

COMMENTS FROM GPU CULTURAL RESOURCES WORKING GROUP AND SUPPORTERS PER 3/22/11 COVER LETTER.
 SUGGESTED TEXT CHANGES MADE IN **BOLD/ITALICS** AND STRIKE THROUGH USED FOR DELETIONS.

Recommendations and comments in bold/italics/underline.

Summary of Key Issues and Review of Alternatives

Section 10.6 Cultural Resources

Section 10.6 Cultural Resources				
Topics and Issues	Plan Update Approach (Alternative B)	Existing Framework Plan (Alternative D)	Alternative A	Alternative C
<p>Cultural Resource Protection</p> <p>County's rich history and resources define the unique character and identity of the county.</p> <p>What level of protection should be afforded to the cultural resources within the county?</p> <p>Policies: <i>Employ best practices in historic preservation to identify and</i></p>	<p>Provides protection as outlined in existing state and federal laws and guidelines, and includes updated references. Requires identification of cultural resources and mitigation of impacts <i>to significant resource values</i> (P1, 2, 5 S4,5). Calls for review and updating of existing implementing ordinances and guidelines to ensure appropriate protection (IM-</p>	<p>Provides protection for significant cultural resources; includes dated references to state and federal laws, guidelines;(,) and consultation with interest groups <i>including affected Native American Tribes and other descendant groups as applicable.</i></p>	<p>Provides (additional) protection through CEQA review (Sxxx) and cultural resources report (Sx) requirements <i>as set forth in a Cultural Resources Protection Ordinance for all discretionary and ministerial permits</i> and projects that might impact</p>	<p>Alternative C would update basic requirements for cultural resource protection, but would not otherwise expand cultural resource protection beyond requirements of state and federal law.</p>

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<p><i>serve significant or unique cultural resources for and future generations.</i></p>	<p>1,2), resulting in adoption of a Cultural Resources Protection Ordinance.</p>		<p>historical resources. (Also establishes a County Cultural Resource Commission) (Sxx).</p>	
<p>Historic Structures Historic buildings are a particularly visible and important component of community character. What level of effort is appropriate to ensure preservation of these resources? Policies: For benefit of and future generations, significant historic architectural properties will be identified and preserved employing best practices recommended by the US Secretary of the Interior's Standards & Guidelines for Historic Preservation.</p>	<p>Encourages active support of local, state and federal historical registrations programs (IM3), promotes adopts the use of the State Historic Building Code (IM4), and calls for establishing a system for identifying historic properties (IM5), to be addressed in a Cultural Resources Protection Ordinance.</p>	<p>Encourages active support of local, state and federal historical registrations programs, promotes the use of the State Historic Building Code.</p>	<p>In addition to policy of Alt B, calls for efforts to develop a Certified Local Government Program through the State Office of Historic Preservation (IMx). includes establishment of an advisory Cultural Resources Commission to include historic preservation professionals skilled and knowledgeable about the County's historic architecture and/or architectural history.</p>	<p>Alternative C would not promote the use of the Historic Building Code or encourage identification or registration of historic properties.</p>

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Plan Alternatives Comparison Chart

Section 10.6 Cultural Resources

Alternative			Section 10.6 Cultural Resources	Staff Remarks/Implementation	Priority
			10.6.3 Goals		
	B	D	CU-G1 Protection and Enhancement of Cultural Resources. <i>To Protect (ed) (and enhanced) significant cultural resources that are important for their heritage, historic, scientific, educational, social and economic values to benefit (to) present and future generations.</i>	Recommended staff revision a variation of FRWK 3530.	
			COMMENTS: 'A' AND 'B' RECOMMENDED AS EDITED ABOVE.		
		C	CU-G1 Protection and Enhancement of Cultural Resources. Protected cultural resources providing significant historic, scientific, educational, social and economic contributions to present and future generations.		
			COMMENTS: 'C' NOT RECOMMENDED.		
			10.6.4 Policies		
	B	C	CU-P1. Identification and Protection. <i>(Cultural resources) The potential for significant impacts to historical resources as defined shall be identified during ministerial (CEQA Guidelines Section 15369) and discretionary permit review, assessed as to significance, and if found to be significant, protected from inappropriate alteration, damage, deterioration, loss, or destruction. A Cultural Resources Protection Ordinance (CRPO) shall establish a 2-tiered review process to identify the potential for significant known or unknown resources aged 50 years or older: (1) Initial Screening (e.g., rapid-response records search, assessor's property characteristics, THPO consultation, NAHC review of Sacred Lands Inventory, "windshield" survey, consult revised/new Zone Overlays), where if no potential for</i>	, MIN, QJ S1,4,5 IM5	

