

Cultural Resources

APPENDIX C

PHASE I HISTORICAL RESOURCES

MANAGEMENT REPORT

For

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City of Goleta
Planning & Environmental Svcs.

A portion of the Westar Property

7000 Hollister Avenue

(APN 073-030-020)

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1.0 INTRODUCTION

This Phase I Historical Resources Management Report is for a segment of the 1887 railroad line that is located on APN 073-030-020 in the City of Goleta (Figures 1-3). This Historic Resources Management Report will document the history of the property, re-evaluate its eligibility for listing as a significant historic resource at the City of Goleta level and determine its potential eligibility for listing as a significant historic resource at the State and National level. If a significant historic resource is identified, the report will evaluate the need for further study. The report follows the guidelines for cultural resource studies set forth in Section 8, *Cultural Resources Guidelines, Archaeological, Historic, and Ethnic Elements of the City of Goleta, Environmental Review Guidelines for the Implementation of the Provisions of the California Environmental Quality Act* (adopted by Resolution No. 03-56, December 15, 2003). It was written by Pamela Post, Ph.D. (Senior Historian) and Timothy Hazeltine of Post/Hazeltine Associates.

2.0 PROJECT DESCRIPTION

The applicant proposes to construct a mixed-use project on APN 073-030-020 and APN 073-030-020 featuring commercial/retail development along Hollister Avenue and a residential condominium development on the north end of property (Figure 4). The parcels are currently un-improved. A segment of abandoned 1887 Southern Pacific Railroad line located near the northeast corner of APN 073-030-020 has been identified by the City of Goleta as a Significant Historic Resource. Construction of the project would result in removal of the railroad cut. The purpose of this report is to reevaluate the historic significance of the segment of railroad line within the study parcel using the criteria established by the City of Goleta's for determining the significance of potential historic resources.

3.0 HISTORICAL CONTEXT

3.1 The Goleta Valley (1786-1898)

Before the arrival of the Europeans the region which now comprises the Goleta Valley was the site of several important Chumash settlements. Spanish and English seafarers first visited the area in the late sixteenth century. Subsequent explorations were infrequent and sporadic until the late eighteenth century when the Spanish established, in 1782, a permanent fort or Presidio in what is now the city of Santa Barbara. Four years later, in 1786, Franciscan friars founded Mission Santa Barbara, and with its establishment, the Chumash inhabitants of the Goleta Valley were drawn into the mission system. Subsequently, the Goleta Valley became the focus of stock-raising and the cultivation of crops for the expanding population of the Mission and its neophyte inhabitants. To serve its Goleta Valley population the Mission Fathers founded a settlement along Cieneguitas Creek. The settlement remained small, numbering only a few adobe houses and a chapel (A second chapel was later located at what is now the intersection of Hollister and Fairview Avenues).

In 1821, California passed from Spanish to Mexican control. Thirteen years later, in 1834, the Mexican government took command of the mission lands, turning them over to secular authorities. Vast tracts of former mission holdings were granted to Mexican citizens, including land in Goleta. In 1842, a portion of the former mission tract, now known as Rancho Los Dos Pueblos, was granted to Nicholas Den. Den, originally from Ireland, became a naturalized Mexican citizen through his marriage to Dona Rosa Hill, a descendant through her mother's line of early Spanish settlers to the area, the Carrillo and Ortega families. Included in Den's land grant were the project parcels (APN 073-030-021 and APN 073-030-020). Den made few improvements to his holdings and was content to focus his activities on raising livestock. Among the few undertakings he did carry out was the construction of an adobe house on Rancho Los Dos Pueblos, as well as an expansive adobe town house in Santa Barbara. Den died in 1862 leaving his property to his wife and children. In 1868, William Wells Hollister, Santa Barbara's most powerful and influential rancher, purchased 5,000 acres of Rancho Los Dos Pueblos from the Den estate (Tompkins 1983: 146). Hollister's purchase was facilitated by the unscrupulous attorney Charles C. Huse, who served as an executor for the Den estate for Hollister (a stipulation of Nicholas Den's will stated that no property could be sold until the last of Den's children reached the age of majority). Even though Hollister had been warned that his title to the property was clouded he carried out many improvements to his newly acquired ranch including planting orchards, gardens and roads as well as building two large ranch houses in Tecolote Canyon.

