City Archaeological Resources Reports Database to determine if prior archaeological reports have been prepared for the same project site or vicinity. If a Phase 1 Report or Letter Report was previously completed within the same study area, the City Environmental Analyst may determine that the previous report adequately addresses potential impacts associated with a currently proposed project if each of the following occurs:

- *The horizontal extent and depth of ground disturbance of the proposed project would occur within the area assessed in the previous report.* This requires that staff carefully review the proposed ground disturbance associated with the new project description as outlined in Step 2. Some archaeological resources reports only cover a specific area or portion of the parcel to address impacts of a specific project.
- *The previously completed report adequately reviewed background research sources.* Staff must review the background research section of the report to determine if the prior research is relevant to the currently proposed project. This includes consideration of relevant background resources identified in Appendix B, Archaeological Resources Sensitivity Areas and Background Research Sources for the particular Sensitivity Area, including archival maps, building permits, and Historic Structures/Sites Reports.
- *The fieldwork techniques used in the previously completed report (e.g., intensive ground surface survey transect spacing, photographs of project impact areas, etc.) are consistent with the current MEA Guidelines.* This requires that staff review the field survey in the prior report to determine if it covers the entire area of proposed disturbance in the new project description.
- *The previously completed Phase 1 Report adequately addresses tribal cultural resources.* If a Phase 1 Report was previously prepared within the same study area, but no outreach to tribal representatives was conducted as part of the report preparation, the Phase 1 Report shall be circulated to tribal representatives as outlined in Section 4.2.



Negative survey results from the previously completed report do not necessarily imply the absence of potential subsurface deposits within the project site. Therefore, when assessing the adequacy of the previous reports, staff must carefully consider both the background document research and survey procedures. If the previously prepared archaeological resources report(s) is found to be inadequate and irrelevant to the proposed project based on the direction in the preceding paragraphs, then a new Phase 1 Archaeological Resources Report or new Letter Report may be required. Alternatively, staff may require an Addendum to the previously accepted Phase 1 Report to assess the new project at the same site.

- If an Addendum to a prior Phase 1 Archaeological Resources Report is prepared and confirms that no new impacts to archaeological resources are identified, the Addendum shall be processed in the same manner as a Letter Report Confirming No Archaeological Resources (see Step 6).
- If the Addendum identifies new potential impacts that were not previously included in the prior Phase 1 Report, the Addendum shall be processed in the same manner as a Phase 1 Report (see Steps 6 and 7).

### Previously Completed Reports in the Vicinity of the Project Site

If another Phase 1 Report was prepared consistent with the current MEA Guidelines for Archaeological Resources and was completed in the vicinity of the project site, the City Environmental Analyst may determine whether a new Phase 1 Report is required for the project site. The requirement for a new Phase 1 Report may be waived, replaced by a Letter Report, or replaced by a Phase 1 Report Addendum, provided that one of the following conditions are met:

- The proposed project's parcel size is 5,000 square feet or smaller, and one or more Phase 1 Reports completed within 50 feet of the proposed project's parcel yielded negative results; and/or
- The applicant obtains a letter from the CCoIC confirming that the previous Phase 1 Report on an adjacent property did not identify any archaeological resources.

### Prior Land Modification on the Project Site

Staff may consider the extent of the project site's previous topographic landform modification resulting from previous development. In cases where the project site has been subject to prior cuts and/or fills, staff must determine whether the proposed project would result in disturbance to previously undisturbed soil; this determination may be in consultation with the qualified archaeologist (see Section 4.2.1). If the case planner and City Environmental Analyst can be reasonably assured that the project would not affect any archaeological resources due to prior landform modification, an archaeological investigation may not be required if either of the following occurs:



- *The project applicant provides documentation demonstrating prior ground surface modifications.* As-built (previous) grading plans, previously permitted site plans, soils reports, and/or utility improvements plans, etc. can be used to illustrate the extent of previous landform disturbance. Photographs demonstrating ground modifications including retaining walls and cut slopes can complement permitting documentation. Landform modifications can be reliably ascertained by noting the presence of cut slopes and/or retaining walls, and reasonably estimating the difference in height of the terraced slope elevation (above vs. below the graded cut). Within the street right-of-way, driveways, or surface parking lots, asphalt overlays and slurries that do not go below the existing road base may be considered prior landform modification. In some cases, areas with existing ornamental landscaping may be considered prior ground surface modification. If documentation of prior landform modification is lacking, then a Phase 1 Archaeological Resources Report or Letter Report Confirming No Archaeological Resources may be required.
- *An archaeologist on the City Qualified Archaeologists List provides a written recommendation to waive the report or complete a Letter Report based on prior landform modification or lack of A-Horizon soils.* The recommendation must present substantial evidence to demonstrate previous landform disturbances have effectively removed any potential for intact, previously undisturbed, prehistoric or historic period archaeological site deposits and provide a reasonable conclusion that proposed project activities would not impact any unknown archaeological resources.

### Minimal Proposed Area and Depth of Disturbance

In cases where a proposed project's area of disturbance and depth is minimal and Table 1 of the MEA Guidelines indicate that a Phase 1 Report is required, the City Environmental Analyst has the authority to waive the requirement for a Phase 1 Report and to instead require a Letter Report Confirming No Archaeological Resources. The Environmental Analyst must be reasonably assured that unknown archaeological resources are unlikely to be disturbed based on the proposed project's minimal area and depth of disturbance; supporting evidence may include the following:

- Any prior archaeological investigations completed at the project site or vicinity;
- Documentation of prior land modification on the site;
- Letter from the CCIC demonstrating negative results for the parcel; and/or
- Written recommendation from an archaeologist on the City Qualified Archaeologists List to prepare a Letter Report instead of a Phase 1 Report.

The Letter Report will either:

1. Confirm the Environmental Analyst's initial determination that archaeological resources are not likely to be present; or,
2. Determine that there is a potential for archaeological resources to be discovered, in which case, a Phase 1 Report is required.



## STEP 5.

---

### Notification of Required Report Type

Following a review of planning application materials, the case planner will inform the project applicant whether a Phase 1 Report, Addendum to a Phase 1 Report, a Letter Report Confirming No Archaeological Resources, or no report is needed.

- **Sensitivity Area.** The applicant will be notified of the archaeological Sensitivity Area(s) where the project is located and the potential resources which may be encountered based on the guidelines for each Sensitivity Area.
- **City Qualified Archaeologists List.** All archaeological reports must be prepared by a qualified archaeologist from the City Qualified Archaeologists List, hired by the applicant.
- **Report Submittal Instructions.** The City Qualified Archaeologists List and the Archaeological Resources Report Submittal Instructions can be accessed at the Community Development Department's Planning and Zoning Public Counter at 630 Garden Street or online.

## STEP 6.

---

### Review of Archaeological Resources Reports

Upon submittal of the required report, the case planner and City Environmental Analyst will review it for compliance with the MEA Guidelines. Project applications subject to the Permit Streamlining Act (PSA) require a 30-day review of submitted application materials; this includes archaeological reports received as part of a formal planning application submittal package. Archaeological reports subject to the PSA will be reviewed and comments will be provided within 30 days of the date that the planning application is received by the City.

- **Phase 1, 2, and 3 Reports.** Staff will route all Phase 1, 2, and 3 Reports to the City Archaeological Advisor for review and comments. The case planner or Environmental Analyst will inform the archaeologist of any resulting comments, and the archaeologist may be asked to resubmit the report with recommended changes. If the results of the Phase 1 Report are negative and the City Archaeological Advisor either has no comments or any comments have been adequately addressed, the City Environmental Analyst may accept the report and no further action is necessary. If the results of the Phase 1 Report are positive, proceed to Step 7.
- **Letter Report Confirming No Archaeological Resources.** The City Environmental Analyst will review the report and either:
  - Accept the Letter Report;
  - Request additional information or changes to the Letter Report; or
  - Reject the Letter Report.

If the report is not accepted or if additional information is requested, the case planner or Environmental Analyst will inform the applicant and archaeologist.



In addition, it is important to note that the State CEQA Guidelines Section 15064(g) state:

*“...the lead agency shall be guided by the following principle: If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an [Environmental Impact Report] EIR.”*

Expert opinion may include, but is not limited to, the City Archaeological Advisor, archaeological consultants, or local Chumash tribal representatives identified by the NAHC. If there is differing expert opinion regarding the project’s potential to impact important or unique archaeological resources, an EIR may be required for the project.

## STEP 7.

---

### Historic Landmarks Commission (HLC) Action

If an archaeological report results in the recordation of an archaeological resource or assessment of a previously recorded archaeological resource, the report will be reviewed by HLC. The following process will take place after the report review as described in Step 6:

- The archaeological report, any comments and recommendations from the City Archaeological Advisor and/or Environmental Analyst, and a staff recommendation for acceptance, acceptance with conditions, or rejection, will be forwarded to the HLC for its review and action (acceptance, conditional acceptance, or rejection).
- If the Phase 1 Report is not accepted by HLC, revisions and/or additional information may be required. Revisions and/or additional information may be incorporated into the Phase 1 Archaeological Resources Report, may result in the need for a Phase 2 Archaeological Resources Report, or may result in a combined Phase 1/Phase 2 Archaeological Resources Report as determined appropriate by the City Environmental Analyst.

The reporting archaeologist must submit all completed Phase 1 Reports to the CCoIC for filing in its database following report acceptance by the City. If a Phase 2 Report or a Phase 3 Work Plan and Report are required, Steps 6 and 7 must be repeated.

Staff, applicants, archaeologists, consultants, and Commissioners must adhere to state confidentiality laws pertaining to archaeological resources and must not disclose any information to the public regarding the location or any identifying features of the resource. See Appendix D, Confidentiality of Information, for more information.



## 4.0 ARCHAEOLOGICAL RESOURCES REPORT REQUIREMENTS

Archaeological reports submitted to the City must adhere to the format and contents provided in this Chapter.

Promptly after acceptance by the City of Santa Barbara, all Phase 1, 2 and 3 Reports must be submitted to the Central Coast Information Center (CCoIC).

Phase 1, 2 and 3 Reports must incorporate outreach to local tribal representatives as described in the MEA Guidelines for Tribal Cultural Resources, and include this discussion in the *Potential Project Tribal Cultural Resources Impacts* section of the Report. Additional guidance is provided below. **Please note: If the Report receives comments from tribal representatives, the Report must be titled Phase [1,2,3] Archaeological Resources and Tribal Cultural Resources Report.<sup>24</sup>**

### 4.1 City Qualified Archaeologists List

Archaeologists preparing archaeological reports for submittal to the City must be approved by the City and appear on the most current City Qualified Archaeologists List. The City Environmental Analyst maintains the City Qualified Archaeologists List, which can be accessed at the Community Development Department's Planning and Zoning Public Counter at 630 Garden Street or online. In order to be approved on the City Qualified Archaeologists List, archaeologists must meet the professional qualification standards contained within Appendix E of the MEA Guidelines for Archaeological Resources.

### 4.2 Phase 1 Report

A Phase 1 Archaeological Resources Report (and Tribal Cultural Resources Report, as applicable) herein referred to as a Phase 1 Report, is an investigation intended to accomplish the following:

- Identify the presence of any archaeological and/or tribal cultural resources in a project area;
- Evaluate the potential for additional surface or subsurface resources to be present;
- Assess the significance of identified resources, whenever possible; and,
- Develop feasible measures to mitigate potential adverse effects.

#### 4.2.1 Contents and Format

1. **Cover Page:** The cover page must list:

- Name, address, telephone number, and email of the applicant;
- Name, address, telephone number, and email of the archaeologist;
- Address and Assessor's Parcel Number(s) of the project site under investigation; and,
- Date the report was prepared.

---

<sup>24</sup> Refer also to the 2025 MEA Guidelines for Tribal Cultural Resources. Tribal outreach with local Chumash tribal representatives with ancestral affiliation to the project area, as identified by NAHC, is required to identify any tribal cultural resources.



2. **Table of Contents:** The table of contents must include a list of figures and appendices.
3. **Project Description:** This includes a written project description and a site plan showing all existing and proposed development. The project description must include details regarding the extent of horizontal and vertical ground disturbances. Ground disturbance typically results from, but is not limited to the following project features:
  - New Structures or Additions to Existing Structures. Plans must clearly identify the proposed gross and net ground floor areas.
  - Site Grading. Grading may be proposed as part of a project. Examples of projects that may contain substantial grading include a new pool or spa, hardscaping and landscaping, driveways, and/or public right-of-way improvements. Plans must clearly identify the location and extent of proposed grading.
  - Structural Foundations. The conventional depth for 1-story foundations is 1.5 feet below existing grade, while the depth for 2-story foundations is 2.0 feet. Structures of greater height normally require 3 or more feet of disturbance for foundations. Project site and grading plans may provide cross-sections of proposed foundation design and their depth extending below surface.
  - Soil Preparation. A project-specific geotechnical soils report prepared by a registered geotechnical or civil engineer is generally required for all new structures and additions larger than 500 sq. ft. The soils report provides recommendations based on testing within the proposed structural footprint. Soils below and beyond structural foundations often require excavation and recompaction (scarification) dependent on soil conditions to provide engineering stability per state and local building code specifications. Soils reports, or communications with the project engineer, must be considered when available to account for the amount of additional ground disturbance resulting from these actions.
  - Utilities and Stormwater Requirements. These include extension of sewer, water, electrical, gas and cable lines, and generally extend at least 1.5 feet or deeper below existing grade; sewer lines requiring gravity feed can extend well over 3 feet below existing grade. Sedimentation and/or retention basins, swales, or other drainage conveyance structures required for stormwater retention may require excavation over several feet below existing grade. Stormwater Management Plans require information regarding the type and location of proposed stormwater best management practices.
  - Landscaping. The project landscaping plan provides the location and size of ornamental plantings. Most ornamental landscaping, including shrubs and small tree specimens, will not require excavation below 1.5 feet from existing grade. Larger, mature trees (trunks exceeding 6 inches in diameter measured 4 feet from the ground) that have been grown or transplanted in over 24-inch boxes will require excavation of several feet below this depth. The area of proposed landscaping must be considered when estimating the area of proposed ground disturbance.
  - Retaining Walls, Decks, and Fences. The location of retaining walls, fences, and decks, and depth of these foundations must be provided on the project site plan. These



structures can be constructed with a continuous subterranean foundation 1.5 feet wide and at least that deep, or by caissons placed regularly (e.g., every 10 feet) along their length, based on soil characteristics.

If project plans do not provide sufficient detail to determine depth of disturbance for any proposed project improvements, the archaeologist must request this detail in the form of conceptual plans from the applicant. Where design detail is not yet available, a reasonable worst case estimate of ground disturbance depth provided by the licensed professional (e.g., architect, engineer, or design consultant) must be requested and included in the report, by the archaeologist.

4. **Santa Barbara Prehistory and History:** The Santa Barbara Prehistory and History provided in Section 1.2 may be incorporated by reference into the Phase 1 Report by citing the MEA Guidelines for Archaeological Resources. The following example text may be included:

*The Santa Barbara Prehistory and History, including all references and citations in Section 1.2 of the MEA Guidelines for Archaeological Resources, is incorporated by reference into this Phase 1 Archaeological Resources (and Tribal Cultural Resources Report, as applicable). The prehistory, Chumash ethnography, and historical developments summarized in MEA Guidelines for Archaeological Resources and Guidelines for Tribal Cultural Resources, provide the regional cultural and historical context.*

5. **Environmental Setting and Prior Land Modification:** This section includes a characterization of the prior land modification of the project site.

