

4.4 CULTURAL RESOURCES

The following section is based on a cultural resources survey, Cultural Landscape Report (refer to Appendix E), and Native American consultation (refer to Appendix F) conducted by Applied Earthworks, Inc. (AE), and a Paleontology Study conducted by California State University, Fresno (CSUF) (refer to Appendix G).

Agricultural Residential Cluster Subdivision. **As defined in Appendix E (Cultural Landscape Report), the historic core of the ranch qualifies as a rural historic district.** The proposed Agricultural Residential Cluster Subdivision is located in one of the character-defining areas of ~~the ranch, which is a rural historic~~ **this** district. Development of the proposed residential cluster in this area would substantially diminish the integrity of the design, setting, materials, feeling, and association of this important character-defining area. In addition, implementation of the Agricultural Residential Cluster Subdivision would adversely impact traditional Native American values. Several prehistoric and historical archaeological sites have been identified within or immediately adjacent to the Agricultural Residential Cluster Subdivision site. All of these resources contribute to the significance of the Santa Margarita Ranch Rural Historic District and are eligible for the California Register of Historic Resources (CRHR) under multiple significance criteria. Although mitigation measures, including preservation of key cultural landscape elements, and resource data recovery, would lessen the impacts, impacts would remain Class I, significant and unavoidable. The proposed Agricultural Residential Cluster Subdivision would result in Class II, significant but mitigable, impacts related to disturbance of previously unidentified buried archeological deposits or previously unidentified human remains, and indirect impacts to identified or unidentified archaeological and historical resources. The Agricultural Residential Cluster Subdivision is anticipated to result in Class II, significant but mitigable, impacts to paleontological resources, since portions of the site lie on geological formations that may harbor significant vertebrate fossil remains.

Future Development Program. Because no active application currently exists for the Future Development Program subsequent to the Agricultural Residential Cluster Subdivision, the assessment of cultural resources impacts is based on a reasonable worst case scenario with regard to the location of future land uses. Buildout of the Future Development Program would result in impacts similar to those resulting from the Agricultural Residential Cluster Subdivision individually. The Future Development Program would also result in Class I, Significant and Unavoidable, impacts related to disturbance of the cultural landscape of the Santa Margarita Ranch Rural Historic District, Native American values, and individual prehistoric and historical archaeological sites identified on the property. Additional cultural resources surveys are required to assess the potential for additional resources on portions of the Future Development Program area. The Future Development Program would also result in Class II, significant but mitigable, impacts related to disturbance of previously unidentified buried archeological deposits or previously unidentified human remains, and indirect impacts to identified or unidentified archaeological and historical resources. In addition, the Future Development Program would result in Class II, significant but mitigable impacts, related to disturbance of historical buildings and structures on the ranch. The Future Development Program would result in Class II, significant but mitigable, impacts to paleontological resources, since portions of the land use areas lie on geological formations that may harbor significant vertebrate fossil remains.



4.4.1 Setting

a. Regional Prehistory. Archaeological evidence indicates that coastal San Luis Obispo County was occupied as early as 10,000 years ago (Greenwood 1972; Fitzgerald 2000). In the Santa Margarita area, Gibson (1995) collected an isolated fluted point fragment, an artifact type associated with the region's earliest occupation, from CA-SLO-1429. Most local archaeologists believe that the complex Chumash political, economic, and social organization present at the time of historic contact emerged during a relatively brief transitional period between A.D. 1000 and 1250 (Arnold 1992). The population continued to grow after A.D. 1250, and village size increased accordingly. By the time the first Europeans reached California, native people living along the Santa Barbara Channel resided in large villages housing as many as 1,000 residents at one time. Settlements in the San Luis Obispo region were never as populous as those along the channel, and as a result, lifestyles may have been more mobile with greater access to inland resources (Roper et al. 1997:2.12).

b. Regional Ethnography and Ethnohistory. The Santa Margarita Ranch lies in an area historically occupied by both Salinans and Obispeño Chumash. Generally, lands from Santa Margarita south and west have been ascribed to the Obispeño, while the Salinans utilized lands along the coast and in the rugged mountains of the interior, and may have occupied the area extending south from Soledad to a point near Atascadero. A recent study of Salinan and Northern Chumash linguistic and social geography (Milliken and Johnson 2003) concluded that villages around Santa Margarita were Northern Chumash during the Mission Period (and presumably before), but that Salinan speakers occupied the area during the middle and late nineteenth century. Both the Northern Chumash and Salinans lived in permanent villages along the coast and major inland drainages, but not in the rugged Coast Range. However, task-specific sites likely occurred in the mountains and along minor seasonal creeks and streams. Historically, there were at least two named native rancherías (villages) on or near the ranch. Following McLendon and Johnson (1999), Milliken and Johnson (2003) locate the rancherías *Chetpu* and *Chotnegle* at Santa Margarita. Additionally, they place *Tchena* and *Tipu* in the region (Milliken and Johnson 2003: 121). To date, these named settlements have not been clearly associated with any particular archaeological site or group of sites, though it is likely that at least one of these may have been located at the current ranch headquarters area.

The Spanish built a series of presidios, missions, and ancillary settlements (pueblos, ranchos, estancias, and asistencias) between San Diego and San Francisco; the first Spanish settlement in Salinan territory, Mission San Antonio de Padua, was established in 1771; Mission San Luis Obispo de Tolosa, the first Spanish establishment in Chumash territory, was founded 14 months later. The missions had "countless flocks and herds," orchards, and vineyards (Cooper 1875:24), and towns quickly grew up around the mission buildings. By the end of the Mission Period in 1834, the native population had been reduced to a small percentage of its former number by maltreatment, disease, and subsequent declining birthrates. Population loss as a result of disease and economic deprivation continued into the next century.

c. Regional History. During their initial explorations of Alta California, the Spanish traveled along the coast by land and sea and did not penetrate far inland. The Governor of Baja California, Gaspar de Portolá, captained a set of such expeditions in 1769 and 1770 that resulted in establishment of the first two California presidios and missions at San Diego and Monterey.



These two settlements were used as bases from which to colonize the rest of California (Bancroft 1886a:152, 168-170). While traveling south from the Presidio at Monterey, Father Junipero Serra later established the fifth California mission, San Luis Obispo de Tolosa, in the fall of 1772.

When Juan Bautista de Anza led a party of colonists from Tubac, Arizona, to San Francisco in 1775-1776, he followed a new route that took the Spanish further inland than previous passages. The Anza Trail traversed Cuesta Grade and the Santa Margarita Valley on its northward journey from San Luis Obispo. It became known as El Camino Real, the King's Highway, and became the primary route from San Diego to Monterey.

Within 10 years of establishment of the mission at San Luis Obispo, crops were being cultivated and livestock raised in the Santa Margarita Valley. By 1790, the lands in the valley had become a productive part of the mission economy. A Chumash village was located there, from which the mission drew converts, but it appears no mission buildings had been erected at that time.

In 1817 Father Martinez, head of the San Luis Obispo Mission, wrote that he was constructing an *asistencia* in stone (Geiger 1965). The 1822 *Informe* (Annual Report) stated that the Santa Margarita *asistencia* was established to raise wheat and livestock for the main mission community and as a *retirada* (refuge) in case of attacks on the mission (Webb 1952:93).

An *asistencia* was a "mission on a small scale with all the requisites for a mission, and with Divine Service held regularly on days of obligations, except that it lacked a resident priest" (Weber 2003:4). Although it is not clear precisely when construction of the Santa Margarita de Cortona *asistencia* actually began, a construction date of 1816-1817 is most likely.

The *asistencia* flourished for a time, ultimately passing into control of the mission at San Miguel as the San Luis Obispo population declined in the 1820s. As a result, Salinan Indians from the San Miguel area gradually replaced the Chumash as workers on the *asistencia*.

Following Mexican independence from Spain and secularization of the missions, the Santa Margarita lands were granted to Joaquin Estrada in 1841. His Santa Margarita Ranch encompassed 17,735 acres and became an economic, social, and political focal point of the region. The 1840s were halcyon days for the Mexican ranchos. For the most part the ranchers raised cattle on native grasses.

In 1861 Estrada sold the ranch to Martin Murphy, Jr. By that time, most of the mission-era structures at the ranch were in ruins. In 1889, Murphy granted the Southern Pacific Railroad a right-of-way through the ranch and donated 640 acres for the town site of Santa Margarita. The railroad established a stop at Santa Margarita with depot, roundhouse, warehouse, spur lines, and wells for water. The town boomed in its early years as a home for railroad construction workers. After the road was completed, Santa Margarita lost population, and has remained a small town ever since.

At the turn of the century, Murphy sold the ranch to the Reis family. The Reis family established the Santa Margarita Land and Cattle Company and continued the ranching tradition. In 1904, Reis converted the main *asistencia* building into a hay barn. At that time he removed the interior walls, lowered the floor, and poured a concrete floor. Reis erected a superstructure of corrugated metal around the stone walls of the *asistencia*. The roof was the



same material, giving the structure the appearance of a monitor barn. Besides the asistencia building, ranch house, and stage stop, there was a horse barn, blacksmith shop, implement shed, granary, and cow barn on the ranch. Another structure mentioned from that time was a small adobe, then used as a pump house, although the original use was not known at that time (Hoover et al. 1948:307).

In 1961, Reis sold 4,000 acres of the ranch, and by 1989 the ranch acreage was down to its current 13,800 acres (Caine, 1989). Reis died in 1969, willing the ranch to Stanford University. The Robertson family from Texas purchased the ranch from Stanford in 1979. The leasing of farmland continued, as did cattle ranching. The current owners purchased the ranch in 1999. Cattle ranching continues on the ranch, although no land is leased for farming. Three vineyards have been planted; these are the only current agricultural pursuits on the ranch **aside from cattle grazing operations**.