Until the 1860s economic activity in the Goleta Valley focused almost exclusively on the raising of livestock. After a severe drought devastated the cattle and sheep herds in the early 1860s, inhabitants of the Goleta Valley turned primarily to dry farming and the orchards to sustain the economy. During this period two small settlements developed in the valley, one, called La Goleta, was located near the intersection of present-day Patterson and Hollister Avenues, the other, La Patera, was located near the intersection of Fairview and Hollister Avenues.

In 1876 Den's daughter Kate Den Bell initiated a lawsuit to recover the Den estate lands that Huse had sold to a number of investors including Hollister, the Sturgis brothers and Ellwood Cooper. This initiated a 14-year court case which proved to be one of the longest in California history. A fourteen year-long litigation, which was not finally concluded until 1890, four years after Hollister's death in 1886 when the California Supreme Court upheld a lower court's ruling that Hollister had acquired the property in contravention of the terms of the Den will and ordered the properties returned to the Den family. As part of the division of property returned to the Den family, Susan Den Tyler the daughter of Nicolas Den was allotted a 256-acre parcel located west of Tecolote Canyon that encompassed the segment of the rail line that is the focus of the current study. Within a few years of their legal victory the Den family began selling off large portions of their holdings, though they continued to retain parts of Rancho Los Dos Pueblos well into the twentieth century.

On August 17, 1887, the Southern Pacific Railroad completed the southern segment of the *Coast Line*, linking Santa Barbara and Los Angeles (the first train arrived five days later) (*Ventura Free Press*, August 19, 1887:3). Continuing through the Goleta Valley

the Southern Pacific laid tracks as far west as Ellwood and constructed stations at La Goleta and La Patera before halting construction on December 21, 1887 due to the onset of a nation-wide depression (Figures 5- 6). Beset by financial problems the Southern Pacific Railroad would defer further construction on the coastal route for a decade. In order to provide a turn-around for trains on the dead end line, a switch and loop of track was constructed to allow trains to return south towards Santa Barbara (this loop was located northwest of the project parcel). Cessation of work left a 50 mile gap in the line between Ellwood and San Luis Obispo County (Coombs 1982: 6). When construction came to a halt just south of Ellwood in 1887, the completed portion of the line included a segment that traversed the property at APN 073-030-020 (Coombs, 1982: 6). At the time the railroad was built this land was part of the Hollister estate. In an article published by the *Goleta Historical Society* Coombs notes that “this old cut is still visible just south of the present railroad and opposite the Isla Vista Power Sub-station at the north end of Old Glen Annie Road (Flavin: 1987: 5). While the coastal route did not continue north to San Francisco, it did allow Goleta Valley farmers to efficiently move their crops south to Los Angeles and points further east. With a reliable transportation link to the rest of California and the nation Goleta Valley’s farms and orchards became an increasingly important part of the local economy.

