

4.12 CULTURAL RESOURCES

INTRODUCTION

*This section discusses existing cultural resources conditions in the proposed RiverPark Specific Plan Area and identifies potential cultural resources impacts that would result from the development of the proposed Specific Plan. This section incorporates information from a historical resources study prepared by San Buenaventura Research Associates in November 12, 2001 and a Phase I Archaeological Survey conducted by W & S Consultants December 2000. These studies are contained in **Appendix 4.12** of this EIR. Additional sources of information used in this section include the City of Oxnard 2020 General Plan, the General Plan Final EIR, aerial photographs, and historical and archaeological maps of the project area.*

The historical resources study was conducted to determine whether any cultural resources present within the Specific Plan Area meet the definition of an historical resource as defined in Section 15064.5 (a) of the CEQA Guidelines. The Phase I Archaeological Survey was conducted to provide background review of pertinent research to determine if any known archaeological sites were present within the project site and provide a field survey to determine the presence of any archeological resources.

ENVIRONMENTAL SETTING

Prehistoric Setting

The area around the RiverPark Specific Plan site, and Ventura County in general, lies within the territory of the Ventureño dialect of the Chumash ethnolinguistic group. At the time of first European contact, the Chumash population numbered in the thousands and their territory stretched from the Malibu area in Los Angeles County to northern San Luis Obispo County, and inland as far as the western edge of the San Joaquin Valley. The Ventureño Chumashan speakers' territory included most of Ventura County.

Archaeological data indicate that the southern coastal areas of California have been occupied for the past 9,000 years. The prehistory of the Santa Barbara Channel region is divided into three periods: Early (8,000 to 3,350 Before Present [BP]), Middle (3,350 to 8,00 B.P.), and Late (800 to 150 B.P.). The Early Period is characterized by a primarily seed processing, subsistence economy. The middle period is marked by increasing sedentism and hunting. The full development of the Chumash culture, one of

the most socially and economically complex hunting and gathering groups in North America, occurred during the Late Period.

Historical accounts of the Ventureño Chumash date back to the 1542 voyage of Juan Rodríguez Cabrillo. Spain began to colonize Alta California in 1769. In 1782, Father Serra founded San Buena Ventura Mission near the Chumash village of Shisholop. The mission padres recruited Chumash both as neophytes and laborers.

Spanish rule in Alta California came to an end in 1821 with Mexican Independence. The missions were secularized in 1832. The break up of San Buenaventura Mission resulted in a dispersion of the Ventureño Chumash, whose numbers had already been decimated by disease. However, the Chumash did not simply disappear, either as a people or as a culture, following secularization of the mission system. Many went to work on new ranchos, others took up residence around the missions or returned to existing villages. Several intermarried with Mexican citizens, and a few became property owners. Descendants of Native American Indian families whose names can be found on the San Buena Ventura Mission register live in the County today.

Following Independence, the Mexican government of Alta California began granting large pieces of land to Mexican citizens. During Mexican rule, missions declined in influence and large cattle ranches called Ranchos came into dominance in Ventura County.

Following the 1848 Treaty of Guadalupe Hidalgo, by which Mexico relinquished Alta California to the United States, the American Period began in California. Between 1860 and 1900 farming and oil production joined cattle ranching as a major industry in the Ventura area.

Historical Setting

Lists from various national, state, and local agencies were consulted to identify any previously recorded architectural historical resources. These lists included the California State Historical Resources Inventory Data Base, National Register of Historical Places (NRHP), California Historical Landmarks, California Points of Historic Interest, and the Ventura County Historical Landmarks (Ventura County *General Plan*, Resources Appendix). None of these lists identified any architectural historical resources the project site. The historical study also evaluated the potential for listing of the existing structures within the Specific Plan Area that would be demolished.

The historic character of the area is defined primarily by the original Town of Colonia (El Rio West Residential Neighborhood) directly adjacent to the project site on the east. This area was primarily developed between 1900 and 1945. Additional housing north of this area and east of the project site was developed after 1950. RiverPark Area 'A' contains a nineteenth century farmhouse, a 1950s residence, a metal barn, a 1960s former automobile showroom, Ventura County Maintenance Facilities, and the recent town center high-rise buildings. RiverPark Area 'B' contains a 1950s farmhouse on Vineyard Avenue on the El Rio Detention Basin No. 2 and the former Hanson Aggregates (formerly Southern Pacific Milling Company) property.