4.4.2 Existing Cultural Resources

a. Prior Research and Identification Efforts. The historical and archaeological values of the Santa Margarita Ranch were recognized even in the late 19th century. In 1872 Edward Vischer's drawings of mission buildings were published in *Missions of Upper California*, and from 1881-1882 Henry Chapman Ford painted all 21 missions and five asistencias, including Santa Margarita.

In 1941, the Santa Margarita Asistencia was designated California Historic Landmark #364, and in 1953, Arnold Pilling recorded two Mission Period archaeological sites in the headquarters area: CA-SLO-127 and -128. Avocationalists began examining the local archaeology in the 1960s, when members of the San Luis Obispo County Archaeological Society performed the first systematic archaeological survey of ranch lands (Hunter 1971). They identified 14 prehistoric sites and collected numerous surface artifacts.

The next important body of research from the Santa Margarita area can be attributed to several water and oil pipeline projects in the mid 1990s. The State of California Department of Water Resources (DWR) built a 102-mile underground water pipeline (the Coastal Branch Aqueduct) that crossed the ranch at Miller Flat, continued along the south side of Santa Margarita, and followed Highway 58 and El Camino Real north toward the Salinas River. As a result of various cultural resources studies required during the project (e.g., survey, excavation, monitoring), several archaeological sites were identified at the ranch within the right-of-way. Studies on some of these sites included extended survey excavations at CA-SLO-1763, test excavations at CA-SLO-586 (originally recorded by Hunter), and data recovery excavations at CA-SLO-1644 and CA-SLO-1756 (Fitzgerald 1997a, 1997b; Johnson 1998; Painted Cave Archaeological Associates 1989; Wickstrom et al. 1996). Diagnostic artifacts, dateable carbon samples, and other important materials recovered during these excavations have broadened the database on prehistoric occupation in the Santa Margarita Valley.

UNOCAL replaced an existing oil pipeline that extends southwest from the oil tank farm adjacent to El Camino Real across the ranch to Highway 101. Gibson (1992) identified several sites along the pipeline route. Two of these are within or adjacent to the current project area. CA-SLO-1430, a lithic scatter, is located at ranch headquarters, and CA-SLO-1429, also a lithic



scatter, is located along El Camino Real near the tank farm. A rare fluted point base recovered during construction monitoring at CA-SLO-1429 (Gibson 1995) provides invaluable evidence of the earliest human occupation of the area.

In 1999–2000, Applied EarthWorks, Inc. (Æ) surveyed approximately 4,000 discontinuous acres of the Santa Margarita Ranch for vineyards and possible residential use (Flint et al. 2000). Fifty-two previously unidentified sites and 67 isolated artifacts were encountered during the survey, which revealed a large and diverse array of prehistoric and historical sites including structures associated with Mission San Luis Obispo de Tolosa as well as sites associated with ranching, farming, and mining. Prehistoric sites ranged from small, isolated task-specific sites dating as far back as circa 6500–3500 B.C. (Milling Stone Period) to large villages, temporary camps, and special use areas that were occupied during the Late Period (circa A.D. 1250–1500) and possibly into the Mission Period (circa A.D. 1500–1834).

b. Investigations for the Current Proposal. To supplement these prior surveys of ranch lands, **in May and June 2006** Æ performed additional archaeological surveys of approximately 526 acres focused on **the portions of** the currently proposed Agricultural Residential Cluster area ~~in May and June 2006~~ **that had been surveyed previously** (Lloyd 2006). In addition to the field inventory, Æ conducted a literature review and records search at the Central Coastal Information Center of the California Historical Resources Information System, performed historical background research, and consulted with the Native American Heritage Commission (NAHC) and local Native American representatives from the Chumash and Salinan tribes. Æ recorded six previously unknown archaeological sites and two isolates during this investigation.

In addition to its archaeological study, Æ conducted a cultural landscape study that focused on the impacts of development on the historical integrity of the ranch. This analysis examined the existing ranch property within the context of the original land grant rancho and its historical development. The product of that study is a Cultural Landscape Report (CLR) that is appended to this EIR (Appendix E; Beedle and Price 2006). It describes the historical landscape of the Santa Margarita Ranch, identifies its important features and character-defining elements, and assesses the potential effects of the proposed development on the important qualities of the historical landscape. It provides a detailed historical context within which these evaluations are made, and offers recommendations to mitigate potentially significant impacts.

c. Native American Consultation. Æ contacted the Native American Heritage Commission (NAHC) in September 2005 to request a review of their Sacred Lands File and a current list of local Native American contacts. In a letter dated 20 October 2005, the NAHC responded that the Santa Margarita Ranch is listed in their Sacred Lands Inventory, and suggested contacting Chief Mark Vigil of the San Luis Obispo County Chumash Council for additional information and to determine potential impacts to the site. In addition, the NAHC supplied a list of 23 other local tribal contacts.

In January 2006, Æ submitted letters to each contact on the NAHC list, supplying details about the proposed project and soliciting information on Native American interests and concerns. Æ followed the letters with telephone calls to each of the contacts in March 2006. Follow-up contacts with the Northern Chumash Tribal Council have continued throughout the course of



the EIR preparation. The NAHC contact list, a complete listing of contacts with dates and comments, and all relevant correspondence is provided in Appendix F.

d. Inventory of Cultural Resources. The archaeological and historical surveys described above have covered approximately 60% of Tract 2586 and an equivalent amount of lands encompassed by the Future Development Program. All lands within or immediately adjacent to the proposed Agricultural Residential Cluster Subdivision have been inventoried. Archaeological survey coverage is shown on Figure 4.4-1. Within or immediately adjacent to the studied areas, 62 prehistoric and historic archaeological sites and 33 isolated artifacts have been identified. Complete descriptions of these sites can be found in the inventory reports (Flint et al. 2000; Gibson 1992; Hunter 1971; Lloyd 2006; Painted Cave Archaeological Associates 1989; Pilling 1953a, 1953b) and associated cultural resource records kept on file at the Central Coastal Information Center.

Cultural resources in the vicinity span all of local prehistory and history, and provide evidence for continuous occupation and use of the landscape over the past 10,000 years. Prehistoric archaeological sites range from large, dense midden deposits containing a broad range of artifact classes and types, dietary refuse, residential debris, structural remains, and human interments to small, diffuse scatters of stone tool manufacturing debris. Historic period sites include stone and adobe buildings associated with the asistencia of Santa Margarita de Cortona, other mission-era features, wood framed structures erected between the mid-nineteenth and mid-twentieth centuries, and the archaeological remains of homesteads, mines, trash dumps, and various agricultural and ranching activities. Historical sites reflect all of the major themes that have operated in the study area during mission times, the rancho period, and subsequent American era. **Human remains and prehistoric graves have not been regularly encountered on the Ranch.**

Currently available information indicates that two prehistoric sites within the study area have been formally evaluated for significance and found eligible for the National Register of Historic Places. During construction of Reach 4 of the Coastal Branch Aqueduct, test excavations were conducted along the pipeline right-of-way through CA-SLO-586. Wickstrom et al. (1996) concluded that the site was eligible under Criterion D for its potential to provide important information about local and regional prehistory [refer to “Regulatory Framework” Subsection 4.4.3(a), below, for a description of historic significance criteria]. For the same project, Fitzgerald (1997) performed data recovery excavations at CA-SLO-1644.

The archaeological sites, historical buildings, and other cultural remains on the ranch have combined with the unique natural environment of the Santa Margarita Valley to produce a distinctive cultural landscape shaped by American Indian, Spanish, Mexican, and Euro-American cultural traditions. As Beedle and Price (2006) describe in detail in their Cultural Landscape Report (refer to Appendix E), the Santa Margarita Ranch possesses a unique and unusual concentration of buildings, structures, and sites that have been connected through their shared history and by the continuation of historical traditions and patterns of land use into modern times. The landscape is considered sacred by local Native Americans, and qualifies as a historic district eligible for the California Register of Historic Resources.

