

RCVD 5/26/11

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CONSULTING

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Humboldt County Planning Commission
825 5th St.
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RE: GPU, Cultural Resources Chapter

Dear Commissioners,

Thank you for your support of Alternative A. I'd like to recommend a few additional changes to the draft.

POLICY

CU-P1 - Identification and Protection - Cultural Resources shall be identified during ministerial and discretionary permit review, assessed as to significance *per CEQA*, and if found to be significant, protected from substantial adverse change.

STANDARDS

Separate ASSESSMENT OF IMPACTS to Archaeological and Paleontological Resources (CU-S5) from Historic Resources (CU-S6) and adopt the recommended language.

CU-S5 - Assessment of Impacts to Archaeological and Paleontological Resources. Impacts to *significant* archaeological or paleontological resources shall *be avoided or mitigated as applicable*:

CU-S6 - Assessment of Impacts to Significant Historic Structures and Districts. *A review of historic structures 45 years or older shall be conducted for ministerial and discretionary permits to determine the presence or absence of significant historic resources. When initial screening has determined there is a known or potentially significant cultural resource, a Cultural Resource Report shall be prepared by a professional who meets the Secretary of the Interior's professional qualifications. The report shall document the presence, extent, condition and significance of an historic resource per CEQA. Report recommendations shall follow the Secretary of the Interior's Standards and Guidelines for the Treatment of Historic Properties to qualify the project for a Class 31 CEQA Exemption.*

CU-S4 - Conditioning, Designing or Mitigating Projects to Avoid Loss

A-E

F. A project that does not comply with the Secretary of the Interior's Standards and Guidelines for the Treatment of Historic Properties is a project that may have an adverse impact to the significance of an historic resource and shall require an Initial Study and Mitigated Negative Declaration or EIR.

IMPLEMENTATION

Separate the creation of the Committee (CU-IM1) from the Ordinance (CU-IM2).

CU-IM1 - Advisory Committee

A Cultural Resources Advisory Committee shall be created by separate ordinance and consist of seven members. The committee shall consist of three members who are Tribal Historic Preservation Officers (THPO), three members who meet the Secretary of the Interior's Standards for Professionals in Historic Preservation for history, archaeology, architectural history, architecture and historic architecture or have interest or knowledge by virtue of training or experience in: American studies, ethnic studies, museum studies, preservation planning, cultural anthropology, cultural geography, art history, design, folklife, historical landscape architecture or historic building technology. Another member shall have demonstrated interest in or experience with historical resources, historical research, planning, material and object conservation, museums, libraries, archives, historical or cultural organizations.

The Committee shall aid the County in the identification, evaluation and protection of significant cultural resources, shall facilitate public education and promotion of historic and cultural preservation and shall assist in the creation of a Cultural Resources Ordinance.

CU-IM2 - Cultural Resources Ordinance

Review existing ordinances and guidelines and make necessary amendments to assure the protection of cultural resources. ***Create a Cultural Resources Ordinance to describe the process for the*** identification, evaluation, assessment of impacts and mitigation of significant cultural resources per CEQA.

CU-IM3- Historical (*Cultural Resources?*) Designation

Develop a program to actively support nominations to the federal, state, and local registers.

CU-IM5 - Historic Building Identification

Since the County already has a two-tier survey process in place as explained by Director Girard last week, the identification of historic structures should be addressed as a Standard (CU-S5/CU-S6), not an Implementation measure. The Committee and Ordinance will provide consistency for the application of the survey process and improve CEQA compliance.

CU-IMx - Map Resource Areas

Suggest separating the Overlay Zones from the Confidential Database and adopting the following language for Cultural Overlay Zones.

Cultural Overlay Zones - Apply overlay zones to recognize unique cultural landscapes and enhance the evaluation of significance for cultural resources located within these areas as they relate to cultural and historic contexts.

Thank you for your careful attention to these issues.

Regards,



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