

## Section 3.4

# Cultural Resources

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### 3.4.1 Introduction

This section identifies and evaluates issues related to cultural resources including archeological, historic built environment, and ethnic resources for the Proposed Project and its alternatives. Historical resources such as qualified buildings and structures are not present within the Guadalupe Dunes. For this reason, historic built cultural resources are not discussed in the following section.

The information in this section is based on the 1982 Final Environmental Impact Report (EIR), associated studies, information provided by the Dunes Center and the City of Santa Maria, regional information available in previous environmental impact reports prepared by the County, and a records search done by the Central Coast Information Center (CCIC).

### 3.4.2 Environmental Setting

The following summary of the cultural setting describes the prehistory, ethnography, and history of the Project Site and region.

#### 3.4.2.1 Prehistory

Human inhabitation of the Santa Barbara region is believed to have begun at least 12,000 years ago. Although early archaeological evidence is sparse, several discoveries have led to an understanding of the areas prehistory. A fluted Clovis point fragment found near the coast on Hollister Ranch was estimated to be approximately 11,000–12,000 years old (Erlandson et al. 1987). Based on radiocarbon dates from CA-SBA-246 and CA-SBA-931 (both of which took place near the mouth of the Santa Ynez River), occupation of Vandenberg Air Force Base area in northern Santa Barbara County occurred at least 9,000 years ago (Glassow 1990, 1996; Lebow et al. 2001).

Although the earliest documented human habitation of the Santa Barbara Channel area dates to more than 10,000 before present (B.P.), human presence is not believed to have been more widespread until approximately 9000 B.P. Moratto (1984) coined the term “Paleocoastal” to refer to the possible descendants of local Paleoindians who inhabited the coast and exploited marine resources prior to the Milling Stone Period. Very few Paleocoastal sites have been identified. This shortage could possibly be due to relatively small populations and/or loss through erosion and other natural forces. The Paleocoastal Period has been described as a time of low population density, simple technology, and egalitarian social organization. People appear to have subsisted largely on plants, shellfish, and some vertebrate species. The Paleoindian artifact assemblage emphasized flaked stone tools.

Soon after 9,000 years ago, milling stones called mutates and manos begin to be found in abundance. These milling stones have been interpreted as evidence of a dietary shift to a focus on plant materials such as seeds and nuts, and may also be a sign of food storage capabilities (Glassow 1996). As such, it is believed that subsistence during the Milling Stone Period consisted of a mixture of plant foods, shellfish, and a limited array of vertebrate species. Assemblages from this era also contain

hammerstones for making flaked tools and for resharpening milling surfaces, small anvils, bone fish gorges, stone sinkers, and other fishing technology. The number, size, and complexity of habitation sites increases dramatically at this time, and sites show substantial variability across the region. Well-developed middens have been associated with this period, suggesting more regular and continuous use of habitation sites; however, small ephemeral campsites marked by just a few handstones or other milling tools are also found during this time.

Although they are not very common until later, shell beads appear in the Early Period, approximately 7,000 years ago. Archaeological sites within the period from 6,500 to 5,000 years ago are very limited, probably due to environmental changes. Population densities appear to rebound around 5,000 years ago. This reemergence is accompanied by the developed of mortar and pestle milling equipment. Notched projectile points and the atlatl (throwing stick) appear shortly thereafter as well.

Approximately 3,000 years ago, at the start of the Middle Period, a boost in population, resource use, and trade occurs. The early Middle Period is defined by the continued specialization in resource exploitation, trade, and increased technological complexity. Fishing, sea mammal hunting, and acorn harvesting increased steadily during this time. Use of the single-piece shell fishhook appears during this period, and by 800 years ago the bone-barbed harpoon, large contracting stem chert projectiles, and sewn plank canoe had all come into use (Erlandson 1993; Glassow 1996; Glassow and Wilcoxon 1988; King 1990; Strudwick 1985). Scholarly opinions regarding the development of a definitively centralized and stratified society differ; however, most agree this cultural change took place late in the Middle Period. Microlithic blades also begin to be found late in this period, and are believed to have been used primarily to perforate shells. Smaller projectile points begin to be found from this period, indicating the use of bows and arrows in the region. Both fish and acorns continued to be primary sources of subsistence. The development of mass hunting techniques suggests population pressure on resource collection late in the period.