The unincorporated town of El Rio (The River) has had several names over its long history. El Rio was originally located at the crossroads where the boundary of two ranchos (El Rio de Santa Clara o La Colonia and Rancho Santa Clara del Norte) are bisected by Vineyard Avenue (State Highway 232). El Rio's name probably came from the rancho and its location directly adjacent to the Santa Clara River. The Ventura Freeway, originally called the Conejo Road and later Ventura Road, separated the two ranchos.

The 44,883-acre Rancho El Rio de Santa Clara o La Colonia was granted by the Mexican Government to eight Santa Barbara soldiers in 1837. Settlers came to the area in the late 1860s as the large ranchos began to be subdivided. When the land was finally patented to the original grantees in 1872, a map was prepared by surveyor John Stow, showing subdivision and ownership of the Rancho. Many of the early settlers of the Oxnard area were German and Irish, with names such as Borchard, Maulhardt, Donlon, and McGrath.

On April 11, 1876 a grant deed was recorded showing that Christian Borchard sold a 7-acre parcel of land, located at the intersection of the Conejo Road (later to be called Ventura Boulevard/Ventura Freeway) and the Hueneme and Saticoy Road (later to be called Vineyard Avenue) to Simon Cohn, for forty dollars in gold.

Shortly afterwards, Simon Cohn, a native of Germany, had a general merchandise store built at the intersection of Vineyard Avenue and Ventura Boulevard. Cohn had come to Ventura County to join his brother Morris Cohn, who operated a general merchandise store in Saticoy. Simon married Minnie Cohn in 1885. The couple raised eight children; all of whom attended the local El Rio School located on Vineyard Avenue adjacent to the Colonia Tract. The family lived in a house Simon had built behind his store.

When Simon Cohn built his store, no other commercial buildings were located in the area, just scattered farmhouses along Conejo Road (Ventura Boulevard). Cohn gradually acquired land on three of the four corners at the intersection of Vineyard Avenue and Ventura Boulevard. A larger brick building was constructed on the northeastern corner of Ventura Boulevard and Vineyard Road in the late 1890s, following the purchase of two more parcels of land. Two of Cohn's brothers built stores on the other corners. Simon Cohn used profits from his lucrative merchandise business to purchase additional lands in the 1880s and 1890s. In 1887 he purchased a 47-acre parcel where the present Wagon Wheel Junction is located.

Following the subdivision of the Town of Colonia in 1887, Cohn purchase all of Block Seven in 1889 for \$500, as well as eleven individual lots in Blocks 3, 4 and 9 for \$915. Simon and his brothers Morris and David also invested heavily in land throughout Ventura County including the towns of Santa Paula and Camarillo.

Numerous articles about his life relate to his generosity in the community. He provided credit to farmers so that they were able to pay him back when their crops came in. He would provide goods free, when possible, to people who were unable to pay. When Cohn died in 1936 at the age of eighty-four, one of his children told about the boxes of bills they found owed by people who could not afford to pay. Their father had never mentioned them, so they didn't either. Another story about the family's generosity related to the large cornfield behind their home. Customers were welcome to pick as much corn as they could carry home.

Simon was referred to as the "Mayor" of El Rio, although it was in name only since El Rio was never incorporated as a city. Certainly Simon Cohn can be considered the founder of New Jerusalem/El Rio, as the first merchant to establish himself in the area. Although Cohn started with little when he opened his business, he prospered over time by purchasing land at low prices. In 1910 his assessed value was \$73,930, making him among the ten wealthiest landowners in the EL Rio/Oxnard area. He owned many large parcels of land surrounding his original purchase, and upon his death, he owned the acreage that was eventually to become Wagon Wheel Junction and the Esplanade Shopping Center in later years.