3.2 Goleta Valley (1899-2009)

In 1899 the Southern Pacific Railroad Company, which had recently merged with the Union Pacific Railroad Company, recommenced work on the *Coast Line* and instituted a system-wide program to extend and modernize the railroad’s infrastructure. Improvements in Santa Barbara County included the construction of a new station, rail yard and roundhouse in Santa Barbara, the realignment of tracks between Santa Barbara and Ellwood and the construction of a new depot in the town of La Patera (which later became Old Goleta). The re-alignment of the tracks was made necessary by the replacement of the old locomotives by larger, faster oil-burning engines that could not negotiate the narrow curves of the old line (Coombs 1982: 6 -7). As a consequence the old route that extended through the project parcels was abandoned and replaced by the current route that runs just south of the 101 Freeway. The new route passed through the property of Susan Den Tyler (Burton Map, January 1900) (Figure 7 and see Figure 6). In conjunction with the realignment of the railroad a new depot was built in La Patera on Depot Road in 1902 (the depot closed in 1973 and was shortly after moved to Rancho La Patera Park in Goleta). No possessing a link to Northern California the Goleta Valley’s agricultural industry expanded with walnut and lemon cultivation becoming major components of the local economy.

During the early twentieth century the community of La Goleta slowly declined after the United States post office was relocated to La Patera. It was at this time that La Patera’s name was changed to Goleta where it formed the nucleus of what is now “Old Town Goleta.” The town eventually expanded, with most of the early development located between what is now Pine and Fairview Avenues (*Goleta Valley Historical Society*, Volume 2, No. 1, Spring, 1987: 5). The new railroad line proved to be a boon to local growers as it allowed them to easily transport their crops south to Los Angeles and, later, to San Francisco with the completion of its northern link,

in 1901. By the onset of the Depression in 1929, however, farmers began to suffer from a decreased demand for their products; fortuitously the valley was able to supplement some of its loss in farm revenue with the petroleum royalties from a strike at Ellwood Beach, in 1928. In the succeeding years the petroleum industry began to play a larger role in the local economy. Taxes from the industry helped to fill the county's coffers and even contributed to the construction of a new courthouse (Tompkins 1966: 277-290). Economic stagnation continued throughout the 1930s finally ending with America's entry into World War II. A significant contributor to the re-energizing of the area's economy was the construction of a federally-funded airport in 1941 (the airport was still under construction when the United States declared war on Japan following its attack on Pearl Harbor, on December 7, 1941) (Ruhge 1988: 4-1). In 1942, the airport was requisitioned as a Marine Air Corps training base where it remained under the aegis of the military until 1946 when it was put on caretaker status. Shortly after, negotiations were begun to not only return the airport to the City of Santa Barbara, but to find a new use for those parts of the base located near Isla Vista. Eventually, this acreage was given to the University of California as the site for a new college campus.

Beginning in the mid-1950s, a dramatic shift occurred in the valley's economy from one based largely on agricultural production, to one dominated by defense-related research and development, construction, and the University of California, Santa Barbara (UCSB). The rapid postwar growth of defense firms and UCSB spurred intense development in the Goleta Valley. Beginning in the late 1950s orchards, farms, and ranches, began to be sold off and subdivided into residential and commercial tracts. With its proximity to an airport and a university campus the Goleta Valley soon developed into a center for academic research and "high tech" industries. Beginning in the late 1950s development in the valley was increasingly dominated by the expansion of the UCSB campus, the building of research and development companies, and the construction of large residential subdivisions, the majority of them located on former farmland close to or adjacent to U.S. 101. By 1960 over 1,000 new homes were under construction, including the early postwar tracts of El Encanto Heights and the Scull Ranch subdivision. By the mid-1960s, research and development companies and UCSB had replaced agriculture as the Goleta Valley's most significant employers. This trend was facilitated by improvements to the transportation system, including the expansion of the Santa Barbara Airport, the construction, in 1970, of Ward Memorial Boulevard (SR 217), and the construction of the U.S. 101 Freeway. Along with the housing tracts came new schools, churches, and retail development. In the succeeding decades the trend toward greater suburbanization of the valley continued. Within the last 30 years, however, economic demographics have once again changed. The research and development industry has largely left the Goleta Valley replaced in its absence by the increased expansion of UCSB and the growth in retail development, including the "big-box" stores at the Calle Real Marketplace (built 1998). Today, the Goleta Valley is largely defined by its suburban housing and university campus. Continuing a pattern begun a half century ago, agriculture and the railroad that served it, while still contributors, play progressively lessening roles in the economy of the Goleta Valley.