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			<p><i>known or unknown resources are identified, then findings are documented by letter to file; and (2) if Initial Screening discloses known or potentially unknown significant resources are identified, then a Cultural Resources Report is required (see CU-S5).</i></p>		
			<p>COMMENTS: ‘A’ AND ‘B’ RECOMMENDED AS REVISED ABOVE. <u>Question: What is the process for identifying potentially significant resources that have not been inventoried? We recommend establishing a Cultural Resources Protection Ordinance (CRPO). Also recommend OVERLAY ZONES for culturally sensitive zones or landscapes especially in rural, inland areas outside the Coastal Zone to expand the County’s review of projects that may affect known & unknown cultural resources (see CU-1Mx).</u></p> <p><u>Note: A Categorical Exemption shall not apply for a project which may cause a substantial adverse change in the significance of a historical resource (PRC Section 15300.2.f). Examples may including issuance of grading permits (if known or unknown archaeological sites and/or Native American remains are present) and building (and demolition) permits (if building or structure is 50 years of age or older and is eligible for or listed on the California Register).</u></p>		
		D	<p>3531.1 Identification and Protection. Cultural resources (including but not limited to <i>prehistoric and historic archaeological sites and districts, paleontological sites, and historic architectural sites and districts, cultural landscapes, grave sites, traditional cultural properties, sacred places and Native American cultural places</i>) shall be identified where feasible, assessed as to significance, and if found to be significant, protected from loss, or destruction.</p>		
	B	C	<p>CU-P2. Consultation. <i>Humboldt County Federally recognized and non-recognized Tribes, Tribal organizations, historical organizations and historic preservation professionals, interested citizens</i> and applicable agencies shall be consulted during discretionary project review, zone reclassifications, and Plan amendments for the identification, (and) protection and mitigation of adverse impacts to (of) cultural resources. Consultation on ministerial permits shall be initiated if when it has been determined the project may create a substantial adverse change in the significance of a</p>	, MIN, QJ S3	

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	<p>historical resource. <i>At their request, Tribes shall be afforded the opportunity to review and provide comments to the County early in project review and planning (screening) about known or potential significant Native American cultural resources located in project areas within their respective tribal geographical area of concern.</i></p>		
	<p><u>COMMENTS: INCOMPLETE. What if “applicable agencies” don’t know if there are significant cultural resources in the project area? What if the area has never been surveyed by a qualified professional to determine the presence or absence of cultural resources? How will unidentified significant resources be protected with ministerial permits? Who determines the potential for substantial adverse change? When does this process happen if ministerial permits are given out at the counter? How can County regularly consider impacts to known or undocumented significant cultural resources in efficiently carrying out its cyclical maintenance (e.g., roads, buildings, parks) and prepare for emergency situations (e.g., water main leaks in sensitive cultural areas; tsunamis or earthquakes)?</u></p> <p><u>COMMENTS; ‘A’ AND ‘B’ RECOMMENDED AS REVISED ABOVE. Need Consultation + Survey Protocol to fulfill CU-P1 - Identification & Protection of Cultural Resources. Adopt a comprehensive Cultural Resources Protection Ordinance (CRPO); establish a working group composed of local Tribe THPOs, historic preservation professionals versed in archaeology, historical architecture, architectural history, cultural landscapes, etc. to draft Ordinance for adoption by Board of Supervisors. Make process clearer to Applicants, Planners and consultants about review of CEQA and cultural resources.</u></p> <p><u>Record searches & consultation with “applicable agencies” are important first steps, but insufficient if the area has never been surveyed. Therefore, especially with Ministerial permits and in-house County projects, the County needs an Initial Screening process and treshhold (e.g., buildings and sites must be 50 year or older) to identify & protect potentially significant historic buildings and archaeological sites.</u></p> <p><u>Reconnaissance (or “windshield”) surveys could be done by professional(s) - perhaps through independent consultant contracts, or interns coordinated with HSU</u></p>		