The depth of soils dating to the Holocene geologic era (dating up to 15,000 years ago) is identified by United States Department of Agriculture, Soil Conservation Service Soil Survey Maps.<sup>25</sup> These are characterized as A-Horizon soils, and are defined in the Soil Survey Maps by color, texture, and depth. The Soil Survey database (provided in USGS quadrangle format) provides this information throughout the city. Currently accepted evidence of prehistoric occupation within a proposed project site within the City of Santa Barbara would be limited to A-Horizon topsoil depths, except for those that had been redeposited below this depth by urban development and/or rodent activity. Intact, previously undisturbed prehistoric archaeological resources are not likely to be found at locations where soils have been subject to substantial horizontal disturbances from earth moving (e.g., terracing by heavy equipment on sloping topography to create level building pads). The possibility, remains, however, that redeposited prehistoric archaeological resources and/or historic period archaeological resources may be located in previously disturbed soils. Redeposited archaeological deposits generally lack integrity, given that the stratigraphic relationship demonstrating their vertical (chronological) and horizontal (spatial) deposition has been lost. This results in the inability to address significance criteria identified in CEQA Guidelines Section 15064.5, (a)(3)(D): “Has [the archaeological resource] yielded, or may be likely to yield, information important in prehistory or history.”

<sup>25</sup> United States Department of Agriculture, Soil Conservation Services (USDA-SCS). 1981. *Soil Survey of Santa Barbara County, South Coastal Part*. <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>



**6. Background Research:** This section summarizes research and information sources related to prehistoric resources and historic period resources.

- Prehistoric Period Resources. A search of archaeological site records and previously completed reports maintained at the Central Coast Information Center (CCoIC), Santa Barbara Museum of Natural History is required, including records and reports for a minimum 0.125-mile buffer extending from the project site or parcel. Documentation that a records search was completed at the CCoIC must be included in the Phase 1 Report including: a letter from CCoIC Curator or representative staff; a map of the archaeological sites and previous reports on file within the project site and buffer; and spreadsheet summarizing the archaeological site number, attributes, and archaeologist recording the resources.
- Historical Period Resources. In addition to the CCoIC records search, the reviewing all historical archival records identified for Phase 1 Reports defined for each Archaeological Resources Sensitivity Area within which the project site is located in MEA Guidelines Appendix B.2, Archaeological Resources Sensitivity Area Maps and Background Research Sources is required. These resources provide context for the earliest European-American occupation of the project site, land uses, and individuals residing onsite from the turn of the 20th century.

**7. Fieldwork:** A field visit to the project site by the consulting archaeologist is necessary to verify the presence and condition of previously recorded archaeological resources, to identify previously unrecorded resources, and to assess the potential for archaeological resources to be present if they are not visible. The project location relative to the Archaeological Resources Sensitivity Areas, and results of the documents review are used to predict the kinds of unknown resources that may be located in the project area that can be verified with the fieldwork.

- Field Survey Techniques. Where prehistoric resources are potentially present, field survey techniques must be designed to locate the full range of prehistoric archaeological sites that may occur in the city of Santa Barbara, including small sites and sites of low artifact density, as well as more obvious, well-developed midden sites. Field inventories for both prehistoric and historical archaeological resources must employ a controlled, intensive survey technique using maximum transect spacing of no more than five (5) meters (16.5 feet).

Where historic period archaeological resources are potentially present, field survey techniques must be of sufficient rigor to identify traces of foundations or isolated artifacts indicative of remains of a previous structure. Non-structural remains such as fence lines, water systems, and roads must be mapped.

Field inventories for both prehistoric and historical archaeological resources should employ a controlled, intensive reconnaissance technique, using maximum transect spacing of 5 meters, and inspection of ground surface at a maximum of 5-meter intervals. If steepness of slope or dense vegetation precludes survey of this intensity, exceptions should be mapped and explained in the Phase 1 Report.

- Ground Surface Visibility. Ground surface visibility within areas of proposed ground disturbances must be described in a systematic manner using percentage area visible.



Examples include: poor (less than 30 percent), fair (30 to 50 percent), good (50 to 75 percent), very good (75 to 90 percent), and excellent (90 to 100 percent). The visual estimation of ground surface visibility is critical to justify the reliability of the survey results. Areas of ground surface visibility must be described relative to the location of proposed project improvements and ground disturbances. Areas covered with existing structures and pavement must also be described in this manner.

If dense vegetation results in poor ground surface visibility, systematic shovel scrapes must be completed clearing a 0.5-meter square (1.5-foot) area every 5 meters (16-feet of survey transect) to improve results and survey reliability. Within large project survey areas, mechanical disking is recommended to remove dense annual grasses and forbs (disking does not result in vertical disturbances exceeding 4 inches, much less than natural bioturbation disturbances of over 2 feet caused by rodents). Areas where shovel scrapes and/or disking are completed must be described in this report section and representative photographs of these ground surfaces included.

- Topography. Steeper slopes of over 20 percent are not generally locations of prehistoric or historical period occupation or limited activity use. Efforts should be made, however, to complete a systematic survey of this topography within the project site to the extent feasible. The report must explain locations of areas where survey interval transects were greater than 5 meters, and the coverage involved.
- Evidence of Prior Disturbance. The survey description must include evidence of previous ground disturbances including cutting and filling. These can include structural retaining walls, fences, and existing structural foundations. The height of cut slopes and resulting modification of pre-development topography relative to proposed project improvement areas must be described.
- Survey Results. The section must provide a summary of intensive ground surface survey results and the extent to which surface visibility within areas of proposed project improvement areas was poor, fair, good, very good, and/or excellent. A determination of whether the survey coverage in a reliable identification of potential unknown archaeological resources is required.



**8. Subsurface Phase 1 Techniques:** Circumstances may be present that preclude the project archaeologist from determining whether an intensive ground surface survey can reliably assess the potential for unknown, potentially significant cultural deposits. These may include situations where proposed project ground disturbances are:

- Covered with extremely dense vegetation that cannot be effectively removed by shovel scrapes;
- Covered with impervious surfaces such as parking lots;
- Covered with imported fill soils (based on review of previous project site building permits or by visual inspection of contrasting soil color/texture); or,
- In areas subject to rapid alluvial accumulation (adjacent to creek banks or former estuary boundaries) or at the base of steep slopes where downslope erosion would reasonably deposit alluvium.

In these circumstances, subsurface excavations using an appropriate sampling strategy will be required to evaluate the potential for buried archaeological resources. These may include:

- Hand-excavated shovel test pits/probes, hand augers, or solid core probes;
- Mechanically driven solid core probes; or,
- Backhoe trenching.

The selection of a subsurface excavation technique must consider the ability to effectively identify a potential buried archaeological resource, while minimizing the potential disturbance of an unknown archaeological resource. For example, may be appropriate for locating the presence of a Spanish Colonial and Mexican Period adobe foundation within an existing parking lot, but the trench would not be the best strategy to locate a buried prehistoric archaeological site adjacent to a major creek bank within close proximity to a previously recorded resource. The appropriate excavation technique must be implemented, however, with sufficient intensity (i.e., spacing, size and depth) to address the potential of unknown archaeological resources horizontally (throughout the proposed project disturbance area) and vertically (addressing the proposed project disturbance maximum depth).

Subsurface exploration techniques must be consistent with those discussed for Phase 2 Reports. When subsurface excavation is undertaken as part of a Phase 1 Report, it should be structured to permit efficient incorporation within a subsequent Phase 2 Report if buried archaeological or tribal cultural resources are identified.

*If Phase 1 subsurface techniques are incorporated into a project located within a Prehistoric Resources Sensitivity Area and/or Mission Complex and Waterworks Sensitivity Area, a local Chumash tribal representative must be retained to observe the excavations.*

Significant or unique archaeological resources recovered during Phase 1 Report field survey work must be retained so that they can be analyzed along with any cultural materials that are subsequently excavated as part of a Phase 2 Report. If no further investigation is undertaken, the materials must be curated consistent with those procedures outlined for Phase 2 Reports in Section 4.4.



**9. Potential for Unrecorded Archaeological Resources:** The Phase 1 Report must contain a discussion of the potential for discovery of unrecorded archaeological resources that may be located on the proposed project site. Appendix B, Guidelines and Information Sources for Sensitivity Areas, contains a list of resources associated with the Archaeological Resources Sensitivity Areas delineated on the Archaeological Resources Sensitivity Maps. The potential for unknown, subsurface archaeological resources resulting from previous geological processes (i.e. alluvial erosion, etc.) or urban land use history (placement of fill) must be assessed.

**10. Assessment of Archaeological Resources:** If the results of the Background Research and Fieldwork yield sufficient information, the Phase 1 Report must include an assessment of the significance of identified archaeological resources, and must identify any archaeological resources meeting the definition of unique or important archaeological resources and/or significant historic resources. See Appendix C, Regulatory Framework, for a summary of local and state laws pertaining to the significance of archaeological resources.

The assessment of the significance of archaeological resources should be based on substantial evidence and presented in the Phase 1 Report in a clear, logical, and well-supported manner. Conclusionary statements of the significance of identified archaeological resources without supporting substantial evidence are insufficient.

**11. Potential Project Archaeological Resources Impacts:** If the Phase 1 Report determines that archaeological resources located at the project site are important (significant) or unique archaeological resources, then the Phase 1 Report must include an analysis of the project's potential impacts on the resources. Potentially significant adverse effects on important or unique archaeological resources and/or significant historic archaeological resources are described in Appendix C, Regulatory Framework. Any limitations or constraints must be identified that limit the ability to assess potential project impacts on an archaeological resource or tribal cultural resource must be identified, such as: inability to adequately assess the extent of previous ground disturbances that could affect resource integrity; inadequate resource spatial (horizontal and vertical) determination, etc.

In addition, any potential direct, indirect, and cumulative project effects on overall site integrity and significance must be considered. This evaluation of project effects on significant archaeological resources must be based on substantial evidence, and presented in a well-reasoned, defensible and logical manner.



- 12. Potential Project Tribal Cultural Resources Impacts:** This section summarizes the tribal outreach process and communications with local Chumash tribal representatives with ancestral affiliation to the project area, as identified by the Native American Heritage Commission (NAHC). Documentation must be included that demonstrates:

- The Draft Phase 1 Report was distributed to local Chumash tribal representatives with ancestral affiliation to the project area via email;
- At least 2 weeks were provided to the representatives to provide comment;
- If no comments were received within 2 weeks of initial outreach, documentation that a follow up request was sent and provided an additional two weeks for a response; and
- A summary of all comments and recommendations regarding potential impacts to tribal cultural resources received after 4 weeks from initial outreach, and the documented correspondence resulting from the outreach.

A standard letter format for requesting comment from Chumash tribal representatives on the Draft Phase 1 Report findings is provided in Appendix F, Tribal Outreach Correspondence Format. Please also refer to the MEA Guidelines for Tribal Cultural Resources.

- 13. Recommendations/ Mitigation Measures:** The Phase 1 Report must include measures to avoid or mitigate any potential impacts resulting from project implementation, including standard measures for *Alerting to the Possibility of Discovery of Resources During Ground Disturbance*, and if applicable, *Workers Environmental Awareness Program* and *Monitoring During Ground Disturbance*. Measures must be replicated in report recommendations.

If there is insufficient information to assess the significance of identified archaeological resources or the project's effects, particularly with respect to the spatial extent of the resource within the project site or its intactness to the point of being identifiable, the Phase 1 Report must include a recommendation for further assessment through a Phase 2 Archaeological Resources Report. The recommendation should include a description of the Phase 2 investigation's potential objectives and scope of analysis, including the types of research questions that may be addressed by further research and analysis. The recommendation should also outline the necessary investigation strategies, such as background research, fieldwork, and/or laboratory analysis, to gather needed information and answer research questions.

- 14. Residual Impacts:** The Phase 1 Report must specify the anticipated level of impact following implementation of Recommendations/ Mitigation Measures. The residual impact should be categorized as significant and unavoidable (Class I), significant but feasibly mitigated to less than significant (Class II), or less than significant (Class III).

- 15. References:** The Phase 1 Report must contain a list of all resources used in its preparation, including all resources relevant to the appropriate Archaeological Resources Sensitivity Area in which the project site is located, as listed in Appendix B, Archaeological Resources Sensitivity Area Maps and Background Research Sources.



## ALERTING TO THE POSSIBILITY OF DISCOVERY OF RESOURCES DURING GROUND DISTURBANCE

The following standard measure must be applied to all projects involving ground disturbance, even if an archaeological report has concluded that there are no known archaeological resources. The directives of this measures are as follows:

### **A. *Unanticipated Discovery of Archaeological and Tribal Cultural Resources:***

*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.*

*If such archaeological resources are encountered or suspected, work shall be halted immediately. The City Environmental Analyst shall be notified, and a City Qualified Archaeologist shall be retained by the applicant to assess the nature, extent, and significance of the discovery. The City Qualified Archaeologist will develop appropriate management recommendations for the treatment of archaeological resources, which may include, but are not limited to, redirection of grading and/or excavation activities, and consultation and/or monitoring with a local Chumash representative.*

*If a discovery consists of possible human remains, the Santa Barbara County Coroner and the California Native American Heritage Commission shall be contacted immediately, and a local Chumash representative shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only resume after the Environmental Analyst grants authorization.*

*If a discovery consists of possible prehistoric or Native American artifacts or materials, a local Chumash representative shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only resume after the Environmental Analyst grants authorization.*



## WORKERS ENVIRONMENTAL AWARENESS PROGRAM

If the archaeological report has identified the existence of, or potential for, cultural or tribal cultural resources within the project site, the following measure must be applied. The language may be modified as necessary to address project site specific characteristics. The directives of this measures are as follows:

### **B. Workers Environmental Awareness Program (WEAP):**

*The Applicant shall retain a City Qualified Archaeologist and local Chumash Tribal Representative to provide a Workers Environmental Awareness Program (WEAP) to all personnel involved in project construction, including field consultants and construction workers, prior to the commencement of ground disturbing activities. Chumash tribal representatives involved with initial project outreach should assist in preparation of the WEAP. The WEAP shall include:*

- *Applicable regulations including the requirement for confidentiality and consequences of violating state laws and regulations.*
- *Protocols for avoidance and appropriate measures for avoiding and minimizing impacts resources that could be present.*
- *Culturally appropriate treatment of any discovery of significance to Native Americans, including appropriate behaviors and responsive actions to follow, consistent with Native American tribal values.*
- *Relevant information outlining what to do and who to contact if any potential cultural resources or tribal cultural resources are encountered.*

*All grading/excavating workers, contractors, and visitors shall attend the WEAP prior to entering the project site and performing any work. The Applicant shall provide copies of the training attendance sheets to City staff as a record of compliance. As new crew members are added during project construction, they will be required to review the WEAP training manual and sign off on it with acknowledgement from the construction superintendent, who will inform the monitoring archaeologist and local Chumash tribal representative observer.*



## MONITORING DURING GROUND DISTURBANCE

The following standard measures must be applied to any site with suspected, but not confirmed subsurface resources where site monitoring is considered necessary. The language may be modified as necessary to address project site specific characteristics. The directives of this measures are as follows:

### **C. Archaeological Monitoring:**

*Prior to the issuance of a Building Permit, the Applicant shall contract with an archaeologist from the most current City Qualified Archaeologists List to oversee monitoring during all ground disturbing activities associated with the project, including, but not limited to, grading, excavation, trenching, vegetation or paving removal and ground clearance in the areas identified in the Phase \_\_ Archaeological Resources Report prepared for this site by \_\_\_\_\_, dated \_\_\_\_\_. The contract shall be subject to the review and approval of the City Environmental Analyst. The archaeologist's monitoring contract shall include the following provisions:*

- *If archaeological resources are encountered or suspected, work shall be halted or redirected immediately and the City Environmental Analyst shall be notified. The archaeologist shall assess the nature, extent and significance of any discoveries and develop appropriate management recommendations for archaeological resource treatment which may include, but are not limited to, redirection of grading and/or excavation activities, consultation and/or monitoring with a local Barbareño Chumash representative.*
- *If a discovery consists of possible human remains, the Santa Barbara County Coroner shall be contacted immediately. If the Coroner determines that the remains are Native American, the Coroner shall contact the California Native American Heritage Commission. A local Barbareño Chumash representative shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.*
- *If a discovery consists of possible prehistoric or Native American materials or artifacts, a local Barbareño Chumash representative shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.*

### **D. Archaeological Resources Construction Monitoring Report:**

*Prior to issuance of the Certificate of Occupancy (Final Inspection), the Applicant shall submit a final report on the results of the archaeological monitoring to the Environmental Analyst within 180 days of completion of the monitoring, or prior to the issuance of the Certificate of Occupancy (Final Inspection), whichever is earlier.*



16. **Appendices:** The Phase 1 Report must contain a list of appended materials, including:
- A. CCoIC Records Search Results. This includes the results cover letter, all maps indicating the location of resources and resources (if applicable), and details of both as provided in Excel files. No site records are to be included.
  - B. Photographs. Photos must include those taken during the survey, fieldwork, and if applicable, excavation. At least one photo should show the project site as seen from a public right-of-way. The photos should illustrate representative ground surfaces where project-related ground disturbances are proposed, and reflect the results of the fieldwork. Each photo must be labeled to indicate the aspect of the project area depicted, and the directional viewpoint (e.g., looking north, east, west, south, etc.). Representative ground surfaces where shovel scrapes and/or disking were completed to increase ground surface visibility should be included, along with subsurface excavation locations, if relevant, to support the fieldwork descriptions provided.
  - C. Tribal Cultural Resource Correspondence. All correspondence with the Native American Heritage Commission and local Chumash tribal representatives must be included.
  - D. Archaeological Site and Artifact Isolate Records. All archaeological sites or isolated finds recorded during Phase 1 investigation fieldwork must be recorded consistent with the most current version of the State Office of Historic Preservation Instructions for Recording Historical Resources.<sup>26</sup> Supplementary site record forms must be prepared for previously recorded sites if supplementary information is gathered. Copies of the completed forms must also be included in Phase 2 Reports.