The town was first officially referred to as New Jerusalem and is said to have been given its name by Judge J.D. Hines, the first Superior Court Judge in Ventura County, who in 1876 named it to honor the first Jewish merchants in the area, the Cohn Family. Simon Cohn had the name New Jerusalem painted on his store, which at first was a small woodframe building that was replaced by 1891 with a larger brick masonry building that stood at the same location for over seventy-five years until the

freeway paved over the site. In 1891 when the town of New Jerusalem was visited by Yda Storke, she wrote, "The town has two large general merchandise stores, a church and other businesses."

In 1882 the first post office was open in New Jerusalem, and Simon Cohn served as postmaster. In 1895, the post office shortened the name of the town to Jerusalem, and a few months later, on June 6, 1895, the name was changed to Elrio (all one word). In 1905 the post office name was finally changed to El Rio and stayed that way until the post office closed in 1911.

The Rio School District was established by the Board of Supervisors in 1885, and a school house was built on the western side of Vineyard Avenue about three-tenth of a mile east of the intersection with Ventura Boulevard. A Catholic Church was built in the 1870s on Conejo Boulevard (Ventura Boulevard) adjacent to one of Simon Cohn's properties. It is said that Simon Cohn, although he was not a Catholic, contributed to its construction. It may have been that he donated land. In later years, when the freeway was built, the church was moved to Rose Avenue. A Methodist Church was also built on Vineyard Avenue across from the Myrtle Avenue intersection.

In 1887 the Town of Colonia, a twelve-block subdivision by Taylor and Jepson, was recorded by surveyor J.B. Stow. This was the first housing development in the New Jerusalem area at the time. It was located adjacent to Vineyard Avenue and the Conejo Road (Ventura Boulevard/Ventura Freeway). Within the tract was one main road, Colonia Avenue, and bisected by three streets: Myrtle, Olive, and Sycamore Streets. The first school was built in this tract and faced onto Vineyard Avenue.

When the town of Oxnard was established in 1898, it is said that some of the buildings from El Rio were moved to Oxnard. The small community of El Rio retained its rural agricultural character until World War II. Farmland was used for such crops as lima beans, walnuts, grain and citrus. Following the war, there was pressure to develop in Ventura County, and El Rio was no exception. Former agricultural lands east and west of Vineyard Avenue were turned into housing tracts. A new El Rio School was built on the east side of Vineyard Avenue, and the old school was torn down to make way for commercial development. The final blow to the original town center of New Jerusalem where Simon Cohn's store, the Catholic Church, and other commercial buildings were located, came with the construction of the Ventura Freeway in the mid-1950s. The widening of the old Conejo Road (Ventura Boulevard), combined with the construction of the Vineyard overpass, wiped out the entire original crossroads where Simon Cohn's store and other stores, as well as farm houses, once stood.

Vineyard Avenue became the new commercial center of El Rio following World War II and the freeway construction. New commercial buildings and small shopping centers continue to be built on Vineyard

Avenue. During the early 1950s, the County of Ventura began to develop the El Rio Maintenance Yard on El Rio Drive Drive, following the freeway's construction. This large site contained a number of buildings including the animal shelter, shelter office, weights and measures shop and storage, weights and measures garage, calibration station, truck scales, office and labs, communications building, pound master's residence, firemen's residences, fire station, and private garages.

Santa Paula architect, Roy C. Wilson, drew up the master plan for the facility yard in 1953. The buildings were constructed between 1953 and 1959 with other buildings added in the 1960s. These new buildings included several public works buildings: office, warehouse, joint operations, and equipment repair. During the 1980s, the animal shelter buildings were removed from the site.

The land adjacent to the Santa Clara River has been used by several mining companies since the 1930s. During the 1940s, the El Rio Rock Company, specializing in excavating and grading, was located west of Vineyard Avenue and two miles north of Ventura Boulevard. The Southern Pacific Milling Company, formerly a grain storage and milling business with warehouses adjacent to the Southern Pacific Railroad depots throughout Ventura County, transitioned out of this business in the 1940s into rock, sand, ready mix concrete and asphaltic concrete production. It opened its offices at its present location at 3555 Vineyard Avenue in 1952, having acquired the lease for the property that year. The site was developed between 1952 and 1960.

PROJECT IMPACTS

Thresholds of Significance

Archaeological Resources

Based on the CEQA *Guidelines* (item j of Appendix G), the City of Oxnard considers the impact of a project to result in a significant impact on cultural resources if it will disrupt or adversely affect a prehistoric or historic archaeological site or a paleontological site except as a part of a scientific study.