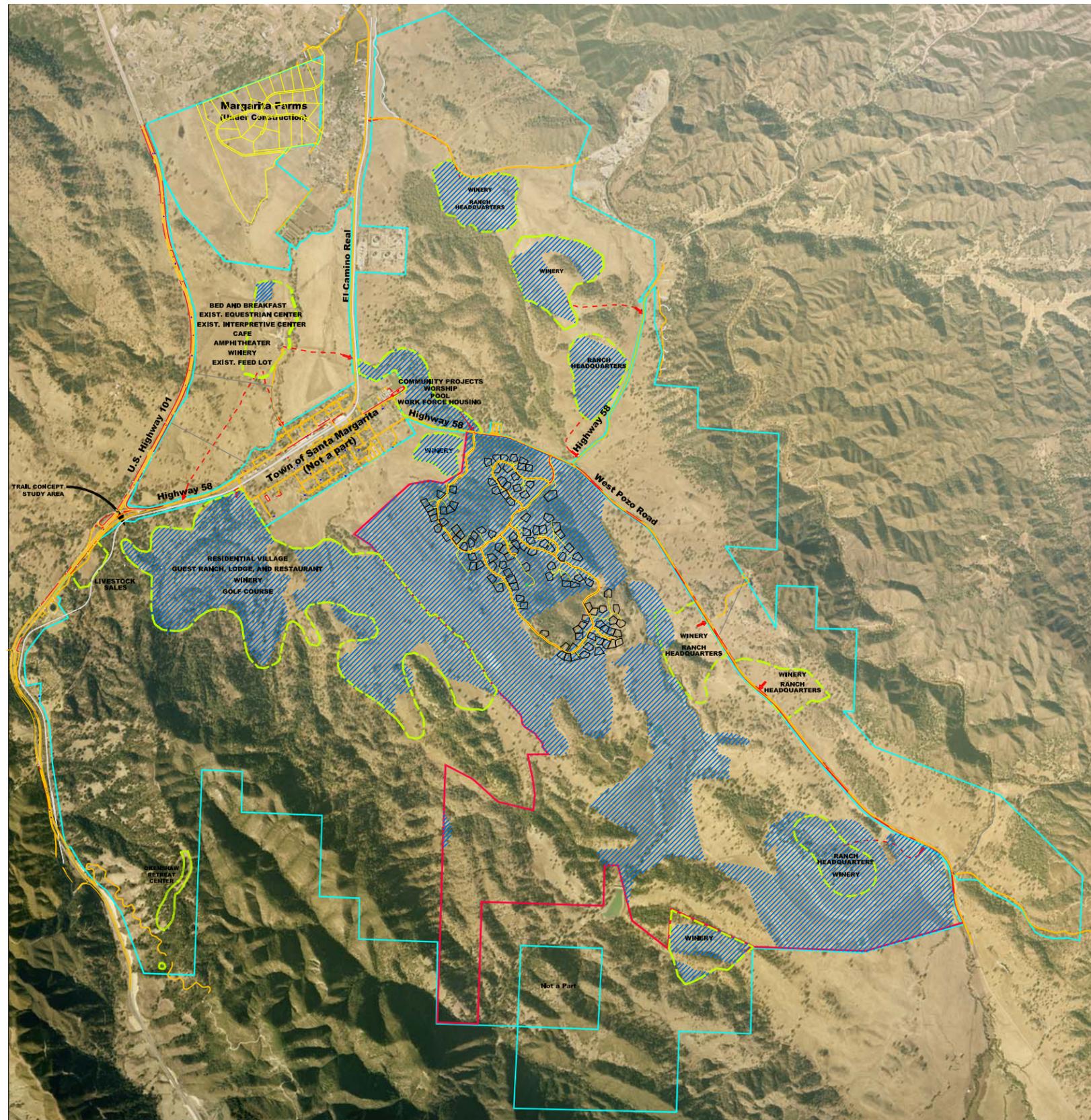


Sixty-two archaeological and historical sites are currently recorded within or adjacent to the study area. Thirty-two archaeological sites are within or adjacent to the boundaries of Tract 2586. Thirty archaeological sites are within or adjacent to Future Development Program areas proposed for residential development, guest ranches, golf courses, wineries, ranch headquarters, an interpretive center, and other uses. Of the 32 sites within Tract 2586, 22 are within or surrounding the Agricultural Residential Cluster Subdivision area.

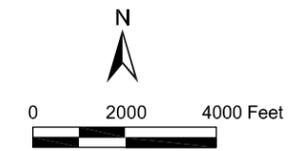


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- TENTATIVE TRACT 2586 BOUNDARY
- PROPOSED LOT LINES FOR TENTATIVE TRACT 2586 RESIDENTIAL CLUSTER SUBDIVISION
- RANCH PROPERTY BOUNDARY
- - - FUTURE DEVELOPMENT PROGRAM LAND USE LOCATIONS
- ROADWAYS
- ARCHAEOLOGICAL SURVEY AREA



Archaeological Survey Coverage Map

Figure 4.4-1



In addition to the archaeological sites, 33 isolated artifacts have been recorded within the areas surveyed for cultural resources. Six isolates are within or immediately adjacent to the Agricultural Residential Cluster area. These isolates may represent broadly dispersed artifacts unassociated with a particular site but evidence that people have lived in the area and intensively utilized the landscape over many thousands of years. However, such isolates might also be considered evidence of cultural deposits that have become buried over time, so that only the slightest indication is visible on the surface. Which scenario is accurate for any particular isolate can only be determined by subsurface examination of the area.

e. Existing Paleontological Resources. Paleontological resources are organic remains or their traces, usually older than 11,000 years, which are naturally preserved and imbedded in rocks or rock-like material such as amber. Organisms that possess hard parts (e.g., bone or shell) are most typically preserved, but fossils can represent soft parts, hard parts, tracks, trails, molds, casts, and trace indications such as burrows. Fossils occur primarily in sedimentary rocks, but some fossils have been excavated from other rock types, especially volcanic rocks.

There is a temporal threshold for an entity to become a fossil. If the organic material is 5,000 years old, it is not considered a fossil by most paleontologists. If it is 10,000 years old, it may be deemed a fossil. If it dates to 100,000 B.P., there is no question about its classification as a fossil if the organic material is found in situ in rocks preserved by natural processes.

The published record identifies numerous invertebrate fossil localities in the Santa Margarita region, especially in marine rocks. These fossils are usually well preserved in the rock, and are commonplace throughout the area, although some sites are more productive than others. Invertebrate fossils generally are regarded as less significant than other types of paleontological remains. Elevated areas within the Santa Margarita Valley have extensive exposures of the Late Cretaceous Atascadero and Late Miocene Santa Margarita and Monterey formations; these are marine deposits that may contain extensive invertebrate faunas. One such exposure of fossilized shell strata is found within the Agricultural Residential Cluster Subdivision site. Because of the richness of invertebrate fossils in marine rocks and their widespread distribution, they are not discussed individually in the summary of fossil resources below.

Neither the UCMP nor the LACM have recorded vertebrate fossil localities within the project area. However, both the LACM and UCMP identify vertebrate sites from elsewhere in the region in some of the same sedimentary rock units that are exposed in the study area.

f. Paleontological Potential of Rock Units in the Project Area. Although no specific vertebrate fossil sites have been identified within the Agricultural Residential Subdivision site, the project area contains several rock units that have produced fossils. The paleontological sensitivity of these rock units has been evaluated based on the density of recorded fossils and sites in exposures of the unit in or near the area under observation. Sedimentary rocks, especially detrital or nonmarine deposits, contain by far the most vertebrate fossil material. A rock unit is most likely to yield fossils in number and kind similar to those previously recorded from that unit in the same vicinity.

The paleontological sensitivity of the rock units in the study area is classified as high, low, unknown, or none. Each sensitivity class and its associated rock units are described below.



- **High Sensitivity:** High-sensitivity rock units include the older Quaternary Alluvium, Paso Robles Formation, Monterey Formation, Santa Margarita Formation, and Vaqueros Formation. These rock units have yielded important marine and nonmarine vertebrate fossils in the past, including marine mammals and fish, sharks, western horse, American mastodon, ground sloth, camel, and others.
- **Low Sensitivity:** The Simmler and Franciscan formations are classified as low sensitivity. The coarse clastic nature of the Simmler Formation, and the lack of fossils generated from the unit to date, suggest that it is unlikely to yield important fossil remains. While the Franciscan assemblage has produced vertebrate remains in the past, including plesiosaur and ichthyosaur, these fossils are rare and it is unlikely that significant fossils will be recovered from this assemblage in the project area.
- **Unknown Sensitivity:** It is undetermined whether the Atascadero Formation and Toro Formation will yield important vertebrate remains, although any vertebrate remains from these units would be significant.
- **No Sensitivity:** The Obispo Formation and Cretaceous granitic rocks are not sensitive because they contain little or no fossil material or contain fossils that are so common or widespread that a sensitivity designation is not warranted. Some rock units are of an igneous origin, and thus have no potential to contain fossils. Others are known to contain marine fossils, but better and more abundant localities are present in the region.

4.4.3 Regulatory Framework

a. California Register of Historical Resources (CRHR). “The California Register is an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (Public Resources Code Section 5024.1(a)). The CRHR is overseen and administered by the State Historical Resources Commission. The criteria for listing resources on the CRHR are based on those developed by the National Park Service for listing on the National Register of Historic Places with modifications in order to include a broader range of resources which better reflect the history of California. A resource is considered historically significant if it:

- A. Is associated with events or patterns of events that have made a significant contribution to the broad patterns of the history and cultural heritage of California and the United States.*
- B. Is associated with the lives of persons important to the nation or to California’s past.*
- C. It 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.*
- D. It has yielded, or may be likely to yield, information important to the prehistory or history of the State and the Nation.*

b. California Public Resources Code. Section 5097.9 of the California Public Resources Code stipulates that it is contrary to the free expression and exercise of Native American religion to interfere with or cause severe irreparable damage to any Native American cemetery, place of worship, religious or ceremonial site, or sacred shrine.



Section 5097.5 of the California Public Resources Code (PRC) prohibits excavation or removal of any “vertebrate paleontological site or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.” PRC 30244 requires reasonable mitigation of adverse impacts to paleontological resources from development on public land. Penal Code Section 623 spells out regulations for the protection of caves, including their natural, cultural, and paleontological contents. It specifies that no “material” (including all or any part of any paleontological item) will be removed from any natural geologically formed cavity or cave.

c. State Health and Safety Code. If human remains are discovered or exposed during construction, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendent of the deceased Native American, who will serve as a consultant on how to proceed with the remains (i.e., avoid, reburial).

d. San Luis Obispo County Standards. The County has a vital interest in preserving its many older buildings, and prehistoric and historic sites, which not only represent the heritage of San Luis Obispo County, but also help define the character of the region today.

In the event archaeological resources are unearthed or discovered during any construction activities, the following standards apply:

- Construction activities shall cease, and the County Environmental Coordinator shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and disposition of artifacts may be accomplished in accordance with state and federal law.
- In the event archaeological resources are found to include human remains, or in any other case when human remains are discovered during construction, the County Coroner is to be notified in addition to the Environmental Coordinator so proper disposition may be accomplished. If the remains are determined to be Native American, then the County Coroner must notify the Native American Heritage Commission within 24 hours.