The absence of imported obsidian after A.D. 1000 may reflect a change in trade relationships that is likely associated with a shift in settlement patterns. Although different evaluation methods have produced a different time frame for the development of chiefly status positions, craft specialization, and complex socioeconomic and political systems, profound changes in Chumash society, economy, and political organization began sometime during the Middle Late Transitional and Late Periods. By 600 years ago, prehistoric life was most likely very similar to the Chumash culture observed by the Spanish when they arrived. Archaeological investigations indicate an increase in marine and terrestrial species in midden deposits less than 600 years old. The use of temporary camps for resource procurement also increased. Objects of material culture included a wide array of utilitarian and ornamental objects such as arrow points, small bead drills (microlithic blades), various mortar types for milling different foods, *Olivella* shell beads and disk beads, and various other artifacts.

### **3.4.2.2 Ethnography**

Chumash is a name derived from traditional Coastal Chumash language that is used by anthropologists to refer to several closely related groups of Native Americans that spoke seven similar languages. The Chumash people lived between Malibu in Los Angeles County and the Monterey County line, on the northern Channel Islands, and east as far as the edge of Kern County. Chumash territory has been divided into sections representing the various linguistic subgroups. Kroeber notes that there is limited information about the geographical limit of the dialects and admits that his boundaries are based more on topography argues that the territorial divisions may

correspond more to catchment areas of the missions for which the groups were named rather than the groups' actual native territories.

The Proposed Project lies in the Guadalupe Dunes region, which was believed to be the ethnographic territory of the Central Chumash. Specifically, the area is thought to have been inhabited by the Purisimeno Chumash, named for the Chumash dialect they spoke. Some Central Chumash dialects, including Purisimeno, may even have been distinct languages. Little is known of Chumash languages, except what was gathered from the fieldwork of John Peabody Harrington, conducted early in the 20<sup>th</sup> century before the languages became dormant.

Spanish expeditions to the Santa Barbara area recorded heavily populated villages along the coast. The coastal Chumash populations lived in villages of dome-shaped semi-subterranean dwellings built of thatch (primarily willow branches and reeds) and oriented around streets. Some villages were believed to have as many as many as 1,000 residents, and included communal features such as sweat lodges (*temescals*) and dance areas (Erlandson 1993; Gamble 1991).

Despite being a largely non-agricultural group, the Chumash exhibited a complex society which tied separate villages together by regionally-influencing economic, religious, and political systems. Personal rankings were dependent on wealth and social status, occupations were specialized, leadership was hereditary and it was possible for chiefdom to span several villages. Although sources of sustenance included a variety of terrestrial species and plants, the diet of Chumash villages near the coast consisted largely of marine resources such as fish and shellfish.

The Chumash had a rich material culture consisting of utilitarian items such as fishnets, fishhooks, baskets, stone bowls, canoes (*tomols*) and projectile points. In addition, some utilitarian objects and religious objects such as charmstones were decorated with shell beads. The decimation of Native American populations and subsequent deterioration of cultural practices as a result of missionization is a profound event in the history of the coastal region. Much information was lost, and the mission records do not provide much insight into the lifeways of the Chumash or other groups of the coastal region prior to contact with Europeans.

### **3.4.2.3 History**

European contact with the Chumash occurred in A.D. 1542 during Juan Cabrillo's explorations. In 1769, the Spanish explorer Gaspar de Portola landed near the Project Site. While there, his men shot a bear near a lake north of the Project Site and named it Oso Flaco Lake (Dunes Center 2014). The Spanish Colonial Period (1769–1822) is marked by establishment of permanent Spanish settlements, including the Santa Barbara Presidio in 1782, Mission Santa Barbara in 1786, Mission La Purísima Concepcion in 1787, and Mission San Luis Obispo de Tolosa in 1772. The establishment of the missions led to the incorporation of the Chumash into mission settlements and the gradual depopulation of Chumash villages and settlements. During the Mission Period (1760–1820), some lands held by the missions were granted to Spanish military veterans. These land grants foreshadowed the subsequent Rancho Period (1820–1845) in California.

Following Mexican independence from Spain in 1822, the Mexican government gained control over California. About 500 land grants were given to local rancheros during the Rancho Period. Life on the ranchos in many ways resembled life in the Spanish missions. The typical rancho employed between 20 and several hundred Native American workers, many of whom had formerly lived at local missions.

In 1895, the Southern Pacific Railroad was built through the area, allowing for great migration to near the Project Site. Migration from the east steadily increased the population of the east coast throughout the 1800s. The area of what is now Santa Maria and the city of Guadalupe was predominantly used for private agricultural use.