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			Cultural Resources Facility.		
		D	3531.2 Consultation. <i>Humboldt County’s Federally recognized and non-recognized Tribes and other applicable descendant groups, interested concerned citizens, historical organizations, and applicable agencies shall be consulted during project review for the identification and protection of cultural resources.</i>		
	B		CU-P3. Avoid Loss or Degradation. Projects located in areas found or zones known to have cultural resources historic or prehistoric archaeological sites, burial grounds, or archeological sites significant cultural resources shall be conditioned and designed to avoid loss or substantial degradation of these resources, including standard provisions for post-review inadvertent archaeological discoveries.	Staff recommended additions to distinguish P3 from P1 and require additional precautions within known cultural resource areas. MIN, QJ, S4	
			COMMENTS: ‘A’ AND ‘B’ RECOMMENDED AS REVISED ABOVE. What about projects with “unknown” cultural resources? How are unidentified resources protected during the permit process as required by Policy CU-P1 & CEQA?		
		D	3531.3. Avoid Loss or Degradation. Projects located in areas found to have cultural resources shall be conditioned and designed to avoid loss or substantial degradation of these resources.		
			COMMENTS: ‘D’ NOT RECOMMENDED AS WRITTEN.		
	B	C	CU-P4. Findings Necessary for Loss or Destruction. Cultural resources shall not be knowingly destroyed or lost through a ministerial or discretionary action unless: A. There is no significant resource that meets the CEQA definition of a historical resource as recommended by the advisory Cultural Resources Commission site or resource has been found to be of insignificant value by representatives of the cultural resources community	Staff recommended additions to improve the title. , MIN, QJ	

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			<p>and relevant experts; or</p> <p>B. There is an overriding public benefit from the project and (compensating) mitigation will assist (to) offset the loss as (is) a condition (made part) of the project.</p>			
			<p>COMMENTS: <u>'A' AND 'B' RECOMMENDED AS REVISED ABOVE.</u></p>			
	B	C	D	<p>CU-P5. Mitigation. Mitigation measures shall be required for any permitted project or County action that where new development would adversely impact significant cultural resources.</p> <hr/> <p>COMMENTS: <u>'A' AND 'B' RECOMMENDED AS REVISED ABOVE.</u></p>	, MIN, QJ S4	
				<p>10.6.5 Standards</p>		
	B	C		<p>CU-S1. Cultural Resources. Cultural resources include, but are not limited to, any object, building, structure, site, district, cultural landscape, area, or place that is culturally, historically, or archeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural history of California annals of Humboldt County. Sites, resources, or structures listed placed in federal, state, or local historic registration programs, or formally determined eligible for listing, or that meet the criteria for listing in the California Register of Historical Resources shall also be recognized as significant cultural (historical) resources. Cultural resources also include cultural places, as defined by California Public Resources Code Sections 5097.9 and 5097.993, including any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine or any Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historic Resources, including any historic or prehistoric ruins, any burial ground, and any archeological or historic site.</p>		
				<p>COMMENTS: <u>'A' AND 'B' RECOMMENDED AS REVISED ABOVE. Notes: the "collection" or group(s) of resources that comprise Districts & Cultural Landscapes MUST be considered in addition to the traditional focus on individual buildings or sites. Properties that are formally determined to be eligible, but are not listed in the</u></p>		