4.4.4 Thresholds of Significance

Appendix G of the State CEQA Guidelines states that a project would result in a potentially significant impact if it would:

- *Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5;*
- *Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;*
- *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;*
or



- *Disturb any human remains, including those interred outside of formal cemeteries.*

a. Historical and Archaeological Resources. According to the State CEQA Guidelines, a resource shall generally be considered “historically significant” if the resource meets the criteria for listing on the California Register of Historic Resources (*supra*). The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historic Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in a 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 a historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

Under CEQA, an impact on a historical resource is considered significant if the impact lessens the integrity of the qualities of the property that qualify it for the California Register. If the proposed project may cause damage to a significant historical resource, the project may have a significant effect on the environment. Section 15064.5 of the *CEQA Guidelines* pertains to the determination of the significance of impacts to archaeological and historic resources. Direct impacts may occur by:

- (1) *Physically damaging, destroying, or altering all or part of the resource;*
- (2) *Altering characteristics of the surrounding environment that contribute to the resource’s significance;*
- (3) *Neglecting the resource to the extent that it deteriorates or is destroyed. Indirect impacts primarily result from the effects of project-induced population growth. Such growth can result in increased construction as well as increased recreational activities that can disturb or destroy cultural resources; or*
- (4) *The incidental discovery of cultural resources without proper notification.*

Indirect impacts result primarily from the effects of project-induced population growth. Such growth can result in increased construction as well as increased recreational activities that can disturb or destroy cultural resources.

CEQA provides guidelines for mitigating impacts to historical or archaeological resources in Section 15126.4. Preservation in place is the preferred manner of mitigating impacts (14 CCR 15126.4(b)(3)). Preservation in place may be accomplished by planning construction to avoid the resource, incorporating sites within parks or open space, covering sites with chemically stable and culturally sterile fill, or deeding the site into a permanent conservation easement. For buildings and structures, maintenance, repair, restoration, preservation, conservation, or reconstruction consistent with the *Secretary of Interior’s Standards and Guidelines for the Treatment of Historic Properties* is considered mitigation of impacts to a less than significant level (14 CCR 15126.4(b)(1)). Documentation of an historical resource, however, will not mitigate the effects of demolition to a less than significant level (14 CCR 15126.4(b)(2)). When data recovery excavation of an archaeological site is the only feasible mitigation, a detailed data recovery plan must be prepared and adopted prior to any excavation.

b. Paleontological Resources. Significant paleontological resources are fossils or assemblages of fossils that are unique, unusual, rare, uncommon, diagnostically or stratigraphically important, and/or add to an existing body of knowledge in specific areas



stratigraphically, taxonomically, or regionally. Significant resources include fossil remains of large to very small aquatic and terrestrial vertebrates, remains of plants and animals not previously represented in certain portions of the stratigraphic sequence, and assemblages of fossils that might aid stratigraphic correlations, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, paleoclimatology, and the relationships of aquatic and terrestrial species. Vertebrate fossils, some invertebrate fossils, and some suites of plant fossils may be classified as significant paleontological resources.

The discovery of a vertebrate fossil locality is of greater significance than that of an invertebrate fossil locality, especially if it contains a microvertebrate assemblage. The recognition of new vertebrate fossil locations could provide important information on the geographical range of the vertebrates, their age, evolutionary characteristics, the type of environment, and other important scientific research questions. Vertebrate fossils are almost always significant because they occur so rarely. Each additional vertebrate fossil provides considerable scientific information. Invertebrate fossils and plant fossils tend to be more abundant than vertebrate fossils. These fossils generally are ranked lower in significance than vertebrates unless they are in short supply, are age-diagnostic, or their paleoenvironmental framework is unique. Thus, geological rock units having the potential to contain vertebrate fossils are considered the most sensitive.

4.4.5 Site Significance and Impact Analysis

a. Agricultural Residential Cluster Subdivision Impacts and Mitigation Measures.

Agricultural Residential Cluster Subdivision Impact CR-1 As defined in Appendix E (Cultural Landscape Report), the historic core of the Santa Margarita Ranch is a rural historic district eligible for the CRHR. The proposed Agricultural Residential Cluster Subdivision is located in one of the character-defining areas of the ranch district. Development of the proposed residential cluster in this area would substantially diminish the integrity of the design, setting, materials, feeling, and association of this important character-defining area. In addition, implementation of the Agricultural Residential Cluster Subdivision would adversely impact traditional Native American values. This is considered a Class I, significant and unavoidable, impact.

Cultural forces have shaped the natural landscape of the Santa Margarita Ranch for many centuries. The resulting cultural landscape reflects Native American land use, ranching and agriculture under the mission system, and continued ranching, agricultural, mining, and other uses under private ownership until the present day. Local folklore – stories of events and human experience – add richness to this rural historic landscape. The ranch possesses a concentration, linkage, and continuity of sites, buildings, structures, and objects united aesthetically; by shared history; by both plan and physical development; and by the continuation of historical traditions into modern times. The ranch therefore qualifies as a Rural Historic District under the California Register criteria (see California Public Resources Code 5020.1[h]; National Park Service 1997:5). Because many ranching traditions, lifeways, crafts, and social institutions have been carried out continuously on the ranch for well more than a century,



the district may also qualify as a Traditional Cultural Property as defined in National Register Bulletin 38 (Parker and King 1998).

The boundary of a historic district is meant to “encompass but not exceed the extent of the significant resources and land areas comprising the property” (Seifert 1997:2). From the nebulous boundaries of the mission era and the Estrada diseño, the Santa Margarita Ranch has encompassed approximately 17,000 acres. In the late 1800s, Patrick Murphy sold the northern and southern portions of the ranch, leaving an area of about 9,600 acres. Although the Reis family expanded the ranch to 22,000 acres, this was new land not associated with the original rancho. The significant qualities of the district are found within the original boundaries of the ranch as depicted on the 1858 and 1880 survey maps of the ranch (Appendix E, Figures 3-3 and 3-4). Areas of the ranch that were sold are not included within the historic district, nor are any current ranch parcels that lie outside of the historic boundaries. Therefore, the historic district encompasses the 9,600-acre historic ranch core, which has remained essentially intact for more than 200 years (Appendix E, Figure 5-1).

The Santa Margarita Ranch Rural Historic District has local, regional, and statewide importance. It is eligible for the California Register under Criterion A [refer to “Regulatory Framework” Subsection 4.4.3(a), ~~below~~ **above**, for a description of historic significance criteria] because of its important association with broad patterns of California history, such as the establishment of missions as a means of colonizing California and the subsequent development of secular ranchos. Under Criterion A its period of significance begins with the Anza expedition’s entry into the valley in 1775 and continues to the present day. It is eligible under Criterion B because it is associated with persons important to our past, in this case General Patrick W. Murphy, rancher, businessman, and state senator, whose family owned the ranch between 1860 and 1900. Under Criterion B its period of significance begins in 1860 and continues to 1900. The district is eligible under Criterion C because of the distinctive local methods and techniques of construction used in the stone and adobe buildings erected at the asistencia during the Mission and Rancho periods; for the unique melding of Hispanic and American construction methods during the American Period; and for the distinctive characteristics and physical qualities of its spatial organization and land-use patterns, which illustrate traditional practices associated with self-contained rural ranch life. Under Criterion C the period of significance begins circa 1780 and continues to ~~1900~~ **1950**. The district is eligible under Criterion D for its potential to yield important information in history and prehistory unavailable from the documentary record, notably about mission and ranch construction methods; about land use related to agriculture, ranching, mining, and other practices; and about the lives of Native Americans who lived on the land before and after the arrival of the Spanish.

To be eligible for the CRHR, a property must be significant and it must retain integrity. Integrity is the ability of a property to convey its important historical associations and significant cultural values. The ranch retains integrity of location, design, setting, materials, workmanship, feeling, and association. Intrusions on the integrity of the landscape have been minimal, and limited principally to the selling off of some ranch lands, development of vineyards on some agricultural and grazing lands, a new road system around the vineyards, and small-scale residential development. However, more than half of the original ranch acreage is still intact, and the current placement of buildings, agricultural fields, pastures, roadways, and other cultural elements in relationship to each other and to the natural environment still reflects historical decisions about spatial organization and land use. Moreover, the ranch’s natural



material elements – soils, rock outcroppings, water courses, and vegetation – are largely unchanged from historic, and even prehistoric, times. Although vegetation is less static, with some species dying out or being replaced and their distributions changing with time, the current vegetation regime largely reflects historical conditions in scale, type, and visual effect.

Similarly, much of the original Spanish and Rancho construction at the ranch headquarters is preserved within more recent building additions, and the changes themselves are historically significant, reflecting an important stylistic tradition melding Spanish and American architectural elements. The coursed stone walls and tiled arched doors and windows of the main asistencia building illustrate a high degree of workmanship and are excellent representations of local mission architecture, even though the building has been partially demolished over the years. Similarly, adobe structures have deteriorated over the years, and extant adobe buildings have been incorporated into subsequent structures. Much adobe work is nonetheless preserved within the wooden siding and interior lath and plaster of the ranch headquarters buildings, and the overprinted construction displays excellent Queen Anne and vernacular workmanship. Finally, the agricultural and ranching workmanship, although seasonal and impermanent in nature, reflects traditional historic practices and contributes to the integrity of the district.

Through uninterrupted use and occupation, continuation and revival of historic cultural traditions and ranching practices, and the cumulative effect of setting, design, materials, workmanship, and feeling, the Santa Margarita Ranch retains a strong sense of association with the historic personages and events of its past.

Cultural landscapes have distinguishing character areas and contributing elements that define the significance of the landscape and are the starting point from which impacts of the proposed project can be assessed. These elements include individual cultural properties as well as other physical features and visual aspects that combine to create the historic landscape (National Park Service 2006:91).