The City of Guadalupe was established in the 1840s as part of a Mexican land grant. The City's name honors Our Lady of Guadalupe (a title given to the Virgin Mary). It was finally incorporated in 1946. The nearby city of Santa Maria was also established around the same time after several agriculturalists banded together to donate land at the intersection of their properties in 1875. Although it was first called Grangerville, the name of the city changed to Central City, and then finally to Santa Maria in 1885 (City of Santa Maria 2014).

Oil was first discovered in California during the 1860s but did not become a major economic force until the 1890s. George S. Gilbert was among the first men to drill for oil in California when he built a small refinery on the Ojai Ranch in Ventura County in 1861. Oil exploration in the Santa Maria Valley began in 1888, and in 1901 William Orcutt introduced Union Oil in the area. Oil development increased and intensified throughout the early 1900s and became a major economic and organizing force in the region.

In 1923, the American epic silent film "The Ten Commandments" was filmed in the Guadalupe Dunes. The film, distributed by Paramount Pictures, was directed and produced by Cecil B. DeMille. The set built for the film was very extensive, and was subsequently left in the Guadalupe Dunes after filming wrapped. It is still present today in a semi-buried state. Portions are being excavated and preserved as the 'Lost City of DeMille' by the Guadalupe-Nipomo Dunes Center. The Guadalupe Dunes Discovery Center was established in 1996 with support from the Nature Conservancy, and was incorporated as the non-profit organization 'The Guadalupe-Nipomo Dunes Center' in 1999 (Dunes Center 2014).

### **3.4.2.4 Local Cultural Resources**

#### **Records Searches and Field Surveys**

The CCIC conducted a records search for the Proposed Project in March 2014. This records search revealed four relevant studies in the area:

The Archaeological Survey for the 1982 Final EIR, conducted between May 19 and May 26, 1982 included a records search and field survey. In addition, three other cultural resource surveys (1990, 2001, and 2003) were conducted in the area, but were not focused on the Project Site. The records search and field survey conducted for the 1982 Final EIR identified several dozen Monterey chert flakes of minimal scientific value in the area, as well as two archaeological sites.

#### **Identified Cultural Resources**

##### **SBA-1209:**

SBA-1209 is located approximately 600 feet from the Project Site and consists of four low-lying shell mounds interconnected by a dispersed scatter of flakes and chipped stone tools. The site was initially discovered and excavated by Paul Shumacher of the Smithsonian Institution in 1875. To ensure that the flakes were not part of a larger, more intact cultural deposit, six shovel test pits were excavated in areas of high flake density. No additional cultural materials were found.

**SBA-1091:**

SBA 1091 is a buried archaeological deposit that is exposed in a terraced area facing the Santa Maria River approximately 350 feet from the Project Site. Several flakes and a bird bone were seen protruding from the cut at the time of the 1982 survey. The survey also postulated that the midden had been buried for a long period of time, and may possibly extend southward.

The 1982 Final EIR analyzed both of these cultural resources and determined that the original Husky Oil drilling project would not adversely affect these resources.

### 3.4.3 Regulatory Setting

This section describes the cultural resource requirements of California Environmental Quality Act (CEQA), the California Health and Safety Code (HSC), the Public Resources Code (PRC), California Register Program, the Office of Historic Preservation, the Santa Barbara County Land Use and Development Code, the Santa Barbara County Land Use Element of the Comprehensive Plan, and the County of Santa Barbara's Cultural Resources Guidelines, Archaeological, Historical, and Ethnic Elements as provided in the Santa Barbara County Environmental Thresholds and Guidelines Manual (County of Santa Barbara 2008).

#### 3.4.3.1 State

#### State CEQA Guidelines

State CEQA Guidelines require that historical resources and unique archaeological resources be taken into consideration during the CEQA planning process (California Code of Regulations [CCR] Title 14[3] §15064.5; PRC §21083.2). If feasible, adverse effects to the significance of historical resources must be avoided or the effects mitigated (CCR Title 14[3] §15064.5(b)(4)). State CEQA Guidelines require that all feasible mitigation be undertaken even if the prescribed mitigation does not mitigate impacts to a less-than-significant level (CCR Title 14[3] §15126.5 [a][1]).

The term that CEQA uses for significant cultural resources is "historical resource," which is defined as a resource which meets one or more of the following criteria: 1) listed in, or determined eligible for listing, in the California Register of Historical Resources (California Register); 2) listed in a local register of historical resources as defined in PRC Section 5020.1(k); 3) identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or 4) determined to be a historical resource by a project's lead agency (PRC Section 21084.1 and State CEQA Guidelines Section 15064.5[a]). A historical resource consists of:

"Any object, building, structure, site, area, place, record, or manuscript which 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... Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (CEQA Guidelines Section 15064.5[a][3]).