Historic Resources

Based on Section 15064.5(b) of the CEQA *Guidelines*, the City of Oxnard considers a project with an effect that may cause a substantial adverse change in the significance of an historical resource as a project that may have a significant effect on the environment. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration

of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource is materially impaired a project does the following.

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

Archaeological Resources

With regard to prehistoric archaeological resources, the majority of RiverPark Area 'A' was systematically surveyed by archaeologists in 1985 as part of the planning and environmental review process conducted by the City to support the preparation of the Oxnard Town Center Specific Plan.¹ No archaeological sites were recorded within the study area during this or other surveys of portions of the study area, and no sites were known to be present within the Specific Plan boundaries.

The archival and historic records search conducted by the California State University, Fullerton, Archaeological Information Center (AIC) identified two prehistoric archaeological sites within a one-half mile radius of the project area. These archaeological sites are designated CA-VEN-545 and CA-VEN-1234.

With regard to historic archaeological resources, an intensive and systematic Phase I Archaeological Survey was conducted on the site in December 2000. The ground surface was examined by walking transects across the study area spaced at 15-meter intervals to identify artifacts that might be present on the ground surface.

¹ Bissell, R.M. 1985 Cultural Resources Evaluation, Oxnard Town Center Site, Ventura County, California. Report on file, City of Oxnard.

No sites of any kind had been previously recorded within the study area or adjacent properties, and no new sites were discovered during the Phase I survey. However, a low density, mixed scatter of historical debris, possibly dating between 1879 and 1884, was found in the southeastern extreme of the study area, southeast of Myrtle Street and El Rio Drive. This is currently an open lot which is in a disturbed state as a result of the fairly recent demolition of structures that were present on this parcel. As a result of this recent disturbance, this site currently contains a mixture of recent and older trash. This area lacks historical remains in sufficient quantity and with adequate integrity to warrant the recording of a historical site; however, it is possible that a buried historical deposit may be present at this location. Development of the proposed project would result in grading and earthwork at this location that may impact potential historical deposit. This is considered a potential significant impact on archaeological resources before mitigation.

Historical Resources

CEQA requires evaluation of project impacts on historic resources, including properties “listed in, or determined eligible for listing in, the California Register of Historic Resources [or] included in a local register of historical resources.” A resource is eligible for listing on the California Register of Historical Resources if it meets any of the criteria for listing, which are:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of persons important in our past;
- 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
- Has yielded, or may be likely to yield, information important in prehistory or history.

The California Register may also include properties listed in “local registers” of historic properties. A “local register of historic resources” is broadly defined in §5020.1 (k), as “a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.” Local registers of historic properties come essentially in two forms: (1) surveys of historic resources conducted by a local agency in accordance with Office of Historic Preservation procedures and standards, adopted by the local agency and maintained as current, and (2) landmarks designated under local ordinances or resolutions. (Public Resources Code §§ 5024.1, 21804.1, 15064.5)

By definition, the California Register of Historic Resources also includes all “properties formally determined eligible for, or listed in, the National Register of Historic Places,” and certain specified

State Historical Landmarks. The majority of “formal determinations” of NRHP eligibility occur when properties are evaluated by the State Office of Historic Preservation in connection with federal environmental review procedures (Section 106 of the National Historic Preservation Act of 1966). Formal determinations of eligibility also occur when properties are nominated to the NRHP, but are not listed due to owner objection. The criteria for determining eligibility for listing on the National Register of Historic Places (NRHP) have been developed by the National Park Service. Properties may qualify for NRHP listing if they meet the following criteria.

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

According to the National Register of Historic Places guidelines, the “essential physical features” of a property must be present for it to convey its significance. Further, in order to qualify for the NRHP, a resource must retain its integrity, or “the ability of a property to convey its significance.”

The seven aspects of integrity are:

- Location (the place where the historic property was constructed or the place where the historic event occurred);
- Design (the combination of elements that create the form, plan, space, structure, and style of a property);
- Setting (the physical environment of a historic property);
- Materials (the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property);
- Workmanship (the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory);
- Feeling (a property’s expression of the aesthetic or historic sense of a particular period of time), and;
- Association (the direct link between an important historic event or person and a historic property).