One of the most distinctive character areas within the Santa Margarita Ranch cultural landscape is the ranch headquarters area. Encompassing the bottomlands along Santa Margarita and Yerba Buena creeks and generally delimited by the townsite to the south, Garden Farms to the north, Highway 101 on the west, and the Southern Pacific Railroad (now Union Pacific Railroad) on the east, this area was the focus of land use during the mission era and became the center of ranch operations during the Estrada and Murphy tenures. It is also the location of the principal historical structures on the ranch.

A second important cultural landscape character area encompasses all the historical water sources on the ranch. The creeks, springs, marshes, and pools sustained prehistoric and historic cultures, are viewed as sacred by modern Native American descendants, and gave life to the important cultural tradition that the ranch has never lacked for water. The stream courses, wetlands, other water sources, and their associated vegetation, play a key role in defining the setting, feeling, and historical associations of the ranch.

The views and vistas of the ranch help define the cultural landscape because they provide the backdrop for all of the cultural activities that have occurred in the valley. Views of mountains



and hill slopes, fields and pastureland, rock outcroppings, oak woodlands and pine forests, crops and pasturelands, and similar visual elements have remained essentially the same as when described by the first travelers through the area, and have a very strong impact on the integrity of setting at the ranch. Photographs and paintings from the late nineteenth and early twentieth century confirm that the integrity of the setting is only minimally impaired.

Archaeological sites, historical structures, and small-scale landscape elements, both prehistoric and historic, reflect the utilization of the landscape over time and are another key contributing element to the significance of the district. Bedrock mortar outcrops, the petrified oyster shell deposits and related mines, charcoal ovens, historic fences and roads, and areas used for cultivation are the most obvious and visible of these elements; however, midden deposits as well as smaller and less visible sites and features within this category also contribute to the significance of the district.

The associated place names and folklore are an important part of the cultural landscape and constitute a significant, though less tangible, character-defining element. These reflect the traditional cultural values that have sustained the community through the centuries and are strongly linked to the integrity of design, setting, feeling, and association within the district.

In addition, the Santa Margarita Ranch lands hold substantial importance for modern Native American communities (refer to Appendix F). Many native people view the landscape and its component elements, both cultural and natural, as sacred elements of their cultural patrimony. Extensive consultation with Chumash and Salinan people revealed many historical and cultural connections between modern native communities and the Santa Margarita Ranch lands. Most native people who responded to inquiries remarked on the importance of the cultural sites; many view the landscape and its component elements, both cultural and natural, as sacred elements of their cultural patrimony. As described in the 16 October 2006 letter from the Northern Chumash Tribal Council (Appendix F), the project site has been used for ceremonial and religious expression for thousands of years, and is known to the native people as a place where there are many villages and cemeteries. Given the sensitivity of the property, any substantial development of undisturbed sites is considered a significant impact.

The proposed Agricultural Residential Cluster Subdivision is located in one of the character-defining areas of the ~~ranch~~ **district** – the ridge of petrified oyster shells that were used to temper the mortar for the asistencia (and perhaps mission) construction; as paving for El Camino Real; and possibly by local Native Americans for utilitarian tools, ornaments, and ritual objects. In addition, the ridge and its petrified shell deposits were a natural wonder for nineteenth- and twentieth-century travelers, many of whom remarked upon it in their journals and other writings. During the 1920s, a small oyster-shell mining industry was developed in the area; its remnants also have become part of the historic landscape. The undisturbed vistas and views from these hills, the watercourses traversing the proposed site, the vegetation, and the prehistoric and historical archaeological remains all contribute to the significance of this character-defining area. Development of the proposed Agricultural Residential Cluster Subdivision in this area would substantially diminish the integrity of the design, setting, materials, feeling, and association of this important character-defining area of the historical landscape by damaging or destroying the shell deposits themselves, damaging or destroying

archaeological remains, introducing uncharacteristic visual design elements into the historic setting, and disrupting the feeling and associations of the historical landscape.

In summary, development of the proposed Agricultural Residential Cluster Subdivision in this area would substantially diminish the integrity of the design, setting, materials, feeling, and association of this important character-defining area. In addition, implementation of the Agricultural Residential Cluster Subdivision would adversely impact traditional Native American values. This is considered a Class I, *significant and unavoidable*, impact.

Mitigation Measures. The following mitigation measures would reduce impacts on the historic landscape to the extent feasible:

**Agricultural
Residential Cluster
Subdivision
CR-1(a)**

Avoidance. The preferred mitigation measure is avoidance of the impacts described above. If avoidance cannot be achieved, other forms of mitigation, such as graphic documentation (photographs, drawings, etc.) and archaeological data recovery, will lessen the impacts but will not mitigate the loss of integrity to a less than significant level.

Plan Requirements and Timing. The location of all development shall be reviewed and approved by Planning and Building prior to issuance of grading permits. **Monitoring:** Planning and Building shall check plans prior to prior to issuance of grading permits and shall spot check in the field.

**Agricultural
Residential Cluster
Subdivision
CR-1(b)**

Cultural Design Guidelines. The Architecture and Landscape Guidelines (refer to Agricultural Residential Cluster Subdivision measure AES-1(b) in Section 4.13, *Visual Resources*) shall incorporate the design principles, plans, and massing of historic ranch structures, such as sandstone or adobe construction, one-story height, gable roofs, shiplap siding, and natural landscaping. The County will have final approval over the project design elements, based in part on consultation with a qualified historian.

Plan Requirements and Timing. Design specifications shall be reviewed and approved by Planning and Building, in consultation with a qualified historian, prior to issuance of grading permits. **Monitoring:** Planning and Building shall check plans prior to issuance of grading permits and shall spot check in the field.

**Agricultural
Residential Cluster
Subdivision
CR-1(c)**

Viewshed Preservation. Because the native flora of the ranch is a key character defining feature of the historic landscape and a critical element of the historic viewshed, non-agricultural open space should be left in natural grasses, with native trees and other flora.

Plan Requirements and Timing. Building locations shall be



reviewed and approved by Planning and Building prior to issuance of grading permits. **Monitoring:** Planning and Building shall check plans prior to issuance of grading permits and shall spot check in the field.

It should be noted that Agricultural Residential Cluster Subdivision measure AES-1(a) in Section 4.13, *Visual Resources*, which prohibits structural silhouetting on ridgelines, would also reduce this impact.

**Agricultural
Residential Cluster
Subdivision
CR-1(d)**

Preservation of Key Landscape Elements. New roads on the ranch shall follow the natural topography to the extent possible, without substantial cuts or fills; the roads shall be as narrow as allowed by County requirements, with no verges. Signage must be subdued, and not mar or interfere with the views. Historic types of fencing shall be used.

To facilitate preservation of these landscape elements, historic roads and other landscape remnants shall be recorded and mapped in greater detail. In particular, a survey of El Camino Real shall be carried out by a qualified professional using the location on the 1858 and 1889 maps as a guide. Any remnants or other physical evidence of these roads shall be thoroughly documented, and no development of any kind shall be located in the path of El Camino Real or other historical transportation elements.

The current local historic place names indicate the history of the ranch and the people who impacted the landscape. These names shall be retained and incorporated into any development. New place names shall reflect the historical usage.

Plan Requirements and Timing. Transportation plans, design specifications, naming conventions, and signage shall be reviewed and approved by Planning and Building prior to issuance of grading permits. This condition shall be in effect throughout Agricultural Residential Cluster Subdivision construction. **Monitoring:** Planning and Building shall check plans prior to issuance of grading permits and shall spot check in the field.

**Agricultural
Residential Cluster
Subdivision
CR-1(e)**

Nomination to the National Register of Historic Places. The Santa Margarita Ranch **Rural Historic District** shall be nominated to the National Register of Historic Places as a ~~Rural Historic District~~ **Rural Historic District**. At a minimum, the NRHP nomination shall include the following elements:

- documentation of all extant historical buildings and



structures in the ranch headquarters area to the level of the Historic American Building Survey (HABS), particularly including measured drawings and large format photographs of the interior and exterior of the main asistencia building, ranch house, Wells Fargo building, and associated structures and features;

- reconstruction of the asistencia layout and the placement of buildings, structures, walls, and other features utilizing historical photographs, artwork, and other documentary evidence; and
- preparation of an ethnographic history of the ranch.

Plan Requirements and Timing. The National Register nomination shall be prepared and submitted to the California Office of Historic Preservation prior to issuance of grading permits. **Monitoring:** Planning and Building shall ensure that the applicant retains a qualified professional to prepare a thorough and National Register nomination prior to issuance of grading permits.

Residual Impacts. Although impacts would be reduced through the above mitigation measures, no mitigation is available to avoid significantly impacting the integrity of the design, setting, materials, feeling, and association of this important character-defining area, or its Native American values. Impacts would remain *significant and unavoidable*.

Agricultural Residential Cluster Subdivision Impact CR-2

Thirty-two prehistoric and historical archaeological sites and six isolates are located within or immediately adjacent to the Agricultural Residential Cluster Subdivision site. All of these resources contribute to the significance of the Santa Margarita Ranch Rural Historic District and are eligible for the California Register of Historic Resources (CRHR) under multiple significance criteria. Recovery of the important information in these sites through excavation would lessen the impacts. However, damage to or destruction of the important associations of these sites, and disruption of their setting and feeling, is a Class I, *significant and unavoidable* impact.

Based on the available mapping, 12 archaeological sites would be directly impacted by proposed home sites or access roads in the Agricultural Residential Cluster Subdivision: CA-SLO-1948H, -1949, 1973, -2060, -2061, -2062, -2505, -2506, -2507, -2508, -2509, and -2510H. The remaining sites are within or adjacent to the disturbance area, and may be indirectly impacted. It must be noted, however, that the boundaries of most sites are not well defined because much of the ground surface is obscured by vegetation and the surface distribution of artifacts at a site does not always match the subsurface distribution (Lloyd 2006). Additional site boundary definition would be needed to define the relationship of archaeological resources to direct impact areas. Impacts would be significant and unavoidable (Class I).