---

<sup>26</sup> Office of Historic Preservation. 1995. *Instructions for Recording Historical Resources*. March. <https://ohp.parks.ca.gov/pages/1054/files/manual95.pdf>



### 4.3 Letter Report Confirming No Archaeological Resources

A Letter Report Confirming No Archaeological Resources (Letter Report) is appropriate for projects that are not expected to result in the discovery of archaeological resources or tribal cultural resources. Chapter 3.0 of the MEA Guidelines for Archaeological Resources provides guidance on when a Letter Report may be prepared for a project.

If the archaeologist identifies the presence of archaeological resources during preparation of the Letter Report that would potentially be impacted by a proposed project, the archaeologist should prepare a Phase 1 Report incorporating the evidence collected, including the results of research and fieldwork.

#### 4.3.1 Contents and Format

1. **Applicant, Consultant, and Project Site Information:** The Letter Report title block must list:
  - Name, address, telephone number, and email of the applicant;
  - Name, address, telephone number, and email of the archaeologist;
  - Address and Assessor's Parcel Number(s) of the project site under investigation; and,
  - Date the report was prepared.
2. **Project Description:** This includes a written project description and a site plan showing all existing and proposed development. The project description must include details regarding the extent of horizontal and vertical ground disturbances. Ground disturbance typically results from, but is not limited to the following project features:
  - New Structures and Additions to Existing Structures;
  - Site Grading;
  - Structural Foundations;
  - Soil Preparation;
  - Utilities and Stormwater Requirements;
  - Landscaping; and,
  - Retaining Walls, Decks, and Fences.
3. **Background Research:** This section includes review of the City Archaeological Resources Reports Database described in Section 2.3, and all historic archival records defined for each particular archaeological Sensitivity Area listed in MEA Guidelines Appendix B.2, Archaeological Resources Sensitivity Area Maps and Background Research Sources. No review of archaeological site records and previously completed reports maintained at the Central Coast Information Center (CCoIC), Santa Barbara Museum of Natural History is required.
4. **Fieldwork:** An intensive ground surface survey (reconnaissance) of all proposed areas of ground disturbance (outside of existing structural development) is necessary to verify that no archaeological resources are present or are not likely to be present.
  - Field Survey Techniques. Field inventories for both prehistoric and historical archaeological resources must employ a controlled, intensive survey technique using maximum transect spacing of no more than five (5) meters (16.5 feet).



- Ground Surface Visibility. Ground surface visibility within areas of proposed ground disturbances must be described in a systematic manner using percentage area visible. An example would be: poor (less than 30 percent), fair (30 to 50 percent), good (50 to 75 percent), very good (75 to 90 percent), and excellent (90 to 100 percent). The visual estimation of ground surface visibility is critical to justify the reliability of the survey results. Areas of ground surface visibility must be described relative to the location of proposed project improvements and ground disturbances. Areas covered with existing structures and pavement must be described in this manner.

If dense vegetation results in poor ground surface visibility, systematic shovel scrapes must be completed clearing a 0.5-meter square (1.5-foot) area every 5 meters (16-feet) of survey transect) to improve results and survey reliability. Within large project survey areas, mechanical disking is recommended to remove dense annual grasses and forbs (disking does not result in vertical disturbances exceeding 4 inches, much less than natural bioturbation disturbances of over 2 feet caused by rodents). Areas where shovel scrapes and/or disking are completed must be described in this report section and representative photographs of these ground surfaces included.

- Topography. Steeper slopes of over 20 percent are not generally locations of prehistoric or historical period occupation or limited activity use. Efforts should be made, however, to complete a systematic survey of this topography within the project site, however, to the extent feasible. The report must explain the locations of these areas where survey interval transects were greater than 15 meters, and what was the coverage involved.
- Evidence of Prior Disturbance. The survey description must include evidence of previous ground disturbances including cutting and filling. These can include structural retaining walls, fences, and existing structural foundations. The height of cut slopes and resulting modification of pre-development topography relative to proposed project improvement areas must be described.
- Survey Results. The section must provide a summary of intensive ground surface survey results and the extent to which surface visibility within areas of proposed project improvement areas was poor, fair, good, very good, and/or excellent. A determination of whether the survey coverage in a reliable identification of potential unknown archaeological resources is required. The potential for unknown, subsurface archaeological resources resulting from previous geological processes (i.e., alluvial erosion, etc.) or urban land use history (placement of fill) must also be addressed.

The results of the intensive ground surface survey undertaken during the Letter Report preparation does not necessarily preclude the absence of potential subsurface cultural resources. Prehistoric cultural deposits also may be buried by natural geomorphic processes including alluvium that may have been deposited over the site soils during intense periods of stormwater runoff or flooding. Subsurface historic period deposits such as foundations, privies, and trash pits also will not usually be visible during surveys. Their location can usually only be determined through excavation, monitoring, or identifying prior existence by reviewing archival maps. For example, the 1853 Wackenreuder Map could indicate the presence of an adobe structure within a project site, but the intensive ground surface survey might not be able to identify any evidence such as Mission Period tile or adobe melt.



5. **Potential Project Impacts:** Assuming that no archaeological resources are identified during fieldwork and the potential for unknown resources to be impacted is unlikely, the Letter Report must contain a statement that no potential impacts on archaeological resources are reasonably expected to occur. This statement must incorporate conclusions based on the extent of previous ground disturbances within the project improvement areas, and the reliability of the intensive survey results. The report must conclude with the statement that project impacts on archaeological resources would be less than significant (Class III). The project will be conditioned with the following:

***Unanticipated Discovery of Archaeological and Tribal Cultural Resources:***

*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.*

*If such archaeological resources are encountered or suspected, work shall be halted immediately. The City Environmental Analyst shall be notified, and a City Qualified Archaeologist shall be retained by the applicant to assess the nature, extent, and significance of the discovery. The City Qualified Archaeologist will develop appropriate management recommendations for the treatment of archaeological resources, which may include, but are not limited to, redirection of grading and/or excavation activities, and consultation and/or monitoring with a local Chumash representative.*

*If a discovery consists of possible human remains, the Santa Barbara County Coroner and the California Native American Heritage Commission shall be contacted immediately, and a local Chumash representative shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only resume after the Environmental Analyst grants authorization.*

*If a discovery consists of possible prehistoric or Native American artifacts or materials, a local Chumash representative shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only resume after the Environmental Analyst grants authorization.*

If after conducting the background research and field inventory, the archaeologist believes that the project has the potential to disturb unrecorded resources, or if archaeological resources are identified, a recommendation for a full Phase 1 or Phase 1/ 2 Report is required.

6. **References:** The Letter Report must contain a list of resources utilized in report preparation, and include all resources required for the appropriate Archaeological Resources Sensitivity Area within which the project site is located, as provided in MEA Guidelines Appendix B.2, Archaeological Resources Sensitivity Area Maps and Background Research Sources.



## 4.4 Phase 2 Report

A Phase 2 Archaeological Resources Report (and Tribal Cultural Resources Report, as applicable), herein referred to as a Phase 2 Report, is an investigation intended to gather any additional data necessary to accomplish the following:

- Assess the significance of archaeological resources identified in Phase 1 Reports;
- Evaluate potential project effects on archaeological and tribal cultural resources; and,
- Develop measures to mitigate potential adverse impacts on those resources.

### 4.4.1 Contents and Format

1. **Cover Page: The cover page must list:**
  - Name, address, telephone number, and email of the applicant;
  - Name, address, telephone number, and email of the archaeologist;
  - Address and Assessor's Parcel Number(s) of the project site under investigation; and
  - Date the report was prepared.
2. **Table of Contents:** The table of contents must include a list of appendices.
3. **Project Description:** This includes a written project description and a site plan showing all existing and proposed development. The project description must include details regarding the extent of horizontal and vertical ground disturbances described in the previously prepared Phase 1 Report.
4. **Background:** This section must include a summary of the Phase 1 Report findings, specifying the horizontal and vertical extent of resources identified, their attributes, integrity (intact, truncated by previous development, or disturbed) and relationship to proposed development activities.
5. **Research and Design/ Work Plan:** The Phase 2 Report must include a Research Design/ Work Plan that clearly identifies investigation objectives including specific research questions to be addressed, and describes the proposed methods of data collection and analysis to meet the identified objectives.
6. **Data Collection:** Phase 2 Report data collection is directed at defining the characteristics and the constituents of archaeological resources. The data enables the archaeologist to address questions of site integrity and research potential to determine archaeological resource significance, evaluate potential project impacts, and identify feasible mitigation measures to avoid or minimize damage to the resource.

Data collection methods must be selected on a site-specific basis and include both field work and laboratory analysis and may entail additional background research relative to the specific resource being assessed.



Considering that the time during which a site was occupied is integral to determining its research potential, radiocarbon dates must be obtained to complement any diagnostic artifacts, such as shell beads, that provide complementary information. The number of radiocarbon dates necessary is dependent on the horizontal and vertical variability that may be present within the proposed project ground disturbance area impacting the archaeological resource.

A local Chumash tribal representative must be retained to observe all excavations associated with Phase 2 investigations where the existence or potential for Tribal Cultural Resources has been identified during the Phase 1 Report.

7. **Data Description:** The Phase 2 Report must contain descriptions of cultural materials recovered and tables presenting quantities and/or weights of artifact classes, as appropriate. Format and content of these descriptions and tables should conform to prevailing archaeological standards.
8. **Assessment of Archaeological Resources:** An assessment of the importance of identified cultural resources based on existing document review and supplemented by fieldwork excavations must be included in the Phase 2 Report. The Phase 2 Report is required to identify any archaeological resources meeting the definition of significant or unique archaeological resources as described in Appendix C, Regulatory Framework. The assessment of the significance or lack of significance of archaeological resources must be based on substantial information in a well-reasoned, defensible, and logical manner.
9. **Potential Project Archaeological Resources Impacts:** If the Phase 2 Report determines that archaeological resources located at the project site are important (significant) or unique archaeological resources, then the Phase 2 Report must include an analysis of the project's potential impacts on the resources. Potentially significant adverse effects on important or unique archaeological resources and/or significant historic archaeological resources are described in Appendix C, Regulatory Framework. Project impacts must be identified as significant unavoidable (Class I), potentially significant unless mitigated (Class II), or less than significant (Class III).

In addition, any potential direct, indirect, and cumulative project effects on overall site integrity and significance must be considered. This evaluation of project effects on significant archaeological resources must be based on substantial evidence, and presented in a well-reasoned, defensible and logical manner.
10. **Potential Project Tribal Cultural Resources Impacts:** This section summarizes the tribal outreach process and communications with local Chumash tribal representatives with ancestral affiliation to the project area, as identified by the Native American Heritage Commission (NAHC). Documentation must be included that demonstrates:
  - The Draft Phase 2 Report was distributed to local Chumash tribal representatives with ancestral affiliation to the project area via email;
  - At least 2 weeks were provided to the representatives to provide comment;



- If no comments were received within 2 weeks of initial outreach, documentation that a follow up request was sent and provided an additional 2 weeks for a response; and,
- A summary of all comments and recommendations regarding potential impacts to tribal cultural resources received after 4 weeks from initial outreach, and the documented correspondence resulting from the outreach.

Please also refer to the MEA Guidelines for Tribal Cultural Resources.

11. **Recommendations/ Mitigation Measures:** Phase 2 Report measures must be described as either required to address significant impacts, or recommended to reduce an adverse, but less than significant impact. The standard measure language is presented in Section 4.3.1, Alerting to the Possibility of Discovery of Resources During Ground Disturbance and Monitoring During Ground Disturbance.
12. **Residual Impacts:** The Phase 2 Report must state the level of impact anticipated following implementation of required and/or recommended measures. The residual impact level must be described as significant and unavoidable (Class I), potentially significant but feasibly mitigated (Class II), or less than significant (Class III).
13. **References:** The Phase 2 Report must contain a list of resources utilized in report preparation.
14. **Curation:** Significant or unique archaeological resources recovered during Phase 2 Report data collection should be curated at the Santa Barbara Museum of Natural History (SBMNH) Anthropology Department, depending upon the nature of the archaeological resources. The SBMNH must be contacted at the beginning of the Phase 2 project to ascertain procedures for preparing and cataloging the collection.
15. **Appendices:** The Phase 2 Report must contain a list of appended materials, such as technical reports, radiocarbon dating results, artifact catalogs, and curatorial accession records.



## 4.5 Phase 3 Report

A Phase 3 Archaeological Resources Report (and Tribal Cultural Resources Report, as applicable), herein referred to as a Phase 3 Report, is an investigation that is intended to address adverse effects by recovering data from cultural resources valued for their informational content. Phase 3 Reports are undertaken when archaeological resources would be adversely impacted by a development project. Phase 3 Reports consist of a two-step process, including a Research Design/ Work Plan Proposal and a final Report summarizing the results and findings of the investigation.

### 4.5.1 Proposal

A Phase 3 Report requires an investigation proposal that includes a Research Design/ Work Plan and discussion of techniques for data collection and analysis. The Research Design/ Work Plan must be based on the recommendations developed in the prior Phase 1 and/or Phase 2 Report for the affected site. The Research Design/ Work Plan must clearly articulate the scope of mitigation with defined research objectives, including specific research questions and proposed methods of data collection and analysis. The steps for Phase 3 Report Proposal approval are as follows:

1. Submit the Phase 3 Report Proposal to the City Environmental Analyst.
2. The Proposal will be reviewed by the City Archaeological Advisor for comments.
3. The Proposal, together with comments, will be forwarded to the HLC for its review and approval, approval with conditions, or denial.