In accordance with State CEQA Guidelines Section 15064.5(b), a project that may cause a substantial adverse change in the significance of a historical resource is a significant effect on the environment.

CEQA requires a lead agency to determine if an archaeological resource meets the definition of a historical resource, a unique archaeological resource, or neither (State CEQA Guidelines Section 15064.5[c]). Prior to considering potential impacts, the Lead Agency must determine whether an archaeological resource meets the definition of a historical resource in State CEQA Guidelines Section 15064.5(c)(1). If the archaeological resource meets the definition of a historical resource, then it is treated like any other type of historical resource in accordance with State CEQA Guidelines Section 15126.4. If the archaeological resource does not meet the definition of a historical resource, then the lead agency determines if it meets the definition of a unique archaeological resource as defined in CEQA Statutes §21083.2(g). In practice, however, most archaeological sites that meet the definition of a unique archaeological resource will also meet the definition of a historical resource (Bass, Herson, and Bogdan 1999:105). Should the archaeological resource meet the definition of a unique archaeological resource, then it must be treated in accordance with CEQA Statutes §21083.2. If the archaeological resource does not meet the definition of a historical resource or a unique archaeological resource, then effects to the resource are not considered significant effects on the environment (State CEQA Guidelines Section 15064.5[c][4]).

### **California Health and Safety Code Section 7050.5**

California HSC Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the County Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

### **Public Resources Code Section 5097.5**

PRC Section 5097.5 provides for the protection of cultural resources. This PRC section prohibits the removal, destruction, injury, or defacement of archaeological features on any lands under the jurisdiction of state or local authorities.

### **California Register of Historical Resources**

The State of California Historical Resources Commission has designed the California Register for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The California Register is the authoritative guide to the state's significant historical and archaeological resources.

The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for State historic preservation grant funding; and affords certain protections under CEQA. The following criteria are utilized when determining if a particular resource has architectural, historical, archaeological, or cultural significance.

- **Criterion 1:** Is the resource associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States?
- **Criterion 2:** Is the resource associated with the lives of persons important to local, California, or national history?
- **Criterion 3:** Does the resource embody the distinctive characteristics of a type, period, region, method of construction, or represent the work of a master or possesses high artistic values?
- **Criterion 4:** Has the resource yielded, or have the potential to yield, information important to the prehistory or history of the local area, California, or the nation?

### 3.4.3.2 County

#### Santa Barbara County Land Use and Development Code

The Santa Barbara County Land Use and Development Code, published August 2011, provides standards for archaeological resources in the Coastal Zone and the Inland areas (35.60.040 A and B)

The following standards are applicable within both the Coastal Zone and the Inland area:

- A. Coastal Zone and Inland area requirements.
  1. Development proposed on a lot where archaeological or other cultural sites are located shall be designed to avoid impacts to the cultural sites if possible.
  2. When sufficient planning flexibility does not permit avoiding construction on an archaeological or other cultural site, adequate mitigation shall be required. Mitigation shall be designed in compliance with the guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.
  3. Inland Area Requirements. Native Americans shall be consulted when development proposals are submitted that impact significant archaeological or cultural sites.

The following standard applies only to the Inland Area:

- B. All available measures, including purchase of the site, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.

#### Santa Barbara County Comprehensive Plan

The County of Santa Barbara Comprehensive Plan (inclusive of all mandatory and optional Elements) contains policies which address historical and archeological sites. Consistency with these policies is discussed in Section 3.7, *Land Use and Planning*.

#### Historic Landmark Advisory Commission

Pursuant to County Code Chapter 18A, Section 18A-3, to be eligible for designation as a Santa Barbara County Landmark, a place, site, building, structure, or object must meet one or more of the following criteria:

- a. It exemplifies or reflects special elements of the County's cultural, social, economic, political, archaeological, aesthetic, engineering, architectural, or natural history.
- b. It is identified with persons or events significant in local, state or national history.
- c. It embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship.
- d. It is representative of the work of a notable builder, designer, or architect.
- e. It contributes to the significance of a historic area, being a geographically definable area possessing a concentration of historic, prehistoric, archaeological, or scenic properties, or thematically related grouping of properties, which contribute to each other and are unified aesthetically by plan or physical development.
- f. It has a location with unique physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the County of Santa Barbara.
- g. It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation.
- h. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particularly transportation modes or distinctive examples of park or community planning.
- i. It is one of the few remaining examples in the County, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.

