

130 and 132 Robin Hill Road
Final Mitigated Negative Declaration

Attachment C

Comment Letters Received

Brian Hiefield

From: sharon ebel <sharonebel@outlook.com>
Sent: Thursday, May 04, 2017 9:48 AM
To: Brian Hiefield
Subject: Robin road project

Good morning Brian,

Let's just keep it simple and quick. If you can remove the suggested changes then go back to your original and then....

In the places where it currently says Chumash observer, just put the word "local" in front there - local Chumash observer.

And you can just add in the simple line of - fields notes by local Chumash observer to be made available if requested.

I am working but will check my email frequently and if needed you can give a call. But those two simple changes might do it.

Thanks so much,
Sharon



Ksen' SKU' Mu' Chumash

Ksen~Sku~Mu
Frank Arredondo ~Chumash MLD
Po Box 161
Santa Barbara Ca, 93102

RECEIVED
MAY 04 2017
City of Goleta
Planning & Environmental Svcs.

May 4, 2017

City of Goleta
130 Cremona Dr.
Goleta. Ca 93117

Re: 130 & 132 Robin Hill Road Site Improvements; Case Number 15-107-DPRV

To Whom It May Concern:

I thank you for the opportunity to comment on the above referenced project. My name is Frank Arredondo. I am a member of the Native American Heritage commission MLD List for the Chumash Territory and listed on the Native American Consultants list for Santa Barbara County. In addition to my professional qualifications as a Cultural Resource Manager I have access to the sensitive information often associated with the Cultural Resource element of project reviews. This provides me with a specific insight to the review of project proposals that the general public does not have.

Being of Native American descendant, from the Chumash territory, I have a strong vested interest in the project. I currently provide comment on several Planning and Development projects in the surrounding areas that have cultural resources impacts. I have been an advocate for the preservation of those Cultural Resources within my community and for several years now as well as placing an emphasis on local governments adhering to policies and procedures. My work is not to be confused with the "consultation" process of Native Americans pursuant to Public Resources Code Section 21080.3.1 I thank you for taking the time to review my comments. My comments today are of my own.

This letter addresses the adequacy and completeness of the environmental analysis described in the Draft MND. The Draft MND does not adequately carry out the process of identification of its review process for the potential to impact cultural resources. The California Environmental Quality Act, (CEQA) is a statute that requires state and local agencies to identify the significant environmental impacts of their actions and to avoid or mitigate those impacts, if feasible. The key here is to "Identify". The Draft MND has failed to properly "Identify" in the DMND document all the steps needed to identify and discuss potential impacts.



Ksen' SKU' Mu' Chumash ksen_sku_mu@yahoo.com / facebook.com/ChumashMLD



After conducting my review of the statements made in the Draft MND I have been able to identify several portions of the draft MND that fail to carry out the process of identifying the potential for impacts to cultural resources.

1. I found no documentation that the parcel has been previously graded, only referenced in previous reports.
2. The parcel has not been extensively archaeologically surveyed. Only one cursory survey has actually been conducted of 2-inch core samples that determine “presence or absence of intact cultural soils”
3. I was not able to find a record that the City made a request for a “Sacred Lands file” with the Native American Heritage commission. (This is separate action aside from AB52 requests.)
4. No such mention of the “southern cemetery” located directly on the project parcel and any discussions to this fact.

The property parcel location is located directly within the entire boundary of CA-SBA-58. Of the two cemeteries identified with CA-SBA-58 one of them are currently mapped on the project parcel. The extended Phase 1 study conducted by DUDEK 2016 only provides a short reference to the southern cemetery by commenting that the 2-inch core samples did not identify any human remains. 2-inch core samples are not a feasible method of identification of human remains. The Archaeological record is very specific as to the location of the southern cemetery and this makes the development proposal needing to address the location of the cemetery. Without proper discussion to this fact the DMND is not complete.

In regards to the proposed Mitigation measures provided additional measures should be applied. A designation should be made by way of a mitigation measure such CulRes-2 & 3. (A Planners Guide to Conditions of Approval and Mitigation Measures, Feb 2005, Cultural Resources section) In doing so would be in accordance with General Plan Open Space Element Policy 8-3.

- City of Goleta General Plan Open Space Element Policy 8-3. OS 8.3 Preservation [CP/CP] *The City shall protect and preserve cultural resources from destruction. The preferred method for preserving a recorded archaeological site shall be by preservation in place to maintain the relationship between the artifacts and archaeological context. Preservation in place maybe accomplished by deed restriction as permanent conservation easement, avoidance through site planning and design, or incorporation of sites into other open spaces to prevent any future development or use that might otherwise adversely impact theses resources.*





Ksen' SKu' Mu' Chumash

Mitigation Measures

- CulRes-2 Mitigation measure requests creating a buffer as “Unbuildable Open Space”, this could be applied to the areas of the identified cemetery location along with a buffer space.
- CulRes-3 Mitigation measure states to include on a separate information sheet to be recorded with the final map designating known archaeological sites as unbuildable areas. The areas shall not be identified as archaeological sites on the information sheet. Some variation of these mitigation measure should be applied at the very least to specify the appropriate distance below the surface to intact resources.

With the inclusion of the additional Mitigation measures that I have stated in this letter and the current mitigation measures proposed, modification/amendment of DMND to include all notification and discovery process made to address cultural resources ‘ie; Sacred lands file request and CCIC background reviews carried out by City or applicant consultant properly noted, I would be happy to support the projects intention for development.

I thank you in advance for your time.

*Best wishes, Frank Arredondo
Ksen~Sku~Mu
Chumash MLD
Po Box 161
Santa Barbara, Ca 93102
Email Ksen_Sku_Mu@yahoo.com*