Fieldwork cannot begin until after HLC approval of the Phase 3 Report Proposal. The proposed project grading and/or building permit cannot be issued until after approval of the Phase 3 proposal.

### 4.5.2 Contents and Format

1. **Cover Page:** The cover page shall list:
  - Name, address, telephone number, and email of the applicant;
  - Name, address, telephone number, and email of the archaeologist;
  - Address and Assessor's Parcel Number(s) of the project site under investigation; and,
  - Date the report was prepared.
2. **Table of Contents:** A table of contents including a list of figures and appendices.
3. **Project Description:** This includes a written project description and a site plan showing all existing and proposed structures. The project description must include details regarding the extent of horizontal and vertical ground disturbances described in the previously prepared Phase 1 and/or Phase 2 Reports.
4. **Background:** This section must include a summary of the findings of the Phase 1 and Phase 2 Reports.



5. **Research and Design/Work Plan:** The Phase 3 Report must include and must be guided by the HLC-approved Phase 3 Report Proposal described in Section 4.5.1.
6. **Data Collection:** Phase 3 Report data collection is directed at recovering information from a cultural resource before it is damaged or destroyed. Data collection may include archaeological techniques such as controlled surface collection, mapping, and subsurface excavation. Any recommendations identified as feasible in conjunction with local Chumash representatives with regard to prehistoric or tribal cultural resources, should be implemented.

This section must present the results of data collection and must specify the personnel involved, including their qualifications, for those that conducted and monitored work in the field, and the personnel involved with data analysis.

Data collections must be monitored by an archaeological monitor from the most current City Qualified Archaeologists List with expertise in the type of archaeological resources being collected. Data collections involving prehistoric or tribal cultural resources must also be monitored by a local Chumash monitor.

Archival research and interviews may be undertaken to document historic or ethnohistoric information, and photographs and architectural drawings may be prepared to provide a permanent record of structures/sites subject to project effects.
8. **Data Description:** The Phase 3 Report must contain descriptions of cultural materials recovered and tables presenting quantities and/or weights of artifact classes, as appropriate. Format and content of these descriptions and tables should conform to prevailing archaeological standards.

Updates to existing archaeological site record forms must be recorded on the most current version of the Office of Historic Preservation's *Instructions for Recording Historical Resources*. Copies of the completed forms must be appended to Phase 3 Reports.
9. **Results/Mitigation:** This section must present the results of data analysis, applying the recovered information to address research questions that were initial goals of analysis, as identified in the Research Design/ Work Plan. Phase 3 Reports must demonstrate the research data values have been collected from the impacted cultural resource. A copy of the collections catalog should be included in an appendix.
10. **Tribal Representative Outreach:** This section summarizes the tribal outreach process and communications with local Chumash tribal representatives with ancestral affiliation to the project area, as identified by the Native American Heritage Commission (NAHC). Documentation must be included that demonstrates:
  - The Draft Phase 3 Report was distributed to local Chumash tribal representatives with ancestral affiliation to the project area via email;
  - At least 2 weeks were provided to the representatives to provide comment;
  - If no comments were received within 2 weeks of initial outreach, documentation that a follow up request was sent and provided an additional 2 weeks for a response; and,



- A summary of all comments and recommendations regarding potential impacts to tribal cultural resources received after 4 weeks from initial outreach, and the documented correspondence resulting from the outreach.

Please also refer to the MEA Guidelines for Tribal Cultural Resources.

11. **Residual Impacts:** The Phase 3 Report must state the level of impact anticipated following implementation of required and/or recommended measures. The residual impact level must be described as significant and unavoidable (Class I), potentially significant but feasibly mitigated (Class II), or less than significant (Class III).
12. **References:** The Phase 3 Report must contain a list of resources utilized in report preparation.
13. **Curation:** Significant or unique archaeological resources recovered during Phase 3 Report data collection should be curated at the Santa Barbara Museum of Natural History (SBMNH) Anthropology Department, depending upon the nature of the archaeological resources. The SBMNH must be contacted at the beginning of the Phase 3 project to ascertain procedures for preparing and cataloging the collection.
12. **Appendices:** The Phase 3 Report must contain a list of appended materials. These may include excavation unit forms; artifact catalogs and photographs; technical study reports; and updates to Department of Parks and Recreation (DPR) site record forms to update the existing knowledge of the archaeological and/or tribal cultural resource.



## 4.6 Archaeological Resources Construction Monitoring Report

Monitoring of ground disturbances during construction by a qualified archaeologist and/or a local Chumash tribal representative is a standard approach to mitigate impacts to portions of recorded archaeological and tribal cultural resources within a project development area, or to address potential impacts to unknown resources within a project development area based on background research including archaeological records search results and/or tribal representative outreach considerations.

The timing, duration, and specific locations where monitoring must be completed should be based on the recommendations within previously prepared Phase 1, 2, and/or Phase 3 Reports.

### 4.6.1 Contents and Format

1. **Applicant, Consultant, and Project Site Information:** The Construction Monitoring Report title block must list:
  - Name, address, telephone number, and email of the applicant;
  - Name, address, telephone number, and email of the archaeologist;
  - Address and Assessor's Parcel Number(s) of the project construction site; and,
  - Date the report was prepared.
2. **Condition of Approval:** The project Condition of Approval requiring the monitoring of construction ground disturbances should be included in its entirety, including the Resolution number, date of project approval, and Condition of Approval number.
3. **Project Description:** This includes a written project description and a site plan matching the approved project. The project description must include details regarding the extent of horizontal and vertical ground disturbances described in the previously prepared Phase 1, 2, and/or 3 Reports.
4. **Summary of Prior Investigation Results:** The summary must provide a brief review of the archaeological and/or tribal cultural resources identified during prior Phase 1, 2, and 3 Reports, including their horizontal and vertical extent. If no recorded resources have been previously identified onsite, but the potential for unknown resources is thought to exist, the substantial evidence supporting this circumstance must be presented. This section must also explain the extent of potential impacts to the recorded cultural resource that were addressed by the monitoring condition. For example, this would include describing the way in which proposed structural foundations and soil preparation would extend 4 feet below surface in a location where existing parking lot pavement did not allow for any ground surface inspection during the previous Phase 1 investigation.
5. **Results:** This section must include a summary of monitoring results including:
  - Days of ground disturbance;
  - Equipment used during ground disturbances; and,
  - Observations including evidence of cultural resources.



If no cultural resources were identified, the description of soils encountered and their comparison to natural stratigraphy identified in the USGS Soil Conservation Survey mapping for the project site must be included.

Cultural artifacts that were identified and mapped during monitoring must be described, photographed (if diagnostic, or characteristic of a larger assemblage such as ground stone or chipped stone tools) and explained as to how they were consistent or inconsistent with previous investigation results. These results are expected to be relatively limited in number, as substantial resources identified during monitoring would likely need to be subject to additional Phase 3 Data Recovery.

The disposition of any artifacts identified during monitoring must be described, including curation at the Santa Barbara Museum of Natural History.

Significant or unique archaeological resources recovered during Phase 3 monitoring may require curation at the Santa Barbara Museum of Natural History (SBMNH) Anthropology Department, depending upon the nature of the archaeological resources. The SBMNH must be contacted at the beginning of the Phase 3 project to ascertain procedures for preparing and cataloging the collection.

6. **Residual Project Impacts:** The extent to which monitoring was effective in ensuring that construction monitoring avoided or reduced potential impacts on archaeological and/or tribal cultural resources must be described and characterized.
7. **References:** The Construction Monitoring Report must contain a list of resources including the previous project investigation reports.
8. **Appendices:** Appendices may include daily monitoring report forms from the archaeologist and/or Native American observer; artifact catalogs and photographs; and updates to Department of Parks and Recreation (DPR) site record forms if results added new information to existing knowledge of the archaeological and/or tribal cultural resource.



# APPENDIX A

## UPDATES TO THE 2025 MEA GUIDELINES FOR ARCHAEOLOGICAL RESOURCES

This appendix explains the rationale and substantial evidence incorporated into updates to the 2025 MEA Guidelines for Archaeological Resources.

### A.1 ARCHAEOLOGICAL RESOURCES SENSITIVITY AREA MAPS

Updated Archaeological Resources Sensitivity Area maps have integrated the results of approximately 1,850 investigations, of which, approximately 1,100 reports were completed between 2002 (the date of the previous MEA update) and 2024. They also have incorporated information on recorded archaeological site locations generously provided by the Central California Information Center (CCoIC), California Historical Resource Information System, at the Santa Barbara Museum of Natural History.

#### Prehistoric Resources Period

This Sensitivity Area denotes areas of potential sensitivity for prehistoric and tribal cultural resources, which encompasses the general locations of recorded prehistoric sites and environmental contexts including food resources and topography that were associated with prehistoric occupation and procurement such as freshwater courses and drainages, estuaries, mesas, and coastal bluffs.

**Update:** This Sensitivity Area was previously called Prehistoric Sites and Watercourses. The Sensitivity Area continues to include boundaries that extend 300 feet from drainages as presently defined on the USGS Santa Barbara Quadrangle map, recognizing that prehistoric residential camps (both permanent and temporary/seasonal) are located proximate to these fresh water sources. Sensitivity Area boundaries also reflect the additional recorded site locations provided by the CCoIC and a minimum 300-foot buffer extending from their boundaries.

Investigations within 300 feet landward of Pacific Ocean bluffs extending from Santa Barbara City College west to Arroyo Burro Creek on the Mesa landform have failed to record any additional prehistoric resources. This may be in part to intensive residential buildout that has occurred over the last 100 years on the Mesa, and associated potential disturbance that is reasonably expected to have removed evidence of these types of deposits. Given that large village sites have been recorded on similar bluffs to the east and west of the Mesa landform, however, this expanse of land has been maintained within the Prehistoric Resources Period Sensitivity Area.

Two estuaries, embayment habitats where freshwater drainages drain into the ocean and result in mixing salt and fresh water sources, extended landward from the East Beach area. Investigations throughout coastal California have identified substantial prehistoric occupation along estuary margins, often extending over 8,000 years of age. The extent of these estuaries has been substantially reduced and at times completely lost from inundation by sea levels over the past 15,000 years, infilling from erosional alluviation of upland landforms, and urban development including specifically the disposal of demolished structural rubble following the 1925 Santa Barbara Earthquake. The Prehistoric Resources Period Sensitivity Area have been revised to incorporate the outlines of these embayments as identified in geological studies that have delineated the extent of alluvial soils deposited during the Holocene



geological time period, dating to 15,000 years ago.<sup>1</sup> The illustration of the "Estero" up and along Milpas Street and the contemporary Bird Refuge in the first mapping of downtown Santa Barbara in 1851<sup>2</sup> is also incorporated in this revised Sensitivity Area boundary.

### Mission Complex and Waterworks Sensitivity Area (1786-1849)

Numerous archival sources and maps accurately depict the extent of Mission Santa Barbara holdings. See Appendix B for background resources to be consulted when preparing investigations within this Sensitivity Area.

**Update:** This Sensitivity Area has been revised to eliminate residential neighborhoods along Mission Ridge Road and Plaza Rubio that are clearly outside of these historic holdings. Areas that may contain Mission Period aqueduct segments remain within this Sensitivity Area.

### Spanish Colonial and Mexican Period Sensitivity Area(1782-1849)

This Sensitivity Area was delineated to include the Santa Barbara community, including the adobes and properties owned by prominent Spanish-Mexican families including De la Guerra, Hill-Carrillo, Orena, Santiago De la Guerra, and the Spanish Presidio, as illustrated on the Wackenrueder Map No. 1 and 2 from 1853. Recorded remains of these structures are limited, but given their relative scarcity, they are considered potentially significant.

**Update:** No change to this Sensitivity Area has been required.

### Early American Transition Period (1850-1870)

A very accurate portrayal of development at the beginning of this period is provided by the Birdseye View of Santa Barbara, 1877. The street grid extended west only to Rancheria Street, though scattered residences are indicated west along the extension of Gutierrez Street called *Masa Road*. Over 110 systematic archaeological investigations have been completed in this Sensitivity Area west of Rancheria Street, and 35 completed between Rancheria Street and east to Santa Barbara Street south of Montecito Street (these exclude investigations located within the previously defined Prehistoric Resources Sensitivity Area in the 2002 MEA version). Only one historic period archaeological site, P-42-002180, a trash dump dating to between 1900- and 1940, has been recorded through this area. This resource is not considered significant or unique.

Three areas east of Olive Street were previously included in this Sensitivity Area. They align generally with a sparse distribution of residential structures east of the downtown core recorded on the Birdseye View of Santa Barbara, 1877. Over 80 investigations have been completed in these areas, but no historic period archaeological resources have been recorded. Additionally, this Sensitivity Area previously extended north from Victoria Street to Islay Street. Eighty-one investigations have been completed in this area extending west to Rancheria Street. No archaeological resources have been recorded. Development to the north of Mission Street by 1877 was very sparse, as Figueroa Street had

---

1 Minor, S.A., Kellogg, K.S., Stanley, R.G., Gurrola, L.D., Keller, E.A., and Brandt, T.R., 2009, Geologic Map of the Santa Barbara Coastal Plain Area, Santa Barbara County, California: U.S. Geological Survey Scientific Investigations Map 3001. <https://pubs.usgs.gov/sim/3001/downloads/pdf/SIM3001map.pdf>

2 Wackenrueder Map No. 1 1851. Gledhill Library, Santa Barbara Historical Museum.



not been established. The block north of Mission Street and west of Bath Street was developed, as was east of Laguna Street.

The areas peripheral to the downtown core during this time period were sparsely developed. As stated above, only one less than significant, historic-period trash dump dating between the 1900-1940 has been recorded as a result of nearly 300 investigations outside the downtown core area.

**Update:** Given that 219 investigations have been completed in this Sensitivity Area and only one historic-period archaeological site has been recorded that is not significant or unique, the area has been reduced to include only those areas that were intensively developed by 1877, as illustrated on the Birds Eye View of Santa Barbara Map: on the west, Mission Creek; to the north, Figueroa Street; to the south, Mason Street; and to the east, Olive Street.

### American Period (1870-1900)

Over 340 investigations have been completed in this Sensitivity Area. Two historic-period resources have been recorded: 1) a cache of cut-marked beef bones in association with milled redwood lumber, considered to be butchering remains probably associated with a grocery store (P-42-002698) that is not considered significant or unique; and 2) sandstone foundations of a former 1 1/2-story adobe known as the Beach House Saloon associated with development of Lower State Street (P-42-040924). As an element of the developing waterfront Santa Barbara economy, this is considered a significant archaeological resource.

**Update:** Given that only one insignificant, non-unique historic period archaeological resource has been recorded as a result of 340 systematic investigations, areas within the American Period Sensitivity Area boundary north of US 101 are not expected to include potentially significant or unique historic period archaeological resources that would likely be impacted by future development. This Sensitivity Area boundary has been revised to only extend from the Hispanic American Transition Period (1848-1870) south of U.S. 101 to Cabrillo Boulevard, between Anacapa Street and Castillo Street; this Sensitivity Area overlaps in large part with the Prehistoric Resources Period Sensitivity Area.

### Early 20<sup>th</sup> Century (1900-1925)

This Sensitivity Area is nearly coincident with the preceding American Period (1870-1900) with the following exceptions.