Under Section 18A-5, the following special conditions may be imposed on designated Landmarks:

- a. Demolition, removal or destruction, partially or entirely, may be prohibited unless consent in writing is first obtained from the County Historical Landmark Advisory Commission.
- b. Alterations, repairs, additions, or changes, other than normal maintenance and repair work shall not be made unless and until all plans have been reviewed and approved or modified by the County Historical Landmark Advisory Commission and reasonable conditions imposed as deemed necessary. All such work shall be done under the direction and control of the County Historical Landmark Advisory Commission. Decisions of the County Historical Landmark Advisory Commission may be appealed to the County Board of Supervisors.
- c. That only certain specified uses may be made, or that certain specified uses shall be prohibited.
- d. That no buildings or structures exposed to public view within a specified distance may be placed, erected, moved in, altered, enlarged or removed (other than normal maintenance and repair work) without approval, with reasonable conditions imposed, where deemed necessary, by the historic landmarks advisory commission, first had and obtained.
- e. Other reasonable requirements, restrictions, or conditions to meet special or unique circumstances.

## **County of Santa Barbara Environmental Thresholds and Guidelines Manual**

Santa Barbara County's Environmental Thresholds and Guidelines Manual (County of Santa Barbara 2008) incorporates mandates specified in CEQA Guidelines Sections 15064.5 and 15126.4. It also

includes significance criteria for evaluating historic architectural resources identified in the County Cultural Resources Guidelines.

## County of Santa Barbara Cultural Resources Guidelines

This section of the County's Guidelines provides the procedures for cultural resources consultants to follow to identify, evaluate, and mitigate impacts to cultural resources. In brief, Phase 1 reports consist of a field survey and a literature search. If a cultural resource is identified during the Phase 1 study, a Phase 2 study is required to evaluate the significance of the resource. Phase 2 reports include the methods and results of the research and field surveys, an integrity rating and significance evaluation based on criteria provided in the guidelines, and recommendations for mitigation measures to reduce project impacts to any significant resources that cannot be avoided. If significant resources cannot be avoided, then Phase 3 mitigation is required after a Phase 3 proposal is prepared and approved. This proposal would outline the required mitigation, the timeframe for conducting and completing the mitigation, and any costs associated with it. If the mitigation would not reduce impacts to significant cultural resources to less than significant, then an EIR may be required. Additional guidelines are provided for curation of collections, ethnic impacts, and steps for a shortened Clearinghouse review.

According to Section 3.1 (g.), of the County Cultural Resource Guidelines, in areas subject to rapid alluvial accumulation (adjacent to rivers, marshes, etc.), in sand dune deposits, in areas covered by imported fill, in areas covered by dense vegetation, or in other situations, the likelihood of buried archaeological deposits must be considered. Excavation including shovel test pits or backhoe trenching may become necessary in these situations to determine whether buried deposits are present, subject to the discretion of the principal investigator.

### 3.4.4 Environmental Impact Analysis

This section discusses the potential cultural resources impacts associated with the Proposed Project.

#### 3.4.4.1 Thresholds of Significance

#### CEQA Guidelines

Appendix G of the CEQA Guidelines states that a project is considered to have a significant impact on Cultural Resources if it is found to:

- Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(b)(1). Specifically, substantial adverse changes include physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5(c)(2)
- Disturb any human remains, including those interred outside of formal cemeteries pursuant to CEQA Guidelines Section 15064.5(d)(1)

## County of Santa Barbara Environmental Thresholds and Guidelines

Santa Barbara County's Environmental Thresholds and Guidelines Manual (County of Santa Barbara 2008) provides local criteria for determining whether a project may have a significant effect on cultural resources. These criteria were discussed above under Regulatory Setting.

The environmental analysis in this section is patterned after the County of Santa Barbara Planning and Development Department Initial Study Checklist (Appendix A). The issues presented in the checklist have been used as thresholds of significance in this section. Accordingly, a project may create a significant environmental impact if it would result in:

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- a. Disruption, alteration, destruction, or adverse effect on a recorded prehistoric or historic archaeological site.
- b. Disruption or removal of human remains.
- c. Increased potential for trespassing, vandalizing, or sabotaging archaeological resources.
- d. Ground disturbances in an area with potential cultural resource sensitivity based on the location of known historic or prehistoric sites.
- e. Disruption of or adverse effects upon a prehistoric or historic archaeological site or property of historic or cultural significance to a community or ethnic group.
- f. Increased potential for trespassing, vandalizing, or sabotaging ethnic, sacred, or ceremonial places.
- g. The potential to conflict with or restrict existing religious, sacred, or educational use of the area.

