

13. Historical Resources

13.1 BACKGROUND AND CONTEXT

The term “historical resources” falls within the broader category of “cultural resources,” which encompasses historic and prehistoric (archaeological) resources. Cultural resources include districts, sites, structures, artifacts, and other evidence of human use considered important to a culture or community for scientific, traditional, religious, or other reasons. Cultural resources may also include less tangible attributes such as traditional cultural places and landscapes considered sacred to particular groups, and may even include objects, records, and manuscripts.

Historical resources refer to the material and nonmaterial expressions of human adaptations that characterize the post-contact (historic) period. These resources include historic event or activity sites, historic archaeological sites, standing architecture and other significant properties, documents and other sources of historical information, objects of material culture, and houses, buildings, structures, roads, walls, and other important historic features generally greater than 50 years old.

For purposes of environmental review, cultural resources may be classified as a historical resource, *archaeological resource*, or *tribal cultural resource*. This section focuses on environmental review of historical resources. *Archaeological resources* are discussed in Section 14 and *tribal cultural resources* are discussed in Section 15.

Section 15064.5(a) of the State California Environmental Quality Act (CEQA) Guidelines defines the term “historical resources” as including the following:

- a. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code (PRC) Section 5024.1; Title 14 California Code of Regulations (CCR), Section 4850 et. seq.).
- b. A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in an historical resource survey meeting the requirements of PRC Section 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- c. Any object, building, structure, site, area, place, record, or manuscript which a *Lead Agency* determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the *Lead Agency’s* determination is supported by *substantial evidence* in light of the whole record. Generally, a resource shall be considered by the *Lead Agency* to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (PRC Section 5024.1; Title 14 CCR, Section 4852) including the following:
 - 1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;

- 2) Is associated with the lives of persons important in our past;
 - 3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - 4) Has yielded, or may be likely to yield, information important in prehistory or history.
- d. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to PRC Section 5020.1(k)), or identified in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)) does not preclude a *Lead Agency* from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

Additionally, PRC Section 5020.1(j) describes a historical resource as including, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

13.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following threshold of significance specified below.

HIS-1 A project may have a significant impact if it would result in a substantial adverse change in the mandatory significance, presumptive significance, or discretionary significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5.

13.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 13.2, the level of impact shall be evaluated based on the appropriate assessment methodologies outlined below.

(a) *Would the project cause a substantial adverse change in the mandatory significance, presumptive significance, or discretionary significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5?*

The types of historical significance are defined as follows:

- **Discretionary Significance:** A historical resource may be considered significant even if it is not on a federal, state or local list if substantial evidence demonstrates its significance. (*League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland* (1997) 52 Cal. App. 4th 896.)
- **Mandatory Significance:** A historical resource may be considered significant if it is listed in or eligible for listing in the National Register of Historic Places or the California Register of Historical Resources.

- **Presumptive Significance:** A historical resource is presumed to be significant if it is listed on a local register of historic resources unless the preponderance of the evidence demonstrates otherwise. In Ventura County this includes County Landmarks, Sites of Merit, Points of Interest, and Districts. These are all noted in the Resource Management Agency's Accela permitting database.

Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. (State CEQA Guidelines Section 15064.5.)

The significance of a historical resource is materially impaired when a project:

- a. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- b. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant.
- c. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a *Lead Agency* for purposes of CEQA.

If there is evidence that a historical resource may be materially impaired as a result of the project based on the threshold above, then the following steps shall be undertaken to determine the extent of any impacts to the resource:

13.3.1 Determine Historical Significance

Examine the Project Site

During review of discretionary project applications, the *Lead Agency* shall define the project's area of potential effect for historic buildings and structures. The *Lead Agency* shall determine the potential for the project to result in adverse effects on the significance of historical resources based on the extent of ground disturbance and site modification anticipated for the project. The potential for adverse effects to the significance of historical resources shall also be determined pursuant to the requirements and protocol set forth in the Ventura County Cultural Heritage Ordinance.

Search Existing Records

The *Lead Agency* shall contact the South Central Coastal Information Center (SCCIC) to initiate a records search that consists of an in-depth review of historical resource records (i.e. built environment, State Historic Properties Directory, National Register, California Register, California Historical Landmark, Points of Historic Interest, and prehistoric and historic archaeological records) that may be affected by a project. Also included in the records search are historical resources studies that pertain to the project area and impact radius, if any. In addition, the SCCIC will assess

the possibility of historical resources that may be affected by the project. This assessment is based on such factors as the age of historic properties; presence of structures within the project area; archaeological site distribution; and environmental setting of known historical resources in the area. The SCCIC will present the results of the records search in a letter report. The project applicant shall retain a qualified professional who meets the SCCIC's access policy in order to receive a bibliography of the literature reviewed, a copy of the records search map, and copies of reports and historical resource records if requested. Requirements to submit a records search request and information on the SCCIC's access policy are found on the SCCIC's website (see Section 13.4).