The relevant aspects of integrity depend upon the National Register criteria applied to a property. For example, a property nominated under Criterion A (events), would be likely to convey its significance primarily through integrity of location, setting and association. A property nominated solely under Criterion C (design) would usually rely primarily upon integrity of design, materials and workmanship. The California Register procedures include similar language with regard to integrity.

The minimum age criterion for the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR) is fifty years. Properties less than fifty years old may be eligible for listing on the NRHP if they can be regarded as “exceptional,” as defined by the NRHP procedures, or in terms of the CRHR, “if it can be demonstrated that sufficient time has passed to understand its historical importance” (Chapter 11, Title 14, §4842(d)(2)) Section 1368 of the Ventura County Cultural Heritage Ordinance sets out the following criteria for designation of a Ventura County Landmark:

1. It exemplifies or reflects special elements of the County’s social, aesthetic, engineering, architectural or natural history;
2. It is identified with persons or events which are significant in national, state or local history;
3. It shows evidence of habitation, activity or the culture of prehistoric man;
4. It embodies elements of architectural design, detail, materials or craftsmanship which represent a significant structural or architectural achievement or innovation;
5. It is representative of the work of a master builder, designer, artist or architect;
6. It is imbued with traditional or legendary lore;
7. It has a unique location or singular physical characteristics or is a view or vista representing an established and familiar feature associated with a neighborhood, community or the County of Ventura;
8. It is one of the few remaining examples in the County possessing distinguishing characteristics of an architectural or historical type or specimen.

The historic resource study identified 33 existing buildings and structures on the project site that would be demolished. Eighteen of these buildings, including the Newport Boats Showroom, the residence at 2423 Colonia Avenue, and sixteen buildings in the Ventura County Facility Yard, are not eligible as historic resources under CEQA because they are not fifty or more years of age.

Three buildings, as well as some of the buildings and structures on the South Pacific Milling Company site, are fifty years or more of age and are thus eligible as potential historic resources based on age.

These three buildings consist of a single family home on El Rio Drive, the Myrtle Street residence, and the Grubb/Campbell Farmhouse at 3091 Vineyard Avenue.

The home on El Rio Drive is not to be associated with any significant historic event (Criterion A) that occurred in the El Rio area, nor is it associated with a significant person (Criterion B). Architecturally it is not sufficiently distinctive to be eligible for the National Register or the California Register under Criterion C, especially since it no longer resembles its original historic appearance. Changes have been made to siding and additions have been made. It does not to meet the criteria for eligibility as a Ventura County landmark.

The Myrtle Street Residence, west of Colonia Avenue is not to be associated with any significant historic event (Criterion A) that occurred in the El Rio area, not is it associated with a significant person (Criterion B). Architecturally it is not sufficiently distinctive to be eligible for listing on the National Register or the California Register under Criterion C, especially since it no longer resembles its original historic appearance. This building was moved to the site in the mid-1930s. It was a pump house converted to a residence with an addition made on the west side. Although it has served as a residence for almost 75 years, its original use was a pump house and the building was moved from the Eastwood ranch on Gonzales Road. It does not meet the criteria for listing as a Ventura County landmark.

The Grubb/Campbell Farmhouse, located at 3091 Vineyard Avenue, is not eligible for listing on the California Register or the National Register of Historic Places because no significant events occurred on the property (Criterion A). The property was once part of a larger walnut ranch that included two residences, but the integrity of the property has been lost with the removal of the other older residence and the walnut trees, and a portion of the original acreage. No significant individuals are associated with this property (Criterion B). The Grubb family were ranchers and owned the land from at least 1912 until circa 1970 when it was purchased by the Campbell family. There are no buildings on the property with distinctive architectural designs (Criterion C). The main house is a modest, fairly unaltered example of the Ranch house style. A garage and a mobile home are also located on the property. The property is not eligible under any of the Ventura County Landmark criteria.