1. **Riviera.** Over 55 investigations have been completed in this northern portion of the Sensitivity Area extending south of Alameda Padre Serra from Mountain Drive to De La Guerra Road, resulting in no recorded historic period archaeological resources. Topography in this area is relatively steep and ranges between a 15- to 30-degree slope, resulting in substantial previous grading (terracing) when existing structures were developed.

**Update:** Given the substantial number of completed investigations (Letter Reports) in this area with no resources recorded, and the substantial amount of previous ground disturbances, this area has been eliminated from the Sensitivity Area.



2. **West of Eucalyptus Avenue to Portosuello Avenue, and south from Modoc Road to Mountain Avenue.** Only three Letter Reports have been prepared for this portion of the Sensitivity Area, but no historic period archaeological resources have been recorded. This area is outside of the development illustrated on the 1930-1931 Sanborn Fire Insurance Maps, indicating that residential buildout occurred after that date.

**Update:** The 20<sup>th</sup> Century Archaeological Resources Sensitivity Area is merged with the preceding American Period, given their overlap in structural buildout.

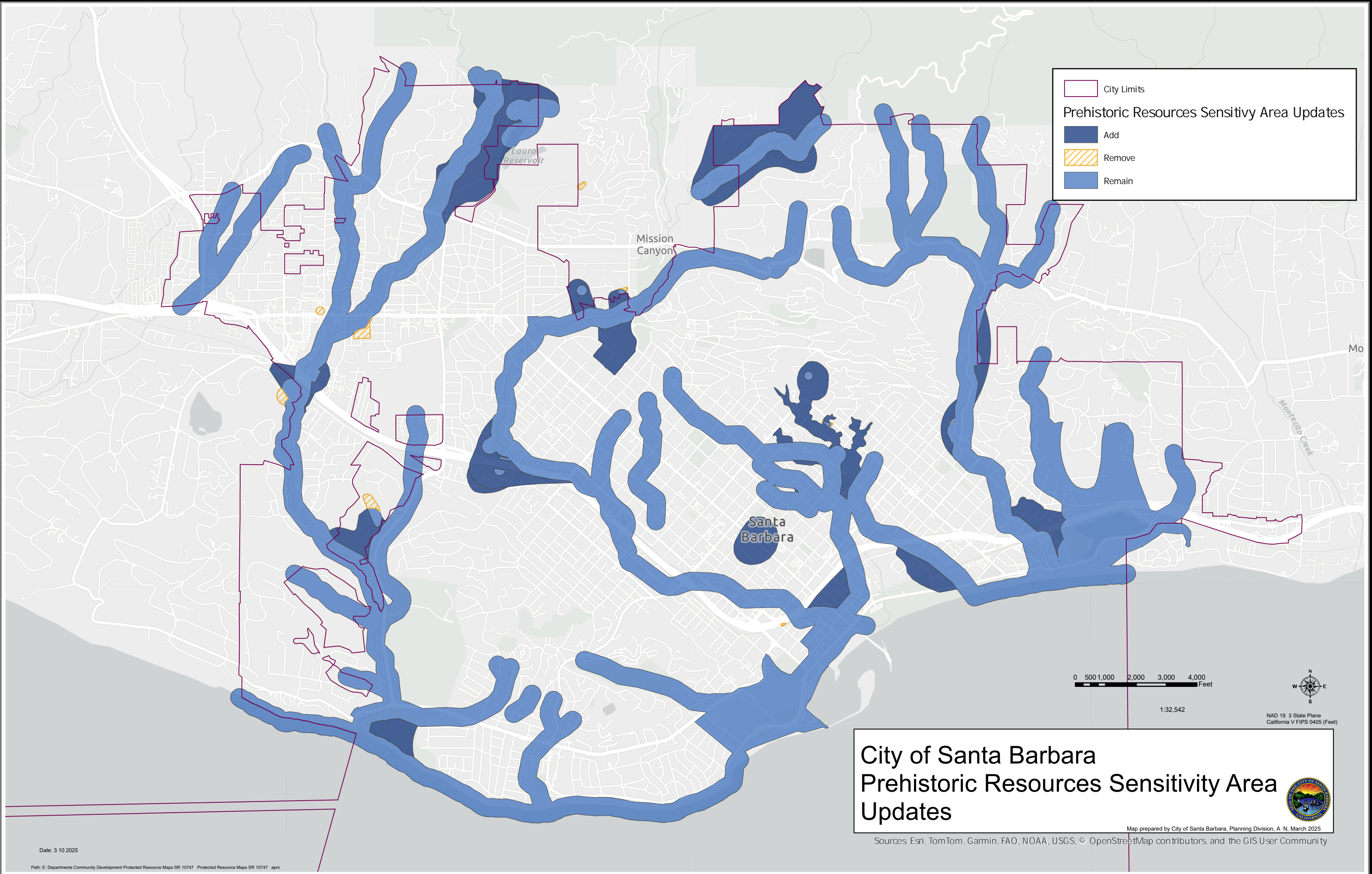
## **A.2 TABLE 1. ARCHAEOLOGICAL RESOURCES REPORT REQUIREMENT SCREENING**

The objective of Table 1, Archaeological Resources Report Requirement Screening, is to effectively and reasonably identify screening criteria for determining the likelihood of a particular development project to result in potential adverse impacts on archaeological resources. Since 2002, the table has used a vertical ground disturbance of 12 inches and a horizontal ground disturbance area of 500 square feet to identify those projects with less than a significant potential to impact archaeological resources.

Analysis of 1,850 investigations throughout all the Archaeological Resources Sensitivity Areas and resulting recorded resources has determined that revisions to these thresholds are necessary for projects outside the Prehistoric Resources Period, Mission Complex and Waterworks (1786-1849), and Spanish Colonial and Mexican Period (1782-1849). Only one significant or unique archaeological resource was recorded within the subsequent Early American Transition Period (1850-1870), American Period (1870-1900), and Early 20 Century (1900-1925) after conducting 611 investigations in these Sensitivity Areas. This indicates that the potential for smaller development projects to significantly impact archaeological resources within the Early American Transition Period (1850-1870), American Period (1870-1900), and Early 20<sup>th</sup> Century (1900-1925) Sensitivity Areas is statistically very low.

Table 1 criteria for requiring an investigation within these three Sensitivity Areas covering the time periods after the Spanish Colonial and Mexican Period (1782-1849) has therefore been revised to focus on larger development projects over 2,000 square feet in horizontal ground disturbance as they would have the most reasonable likelihood to impact unknown significant or unique historic period archaeological resources. The horizontal disturbance area criterion is considered a much more representative threshold of assessing potential impacts to unknown historic period archaeological resources than a vertical depth; for example, extremely limited disturbances such as residential decks may require deep footings for caissons, though the horizontal disturbance is limited to less than 5 square feet per footing location. This horizontal ground disturbance threshold of 2,000 square feet is also used for requiring more stringent onsite stormwater quality treatment within the City Storm Water Management Program (2020) and for the assessment of greenhouse gas emissions impacts within the MEA Guidelines for Greenhouse Gas Emissions Analysis (2024).











There are no updates to Spanish Colonial and Mexican Period

City Limits

Spanish Colonial and Mexican Period

Remain

0170340010201,300

Feet


1:7,707

N  
E  
S  
W

NAD 19 3 State Plane  
California V FIPS 0405 (Feet)

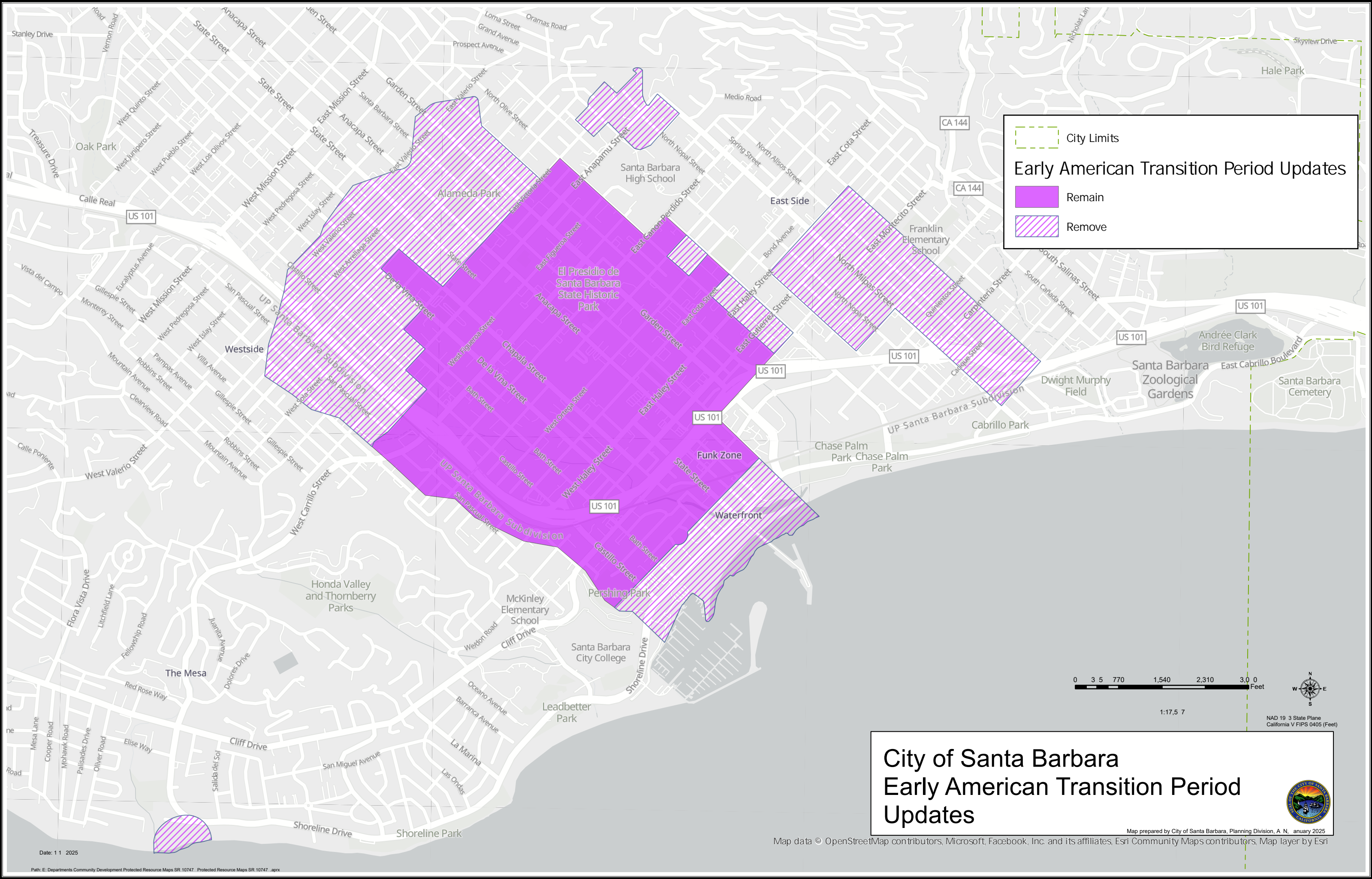
City of Santa Barbara

Spanish Colonial and Mexican Period



Map prepared by City of Santa Barbara, Planning Division, A N, anuary 2025





City Limits

Early American Transition Period Updates

Remain

Remove



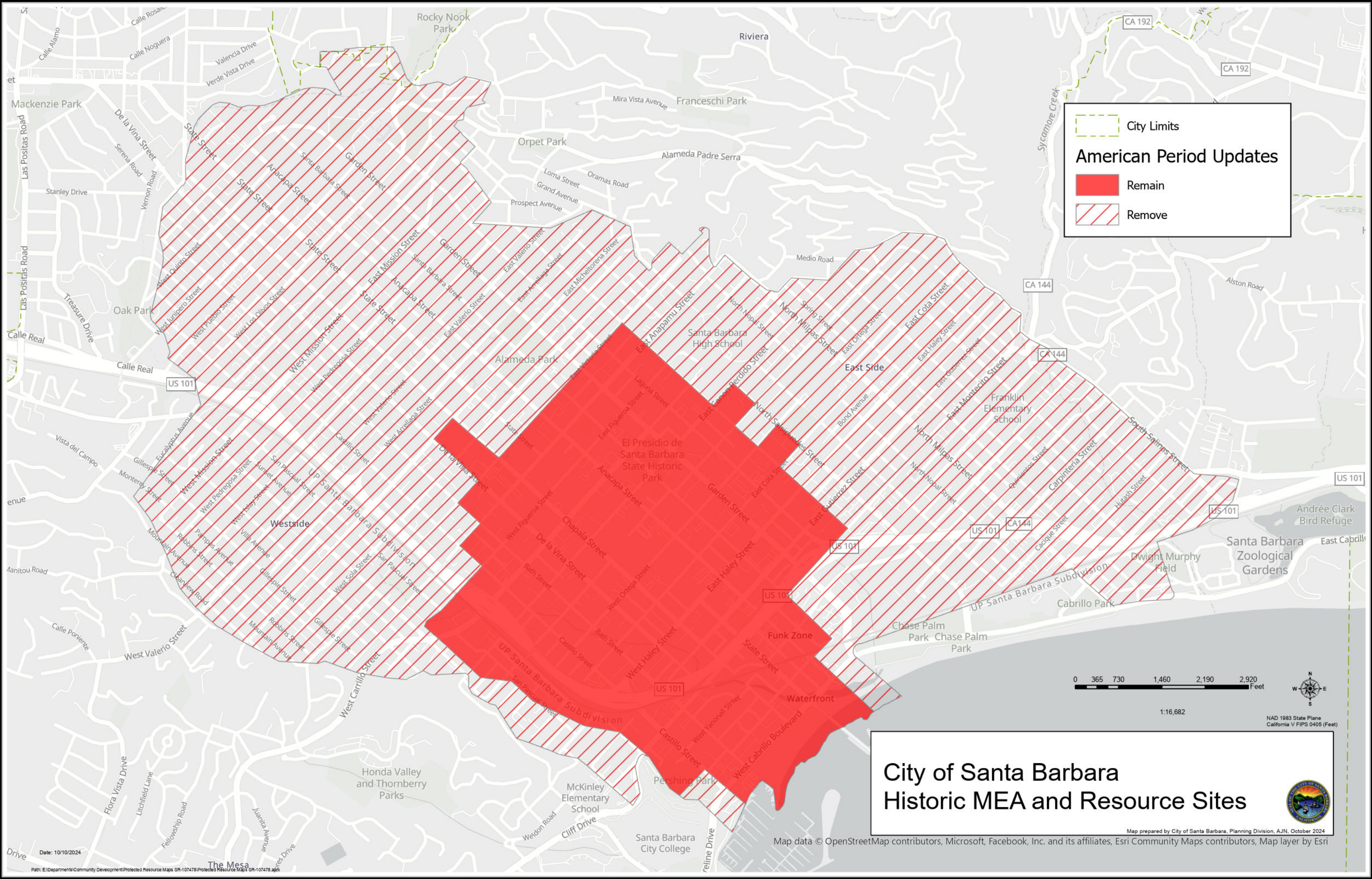
City of Santa Barbara

Early American Transition Period Updates

Map prepared by City of Santa Barbara, Planning Division, January 2025

Map data © OpenStreetMap contributors, Microsoft, Facebook, Inc. and its affiliates, Esri Community Maps contributors, Map layer by Esri





City Limits

**American Period Updates**

Remain

Remove

**City of Santa Barbara**  
**Historic MEA and Resource Sites**

Map prepared by City of Santa Barbara, Planning Division, A.J.N., October 2024

Map data © OpenStreetMap contributors, Microsoft, Facebook, Inc. and its affiliates, Esri Community Maps contributors, Map layer by Esri

Date: 10/10/2024

Path: E:\Departments\Community Development\Protected Resource Maps SR-107478\Protected Resource Maps SR-107478.aprx



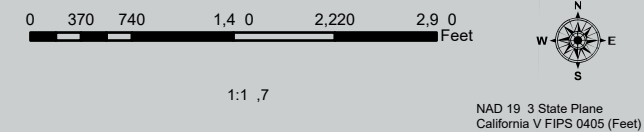


Early 20th Century is proposed to be removed

City Limits

Early20thCenturyUpdates

Remove



City of Santa Barbara  
Historic MEA and Resource Sites

Map prepared by City of Santa Barbara, Planning Division, A. N. October 2024

Map data © OpenStreetMap contributors, Microsoft, Facebook, Inc. and its affiliates, Esri Community Maps contributors, Map layer by Esri



# APPENDIX B

## ARCHAEOLOGICAL RESOURCES SENSITIVITY AREAS AND BACKGROUND RESEARCH SOURCES

This appendix contains the Archaeological Resources Sensitivity Area Maps and a description of the background research resources associated with the 2025 MEA Archaeological Resources Sensitivity Area Maps. These maps have integrated the results of 1,100 investigations completed between 2002 (the date of the previous MEA update) and 2024, for a total of over 1,850 since the MEA was introduced in 1979.