Mitigation Measures. The following mitigation measures would reduce impacts on the scientific values of archaeological resources:

**Agricultural Residential
Cluster Subdivision
CR-2(a)**

Avoidance. As feasible, all cultural sites within Tract 2586 shall be avoided during development. To ensure avoidance, the boundaries of all sites within or adjacent to the housing cluster shall be defined through a program of systematic subsurface boundary testing using shovel probes, surface test units, and other appropriate sampling units. The type and distribution of sampling units shall be determined by a qualified professional archaeologist, who will carry out the boundary testing in the presence of a Native American monitor. After site boundaries are defined, an exclusion zone shall be placed around each site. An exclusion zone is a fenced area where construction equipment and personnel are not permitted. The exclusion zone fencing shall be installed (and later removed) under the direction of a qualified archaeologist and shall be placed five meters beyond the defined site boundary to avoid inadvertent damage to sites during installation. If multiple pieces of heavy equipment are in use simultaneously at diverse locations during construction, each location may be monitored individually. If avoidance cannot be achieved, other forms of mitigation, such as data recovery, will lessen the impacts but will not mitigate the loss of integrity to a less than significant level.

Plan Requirements and Timing. Site boundaries, and exclusion zones shall be included on plans for all buildings, structures, utilities, roads and other elements of the development. Planning and Building shall review these plans prior to issuance of grading permits. **Monitoring.** Planning and Building shall be responsible for ensuring that all structures and utilities avoid cultural resources. Planning and Building staff shall inspect the project site during construction to ensure exclusion zones remain in place. If avoidance is not possible, Planning and Building shall ensure that Agricultural Residential Cluster Subdivision measure CR-2(b) (mitigative data recovery excavation) is applied.

**Agricultural Residential
Cluster Subdivision
CR-2(b)**

Mitigative Data Recovery Excavation. If avoidance of an archaeological site(s) is not possible, data recovery excavation shall be completed prior to issuance of grading permits. A data recovery plan shall be submitted by a qualified archaeologist for review by the County Environmental Coordinator. Data recovery shall be funded by the applicant, shall be performed by a County-qualified archaeologist, and shall be carried out in accordance with a research design consistent with the requirements of the California Office of Historic Preservation



Planning Bulletin 5, *Guidelines for Archaeological Research Design*.
At a minimum, data recovery shall include:

- Mapping of site boundaries and the distribution of surface remains;
- Surface collection of artifacts;
- Excavation of a sample of the cultural deposit to characterize the nature of the site and retrieve a representative sample of artifacts and other remains within the proposed impact area;
- Monitoring of excavations at Native American sites by a tribal representative;
- Technical studies and analysis of the recovered sample, including radiocarbon dating, typological and technical analysis of tools and debris, identification and analysis of preserved faunal and floral remains, and other studies appropriate to the research questions outlined in the research design;
- Cataloguing and curation of all artifacts and records detailing the results of the investigations at a county approved curation facility;
- submission of a final technical report detailing the results of the investigations;
- preparation of an interpretive report suitable for distribution to the general public.

Plan Requirements and Timing: As applicable, the data recovery program shall be completed and the final reports shall be submitted to Planning and Building prior to issuance of a grading permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.

Monitoring: Planning and Building shall review and approve the required report prior to issuance of a grading permit. Building inspectors shall make site inspections to assure implementation of approved plans.

Residual Impacts. Although impacts would be reduced through the above mitigation measures, no mitigation is available to avoid significantly impacting identified cultural resources. Impacts would remain *significant and unavoidable*.

Agricultural Residential Cluster Subdivision Impact CR-3 **Construction of the Agricultural Residential Cluster Subdivision could disturb previously unidentified buried archeological deposits. This is considered a Class II, significant but mitigable impact.**

Given the presence of recorded archaeological sites, isolated artifacts, and the long record of prehistoric and historic settlement and use of the land, there is potential for buried



archaeological deposits to occur within the Agricultural Residential Cluster Subdivision site. Isolated artifacts may represent substantial buried deposits with little surface expression, and construction in areas not known to contain archaeological resources may nevertheless affect previously unidentified resources, given the cultural sensitivity of portions of the Agricultural Residential Cluster Subdivision site. This is a potentially significant but mitigable impact.

Mitigation Measures. The following mitigation measures would reduce impacts on the potentially significant buried archaeological remains to less than significant levels:

**Agricultural Residential
Cluster Subdivision
CR-3(a)**

Buried Site Testing at Isolate Locations. Isolated artifacts shall be tested by a qualified archaeologist to determine whether or not isolated artifacts within or adjacent to the Agricultural Residential Cluster Subdivision represent more substantial buried components. Such testing shall involve hand excavation of shovel probes and/or other sampling units. The type and distribution of sampling units shall be determined by a qualified professional archaeologist, who will carry out the isolate testing in the presence of a Native American monitor. If isolate testing reveals the presence of a buried site, then site boundary definition and avoidance, or mitigative data recovery, shall be carried out in accordance with Agricultural Residential Cluster Subdivision measures CR-2(a) or CR-2(b) above.

Plan Requirements and Timing: As applicable, isolate testing shall be completed and the final report shall be submitted to Planning and Building prior to issuance of a grading permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities. **Monitoring:** Planning and Building shall review and approve the required report prior to issuance of a grading permit. Building inspectors shall make site inspections to assure implementation of approved plans.

**Agricultural Residential
Cluster Subdivision
CR-3(b)**

Archaeological Resource Construction Monitoring. An archaeological resource monitoring plan prepared by a qualified archaeologist shall be submitted for review by the County Environmental Coordinator. The plan shall include a list of personnel involved in monitoring activities, and descriptions of monitoring methods, resources expected to be encountered, circumstances that would result in halting work, procedures for halting work, and procedures for monitoring reporting.

At the commencement of Agricultural Residential Cluster Subdivision construction, an archaeologist and a Native American representative shall conduct an orientation for

construction workers to describe site avoidance requirements, the possibility of exposing unexpected archaeological resources, and the steps to be taken if such a find is encountered.

A qualified archaeologist and Native American representative shall monitor all earth moving activities within native soil. If multiple pieces of heavy equipment are in use simultaneously at diverse locations during construction, each location may be monitored individually. In the event that archaeological remains are encountered during construction, all work in the vicinity of the find will be halted until such time as the find is evaluated by a qualified archaeologist and appropriate mitigation, if necessary, is implemented.

Plan Requirements and Timing. This condition shall be in effect throughout Agricultural Residential Cluster Subdivision construction. **Monitoring:** Planning and Building shall check plans prior to approval of grading permits and shall spot check in the field.

Residual Impacts. With implementation of the above mitigation measures, impacts would be reduced to a less than significant level.

Agricultural Residential Cluster Subdivision Impact CR-4 **There is the potential that Agricultural Residential Cluster Subdivision construction will disturb previously unidentified human remains. This is considered a Class II, significant but mitigable impact.**

Given the presence of recorded historical cemeteries and human remains at prehistoric archaeological sites, the potential to encounter human remains during construction of the Agricultural Residential Cluster Subdivision is high. This would be considered a significant impact unless mitigation is incorporated.

Mitigation Measures. The following mitigation measures would reduce impacts on human remains to less than significant levels:

Agricultural Residential Cluster Subdivision CR-4(a) **Treatment of Human Remains.** In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps will be taken:

- I. State Health and Safety Code Section 7050.5 requires that there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
 - A. The County Coroner is contacted to determine that



- no investigation of the cause of death is required, and
- B. If the coroner determines the remains to be Native American, the coroner has 24 hours to notify the Native American Heritage Commission. The Native American Heritage Commission shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may then make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public resources Code Section 5097.98.
- II. If the Native American Heritage Commission is unable to identify a most likely descendent; or if the most likely descendent fails to make a recommendation within 24 hours after being notified by the commission; or if the landowner or his authorized representative rejects the recommendation of the descendent, and mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner, then the landowner or his authorized representatives shall reinter the Native American human remains and associated grave items with appropriate dignity on the property in a location not subject to further subsurface disturbance. However, any such activity shall be supervised by a Chumash representative if a most likely descendent is either not identified or fails to respond to notification.

Plan Requirements and Timing. This condition shall be in effect throughout Agricultural Residential Cluster Subdivision construction. **Monitoring:** Planning and Building shall check plans prior to approval of grading permits and shall spot check in the field.

Residual Impacts. With implementation of the above mitigation measure, impacts would be reduced to a less than significant level.

Agricultural Residential Cluster Subdivision Impact CR-5

Implementation of the Agricultural Residential Cluster Subdivision could result in indirect impacts to identified or unidentified archaeological and historical resources. This is considered a Class II, *significant but mitigable impact.*

Increased population in the area could result in an increase of relic collecting and/or vandalism that could potentially impact archaeological and historical sites. The establishment of horse



trails, foot and bike paths, parks, picnic areas, or other amenities on or through archaeological sites may result in their physical destruction, relocation of significant features, removal of artifacts, and loss of data classes that yield information important to prehistory. This would constitute a significant but mitigable impact.

Even if trails and other amenities are designed to avoid the sites directly, they are vulnerable indirectly as a result of their proximity to the developed areas and increased public access to and use of the sites. Examples of activities that could substantially alter the integrity and significant qualities of the resources due to such proximity and increased use include, but are not limited to: collection of artifacts from the archaeological sites; unauthorized excavation or looting of sites; erosion and other damage resulting from unmotorized or motorized vehicle use (horses, bicycles, dirt bikes, etc.); illicit trash dumping; and vandalism to cultural features. Such effects are considered significant but mitigable environmental impacts.