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- a. Adverse physical or aesthetic impacts on a structure or property at least 50 years old and/or of historic or cultural significance to the community, state, or nation.

In addition, a project may result in a beneficial impact if it would provide:

- b. Rehabilitation or protection in a conservation/open easement, etc.

#### 3.4.4.2 Impacts of the Proposed Project

This section discusses the impacts to cultural resources from the Proposed Project. Table 3.4-1 below provides a summary of the cultural resources impacts resulting from the Proposed Project and alternatives.

As described in Section 3.4.2.4, *Local Cultural Resources*, no known cultural resources, including archeological resources, are located within the Project Site. The Proposed Project would leave the Project Site in its current condition. Therefore, conditions would remain as they are described under the existing setting and no impacts to cultural resources or human remains would occur as a result of the Proposed Project.

### **3.4.4.3 Impacts of the No Project Alternative**

This section discusses the impacts to cultural resources from the No Project Alternative. Table 3.4-1 below provides a summary of the cultural resources impacts resulting from the Proposed Project and alternatives.

#### **Impact ALT1-CR-1. Potential disruption, alteration, destruction, or adverse impact on cultural resources and/or human remains as a result of the No Project Alternative**

All areas of the Project Site, including the Upper Area, Road Site, Site 2, and Site D, are areas in which gravel was imported to accommodate heavy equipment access and stabilize sand near proposed drilling islands described in the 1982 Final EIR. As described in the 1982 Final EIR none of these areas were located within 100 feet of a known cultural resource, including known archeological sites. As mining would only be conducted at a depth sufficient enough to remove the imported gravel, exposure to new cultural resources or human remains as a result of the No Project Alternative is not likely due to the previously disturbed nature of the areas. Nonetheless, the Project Site contains several archaeological sites adjacent to the Project Site and was prehistorically and historically inhabited by indigenous Chumash groups. Thus, there remains a possibility of unexpectedly encountering undiscovered cultural resources and/or buried remains. In the event of such a discovery, the mitigation measure included in the 1982 Final EIR shall apply and serve to minimize impacts to cultural resources or human remains. This mitigation requires that in the event of an unexpected exposure of a buried cultural resource, work should be halted promptly, and a professional archaeologist consulted. Therefore, this impact is considered less than significant after mitigation (Class II).

### **3.4.4.4 Impacts of the Partial Gravel Removal Alternative**

This section discusses the impacts to cultural resources from the Partial Gravel Removal Alternative. Table 3.4-1 below provides a summary of the cultural resources impacts resulting from the Proposed Project and alternatives.

#### **Impact ALT2-CR-1. Potential disruption, alteration, destruction, or adverse impact on cultural resources and/or human remains as a result of the Partial Gravel Removal Alternative**

The potential impact to cultural resources or human remains is the same as for the No Project Alternative; however, the likelihood of encountering and damaging previously undiscovered cultural resources or human remains as a result of the Partial Gravel Removal is somewhat less due to the reduced scope of ground disturbance of this alternative. Further, as described in the 1982 Final EIR, none of the affected areas under this alternative were located within 100 feet of a known cultural resource, including known archeological sites. Nevertheless, mitigation included in the 1982 Final EIR would similarly apply to the Partial Gravel Removal Alternative, thus reducing the potential for impacts to cultural resources or human remains in the event of their accidental discovery. Therefore, this impact is considered less than significant after mitigation (Class II).

**Table 3.4-1. Summary of Cultural Resources Impacts**

<b>Cultural Resources Impacts</b>	<b>Mitigation Measure</b>	<b>Residual Significance</b>
<b>Proposed Project</b>		
No Impact	N/A	N/A
<b>No Project Alternative</b>		
Impact ALT1-CR-1. Potential disruption, alteration, destruction, or adverse impact on cultural resources and/or human remains as a result of the No Project Alternative	MM 1982-CR-1	Less than Significant after Mitigation (Class II)
<b>Partial Gravel Removal Alternative</b>		
Impact ALT2-CR-1. Potential disruption, alteration, destruction, or adverse impact on cultural resources and/or human remains as a result of the Partial Gravel Removal Alternative	MM 1982-CR-1	Less than Significant after Mitigation (Class II)