The *Lead Agency* shall also search the County's records and coordinate with Cultural Heritage Board (CHB) staff to ensure that all known historical resources have been properly identified. The Ventura County Resource Management Agency (RMA) Planning Division has logged all surveyed historical resources by Assessor's Parcel Number in the Accela permitting database. The RMA Planning Division also maintains historical surveys on the CHB website that cover the limited areas of the county surveyed previously.

If a resource does not show on the RMA Planning Division's Accela permitting database and there is a building or other resource on the property, the *Lead Agency* should request documentation as to whether it is over 50 years old. This general information should be obtained from the applicant during the application review process.

Verify Historical Resource(s)

If the field survey or record search determines that a historical resource may exist on the property, the following process shall be followed to evaluate the historical significance of the resource. If deemed necessary, the project applicant may retain a qualified professional that meets the professional qualifications standards from Article 19 of the Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" used by the National Park Service and published in the Code of Federal Regulations, 36 CFR Part 61. The most recent qualification standards are available online (see Section 13.4). The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise may be needed depending on the complexity of the task and the nature of the historic properties involved.

Before altering a building or structure, or otherwise affecting a site containing a building or structure 50 years old or older, the project applicant shall consult with CHB staff and, if deemed necessary, retain a qualified professional that meets the qualification standards included in Article 19 of the Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" to complete a California Department of Parks and Recreation (DPR) 523 Form or equivalent documentation if the building or structure has not previously been evaluated. The building or structure's significance shall be assessed by the qualified professional using the significance criteria set forth for historical resources under State CEQA Guidelines Section 15064.5 when completing DPR Form 523. The evaluation process shall include the development of appropriate historical background research as context for the assessment of the significance of the structure in the county and the region. The *Lead Agency* should consult with CHB staff to determine, based on the findings of the qualified professional, whether the building or structure meets the criteria as a historical resource under PRC Section 5024.1 or the State CEQA Guidelines Section 15064.5. For buildings or structures that do not meet this criteria, no further mitigation is required. If the building or structure is not deemed a significant historical resource, the impacts of the project on the affected resource shall be considered less than significant.

If the building or structure is determined to be a significant historical resource, the *Lead Agency* shall consult with CHB staff to determine whether a Historic Resource Report is needed. If a Historic Resource Report is determined necessary, the project applicant shall retain a qualified professional to prepare a Historic Resource Report consistent with the RMA Planning Division's recommended report format. The Historic Resource Report shall provide recommendations for any proposed work based on existing conditions and preservation objectives on the significant historical resource, designated *cultural heritage sites*, or those potentially eligible for designation; assess whether a project would have a substantial adverse change on the significance of such historical resource, *cultural heritage site*, or potential site; and recommend appropriate action in compliance with the Secretary of the Interior's "Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" and the Secretary of the Interior's "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings." The purpose of these standards is to provide guidance to property owners and building managers, preservation consultants, architects, contractors, project reviewers, and other design professionals prior to beginning any work.

13.3.2 Impact Analysis

Should a building or structure of historical significance be identified, the CHB shall be provided an opportunity to review the project and the Historic Resource Report (if deemed necessary), and determine whether the project may cause a substantial adverse change in the significance of a historical resource. The CHB shall recommend to the *Lead Agency* *feasible* measures to mitigate substantial adverse changes in the significance of a historical resource.

If the *Lead Agency*, exercising independent judgment, finds that the project may cause a substantial adverse change in the significance of the historical resource, the applicant shall be advised about potential changes to the project design and/or *feasible* mitigation measures that would reduce the impact to less than significant. The applicant must agree to such project revisions and/or mitigation measures in writing before a Mitigated Negative Declaration is released for public review. A determination of Potentially Significant Impact (PS) shall be made and further analysis shall be addressed in an Environmental Impact Report if there is *substantial evidence* that the project may cause a substantial adverse change in the significance of a historical resource, and impacts cannot be mitigated to a less than significant impact level.