The following provides a list of documents and resources to be reviewed when preparing Phase 1 Reports, and should be supplemented with other sources as deemed appropriate by the archaeologist conducting the research.

### **B.1 PREHISTORIC RESOURCES PERIOD SENSITIVITY AREA**

Applegate, Richard B. 1975. *An Index of Chumash Placenames*. San Luis Obispo County Archaeological Society Occasional Papers No. 9, pp. 21-466.

Harrington, John P. 1928. *Exploration of Burton Mound at Santa Barbara, California*. Washington D.C.: Government Printing Office.

Holmes, Marie S. and John R. Johnson. 1998. *The Chumash and Their Predecessors: An annotated Bibliography*. Santa Barbara: Santa Barbara Museum of Natural History.

Minor, S.A., Kellogg, K.S., Stanley, R.G., Gurrola, L.D., Keller, E.A., and Brandt, T.R. 2009. *Geologic Map of the Santa Barbara Coastal Plain Area, Santa Barbara County, California: U.S. Geological Survey Scientific Investigations Map 3001*.  
<https://pubs.usgs.gov/sim/3001/downloads/pdf/SIM3001map.pdf>

Rogers, David Banks. 1929. *Prehistoric Man Along the Santa Barbara Coast*. Santa Barbara Museum of Natural History. *Copies on file at the Central Coast Information Center, Santa Barbara Museum of Natural History*.

### **Prehistoric Resources Sensitivity Areas Within and Adjacent to the Santa Barbara Airport**

Holmes, Marie S. and John R. Johnson. 1998. *The Chumash and Their Predecessors: An annotated Bibliography*. Santa Barbara: Santa Barbara Museum of Natural History.



\*Haslouer, Leeann G., Pandora E. Snethkamp, Clayton G. Lebow and Ann M. Muns. 2009. *Master Archaeological Resources Assessment for the Santa Barbara Municipal Airport, City of Santa Barbara, California (2009 revision)*. Prepared for Airport Department, City of Santa Barbara, 601 Firestone Road, Goleta California. *Copies on file at the City of Santa Barbara Community Development Department, 630 Garden Street, Santa Barbara, CA.*

*\*Sensitivity map included in this report must be consulted.*

Wilcoxon, Larry, Jon Erlandson, and David Stone. 1982. *Final Report: Intensive Cultural Resources Survey for the Goleta Flood Protection Program, Santa Barbara County, California*. Archaeological Systems Management. *Manuscript on file at California Archaeological Inventory Information Center, University of California, Santa Barbara.*

## **Prehistoric Sensitivity Areas Within and Adjacent to City College**

Holmes, Marie S. and John R. Johnson. 1998. *The Chumash and Their Predecessors: An Annotated Bibliography*. Santa Barbara: Santa Barbara Museum of Natural History.

\*Santoro, Loren, J. 1995. *Historic Property Survey Report For Proposed Bikeway Project Located At Santa Barbara City College, Santa Barbara, California*. #05-965100. Prepared for Santa Barbara City College, The County of Santa Barbara, and the Federal Highway Administration. *Report on file at the County of Santa Barbara, Public Works Department.*

*\*Sensitivity map included in this report must be consulted.*

## **B.2. MISSION COMPLEX AND WATERWORKS (1786-1835)**

Santa Barbara Mission Archive Library. The Santa Barbara Mission Archive Library has the originals or facsimiles of many of the original documents, drawings, and maps associated with the history of the Mission between 1786 and the present day. These include but are not limited to the following publications:

Cooligan, James Augustine. 1932. *Some Facts About Santa Barbara Mission*. San Francisco: University of San Francisco Press.

Engelhardt, Zephyrin. 1923. *Santa Barbara Mission*. San Francisco: James Berry Company.

Geiger, Maynard, OFM. 1963. *A Pictorial History of the Physical Development of Mission Santa Barbara from Brush Hut to Institutional Greatness, 1786-1963*. San Francisco: James Berry Company.

Heizer, Robert F. 1955. *California Indian Linguistic Records, The Mission Indian Vocabularies of H.W. Henshaw*. Anthropological Records. Vol. 15, No. 2. Berkeley.

Mclsaac, Colin H. 1926. *Santa Barbara Mission, Santa Barbara*. Schauer Print Studio, Inc.



O'Keefe, Joseph Jeremiah. 1886. *The Buildings and Churches of the Mission of Santa Barbara, Santa Barbara California*. California Independent Job Printing House.

Both the Gledhill Library at the Santa Barbara Historical Society and The Presidio Library, Santa Barbara Trust for Historic Preservation, possess copies of many of the same resources that are housed in the Mission Archives.

Allen, Rebecca. 1997. *National Historic Landmark Form, Mission Santa Barbara, California*. Sacramento: KEA Environmental, Inc. under contract to National Park Service.

Macko, Mike and Larry Wilcox. 1985. *Final Synthesis Report, Cultural Resource Survey Results, Proposed Mission Creek and Vicinity Flood Control Study: Santa Barbara, California*. Los Angeles Corps of Engineers, Contract # DACW09-85-Q-001.

Wilcox, Larry. 1984. *Cultural Resources of the Mission Canyon Area: The Results of an Intensive Cultural Resources Survey for the Mission Canyon Wastewater Facilities Project*.

The Sketch of the City of Santa Barbara, California showing part of the survey of 1870 and changes and improvements to date 1878, by William Greenwell, should also be consulted.

### **B.3 SPANISH COLONIAL AND MEXICAN PERIOD (1782-1849)**

Presidio Research Center, El Presidio de Santa Barbara State Historic Park. Copies of historic maps, including U.S. Coast Survey Maps for 1852, 1853, and 1870; Wackenreuder maps No. 1 and No. 2 and the Presidio map from the Vischer Papers; Sanborn Fire Insurance Maps for 1886 and 1888. While the Sanborn map series does not begin until 1886, it does record the locations of many Spanish and Mexican period structures that no longer exist.

Gledhill Library, Santa Barbara Historical Society. Copies of historic maps, including U.S. Coast Survey Maps for 1852, 1853, and 1870; Wackenreuder maps No. 1 and No. 2 and the Presidio map from the Vischer Papers; Sanborn Fire Insurance Maps for 1886 and 1888. The library also possesses a large collection of historic photographs, books, articles, and manuscripts dealing with the history of the City that may pertain to the project area.

The Sketch of the City of Santa Barbara, California, showing part of the survey of 1870 and changes and improvements to the date 1878, by William Greenwell, should also be consulted.

Map and Imagery Library. Aerial photographs of Santa Barbara dating back to 1927 and various early maps.

### **B.4. EARLY AMERICAN TRANSITION PERIOD (1850-1870)**

City of Santa Barbara, Community Development Department. Street files.



Gledhill Library, Santa Barbara Historical Society. Copies of historic maps, including: Wackenreuder Map Nos. 2 and 3, U.S. Coastal Survey Maps for 1852, 1853 and 1870, and the Sanborn Fire Insurance Maps for 1886 and 1888. While the Sanborn maps series does not begin until 1886, it does record the locations of structures from this time period which no longer exist. The library also possesses a large collection of historic photographs, books, articles and manuscripts dealing with the history of the city that pertain to this area.

Presidio Research Center, El Presidio de Santa Barbara State Historic Park. Copies of historic maps, including U.S. Coast Survey Maps for 1852, 1853, and 1870; Wackenreuder maps No. 1 and No. 2 and the Presidio map from the Vischer Papers; Sanborn Fire Insurance Maps for 1886 and 1888. While the Sanborn map series does not begin until 1886, it does record the locations of many Spanish and Mexican period structures which no longer exist.

Williams, James, C. 1977. *Old Town, Santa Barbara, A Narrative History of State Street from Gutierrez to Ortega, 1850-1975*. Public History Monograph #1, The Graduate Program in Public Historical Studies, Department of History, University of California, Santa Barbara. *Copies on file at the University of California, Santa Barbara and Santa Barbara Museum of Natural History Libraries, and the Presidio Research Center.*

## **B.5 AMERICAN PERIOD (1870-1900)**

City of Santa Barbara, Community Development Department. Street Files and Architectural and Historical Resources Survey forms.

Gledhill Library, Santa Barbara Historical Society. Copies of historic maps, including: Sanborn Fire Insurance Maps for 1886 through 1903, U.S. Coastal Survey Maps for 1888, and the Birds Eye Map of 1877. The library also possesses a large collection of historic photographs, books, articles and manuscripts dealing with the history of the City. The following references should also be consulted, when appropriate:

Williams, James, C. 1977. *Old Town, Santa Barbara, A Narrative History of State Street from Gutierrez to Ortega, 1850-1975*. Public History Monograph #1, The Graduate Program in Public Historical Studies, Department of History, University of California, Santa Barbara.

Santa Barbara Public Library, Central Branch. Copies of the City directories from the late nineteenth through early twentieth centuries. The Smith Collection of Historic Photographs.

## **B.6. EARLY TWENTIETH CENTURY (1900-1925)**

City of Santa Barbara, Community Development Department: Street Files.

Gledhill Library, Santa Barbara Historical Society. Copies of historic maps including Sanborn Fire Insurance Maps for 1903-1931. The library also possesses a large collection of historic photographs, books, articles, and manuscripts dealing with the history of the City, including the 1895 map of Chinatown and businesses. The following reference should also be consulted, when appropriate:



Page and Turnbull. 2022. *Santa Barbara African American and Black Historic Context Statement*. Prepared for the City of Santa Barbara. September.  
<https://santabarbaraca.gov/sites/default/files/2022-09/African%20American%20Black%20Context%20Statement%20-%20Final.pdf>

Williams, James, C. 1977. *Old Town, Santa Barbara, A Narrative History of State Street from Gutierrez to Ortega, 1850-1975*. Public History Monograph #1, The Graduate Program in Public Historical Studies, Department of History, University of California, Santa Barbara.

Santa Barbara Public Library, Downtown Branch: Copies of the City directories from Circa 1900 through 1925. The Smith Collection of Historic Photographs.

Santa Barbara County Genealogical Society.



# APPENDIX C

## REGULATORY FRAMEWORK

Evaluation and protection of archaeological resources is governed by policies, laws, and regulations at the city, state, and federal levels. This Appendix consists of policies and legislation that apply to archaeological resources within the City of Santa Barbara.

### C.1 CITY PLANS AND REGULATIONS

City policies for the protection of archaeological resources are found in the City General Plan, Local Coastal Plan, and Municipal Code. In addition, the Historic Landmarks Commission (HLC) has an ongoing role in evaluation and protection of archaeological resources, as described below.

#### **Historic Landmarks Commission’s Role in Assessment of Archaeological Resources**

The Historic Lands Commission (HLC) advises staff, the Planning Commission and City Council on issues related to the protection of historic resources; this may include known archaeological resources. The City Charter grants the HLC the authority and duty to recommend to the City Council that sites or areas having archaeological significance be designated as either a City Landmark or a City Structure of Merit.

The HLC acts as an advisory review body for proposals that may have impacts on recorded archaeological resources by reviewing and commenting on reports prepared by professional archaeological consultants and providing its comments to the City’s Environmental Analyst. Reports that include the recordation and assessment of impacts on cultural resources including Phase 1, 2, and 3 Archaeological Resources Reports and Phase 3 Archaeological Resources Report proposals are reviewed by the City Archaeological Advisor, an objective expert in Santa Barbara Channel prehistory. The City Archaeological Advisor’s recommendation to which is to accept, accept with conditions, or reject the conclusions of the report or proposal, is provided to the HLC, which then acts upon that recommendation. City Planning Staff are also empowered to offer recommendations to the HLC regarding such reports.

#### **General Plan Historic Resources Element (2012)**

The City General Plan Historic Resources Element (2012) provides goals, policies, and implementation strategies to archaeological resources. The Historic Resources Element does not include a specific definition of tribal cultural resources, but the importance of archaeological resources to the local Chumash community is addressed.

##### ***Goal: Protection and Enhancement of Historic Resources***

*Continue to identify, designate, protect, preserve and enhance the City’s historical architectural and archaeological resources. Ensure Santa Barbara’s “sense of place” by preserving and protecting evidence of its historic past, which includes but is not limited to historic buildings, structures, and cultural landscapes such as sites, features, streetscapes, neighborhoods and landscapes.*



## Protection of Buildings, Structures, Sites and Features Policies

### **Policy and Implementation Strategies:**

*HR 1. Protect Historic and Archaeological Resources. Protect the heritage of the City by preserving, protecting, and enhancing historic resources and archaeological resources. Apply available governmental resources, devices, and approaches, such as the measures enumerated in the Land Use Element of this Plan to facilitate their preservation and protection.*

### **Possible Implementation Actions to be Considered**

*HR 1.5 Protect archaeological resources from damage or destruction.*

- a. *In the environmental review process, any proposed project which is in an area indicated on the map<sup>1</sup> 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.*
- b. *When making land use decisions, potential damage to archaeological resources shall be given consideration along with other planning, environmental, social, and economic considerations.*
- c. *Publicly owned areas known to contain significant archaeological resources should be preserved by limiting access and/or development which would involve permanent covering or disruption of the sub-surface artifacts.*

## Public Education Policy

*HR 9. Increase Awareness of Santa Barbara's Heritage. Promote recognition that preservation of historic and cultural resources is a necessary contributor to economic vitality, attaining sustainability, and preservation of quality of life. Increase awareness and appreciation of the significance of Santa Barbara's history. Promote awareness and awareness of the early inhabitants of Santa Barbara.*

### **Possible Implementation Actions to be Considered**

*HR 9.1 Generate Programs. Develop and expand programs that educate about the importance of preserving archaeological, prehistoric, historic and cultural resources.*

*HR 9.5 Improve Awareness. Encourage and participate in partnerships between the City, developers, landowners and representation from most likely descendants of Barbareño Chumash; and local Native American associations and individuals to increase the visibility of Chumash history and culture by:*

- a. *Supporting public displays or exhibits of Chumash arts, culture, and history;*
- b. *Encouraging the incorporation of elements from Chumash art and culture into public and private development; and*
- c. *Supporting the creation of a permanent Chumash archaeological museum and*

---

<sup>1</sup> The "map" referred to in this General Plan Conservation Element policy is the Cultural Resources Sensitivity Map, originally from May 1987. This Archaeological Resources Sensitivity Map has been updated as an element of the 2025 MEA Update.



*interpretive center in addition to those of the Santa Barbara Museum of Natural History.*

## City Coastal Land Use Plan

The Coastal Land Use Plan (2019) Chapter 4.4 is dedicated to Cultural Resources.