Mitigation Measures. The following mitigation measures would reduce potential indirect impacts related to identified and unidentified archaeological and historical resources to a less than significant level:

**Agricultural Residential
Cluster Subdivision
CR-5(a)**

Prohibition of Archaeological Site Tampering. Off-road vehicle use, unauthorized collecting of artifacts, and other activities that could destroy or damage archaeological or historical sites shall be prohibited and shall be punishable by fine. The applicant shall prepare a brochure for all homebuyers and other occupants describing the cultural sensitivity of the area and explaining the prohibitions. Informational material shall be general in content and shall not include any information that could lead to the identification or location of sensitive cultural resources. Homebuyers and other occupants shall acknowledge receipt and understanding of such prohibitions in writing.

Plan Requirements and Timing. The required brochure shall be prepared and distributed prior to occupancy clearance.

Monitoring: Planning and Building shall ensure that homebuyers and occupants acknowledge receipt of information on such prohibitions, and shall periodically check to ensure their effectiveness.

**Agricultural Residential
Cluster Subdivision
CR-5(b)**

Periodic Monitoring of Archaeological Site Condition. To ensure that prohibitions on site tampering and vandalism are effective, the applicant shall fund an annual inspection of cultural resources within or adjacent to the Agricultural Residential Cluster Subdivision, during which the condition of the sites shall be assessed and any degradation of integrity from vandalism, erosion, or other factors shall be identified. A qualified professional archaeologist and/or a Native American representative trained in site assessment shall carry out the annual site inspections and prepare a brief report for the County,



with recommendations for addressing any apparent site degradation. The applicant shall also develop a list of threatened and sensitive cultural resources sites on other lands within the Agricultural Residential Cluster Subdivision area, and shall retain a qualified archaeologist to inspect and report to the County Environmental Coordinator on the condition of those sites annually.

Plan Requirements and Timing. Condition assessments shall occur annually, preferably in the fall before the first rains, when surface visibility is at its best. A report shall be filed with Building and Planning within one month following completion of the field assessments. **Monitoring:** Planning and Building shall review condition assessments and ensure that recommendations regarding site degradation are implemented.

Residual Impacts. With implementation of the above mitigation measures, impacts would be reduced to a less than significant level.

Agricultural Residential Cluster Subdivision Impact CR-6 **Agricultural Residential Cluster Subdivision facilities and infrastructure could impact fossil-bearing strata and could damage or destroy significant fossil materials. This is considered a Class II, significant but mitigable impact.**

The proposed Agricultural Residential Cluster Subdivision encompasses geological strata with both high and unknown sensitivity to produce significant fossils. High-sensitivity areas have the potential to yield vertebrate fossils and also may produce invertebrate materials that could provide new and important taxonomic, phylogenetic, and/or stratigraphic data. Any vertebrate fossils disturbed in areas where sensitivity is currently unknown (i.e. Atascadero or Toro formation deposits) would also be a significant impact.

Mitigation Measures. Implementation of the following mitigation measures would reduce impacts on paleontological resources to less than significant levels:

Agricultural Residential Cluster Subdivision CR-6(a) **Preparation of a Paleontological Resource Monitoring Plan.** Prior to issuance of grading permits, the applicant shall retain a qualified accredited paleontologist to prepare a Paleontological Resource Monitoring Plan based on the specific construction plans. The monitoring plan shall detail the procedures for monitoring construction in areas of high or unknown sensitivity, collecting fossil remains and relevant geographic and stratigraphic data, stabilizing and preserving recovered specimens, and cataloguing and curating the collection (see Agricultural Residential Cluster Subdivision measure P-1(b and c) below). The monitoring plan shall include provisions for collecting a representative sample of invertebrates from the identified site at the Agricultural Residential Cluster Subdivision site prior to construction, documenting the site according to the



standards developed by the National Research Council (1987), and assessing the potential of this site to contain significant vertebrate remains.

Plan Requirements and Timing: The monitoring plan shall be prepared by a qualified paleontologist and reviewed and approved by the County prior to the issuance of grading permits. **Monitoring:** Planning and Building staff shall review the monitoring plan and ensure its implementation in the field.

**Agricultural Residential
Cluster Subdivision
CR-6(b)**

Paleontological Monitoring. A qualified paleontological monitor shall observe any initial excavation, grading, or other ground disturbance which extends below the upper soil layers in *in situ* sedimentary rock where paleontological sensitivity is high or unknown. Any excavation into *in situ* older Quaternary Alluvium, Paso Robles, Monterey, Santa Margarita, Vaqueros, Atascadero, or Toro formations shall be monitored. The areas covered by late Quaternary strata shall be monitored if excavation is undertaken below the uppermost few feet of sediment, because these strata have yielded vertebrate remains elsewhere in San Luis Obispo County. Shallow excavations in the Quaternary deposits are unlikely to yield significant fossils and do not need monitoring. Paleontologists who monitor excavations must be qualified and experienced in salvaging fossils and authorized to temporarily divert equipment while removing fossils. They must be properly equipped with tools and supplies to allow for rapid removal and preparation of specimens, and trained in safe practices when working around construction equipment. If multiple pieces of heavy equipment are in use simultaneously at diverse locations during construction, each location may be monitored individually.

Plan Requirements and Timing: Monitoring shall occur throughout initial ground disturbing activities. **Monitoring:** Planning and Building staff shall ensure paleontological monitoring in the field.

**Agricultural Residential
Cluster Subdivision
CR-6(c)**

Treatment of Paleontological Remains Discovered During Monitoring. If paleontological resources are found during excavations or other ground disturbance, work shall cease temporarily in the immediate area of the discovery. Ground disturbance may be redirected to another area so that the significance of the fossil find may be assessed. If an accredited paleontologist is not already on site, a vertebrate paleontologist with regional experience will be contacted to inspect the excavation, assess the significance of the fossil find, recover any exposed fossils of significance, and recommend additional mitigation measures, if necessary.



A standard sample (3–12 cubic meters) of matrix from each site will be taken for identification of microvertebrates (rodents, birds, rabbits), especially when the potential for microvertebrates is high. The monitors also will determine whether the fossils are part of an archaeological deposit. If the fossils are found with cultural material, the site then will be considered an archaeological discovery and treated according to the procedures specified in Agricultural Residential Cluster Subdivision measure CR-3(b).

Significant fossils found during construction shall be preserved by prompt removal whenever feasible. Due to the potential for rapid deterioration of exposed surface fossils, preservation by avoidance is not an appropriate measure. When a significant fossil cannot be removed immediately, stabilization is needed to prevent further deterioration prior to removal. The fossil location must be stabilized under the direction of a professional paleontologist.

At the time of collecting, each specimen or group of specimens will be clearly located and plotted on a USGS topographical quadrangle map. Field methods, other excavation activities, and working conditions during monitoring of the paleontological resources will be recorded in a field notebook or on a paleontological resources record or worksheet such as those developed by the National Research Council (1987). Recovered specimens will be stabilized and prepared for identification. Sedimentary matrix with microfossils will be screen washed and sorted to identify the contained fossils. Removal of excess matrix during preparation reduces long-term storage requirements. Competent qualified specialists will classify individual specimens to the lowest identifiable taxon, typically to genus, species, and element. Batch identification and batch numbering (e.g., “mammal, 25 specimens”) shall be avoided.

Paleontological specimens will be cataloged according to current professional standards, and a complete list of collected specimens must be prepared. A complete set of field notes, geologic maps, and stratigraphic sections must accompany the fossil collections.

All fossil remains recovered during construction and operation must be curated by a recognized, nonprofit paleontological specimen repository with a permanent curator, such as a museum or university. Specimens must be stored in a fashion



that allows researchers to retrieve specific individual specimens in the future. In addition to the LACM and UCMP, qualified research facilities include California State Polytechnic University, San Luis Obispo; the Santa Barbara Museum of Natural History; or Santa Barbara City College.

The project paleontologist will complete a final report summarizing findings, describing important fossil localities (vertebrate, megainvertebrate, or plant) discovered in the project area, and explaining any mitigation measures taken. The report will include a summary of the field and laboratory methods, site geology and stratigraphy, an itemized inventory of recovered specimens, faunal lists, and site records. The report also shall discuss the importance of the recovered fossil materials. The reports will be prepared by a professional paleontologist and distributed to the appropriate agencies, museums, colleges, or universities.

Plan Requirements and Timing. This condition shall be in effect throughout Agricultural Residential Cluster Subdivision construction. **Monitoring:** Planning and Building shall check plans prior to approval of grading permits and shall spot check in the field.

Residual Impacts. With implementation of the above mitigation measures, impacts would be reduced to a less than significant level.

b. Future Development Program Impacts and Mitigation Measures. The Future Development Program represents potential future buildout of the Santa Margarita Ranch, including the proposed Agricultural Residential Cluster Subdivision. Refer to Section 4.4.2(c) for a discussion of cultural resource impacts resulting from the Agricultural Residential Cluster Subdivision independently.

**Future Development
Program Impact CR-1**

Future development in accordance with the Future Development Program could adversely impact the Santa Margarita Ranch Rural Historic District and could adversely impact traditional Native American values. This is considered a Class I, *significant and unavoidable* impact.

The Santa Margarita Ranch Rural Historic District is eligible for the CRHR under all four significance criteria. Future buildout of the ranch has the potential to diminish the integrity of the district's character-defining features and contributing elements. Moreover, as discussed above, many native people view the landscape and its component elements, both cultural and natural, as sacred elements of their cultural patrimony. Given the sensitivity of the property, any substantial development of undisturbed sites is a significant impact.