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			<i>California Register are legally recognized as significant historic resources.</i>		
	B	C	D	CU-S2. Confidentiality. As prescribed by law, the exact location of archeological, paleontological, and grave sites and sensitive Native American cultural places shall not be publically identified in order to prevent the possibility of theft or vandalism.	
				<i>COMMENTS: 'A' AND 'B' RECOMMENDED AS REVISED ABOVE. Note: Site specific location information needs to be redacted from cultural resources reports made available to the public and this provision should be included in the Cultural Resources Protection Ordinance (see CU-sx).</i>	
	B	C		CU-S3. Tribes, Tribal Organizations, Historical Organizations, and Applicable Agencies. Federally recognized and non-recognized Tribes and Tribal organizations that have ancestral lands in Humboldt County, historical organizations and preservation professionals, and applicable agencies, include, but are not be limited to, tribal governments with ancestral lands in Humboldt County, appointed Tribal Historic Preservation Officers (THPOs), tribal governments, Native American groups, the Native American Heritage Commission, the Humboldt County Historical Society, the North Coastal Information Center, the Northwest Information Center California Archeological Site Survey at Sonoma State University, Humboldt County Public Works, Building Department and the Planning Division, the California State Office of Historic Preservation, the National Trust for Historic Preservation, local museums, and historical societies and other Native American groups and affected citizens.	
				<i>COMMENTS: 'A' AND 'B' RECOMMENDED AS REVISED ABOVE.</i> <i>Notes: Humboldt County Historical Society has NOT participated in project screening for cultural resources, nor has it expressed interest in doing so to our knowledge.</i> <i>NCIC and NWIC are INFORMATION CENTERS only, and do not make comments about known or potential historical resources (as CEQA defines) to local Governments UNLESS specifically tasked (contracted) to do so. THEY ARE NOT SET UP OR EMPOWERED TO ACT AS REVIEWING AGENCIES. County staff continue to hugely misunderstand the role of the ICs. Each IC houses the confidential info under a contract with CA SHPO, and may have in-house expertise to offer judgement calls on potential (sensitivity) for unlocated historical resources on previously unsurveyed lands, which may</i>	

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			<p><u>lead to IC recommendation for survey/no survey for specific project locations. ICs should be consulted in initial project/permit screening under rapid-response reduced-fee Agreement with County (as has been done in past), along with interested Tribal THPOs for their respective geographical areas of concern. All this needs to be clarified in process under a Cultural Resources Protection Ordinance.</u></p>		
B			<p>CU-S4. Conditioning, Designing, or Mitigating Projects to Avoid Loss. Conditioning, designing, <i>and/or</i> mitigating projects to avoid (loss of cultural resources in general, but) <i>impacts to</i> archeological or paleontological resources (in particular,) <i>significant for their scientific value</i> shall include, where applicable:</p> <p>A. Change building and construction sites and/or road locations to avoid sensitive areas; <i>Design projects involving any ground disturbance to avoid known archaeological or paleontological sites, or</i></p> <p>B. Provide protective cover (e.g. <i>cap with geotextile material and/or other barrier and cover with imported fill soil using light-weight rubber tired equipment</i>) for all or portions of known (for) sites that cannot be <i>feasibly</i> avoided, or <i>after the site has been adequately characterized (depth, area, constituents) and reported on using appropriate scientific excavation techniques, or</i></p> <p>C. <i>Where site avoidance is infeasible, design and implement a research design guided mitigation excavation program, in consultation with culturally affiliated Tribe(s) or other descendant groups, as appropriate, under the direction of a qualified and locally experienced professional, to document significant scientific information that would otherwise be lost by project implementation.</i> Provide for removal or transfer of culturally significant material by a cultural heritage specialist, professional archeologist, or geologist where appropriate and with the approval of all parties concerned.</p> <p>D. For discretionary <i>and ministerial</i> projects that <i>will</i> involve ground disturbing activities, the following measures shall be included as a</p>	New wording required as a part of CEQA review process.	

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			<p><i>standard</i> conditions of approval or as notations to be placed on development plans:</p> <p>resources <i>archaeological or paleontological sites</i> have been identified. located. However, as there exists the possibility that undiscovered cultural resources <i>archaeological or paleontological resources</i> may be encountered during construction activities, the following <i>post-review, inadvertent archaeological discovery mitigation</i> measures are required under state and federal laws:</p> <p>If cultural resources <i>archaeological or paleontological resources</i> are encountered, all <i>ground disturbing work at the find location plus a reasonable buffer zone</i> must <i>be immediately suspended</i> cease and a qualified cultural resources specialist <i>professional</i> contacted to analyze the significance of the find and formulate further mitigation (<i>e.g., project relocation, excavation plan, and protective cover</i>) <i>in consultation with culturally affiliated tribes or other descendant groups, where applicable.</i></p> <p>____ Pursuant to California Health and Safety Code §7050.5, if human remains are encountered, all ground-disturbing work must cease and the County Coroner contacted.</p> <p>The applicant and successors in interest are ultimately responsible for ensuring compliance with this condition.”</p>		
			<p>COMMENTS: <u>‘A’ and ‘B’ RECOMMENDED AS REVISED ABOVE. Note: A standard condition for post-review inadvertent archaeological discoveries should be included in the recommended Cultural Resources Protection Ordinance; the Cultural Resources Commission should be consulted about inadvertent discoveries and advise the County on their resolution consistent with law.</u></p>		
	C	D	<p>CU-S4. Conditioning, Designing, or Mitigating Projects to Avoid Loss. Conditioning, designing, or mitigating projects to avoid loss of cultural resources in general, but archeological or paleontological resources in particular, shall include, where applicable:</p>		