***LUP Policy 4.4-1. Preserve, Protect, and Enhance Cultural Resources.*** *Protect the heritage of the City by preserving, protecting, and enhancing the City's pre-historic and historic past, which includes, but it is not limited to, important or unique pre-historic and historic archaeological artifacts, objects, and/or sites, and important paleontological resources and sites.*

***LUP Policy 4.4-2. Prohibit Disturbing or Destroying Archeological Resources.*** *Unauthorized collecting of artifacts or other activities that have the potential to destroy or disturb archaeological resources shall be prohibited.*

***LUP Policy 4.4-3. Increase the Visibility of Chumash History and Culture.*** *Encourage and participate in partnerships between the City, developers, landowners, non-profits, and representation from most likely descendants of Barbareño Chumash and local Native American associations and individuals to increase the visibility of Chumash history and culture by:*

- A. Supporting public displays or exhibits of Chumash arts, culture, and history;*
- B. Encouraging the incorporation of elements from Chumash art and culture into public and private development; and*
- C. Supporting the creation of a permanent Chumash archaeological museum and interpretive center in addition to the Santa Barbara Museum of Natural History.*

***LUP Policy 4.4-4. Paleontological and Archaeological Resource Consideration and Protection.*** *Potential damage to paleontological and archaeological resources shall be considered when making land-use decisions. Project alternatives and conditions offering the most protection feasible to important paleontological or important or unique archaeological resources shall be implemented.*

***LUP Policy 4.4-5. Avoid Adverse Impacts to Important Paleontological and Important or Unique Archaeological Resources.*** *Development shall be sited and designed to avoid adverse impacts to important paleontological and important or unique archaeological resources to the maximum extent feasible. If there is no feasible alternative that can avoid impacts to important paleontological or important or unique archaeological resources, then the alternative that would result in the least adverse impacts to important paleontological and archaeological resources that would not result in additional adverse impacts to other coastal resources shall be required. Impacts to important or unique archaeological or important paleontological resources that cannot be avoided through siting and design alternatives shall be mitigated.*

***LUP Policy 4.4-6. Native American Consultation Requirement.*** *The City shall consult with Native American tribal groups and individuals approved by the Native American Heritage Commission for the area prior to amending or adopting its General Plan or any specific plan, or amending the Coastal LUP, when designating any land as open space, when development may adversely impact Native American archaeological and/or cultural resources, during preparation of any mitigation plan to address adverse impacts to Native American archaeological and/or cultural resources, and prior to release of a negative declaration, mitigated negative declaration, or environmental impact report prepared for the project.*



**LUP Policy 4.4-7.** *Archaeological Resources Evaluation Requirement. Development proposed in any area known or suspected to contain archaeological resources, or identified as archaeologically sensitive on the City of Santa Barbara's Archaeological Resources Sensitivity Map, shall be evaluated to identify the potential for important or unique archaeological resources at the site and whether the proposed development may potentially have adverse impacts on those resources if present at the site.*

**LUP Policy 4.4-8.** *In-situ Preservation and Avoidance Preferred. In-situ preservation and avoidance is the preferred manner of preserving and protecting important or unique archaeological resources. Where in-situ preservation and avoidance is not feasible, partial or total recovery of important or unique archaeological resources shall be undertaken. Examples of methods to accomplish in-situ preservation and/or avoidance include, but are not limited to:*

- A. *Siting and designing structures to avoid important or unique archaeological resources;*
- B. *Planning construction to prevent contact with important or unique archaeological deposits;*
- C. *Planning parks, green space, or other open space to preserve important or unique archaeological sites;*
- D. *"Capping" or covering important or unique archaeological sites with a layer of soil before building tennis courts, parking lots, or similar facilities. Capping may be used where:*
  - i. *The soils to be covered will not suffer serious compaction;*
  - ii. *The cover materials are not chemically active;*
  - iii. *The site is one in which the natural processes of deterioration have been or can be effectively arrested; and*
  - iv. *The site has been recorded. Although the placement of fill on top of an archaeological site may reduce direct impacts of construction, indirect impacts will possibly result from the loss of access to the site for research purposes and scarification and compaction of soils. To mitigate these impacts, a sample of the cultural resource shall be excavated and appropriately curated for research purposes; and*
- E. *Deeding important or unique archaeological sites into permanent conservation easements held for the benefit of the public.*

**LUP Policy 4.4-9.** *Mitigation if In-Situ Preservation or Avoidance is not Feasible. Where development will or is likely to adversely impact any important or unique archaeological resources and it is not feasible to avoid or preserve resources in-situ, mitigation measures that are sensitive to the cultural beliefs of the affected population(s) and would result in the least significant adverse impacts to resources shall be required and implemented as conditions of the Coastal Development Permit. If total or partial recovery through excavation is the only feasible mitigation measure, a Data Recovery Plan specifying how the archaeological excavation will be carried out and a requirement for a Data Recovery Report summarizing the results of the archaeological excavation(s) shall be prepared by a City-Qualified Archaeologist (Registered Professional) in consultation with the City's Environmental Analyst, the City's Archaeological Resources Advisor, and as appropriate, local Barbareño Chumash tribal representative(s) identified by the Native American Heritage Commission. The Data Recovery Plan shall be*



reviewed and approved by the City's Historic Landmarks Commission, and implemented as a condition of the Coastal Development Permit. The Data Recovery Plan shall include, but not be limited to, the following:

- A. The nature and purpose of the Data Recovery Plan; dates of the fieldwork; names, titles, and qualifications of personnel involved; and the nature of any permits or permission obtained;
- B. The level of excavation needed;
- C. The analytical protocols for the data;
- D. Detailed notes, photographs, and drawings of all excavations and soil samples; and
- E. The location of where archaeological resources will be curated.

The Data Recovery Report shall be submitted to the City following the archaeological excavation detailing the implementation of the Data Recovery Plan and recovery measures that were performed, including the integrity of the site deposits and any other information, as necessary. The Data Recovery Report shall be reviewed by the City's Environmental Analyst, the City's Archaeological Resources Advisor at the UCSB Department of Anthropology, and as appropriate, Native American tribal groups or individuals approved by the Native American Heritage Commission for the area and a City-Qualified Barbareño Chumash Monitor, and accepted by the Historic Landmarks Commission prior to issuance of a building permit for the development.

**LUP Policy 4.4-10. Condition of Approval—Monitoring Requirement.** When recommended by a City-Qualified Archaeologist (Registered Professional) due to a likelihood of uncovering or otherwise disturbing unknown subsurface archaeological resources, the following mitigation measures shall be a condition of approval of the Coastal Development Permit:

- A. Onsite monitoring by a City-Qualified Archaeologist and as appropriate, a local Barbareño Chumash monitor(s) identified by tribal representatives of all grading, excavation, trenching, vegetation or paving removal, ground clearance, and site preparation that involves earthmoving operations;
- B. All 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
- C. If archaeological resources are encountered or suspected, work shall immediately be halted or redirected to an area with no known archaeological resources, and the City's Environmental Analyst shall be notified. The City's Environmental Analyst shall evaluate the nature, extent, and importance of any discoveries or suspected archaeological resources based upon input from the City's Archaeological Resources Advisor, local Chumash tribal representatives identified by the Native American Heritage Commission and their designated Site Monitor(s), and the project City-Qualified Archaeologist (Registered Professional). If archaeological resources are determined to be important or unique, the City's Environmental Analyst shall require a City-Qualified Archaeologist (Registered Professional) to prepare a mitigation plan



*(which may include but is not limited to a Data Recovery Plan and a Data Recovery Report) and, if feasible, redirect grading and/or excavation activities to an area with no archaeological resources until such time as adequate mitigation measures are implemented to protect or preserve the identified important or unique archaeological resources. The City's Environmental Analyst shall determine whether the development or mitigation measures require a new or amended Coastal Development Permit. Activities that may adversely impact these resources shall not resume without written authorization from the City's Environmental Analyst that construction may proceed.*

*If a discovery consists of possible human remains, all work in the area shall be immediately halted, and the Santa Barbara County Coroner shall be contacted pursuant to State Public Resources Code 5097.98. The Native American Heritage Commission shall designate the Barbareño Chumash Most Likely Descendant who will identify recommendations for treatment and disposition of the human remains and any related artifacts with appropriate dignity in a location not subject to further subsurface disturbance. The local Barbareño Chumash monitor shall continue to be retained to monitor all further subsurface disturbance in the area of the find. The City's Environmental Analyst shall determine whether the development or mitigation measures require a new or amended Coastal Development Permit. Activities that may adversely impact these resources shall not resume without written authorization.*

**LUP Policy 4.4-12. Archaeological Resources Evaluations.** *Archaeological resources evaluations shall be conducted by the City's Environmental Analyst based upon input from the following as appropriate: the City's Archaeological Resources Advisor, local Chumash tribal representatives identified by the Native American Heritage Commission, , and/or a City-Qualified Archaeologist (Registered Professional), and shall:*

- A. Evaluate the potential for unrecorded important or unique archaeological resources to be located on the development site following the guidance of the City's Archaeological Resources Sensitivity Area Report Requirements (see table on Archaeological Resources Sensitivity Map) and including site research, records reviews, and field surveys as appropriate;*
- B. Evaluate the development's potential adverse impacts to important or unique archaeological resources; and*
- C. Implement mitigation measures consistent with the Coastal LUP to avoid or minimize significant adverse impacts to important or unique archeological resources to the extent feasible.*

## **Santa Barbara Municipal Code**

Chapter 22.12 of the Santa Barbara Municipal Code (SBMC) provides development standards applicable to all construction projects.

**22.12.001 Legislative Intent.** *It is the intent of this section to provide for the preservation and protection of significant archaeological and paleontological resources found in the City of Santa Barbara.*

**22.12.010 Applicability.** *All new development in the City of Santa Barbara shall be designed*



and constructed wherever feasible to avoid destruction of archaeological and paleontological resources consistent with the standards outlined in Section 22.12.020, below.

**22.12.020 Standards.**

*A. Known sites. Permits to perform grading determined through the Environmental Review process or indicated through records kept by the State of California, or the University of California, to be within an area of known or probable archaeological or paleontological significance may be conditioned in such a manner as to:*

- 1. Ensure the preservation or avoidance of the site, if feasible; or*
- 2. Minimize adverse impacts on the site; or*
- 3. Allow reasonable time for qualified professionals to perform archaeological or paleontological investigations at the site; or*
- 4. Preserve for posterity, in such other manner as may be necessary or appropriate in the public interest, the positive aspects of the archaeological or paleontological site involved.*

*B. Unknown sites. Where a grading permit has been issued with respect to an area not known at the time of issuance to include archaeological or paleontological resources, and where it is subsequently learned, either by representatives of the City or by any persons doing development pursuant to a grading permit, that significant archaeological or paleontological resources may be encompassed within the area to be graded or being graded, all grading which has substantial potential to damage archaeological or paleontological resources shall cease and the grading permit deemed suspended to that extent. The finding of a site which may contain significant archaeological or paleontological resources shall be reported to the Chief of Building and Zoning, or the Public Works Director if a public project, and the Community Development Director within 72 hours from the time such archaeological or paleontological resources are found. The Chief of Building and Zoning, or the Public Works Director if a public project, upon receiving such a report, shall cause a preliminary investigation of the site to be made by qualified experts at the permittee's expense within five working days after the time such a report is received. If the preliminary investigation should confirm that the site does or may contain significant archaeological or paleontological resources, the grading permit shall be suspended for a period not to exceed 45 days after the date the finding of the resources was first reported to or learned by the City. During the period of suspension, and as promptly as reasonably possible, the Chief of Building and Zoning, or the Public Works Director if a public project, shall develop conditions to be included in the grading permit pursuant to the provisions of Section 22.12.020.A. When such conditions are developed and included in the grading permit, said permit shall be deemed reissued subject to such conditions, and the suspension shall be deemed terminated. In extraordinary circumstances, the suspension may be extended beyond 45 days if the Chief of Building and Zoning, or the Public Works Director if a public project, makes application to the City Council for such an extension and the Council shall approve extension of the suspension.*

**C. Appeals.** *Any condition or conditions imposed pursuant to the provisions of Section 22.12.020.A may be appealed to the Planning Commission and thence to the Council in the manner prescribed by Section 1.30.050 of [the Santa Barbara Municipal Code].*



## C.2 STATE LAWS AND REGULATIONS

State laws and regulations involving protection of archaeological resources include the California Environmental Quality Act, the California Coastal Act and related Commission, and code regulations.

### California Coastal Act (CCA)

Coastal Act policies related to Cultural Resources that are relevant to Santa Barbara include the following:

*Section 30244. Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Resources Officer, reasonable mitigation measures shall be required.*

### California Environmental Quality Act (CEQA)

The State CEQA Statute and Guidelines provide direction as to the assessment and protection of archaeological resources. Various sections from CEQA and the State CEQA Guidelines are quoted or summarized throughout the MEA Guidelines. CEQA Section 21083.2 and State CEQA Guidelines Section 15064.5 are specifically intended as guidance in determining the environmental significance of archaeological resources.

### Resource Significance Thresholds

**California Register of Historical Resources (CRHR):** Public Resources Code Section 5024.1(a) (Title 14 CCR, Section 4852) and CEQA Guidelines Section 15064.5 (a)(3) and (a)(4) provide guidance in determining the environmental significance of archaeological and tribal cultural resources.

*A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following:*

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

*The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.*

Any “unique archaeological resource” as defined by CEQA Statutes Section 21083.2.g. also addresses the significance of archaeological resources in terms of “unique archaeological resources.” They are characterized as:



*...an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets 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.*
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.*
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.*

## Impacts

The assessment of impacts on an archaeological resources eligible for listing in the CRHR is defined as a “substantial adverse change” in CEQA Guidelines Appendix G, V, b). The definition of this change is found in Guidelines Section 15064.5(b):

- (b) 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.
  - (1) 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.
  - (2) The significance of an historical resource is materially impaired when a project:
    - (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey 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 a 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.

## Mitigation

Public Resources Section 21083.3 and CEQA Guidelines Section 15126.4(b) state:

- (a) Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.



- (b) If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process provided in Section 21080.3.2, the following are examples of mitigation measures that, if feasible, may be considered to avoid or minimize the significant adverse impacts:
  - (1) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - (2) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - (A) Protecting the cultural character and integrity of the resource.
    - (B) Protecting the traditional use of the resource.
    - (C) Protecting the confidentiality of the resource.
  - (3) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - (4) Protecting the resource.

## **Human Remains**

Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.94, 5097.98, and 5097.99 address the procedures to be followed in the event human remains are encountered during archaeological investigations.

The purpose of these Health and Safety Code sections are to provide protection to Native American human remains and burials and to provide a process by which Native American descendants associated with those remains can make known their concerns regarding the appropriate treatment and disposition of their ancestors and related artifacts.

The procedures to be followed in the event of discovery or disturbance of human burials require notification of the County Coroner for determination as to whether the burial is Native American. If the Coroner so determines, he is required to notify the Native American Heritage Commission, which in turn assists in identifying most-likely-descendants who may consult with the landowner about disposition of the remains. The law makes obtaining or possessing Native American artifacts or human remains taken from a grave or cairn after January 1, 1988, a felony, except as otherwise provided by law or in accordance with an agreement reached pursuant Public Resources Code Sections 5097.94 and 5097.98 which pertain to Native American possession and transport of Native American artifacts and/or human remains. The law applies to archaeological investigations as well as to inadvertent discovery.