Cumulative Impact Analysis

An area one quarter mile in radius (that is used by the SCCIC) surrounding the project site should be used to determine whether there has been any past, present, and reasonably foreseeable probable future projects that have, or would result in, significant adverse impacts to any significant historical resources. These impacts should be listed and cumulatively analyzed with any identified individual project impacts.

Effect on Adjacent Sites

In determining whether the project may have an effect on the site, the *Lead Agency* must consider whether the project may have an effect on the surrounding *adjacent* sites. This may also be a consideration when a new project is *adjacent* to a historical resource. For example, construction of a new house in the midst of an entire block of historic homes in a documented historic area may be a significant impact. The compatibility of the design of the new house with its surroundings must be considered and analyzed.

In complex cases, the *Lead Agency* may request additional evaluation from the qualified professional retained by the applicant.

13.3.3 Mitigation

Avoidance of impacts to and preservation in place of the resource is the preferable strategy. A project that closely adheres to the Secretary of the Interior’s “Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings” and the Secretary of the Interior’s “Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings” shall be considered as mitigated to a level of less than significant impact on the historical resource.

After soliciting advisory input from the CHB as set forth above, the *Lead Agency* shall identify project changes and *feasible* measures to mitigate substantial adverse changes to the significance of a historical resource. The *Lead Agency* shall ensure that any adopted measures to mitigate or avoid substantial adverse changes are fully enforceable and implemented through permit conditions, agreements, or other measures. In addition, the *Lead Agency* shall require, as appropriate, that the property owner place an appropriate marker on the project site to describe the historical significance of the structure, site, or event.

Documentation and/or data recovery shall not be required for a historical resource if the *Lead Agency* determines that previous testing or studies have adequately recovered the historically or scientifically consequential information from and about the historical resource, provided that the determination is documented in the environmental document and the studies are submitted with the SCCIC.

Mitigation measures, including but not limited to those identified in General Plan Program COS-JJ below, shall be implemented where applicable:

- a. The preferred treatment for historical resources is avoidance of impacts to and preservation in place of the resource. If impacts cannot be avoided, the applicant shall reconsider project plans in light of the high value of the resource and implement more substantial modifications to the scope of the proposed project that would allow the structure to be preserved intact. These could include project redesign, relocation, or withdrawal of the project.
- b. If the building or structure can be preserved on site, but remodeling, renovation, or other alterations are required, this work shall be conducted in compliance with the Secretary of the Interior’s “Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.”

If the *Lead Agency* determines that preservation and reuse of the historical resource is not *feasible*, or the impact resulting from demolition or destruction cannot be fully mitigated, the *Lead Agency* shall ensure that a qualified professional thoroughly documents the building and associated landscape and setting. Documentation shall include still and video photography and a written documentary record/history of the building to the standards of the Historic American Building Survey or Historic American Engineering Record, including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. Incorporation of new technology and interpretive programming may also be used to document the historical resource proposed for major alteration, renovation, relocation, and/or demolition. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site specific and comparative archival research, and oral history collection as appropriate.

For projects that are subject to environmental review under the National Environmental Policy Act and Section 106 of the National Preservation Act, the record shall be prepared in consultation with State Historic Preservation Officer and if applicable, filed with the California Office of Historic Preservation.

In the event of demolition, mitigation is still required even if mitigation measures would not fully offset the impact. Mitigation may include, but may not be limited to, the following:

- Still and video photography and a written documentary record/history of the building to the standards of the Historic American Building Survey or Historic American Engineering Record.
- The incorporation of architectural designs and features that reflect the historical and cultural traditions characteristic to the area or community in any proposed development as part of the discretionary project.
- A plaque or marker commemorating the building.

13.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF Website
References		
Article 19 of the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation	National Park Service	Website
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
California Register of Historical Resources	California Office of Historic Preservation	Website
DPR 523 Forms	California Office of Historic Preservation	Website
Historic American Buildings Survey and Historic American Engineering Record Documentation Guidelines	National Park Service	Website
National Register of Historic Places	National Park Service	Website
Secretary of the Interior's "Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating,	National Park Service	Website

Ventura County Initial Study Assessment Guidelines

Source	Managing Agency/Organization	Online Access
Restoring, and Reconstructing Historic Buildings”		
Secretary of the Interior’s “Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings”	National Park Service	Website
Ventura County Cultural Heritage Ordinance	Ventura County RMA Planning Division	PDF Website
Ventura County General Plan, Conservation and Open Space Element	Ventura County RMA Planning Division	PDF Website
Ventura County Cultural Heritage Board	Ventura County RMA	Website