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			<p>E. Change building and construction sites and/or road locations to avoid sensitive areas; or</p> <p>F. Provide protective cover for sites that cannot be avoided; or</p> <p>G. Provide for removal or transfer of culturally significant material by a cultural heritage specialist, professional archeologist, or geologist where appropriate and with the approval of all parties concerned.</p>		
			COMMENTS: <u>NOT RECOMMENDED AS WRITTEN.</u>		
	B	C	<p>CU-S5. Assessment of Impacts. A <i>Cultural Resources Report</i> study prepared by a professional who meets the U.S. Secretary of the Interior’s professional qualification guidelines (36 Code of Federal Regulations Part 61 as amended) may shall be required during environmental assessment to document (determine) the presence, extent, and condition, and explicit significance values of all extant cultural resources and the likely impact upon such resources those found to qualify as (significant) historical resources under CEQA. For buildings and structures of historical significance, alterations and/or additions shall follow the Secretary of the Interior’s Standards and Guidelines for Archaeology and Historic Preservation. Cultural resources reports, including impact assessments on significant resource values, shall be reviewed by the advisory Cultural Resources Commission for adequacy and compliance with recommendations to County staff and the Planning Commission. An advisory CRC shall be appointed as set forth in a CRPO to make recommendations to county staff & Planning Commission.</p>	The addition is necessary to implement the findings in the report.	
			COMMENTS: <u>COMBINE Alternatives A, B, and C to REQUIRE reports for environmental assessments that may involve “unidentified and potentially significant” cultural resources in addition to preparing reports for “known significant” resources.</u>		
			<p>CU-S5. Assessment of Impacts. A <i>Cultural Resources Report</i> study prepared by a professional who meets the U.S. Secretary of the Interior’s professional qualification guidelines (36 Code of Federal Regulations Part 61 as amended) shall be required when Initial Screening has determined there is a known or potentially unknown significant cultural resource that may be adversely impacted by the project (CU-P1). during environmental assessment. The Report shall document to determine the presence, extent, condition, and explicit significance values of all extant cultural resources and the likely impact upon such resources those found to qualify as</p>		

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			<p>(significant) historical resources under CEQA. For <i>buildings and</i> structures of historical significance, alterations and/or additions shall follow the Secretary of the Interior's Standards and Guidelines <i>for Rehabilitation. Study methods and reporting shall follow the Secretary's Standards and Guidelines</i> for Archeology and Historic Preservation. <i>Cultural Resources Reports, including impact assessments on significant resource values, shall be reviewed by the advisory Cultural Resources Commission (CRC) for adequacy and compliance with recommendations to county staff and the Planning Commission.</i></p>		
			<p>COMMENTS: 'A' RECOMMENDED AS REVISED ABOVE.</p>		
			<p>CU-Sx. Cultural Resources Report Contents. <i>The minimum contents of a Cultural Resources Report shall should, at the minimum, contain: be specified in the Cultural Resources Protection Ordinance and be posted on the County's website.</i></p> <p>Recommended: CONDENSE OR REMOVE THIS MATERIAL. Better to include as a Handout or publish online.</p> <p>(1) — Evidence of a full background literature search through the depository at the Humboldt County Historical Society. Whether the resource is on any federal, State or local list of designated historic resources. Whether the resource is identified in any information in the historical archives;</p> <p>(2) — A brief description of the project parcel(s) and the expectations of the consultant at the onset of the inventory report;</p> <p>(3) — A clear description of the methods and results of the field inventory including rationale for surface coverage and a brief discussion of any historic resources encountered. This treatment should be patterned after the <i>Secretary of the Interior's Standards and Guidelines for ARCHEOLOGY AND HISTORIC PRESERVATION [As Amended and Annotated]</i> - http://www.cr.nps.gov/local-law/arch_stnds_0.htm ;</p> <p>(4) — A generally accurate map (7.5' USGS topographic, parcel map or engineers map) in a scale sufficient to show the intensity and coverage of the field inventory as well as the location of any resources encountered;</p> <p>(5) — A description and evaluation of any structures and a determination of whether or not they qualify as historical resources. This evaluation should answer the following questions with respect to possible historic significance:</p> <p>a) — Is it associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California, or the</p>		