The remaining ten buildings and structures are located on the Southern Pacific Milling Company site, currently occupied by Hanson Aggregates at 3555 Vineyard Avenue. The El Rio Rock Company was established circa 1942 by Donald Woolsey primarily in response to the need for asphalt with the construction of the Naval Base at Port Hueneme that same year. These buildings were all located on site prior to the leasing of the property by the Southern Pacific Milling Company in 1952. This

grouping of buildings, including the asphalt plant, which was modernized by SP Milling, was one of three industrial rock mining operations in the Ventura-Santa Clara Valley region. The El Rio Rock Company contributed mainly to the construction of roads and airfields. Later, with the addition of a concrete and rock plant by SP Milling, the company supplied materials used in the construction of a large number of buildings throughout Ventura County. The materials produced by SP Milling were used locally and in the Southern California region for highways and streets, housing projects, industrial and commercial buildings, oil refineries, schools, dams and parking structures, airports and naval bases.

Of these ten buildings and structures on the SP Milling site, five are not eligible as historic resources under CEQA because they are not fifty or more years of age. These five are an office/residence (circa 1952), the Administrative Building (circa 1959), the Asphalt Plant (circa 1940 and upgraded continuously), the Concrete Plant (after 1952), and the Rock Plant (after 1952).

The remaining five buildings and structures, which are an office building (circa 1920), a residence/lab/garage (circa 1942), and three metal storage buildings, (circa 1942) are of sufficient age to be potential historic resources. In this case, these five buildings and structures are associated with an industry that has made a significant contribution to the physical development of Ventura County through the construction of roads, bases, airfields, and buildings.

In order to qualify for the NRHP, a resource must retain its integrity, or “the ability of a property to convey its significance.” When judging the integrity of the property, the entire site as well as its surroundings must be considered.

Because the vicinity of the property no longer resembles its original historic appearance, with the encroachment of urbanization to the east, west, and south, and the loss of adjacent agriculture, the setting (physical environment of a property) is effectively lost. The property’s location is the same. The design and materials of the property is partially intact. Although only minor modifications to the buildings have occurred, the access road into the property has been moved twice, and some buildings were added to the site after 1950, while others have been removed. The feeling and association of the property as a rock and cement company is partially intact. While some materials processing still occurs onsite, mining has ceased.

Because of the significant loss of integrity in setting and design, the remaining buildings on the property do not appear to be eligible for listing on the NRHP or the CRHR.

However, they may be eligible for listing as Ventura County Landmarks, a designation that has no integrity criteria. The El Rio Rock Company/SP Milling Company site appears to qualify as a Ventura County Landmark under Criterion 1 because it reflects special elements of the County's mining engineering history. It also appears eligible under Criterion 8 as one of the few remaining examples in the County possessing distinguishing characteristics of a historical industrial type. Based on the eligibility of these resources for listing as Ventura County Landmarks, these resources are considered to be historic resources.

With the thresholds of significance being used for this analysis, the impact of the project is significant impact if it would result in the demolition, destruction, relocation, or alteration of an historic resource. The demolition of the Residence on El Rio Drive, the Myrtle Street Residence, and the Grubb/Campbell Farmhouse would not result in a significant impacts under this threshold. This is because these three buildings are not eligible for the National or the California Registers based on the fact that they are not associated with significant persons or events and are not architecturally distinctive. However, the demolition of the remaining structures on the El Rio Rock Company/SP Milling site and the construction of new residential uses will result in the loss of the entire rock and concrete mining site. This is a significant impact under the thresholds being used.

CUMULATIVE IMPACTS

There are several related projects in the area at this time. These projects include commercial projects south of the Ventura Freeway in established regional commercial areas, a small residential project proposed in the El Rio West Neighborhood adjacent to the Specific Plan Area and, to the east of the Large Woolsey Mine Pit, the Ventura County Juvenile Justice Center. These projects would involve the redevelopment of existing commercial sites or the development of vacant and agricultural land. No historic resources exist on these sites and for this reason, no cumulative impacts to historic resources will result from the development of these projects and the RiverPark Project.

MITIGATION MEASURES

The following mitigation measure is required, since prehistoric and historic archaeological resource impact is potentially significant.