3.4 The History of the Southern Pacific Railroad (1866-2009)

3.4.1 The Southern Pacific Railroad Company and Its Antecedents (1861-1886)

The Southern Pacific Railroad was the most important component of a vast array of transportation and development companies owned or controlled by the founders (and their descendants) of the Central Pacific Railroad. On June 28, 1861 the four partners, Collis Huntington, Mark Hopkins, Leland Stanford, and Charles Crocker (collectively known as the “Big Four”) incorporated as the Central Pacific Railroad Corporation under the laws of the State of California (Wilson and Taylor 1938: 235). Using their considerable influence in both California and Washington D.C., the partnership lobbied for and eventually won the contract to build the Pacific leg of the transcontinental railroad (Starr 1985: 200 & Wilson and Taylor 1938: 9-11). All the founders of the Central Pacific Railroad, Crocker, Hopkins, Huntington, and Stanford had migrated to California from the East during the period of the Gold Rush. Interestingly enough, only Stanford founded his fortune on mining, the other partners achieved their initial wealth as merchants and entrepreneurs. By the late 1850s all four men had established themselves as economic and political heavyweights in California, but as yet held little presence outside of the state. This soon changed, however, when in the early 1860s, they began to extend their political and economic influence across the western United States through the development of the western branch of the transcontinental railroad.

Long the dream of American expansionists, the transcontinental railroad was intended to begin from where the rail line terminated at Saint Louis, then stretch west across the Great Plains and Rocky Mountains, to reach its final destination in California. By the mid-nineteenth century the concept of a rail linkage between the newly admitted state of California and the eastern seaboard was becoming a distinct possibility. Boosters believed the transcontinental line would not only lead to an economic boom, but would help to heal the sectional discord then afflicting the United States. Ultimately, the hoped for consensus between the North and South never came to fruition and in 1861 a civil war broke out when the Southern states seceded from the Union (Deverall 1994: 10-12). In 1862, with the question of a proposed southern passage mute, President Abraham Lincoln signed the Pacific Railroad Act authorizing construction along a northern route, thus avoiding the Confederate States to the south (Dagget 1922: 48-49). Though the transcontinental railroad was privately financed and operated, the federal government offered monetary subsidies and land grants as an incentive to its builders. These subsidies subsequently were increased with the passage of a bill, in 1864, offering between \$16,000 and \$48,000 per mile of track, depending on the severity of the terrain the railroad had to traverse (Dagget 1922: 49; Deverall 1994: 51-52). The Central Pacific Railroad eventually received from the government almost \$28 million in subsidies and grants of just over 10 million acres in public lands (Deverall 1994: 54). The transcontinental railroad was completed on May 10, 1869 with the driving of the last ceremonial spike at Promontory Point, Utah, some 690 miles east of Sacramento and 1,086 miles west of the Missouri River. Here, at Promontory Point, the western rail line, the Central Pacific Railroad, met its eastern counterpart, the Union Pacific Railroad.

Ironically, the Union Pacific Railroad was destined to have a close, and at times, contentious relationship with both the Central Pacific and Southern Pacific Railroads.