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	<p>United States;</p> <p>b) Is it associated with the lives of persons important to local, California, or national history;</p> <p>c) Does it embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master or possess high artistic values;</p> <p>d) Has it yielded, or does it have the potential to yield, information important to the prehistory or history of the local area, California, or the nation.</p> <p>(6) a) Given the answers to 5. a. through d., Does the resource qualify as an historic resource? If the answer to 6a is no, and any of the answers to 5a through 5d is yes, explain why, in your assessment, the resource does not qualify as historic.</p> <p>b) Does the resource have integrity for the period of significance? The period of significance is the date or span of time within which significant events transpired, or significant individuals made their important contributions. Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of significance.</p> <p>c) Identify whether or not the resource retains enough of its historic character of appearance to be recognizable as an historical resource and able to convey the reasons for significance. If it is determined that a resource has lost its historic character or appearance, does it still have the potential to yield significant scientific or historical information or specific data?</p> <p>d) Is the historic resource located within a historic district or a concentration of historic buildings, structures, objects, or sites with precise boundaries that share a common historical, cultural or architectural background? If so, and if it is determined that the resource lacks individual significance as an historic resource, could the resource be considered a contributor to the significance of the historic district or concentration of historic structures?</p> <p>(7) If the resource is historic, provide recommended means to avoid or lessen development related impacts to any historical resources encountered on the parcel(s);</p> <p>(8) The names of any local persons consulted during the preparation of the report;</p> <p>(9) Statement of Qualifications (education, employment, field experience, previous reports and publications in historic resources).</p>		
	<p><u>COMMENTS: 'A' RECOMMEND AS REVISED. Too much detail for the Alternatives Chart; believe the minimum report contents should follow best practices (which the</u></p>		

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			<u>above models), be included in the Cultural Resources Ordinance, and posted on the County's website.</u>		
			CU-Sxx. Cultural Resources Commission Recommendations & Mitigation. The conclusions, findings and recommendations of the Cultural Resources Report will shall be evaluated during the environmental review process including referral for comments from the advisory and will be referred to the Cultural Resources Commission. The Cultural Resources Commission will make recommendations on cultural historic resources to County staff and the Planning Commission. Applicants shall should be encouraged to plan projects to avoid impacts to significant cultural historical resources where feasible, otherwise , When this is not feasible, mitigation measures shall be required shall be incorporated into the project to lessen the impacts of the project on these resources to a less than significant level . Mitigation shall be in accordance with Appendix K of the State CEQA Guidelines.		
			<u>COMMENTS: 'A' HIGHLY RECOMMENDED AS REVISED. Notes: A Commission will advise staff how the lead agency and its applicants can comply with State & Federal laws. It can also help educate the public about historic preservation & cultural resources management (CRM). Note: Appendix K is no longer in effect - was dropped about 20 years ago.</u>		
			CU-Sxxx. CEQA Review. Historical resources as provided defined in Section 15064.5 of the State CEQA Guidelines shall include: 1) a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources; 2) a resource listed in a local register of historical resources; or 3) any object, building, structure, site, or district (including cultural landscapes) area or place which the County Planning Division, after considering advice from the Cultural Resources Commission , determines to be historically or culturally significant. A County Cultural Resources Ordinance shall be enacted for purposes of Initial Project Review (see CU-P1), when a Cultural Resource Report is required (CU-S5), its contents (CU-Sx), professional standards, and a clearly prescribed process for the identification, significance evaluation, assessment of anticipated impacts, and treatment (mitigation) of historical resource impacts for County permitted projects or actions that could result in significant adverse impacts. The Ordinance shall include establishing a Cultural Resources Commission composed of local historic preservation professionals and Tribal Historic Preservation Officers (THPOs), which shall advise County staff and Planning Commission about the adequacy, findings and		