Archaeological Resources

To ensure that any unpredicted cultural resources, including Chumash artifacts, which are uncovered during earthwork, are properly handled, the following mitigation measure is recommended:

- 4.12-1 A qualified Archaeological Monitor shall be present at the site during grading and earthwork activities. If any unpredicted cultural resources are uncovered during earthmoving activities, construction work shall stop immediately and the appropriate local and regional authorities shall be consulted.

Historic Resources

CEQA *Guidelines* 15126(b) addresses mitigation of impacts to historic resources.

- Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant.
- In some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur.

A principle of environmental impact mitigation is that some measure or combination of measures may serve to reduce adverse impacts, and that feasible measures which mitigate environmental impacts should be implemented, even where residual impacts may remain. In reference to mitigating impacts on historic resources, the CEQA *Guidelines* state:

Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource. (PRC §15064.5 (b)(3))

These standards and the supporting literature describe the principles of historic preservation as well as accepted methodologies for carrying out preservation, restoration and rehabilitation projects. The documentation of a resource in preparation for its demolition, for example, would not comply with the

Secretary of the Interior's Standards, although documentation of a resource in connection with its relocation to another suitable site arguably may.

In direct reference to documenting historic resources as a mitigation technique, the CEQA *Guidelines* state:

In some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur. (PRC §15126.4 (b)(2))

Implied by this language are circumstances where documentation may mitigate impacts to less than significant levels. The conditions under which this may be said to have occurred are not specified in the CEQA *Guidelines*.

Taken in total, the language in the CEQA *Guidelines* steers the methodology for mitigation of impacts on historic properties towards conformance with the Secretary of the Interior's Standards. However, the CEQA *Guidelines* also leave open the potential for reducing impacts to levels below significance thresholds by means other than the application of the Standards, under circumstances which the CEQA *Guidelines* do not define. A logical resolution of the language in the CEQA *Guidelines* is to consider the level of eligibility of the property, as well as by what means it derives its significance, in determining the appropriate level and type of mitigation to be employed, and in concluding whether residual impacts will exist after mitigation.

In general practice, mitigation programs for impacts on historic resources tend to fall into three broad categories: documentation, design, and interpretation. Documentation techniques involve the recordation of the site according to accepted professional standards, such that the data will be available to future researchers. Design measures could potentially include direct or indirect architectural references to the historic property, e.g., the incorporation of historic artifacts, into the new development. Interpretation measures might include commemorating a significant historic event or the property's connection to historically significant themes.

As the existing mine property derives some of its significance from the historic industrial style it represents, recordation should be regarded as an appropriate mitigation technique. Since the significance of the property is not in its architecture, design-based mitigation would not be appropriate. As the property derives its significance partially from its associations with historic themes, interpretative measures are warranted. Accordingly, the following measures are recommended:

- 4.12-2 Documentation. Prior to the issuance of a demolition permit, the applicant shall produce a documentation survey of the property in accordance with the Historic American Building Survey (HABS) standards. This documentation shall include archival quality photographs of exterior features, elevations of the seven historic buildings. The 1960 Inspection Report Map prepared by Marsh & McLennan-Gosgrove & Company shall be included as the site plan. The documentation package will be archived at an appropriate location determined by the City of Oxnard.
- 4.12-3 Interpretation. In consultation with a qualified historian, the applicant shall produce an oral history with the former president of SP Milling Company, Bill Hamilton, and any other employees with knowledge of the company history. The taped history, done according to professional oral history standards, shall be indexed and copies made available to the Ventura County Museum of History and Art Oral History Archive and the Oxnard Historical Society and any other appropriate repository.

UNAVOIDABLE SIGNIFICANT IMPACTS

No unavoidable significant impacts to archeological resources will result from the RiverPark Project.

With regard to mitigation for significant impacts to historical resources, the CEQA *Guidelines* state that a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings can generally be considered to have mitigated any impact to a level that is less than significant. The CEQA *Guidelines* also state that, in some cases, documentation of an historical resource as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur. As discussed above, historical documentation is considered to be the most appropriate measure to mitigate the impact of the demolition of the remaining buildings and structures on the El Rio Rock Company site. Nonetheless, in consideration of the language in the CEQA *Guidelines*, the demolition of these remaining structures is considered an unavoidable significant impact on these local historic resources.