Mitigation Measures. Agricultural Residential Cluster Subdivision measures CR-1(a) (Avoidance), CR-1(b) (Cultural Design Guidelines), CR-1(c) (Viewshed Preservation), CR-1(d) (Preservation of Key Landscape Elements) and CR-2(e) (Nomination to the National Register of Historic Places) would apply to all Future Development Program land uses. No additional mitigation is necessary.

Residual Impacts. Although impacts would be reduced through the above mitigation measures, no mitigation is available to avoid significantly impacting the integrity of the design, setting, materials, feeling, and association of this important character-defining area, or its Native American values. Impacts would remain *significant and unavoidable*.

**Future Development
Program Impact CR-2**

Future development in accordance with the Future Development Program ~~would~~ could adversely impact identified and previously unidentified archeological deposits. These resources contribute to the significance of the Santa Margarita Ranch Rural Historic District and are eligible for the California Register of Historic Resources (CRHR) under multiple significance criteria. Recovery of the important information in these sites through excavation would lessen the impacts. However, damage to or destruction of the important associations of these sites, and disruption of their setting and feeling, is a Class I, *significant and unavoidable* impact.

Sixty-two prehistoric and historical archaeological sites and 29 isolates are recorded on the surveyed portions of the ranch. Thirty sites are located within or immediately adjacent to identified Future Development Program parcels. Given the presence of recorded archaeological sites, isolated artifacts, and the known extent of prehistoric and historical land use, there is also potential for buried archaeological deposits to occur throughout the Ranch property, including Future Development Program locations. Disturbance of these resources is a significant impact.

Mitigation Measures. Agricultural Residential Cluster Subdivision measures CR-2(a) (Avoidance), CR-2(b) (Mitigative Data Recovery Excavation), CR-3(a) (Buried Site Testing), and CR-3(b) (Construction Monitoring) would apply to all Future Development Program land uses. The following additional mitigation measure is also required.

**Future Development
Program CR-2(a)**

Additional Archaeological and Historical Surveys. Additional archaeological and historical surveys shall be carried out on unsurveyed portions of the ranch subject to development. Any documented cultural resources on the ranch shall be avoided and protected during development. If resource avoidance is not feasible, then additional archival research and data recovery excavation shall be carried out [refer to Agricultural Residential Cluster Subdivision measure CR-2(b) (Mitigative Data Recovery Excavation)].

Plan Requirements and Timing. Additional surveys shall be completed, and reports reviewed and approved by Planning and Building, prior to issuance of grading permits for unsurveyed



areas. **Monitoring:** Planning and Building shall be responsible for ensuring that all necessary cultural resource surveys are completed prior to issuance of grading permits.

Residual Impacts. Although impacts would be reduced through the above mitigation measures, no mitigation is available to avoid significantly impacting identified and previously unidentified cultural resources. Impacts would remain *significant and unavoidable*.

**Future Development
Program Impact CR-3**

Future development in accordance with the Future Development Program could adversely impact historical buildings and structures on the ranch. This is considered a Class II, significant but mitigable impact.

Numerous standing buildings and structures on the ranch have historical value and contribute to the significance of the historic district. Although not individually evaluated, several of these buildings may also qualify individually for the CRHR and NRHP. This is particularly true for buildings in the current ranch headquarters area, although it applies to all buildings and structures. Alteration of these buildings and structures in ways that diminish their historical integrity would be a significant impact unless mitigation is incorporated.

Mitigation Measures. The following mitigation measures would reduce impacts on historical buildings and structures to less than significant levels:

**Future Development
Program CR-3(a)**

Prohibition of Demolition of Buildings and Structures. Demolition of buildings, structures, and other elements of the built environment that date from the period of significance of the historic district (as described in the Cultural Landscape Report contained in Appendix E) shall not be permitted.

Plan Requirements and Timing. Planning and Building shall review all demolition, restoration, preservation, or other development plans to ensure compliance prior to issuance of permits. **Monitoring:** Planning and Building shall check plans prior to issuance of permits and shall spot check in the field.

**Future Development
Program CR-3(b)**

Restoration, Stabilization, Repair, and Reconstruction. Any stabilization, restoration, repair, or reconstruction of historic buildings and structures within the district, and particularly at the ranch headquarters, shall follow the *Secretary of Interior's Standards and Guidelines for the Treatment of Historic Properties*. Roof and floor tiles, mortar, and adobe bricks from the asistencia, ranch house, and previously demolished structures shall be analyzed and compared with Mission San Luis Obispo de Tolosa and other mission architecture.

Plan Requirements and Timing. Planning and Building shall



review all restoration, preservation, or other development plans to ensure compliance prior to issuance of permits. **Monitoring:** Planning and Building shall check plans prior to issuance of permits and shall spot check in the field.

**Future Development
Program CR-3(c)**

Resource Conservation. The drawings in the bunkhouse room at the ranch shall be documented and preserved not only for their value as folk art but also for their information on ranch history. A conservator shall be consulted to ascertain the best method of preservation for the drawings. The results of the consultation shall be submitted to the County Environmental Coordinator. Documentation shall include 8 by 10 inch large format photographs.

The adobe core of the main ranch house at the headquarters shall be stabilized and preserved. A conservator with expertise in adobe preservation shall be consulted to ascertain the best method of preservation. The results of the consultation shall be submitted to the County Environmental Coordinator.

Plan Requirements and Timing. The applicant shall prepare a conservation plan for the drawings and adobe structural remains for County Environmental Coordinator review and approval prior to the issuance of Future Development Program land use or development permits. The plans shall include a schedule for implementation. **Monitoring:** Planning and Building shall ensure that conservation measures are implemented according to plan and schedule.

**Future Development
Program CR-3(d)**

Additional Archaeological and Historical Survey. A thorough archaeological and historical survey shall be carried out at the ranch headquarters area, with particular attention to documentation and mapping of surface-visible prehistoric and historical features.

Plan Requirements and Timing. Additional surveys shall be completed, and reports reviewed and approved by Planning and Building, prior to issuance of Future Development Program grading or other development permits. **Monitoring:** Planning and Building shall be responsible for ensuring that all necessary cultural resource surveys are completed prior to issuance of permits.

Residual Impacts. With implementation of the above mitigation measures, impacts would be reduced to a less than significant level.



**Future Development
Program Impact CR-4**

Future development in accordance with the Future Development Program could adversely impact previously identified or unidentified human remains. This is considered a Class II, *significant but mitigable* impact.

Human remains have been identified at several locations within the ranch, and are likely to be present in other locations as well. Disturbance to or damage of human remains would be considered a significant impact unless mitigation is incorporated.

Mitigation Measures. Agricultural Residential Cluster Subdivision measure CR-4(a) (Treatment of Human Remains) would apply to all Future Development Program land uses. No additional mitigation is necessary.

Residual Impacts. With implementation of the above mitigation measure, impacts would be reduced to a less than significant level.

**Future Development
Program Impact CR-5**

Future development in accordance with the Future Development Program could result in indirect impacts to identified or unidentified cultural resources. This is considered a Class II, *significant but mitigable* impact.

Indirect impacts may result from increased population and visitorship within areas identified for future development. As a result, relic hunting and vandalism may increase, and archaeological and historical sites may be damaged by unauthorized artifact collection, excavation; or looting; erosion; illicit trash dumping; or other effects. Such effects are considered significant but mitigable environmental impacts.

Mitigation Measures. Agricultural Residential Cluster Subdivision measure CR-5(a) (Prohibition of Site Tampering) and CR-5(b) (Periodic Monitoring and Condition Assessment) would apply to all Future Development Program land uses. No additional mitigation is necessary.

Residual Impacts. With implementation of the above mitigation measures, impacts would be reduced to a less than significant level.

**Future Development
Program Impact CR-6**

Implementation of the Future Development Program could impact fossil-bearing strata and could damage or destroy significant fossil materials. This is considered a Class II, *significant but mitigable* impact

Future Development Program land uses may be implemented on surface outcrops and underlying strata of the Santa Margarita, Monterey, Atascadero, and Obispo formations. Cretaceous granitics and older alluvium are also present in some of the areas identified for potential future development. The Cretaceous granitic and Obispo formations are defined as no sensitivity areas due to their igneous origin or their limited potential to produce significant fossil material. The Santa Margarita, Monterey, and alluvial deposits are high sensitivity areas that have produced important invertebrate as well as marine and non-marine vertebrate fossils in other locations. The sensitivity of the Atascadero Formation is unknown. Impacts from



future development of these areas could occur directly by destruction of fossils on or near the surface during brushing, grading, road construction, and other ground-disturbing activities; by excavation for foundations, trenches, tower pads, footings, wells, and septic systems; or by other subsurface activity in fossiliferous areas. Indirect impacts include unauthorized collection and increased erosion or compaction from vehicle and human activity, including intensified residential and recreational uses.

Mitigation Measures. Agricultural Residential Cluster Subdivision measures CR-6(a) (Paleontological Monitoring Plan), CR-6(b) (Paleontological Monitoring), and CR-6(c) (Treatment of Paleontological Remains Discovered During Monitoring) would apply to all Future Development Program land uses and would reduce potential impacts on paleontological resources to less than significant levels.

Residual Impacts. With implementation of the above mitigation measures, impacts would be reduced to a less than significant level.

c. Cumulative Impacts. In this EIR, the evaluation of the Future Development Program, which includes the Agricultural Residential Cluster Subdivision, accounts for all of the expected growth in the Santa Margarita area, as it represents buildout of the major landholding that surrounds the existing community, consistent with the Salinas River Area Plan. Therefore, cumulative cultural resources impacts from buildout of the Agricultural Residential Cluster Subdivision in combination with buildout of the Future Development Program were addressed in the Future Development Program impact analysis above. As future applications for individual Future Development Program projects are submitted at a project level of detail, the precise evaluation of future project cumulative impacts would be coordinated through the required Specific Plan and associated environmental review, or through individual project-level environmental review, as applicable.