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				<i>recommendations of CEQA review and reporting for historical resources.</i>		
				COMMENTS: <u>'A' HIGHLY RECOMMENDED AS REVISED.</u>		
				10.6.6 Implementation Measures		
	B	C	D	CU-IM1. Review Existing Protections. Review existing ordinances and guidelines and make necessary amendments to assure the protection of cultural resources, resulting in the adoption of a comprehensive Cultural Resources Protection Ordinance including appointment of an advisory Cultural Resources Commission (see CU-Sxxx).		
				COMMENTS: <u>HIGHLY RECOMMENDED AS REVISED ABOVE.</u>		
	B	C	D	CU-IM2. Implementation Guidelines. Adopt implementation guidelines a comprehensive Cultural Resource Protection Ordinance for purposes of standardizing process for purposes of identifying cultural resources (e.g., 2-tiered review process, see (CU-P1)), evaluating their significance, assessing project impacts, and resolving impacts through adoption of appropriate conditions and/or mitigation measures consistent with best practices in historic preservation. cultural resource identification, protection, mitigation and enhancement, heritage, archeological, or paleontological resources and for historic resources.	Staff recommended re-write for clarity.	
				COMMENTS: <u>HIGHLY RECOMMENDED AS REVISED ABOVE.</u>		
	B		D	CU-IM3. Historical Registration. Encourage and actively support federal, state, and local historical registration programs.		
				COMMENTS: <u>RECOMMENDED.</u>		
	B		D	CU-IM4. Historic Building Code. Promote the use of the Historic Building Code of the State of California for historical sites.		
				COMMENTS: <u>HIGHLY RECOMMENDED.</u>		
	B			CU-IM5. Historic Building Identification. Establish and maintain a system for identifying <i>significant historic buildings and structures (individually or as part of districts or landscapes).</i> properties.		
				COMMENTS: <u>RECOMMENDED AS REVISED ABOVE. Notes: There needs to be consistency throughout GPU in use of terms "historic property," "historical resources," etc. consistent with CEQA and PRC definitions. Suggest including a brief glossary of defined terms in GPU.</u>		
				CU-IMx. Certified Local Government Program. Pursue County certification under the		

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			<p>Certified Local Government Program through the State Office of Historic Preservation (SHPO). Requirements of the program include:</p> <ul style="list-style-type: none"> -Enforce appropriate legislation for the designation and protection of historic properties. -Establish and maintain a qualified historic preservation commission. -Maintain a system for identifying historic properties. -Provide for public participation and perform other agreed functions delegated by SHPO. 		
			<p><u>COMMENTS: NOT RECOMMENDED. Adoption of a comprehensive Cultural Resources Protection Ordinance including an advisory Cultural Resources Commission are more realistic; a CLG is a very sophisticated approach that might be considered for the next GPU.</u></p>		
			<p><u>CU-IMx. Map Resource Areas. In consultation with tribal governments, THPOs, the NCIC and the NWIC, the HSU Cultural Resources Facility, and the Cultural Resources Commission, and other experts as appropriate, consider (1) devising OVERLAY ZONES for culturally sensitive zones (including potentially significant cultural landscapes) especially in rural, inland areas outside the Coastal Zone to expand the County’s review of projects that may affect known & unknown cultural resources to facilitate Initial Project Screening (CU-P1), and (2) developing a confidential database that identifies locations of high archaeologically sensitivity, and listed, eligible or potentially eligible historical resources including architectural sites, districts and cultural landscapes, within the County’s jurisdiction. In the near-term at a minimum, continue to contract with the NCIC and NWIC to provide rapid-response, reduced fee initial review of project locations for purposes of determining if known cultural resources are recorded on or near project areas, and for opinions on cultural resources sensitivity with appropriate recommendations. update the County’s sensitivity map (not site specific) that identifies potential locations of archaeological resources, and survey and evaluate existing archaeology resources every three years (while maintaining confidentiality regarding the location of archaeological sites).</u></p>		
			<p><u>COMMENTS: RECOMMENDED AS REVISED ABOVE.</u></p>		

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