### **C.3 FEDERAL LAWS AND REGULATIONS**

Federal legislation concerning cultural resources applies to City of Santa Barbara projects only when Federal funds or land are involved in the project, or when a federal entity has discretionary interest in a project for some other reason, such as permitting authority. For projects with federal involvement, compliance with federal regulations is the responsibility of the lead agency. In most cases, this is a federal or state agency. Examples of projects requiring federal funding in Santa Barbara are transportation improvements within state or federal roadways such as US 101 and Las Positas Road (State Route 225) where Caltrans has responsible agency status, and city affordable housing projects funded in part by federal Housing and Urban Development (HUD) grant funding. City projects receiving federal funding and subject to federal statutes including the Clean Water Act and Endangered Species Act, such as wastewater treatment facility upgrades, or where a federal agency has permitting authority such as the U.S. Army Corps of Engineers, are also subject to federal regulation. In these cases, the City assumes the role of lead agency and compliance with federal historic preservation requirements including tribal cultural resources are applied.

#### **National Environmental Policy Act (NEPA)**

Under NEPA of 1969 (42 USC 4321) and its implementing regulations and guidelines, environmental assessments of proposed projects on federal lands or projects permitted by a federal agency must identify affected cultural resources, evaluate their significance, identify potential effects on those resources from the proposed project, and recommend appropriate measures to mitigate adverse effects.

#### **The National Historic Preservation Act**

The National Historic Preservation Act (NHPA) of 1966 as amended (16 USC 470), requires federal agencies to inventory, evaluate, and make an effort to preserve cultural resources of local, regional, or national significance on federal lands or lands over which federal agencies have permit, licensing, or financial authority. Regulations implementing these requirements are set forth in Title 36, Part 800 of the Code of Federal Regulations (36 CFR 800). NHPA requires federal agencies to provide the Advisory Council on Historic Preservation the opportunity to comment on proposed activities that may affect significant historic resources. This review process is often referred to as “Section 106 compliance” since it is Section 106 of the NHPA that provides for the Council’s consideration. The criteria of the National Register of Historic Places are used for this evaluation.

#### **National Historic Landmarks**

This listing contains historic resources important in American history, architecture, engineering, archaeology, and culture. The list is maintained by the National Park Service on behalf of the Secretary of the Interior.

#### **The National Register of Historic Places**

The National Register of Historic Places (NRHP) listing is similar to the National Historic Landmarks list, but is expanded to also include archaeological resources of national significance. The list is maintained by the National Park Service on behalf of the Secretary of the Interior. Criteria for listing an archaeological resource on the NRHP include:



*The quality of significance in American archaeology that possess integrity of location and association, and:*

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or*
- B. That are associated with the lives of persons significant in our past; or*
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or*
- D. That have yielded, or may be likely to yield, information important in prehistory or history. (36 CFR 60.4.)*

### Other Federal Acts

The Antiquities Act of 1906 (16 USC 431-433) and the Archaeological Resources Protection Act (ARPA) of 1979 (16 USC 470a) mandate the protection of archaeological resources on lands “owned or controlled by” the federal government. ARPA regulations are set forth at 36 CFR 69. The Archeological and Historic Preservation Act (AHPA) of 1974 (16 USC 469) also requires federal agencies to protect significant cultural resources found during construction.

The American Indian Religious Freedom Act (AIRFA) of 1978 (42 USC 1966) requires all federal agencies to take into account the effects of their policies on traditional Native American religious and cultural values and practices and, insofar as possible, not interfere with those values and practices.



# APPENDIX D

## CONFIDENTIALITY OF INFORMATION

The City of Santa Barbara Community Development Department maintains archeological and historic resource reports and records, and other records of similar nature to aid City staff in the performance of environmental review of projects under the California Environmental Quality Act (CEQA). The City's Archaeological Resources Reports Database is continuously updated as new archaeological reports are submitted, in connection with environmental assessments of development projects. These reports may include information the archaeologist obtains from the California Historic Resource Information System (CHRIS). Submission of the archaeological resources report to the City is required for project review and is considered a disclosure for official purposes. The City treats this information as confidential and exempt from public disclosure under various laws, including California Government Code Sections 7927.000 and 7927.005 and Public Resources Code § 21082.3. Access to and distribution of archaeological resources reports is restricted to authorized City staff, consistent with applicable law. Staff are required to sign a Confidentiality Agreement for Access to Archaeological Resources Reports below, prior to accessing report. Digital access is password protected, and authorized City staff may only distribute archaeological information to archaeologists on the City-Qualified Archaeologists List, Native American tribes, and property owners. Any communications shall be marked as 'confidential' and shall include the following disclosure:

*CONFIDENTIAL INFORMATION: This message and any attachments are confidential and intended solely for the use of the person to whom it was addressed. Any other interception, copying, accessing, distribution, or disclosure of this information to unauthorized individuals is prohibited. If you have received this message in error, please immediately notify the sender and purge the message you received.*

City staff responsible for conducting environmental assessments of projects may review archaeological reports in the performance of their official duties; this includes reports that the City obtains directly from the CHRIS local information center or that contain information that an archeologist obtains from CHRIS. The use of this information is restricted to official City purposes. Public disclosure of such information is prohibited unless specifically authorized by law.

The City's current procedures for reviewing and retaining archaeological reports and other reports containing confidential resource information are compliant with federal and state confidentiality laws. Under existing law, information about the location of an archeological site or sacred lands must not be publicly disclosed, pursuant to the Public Records Act



(California Code of Regulation [CCR] Section 15120(d)). Native American graves, cemeteries, and sacred places and records of Native American places, features, and objects are also exempt from disclosure (Public Resources Code [PRC] Sections 5097.9, 5097.993.) The Public Records Act contains an exemption from disclosure for the items listed in these sections. Lead agencies under CEQA should maintain the confidentiality of cultural resource inventories or reports generated for environmental documents.

Information submitted by a California Native American tribe during the environmental review process may not be included in the environmental document or disclosed to the public without the prior written consent of the tribe (however, consistent with current practice, confidential information may be included in a confidential appendix). A lead agency may also exchange information confidentially with other public agencies that have jurisdiction over the environmental document (PRC Section 21082.3 (c)(1).

A public agency and the tribe may share confidential information regarding tribal cultural resources with the project applicant. The project applicant should keep the information confidential, unless the tribe consents to disclosure in writing. Confidentiality is intended to prevent vandalism or damage to the cultural resource. Additionally, information that is already publicly available, developed by the project applicant, or lawfully obtained from a third party that is not the tribe, or another public agency may be disclosed during the environmental review process (PRC Section 21082.3(c)(2).



## Confidentiality Agreement for Access to Archaeological Resources Reports

I, the undersigned, acknowledge that in the course of my official duties with the City of Santa Barbara, I may have access to confidential and sensitive information related to archaeological resources, including but not limited to archaeological sites, findings, research data, excavation reports, and related materials, herein referred to as 'Confidential Information'. This information is protected due to its cultural, historical, scientific, and legal significance. The City of Santa Barbara Archaeological Resources Reports Database includes Confidential Information originally supplied by the Central Coast Information Center (CCoIC), which is part of the California Historical Resources Information System (CHRIS). I have read and shall abide by all terms below, and comply with related laws and codes (California Gov., Code Section 7927.005; 54 U.S. Code Section 307103).

*1. Obligation of Confidentiality.* I understand that Confidential Information shall be used solely for the purposes of performing duties within the scope of my employment with the City of Santa Barbara. I agree to maintain the confidentiality of all Confidential Information and not to disclose, disseminate, or use such information for any unauthorized purpose, either during or after their employment with the City of Santa Barbara.

*2. Restrictions on Use and Disclosure.* I understand that any Confidential Information I receive shall not be disclosed, distributed, or shared to individuals who do not qualify for access to such information. I understand that any Confidential Information I receive shall not be disclosed in publicly distributed documents.

*3. Handling of Confidential Information.* I agree to adhere to the City of Santa Barbara Master Environmental Assessment Guidelines for Archaeological Resources for handling, storing, and safeguarding Confidential Information. This includes, but is not limited to, ensuring that physical records are securely stored and that electronic records are protected by password or encryption methods. I agree to take all reasonable precautions to prevent unauthorized access to Confidential Information.

*4. Legal Compliance.* I agree to comply with all applicable laws, regulations, and policies concerning the protection of archaeological resources and related Confidential Information.

By signing this Agreement, I acknowledge that I have read, understood, and agree to the terms of this Confidentiality Agreement. **I understand that failure to comply with the above terms shall be grounds for denial of access to Confidential Information.**

---

Employee Name and Title: \_\_\_\_\_

Department: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



# APPENDIX E

## PROFESSIONAL STANDARDS FOR THE CITY QUALIFIED ARCHAEOLOGISTS LIST

The professional qualification standards outlined below describe in terms of academic attainment, training, and experience the minimum professional standards the City of Santa Barbara accepts for archaeologists qualified to prepare archaeological resources reports. These standards are neither entry-level nor do they describe qualifications for pre-eminent master professionals in the field. Rather, they describe the minimum education and experience which qualifies select individuals to produce professionally credible and competent work for local resources. Users of these standards are free to enhance them with additional educational and experience qualifications that may be needed in certain situations. In addition, the work experience time period requirements may be met by discontinuous periods of full-time or part-time work adding up to the equivalent of work experience.

To be considered for placement on the City of Santa Barbara Qualified List of Archaeologists, the archaeologist must submit a corporate vita or statement of qualifications which describes the academic credentials, Santa Barbara work experience, and other specific requirements as listed below, of all principal investigators to the City's Environmental Analyst. A corporate vita or statement of qualifications will be reviewed for fulfillment of qualifications specified below by the Environmental Analyst or other advisory staff, as appropriate. The Environmental Analyst will determine if the individual meets the qualifications. The individual submitting the corporate vita or statement of qualifications will be notified of the Environmental Analyst's decision.

The preparation of some archaeological resources reports and/or the evaluation, protection, curation, etc., of identified resources may require additional areas or levels of expertise. The City Planning Division maintains a list of qualifications for such disciplines as architectural history, architecture, and historic preservation. On an as needed basis, corporate vita or statement of qualifications for other disciplines than those below will be reviewed by the Environmental Analyst or other advisory staff, as appropriate.

### PREHISTORIC ARCHAEOLOGY:

A graduate degree in anthropology with a specialization in prehistoric archaeology, archaeology with a specialization in prehistoric archaeology, or a closely related area of study, plus the minimum demonstrable experience described below. Areas of study closely related to Prehistoric Archaeology include, but are not limited to, Historical Archaeology and Cultural Anthropology. The minimum required experience for prehistoric archaeology is:

1. At least four months of demonstrable, supervised field and analytic experience with prehistoric-period archaeological resources of the city of Santa Barbara (a professional archaeologist without this relevant local experience may collaborate and submit an investigation report that was managed, reviewed, and approved by a City-qualified archaeologist until this local experience is gained); and,



2. At least one year of full-time demonstrable experience (or equivalent specialized training) at a supervisory level in prehistoric archaeological research, administration, or management, including,
  - a. Teaching prehistoric archaeology with an emphasis on and related to prehistoric material culture, historic properties, or the prehistoric built environment of the City of Santa Barbara; or,
  - b. Administrative, project review, or supervisory experience in a historic preservation program or office (academic institution, historical organization or agency, museum, cultural resources management consulting firm, or similar professional institution) with an emphasis on and related to prehistoric material culture, historic properties, or the prehistoric built environment of the City of Santa Barbara; AND,
3. Demonstrated ability to carry research to completion, including scholarly research, publications, papers, or similar research and writings in Prehistoric Archaeology relating to the prehistoric material culture, historic properties, or the prehistoric built environment of the City of Santa Barbara.

#### **HISTORICAL ARCHAEOLOGY:**

A graduate degree in anthropology with a specialization in historical archaeology, archaeology with a specialization in historical archaeology, or a closely related area of study, plus the minimum demonstrable experience described below. Areas of study closely related to Historical Archaeology include, but are not limited to, Prehistoric Archaeology and Cultural Anthropology. The minimum required experience for historical archaeology is:

1. At least four months of demonstrable, supervised field and analytic experience with historic-period archaeological resources of the city of Santa Barbara (a professional archaeologist without this relevant local experience may collaborate and submit an investigation report that was managed, reviewed, and approved by a City-qualified archaeologist until this local experience is gained); and,
2. At least one year of full-time demonstrable experience (or equivalent specialized training) at a supervisory level in historical archaeological research, administration, or management, including,
  - a. Teaching historical archaeology with an emphasis on and related to historic material culture, historic properties, or the historic built environment of the City of Santa Barbara; or,
  - b. Administrative, project review, or supervisory experience in a historic preservation program or office (academic institution, historical organization or agency, museum, cultural resources management consulting firm, or similar professional institution) with an emphasis on and related to historic material culture, historic properties, or the historic built environment of the City of Santa Barbara; and,
3. Demonstrated ability to carry research to completion, including scholarly research, publications, papers, or similar research and writings in historical archaeology relating to the historic material culture, historic properties, or the historic built environment of the City of Santa Barbara.



# APPENDIX F

## TRIBAL OUTREACH CORRESPONDENCE FORMAT

This appendix provides a standard format for undertaking outreach with Chumash tribal representatives to facilitate identification of potential tribal cultural resources within a project site and if these may exist, to solicit comments on how to feasibly address them.

The City of Santa Barbara Community Development Department Planning Division will maintain a list of Chumash tribal representatives identified by the Native American Heritage Commission (NAHC), to be updated on a regular, periodic basis (e.g. quarterly throughout the year). This list will be used by consultants to distribute preliminary results of Phase 1, 2, and 3 investigations to tribal representatives.

In order to ensure consistency and clarity in this community, the following format is provided for City staff or consultants to use. Email is recommended for tribal outreach. City staff or the consultant can elect to provide additional detail where considered appropriate. For formal tribal consultation, see the 2025 MEA Guidelines for Tribal Cultural Resources.



*(Insert Recipient Contact Information)*

SENT VIA EMAIL

(DATE)

Subject: Tribal Outreach for the Preparation of *(Insert Report Name and Address)*

Dear \_\_\_\_ *(insert the appropriate name of the tribal representative),*

I am requesting your review of the attached report (*indicate what phase*) for the proposed (*indicate the project name and location*). This represents tribal outreach complying with the City of Santa Barbara Master Environmental Assessment (MEA) Guidelines for Archaeological Resources and Tribal Cultural Resources. The outreach is used to ensure that the City provides local tribal representatives the opportunity to comment on technical reports so that any known or potential tribal cultural resources within a project site are appropriately identified, and that measures are incorporated in the report to address any project impacts that may affect those known or potential tribal cultural resources.

This outreach is not subject to formal government-to-government consultation pursuant to Senate Bill (SB) 18, Assembly Bill (AB) 52 or the National Historic Preservation Act (NHPA) Section 106 regulations. The City of Santa Barbara, however, is committed to gaining your input, comments, and/or concerns regarding this project.

A background records search for the project was completed at the Central California Research Information System at the Santa Barbara Museum of Natural History. This revealed that ( \_ ) archaeological sites are recorded on the project site, and that ( \_ ) archaeological sites are recorded within ( \_ ) mile of the project site. ( \_ ) previous investigations have been undertaken within the project site, and ( \_ ) previous investigations have been undertaken within ( \_ ) mile of the project site. The intensive ground surface of the proposed project impact areas identified ( \_ ) prehistoric resources. These resources are considered to be/not be significant pursuant to City and State significance criteria. Measures to address these resources include \_\_\_\_ (*summarize all standard conditions or specific recommendations presented in the report*).

Please provide your comments on this Draft Phase ( \_ ) Report by \_\_\_\_ (*two weeks from outreach*). Your response is very much appreciated.

*(Insert Archaeologist Signature Block and Contact Information)*