Even before the completion of its segment of the transcontinental railroad, the Central Pacific Railroad continued its effort to expand its network of California rail lines. In 1868, the Big Four gained control of the Southern Pacific Railroad Company. The Southern Pacific, incorporated in 1865, had been granted a right-of-way by the federal government, in 1866, to build a railroad from San Francisco to San Diego (Daggett 1922: 12-123). In 1869, the partners began construction of the southern line and, by 1874 the railroad had reached Bakersfield (Southern Pacific Railroad 1955: 18). The Tehachapi Mountains south of Bakersfield presented an engineering challenge to the builders and it was not until 1876 that the railroad reached the city of Mojave (Southern Pacific 1955: 18). The branch line to Los Angeles was completed in the same year and its arrival in Los Angeles was instrumental in helping to transform the city, in less than fifty years, from a small town of approximately 6,000 inhabitants to a major metropolis of just over a million people. As was usually the case the railroad was able to secure substantial financial and property grants from the local municipality to ensure that the rail line would run through the Los Angeles (Daggett 1922: 128-129). The greatest engineering feat of this segment of the Southern Pacific was the boring of a 6,975-foot tunnel through the San Gabriel Mountain Range that linked the San Fernando and the San Joaquin Valleys (Southern Pacific Railroad 1955: 19). With the completion of the majority of the southern line, the railroad turned its attention to further expansion and improvements to its holdings (Figure 26). As had been their practice in their earlier business ventures, the Big Four formed companies to carry out these construction projects and other improvements. A contemporaneous account noted that:

They organized construction companies, controlled by themselves, [and] caused these companies to contract with the Southern Pacific for the construction of specified sections of the line, and in their capacity as stockholders of the Southern Pacific required that company to issue and turn over large quantities of stocks and bond in payment for work done (Daggett 1922: 132).

The partners formed three principle construction companies between the mid 1860s and 1878: the Contract and Finance Company (dissolved in 1874), the Western Development Company (incorporated in 1874 and dissolved in 1878) and the Pacific Improvement Company, formed in 1878. The Pacific Improvement Company (dissolved sometime in the early 1940s) would eventually be responsible for building the branch line from the San Fernando Valley to Ellwood in Santa Barbara County (Daggett 1922: 133-134; Post/Hazeltine 1999: 7-8). By 1877, the Central Pacific/Southern Pacific Railroad controlled 85 percent of all the rail lines in California, as well as owning other transportation companies, such as steamship and riverboat companies and urban electric streetcar lines. The various parts of the system were controlled through a complicated combination of leases and stock ownership. The precise relationship

between the various companies controlled by the Big Four were obscure, perhaps deliberately so, and was often modified to suit the changing business goals of the owners. For example, between 1876 and 1885 the Central Pacific leased the Southern Pacific lines.

In 1885, the arrangement was reversed and the Southern Pacific leased the Central Pacific (Southern Pacific 1955: 31-32). The expansion of the Southern Pacific Railroad through the Southwest, (with affiliated lines to New Orleans and steamship lines to the Atlantic coast), as well as the expanding economic opportunities in Southern California and the Central Valley, made it a stronger company than the Central Pacific; a company whose profits were mainly founded on the now declining mineral exploitation of the Sierra Nevada Mountains. As a result, the partnership undertook a restructuring of their holdings to form the Southern Pacific Company. This new holding company was chartered by a special act of the Kentucky Legislature in 1884 (Southern Pacific 1955: 31-32). Long-term leases covering the properties of the Southern Pacific Railroad Company, Central Pacific Railroad Company and all other companies of common control were executed in 1885. After its reorganization, the Southern Pacific undertook a program of expansion. This program included the development of resort and real estate enterprises in Pebble Beach (near Monterey), Coronado (near San Diego) and Hope Ranch (near Santa Barbara) (Post/Hazeltine Associates 2000: 7-8). At the same time the railroad was expanding its other ventures, the long awaited extension to the coastal line that would link Ventura, Santa Barbara, San Luis Obispo, and Monterey Counties with Los Angeles and San Francisco was begun.

3.4.2 Extension of the *Coast Line* (1886-1898)

No additions had been made to the *Coast Line* (the name given Southern Pacific's rail line that followed a route along the western coast of California), since the extension of the railroad to Soledad, in 1873 (Signor 1994: 7). For the next thirteen years the Southern Pacific concentrated on the construction of the interior line through the San Joaquin Valley to Los Angeles and beyond. This hiatus came largely as a result of financial problems the railroad experienced between 1870 and 1878. Contributory factors to the delay came largely as a result of an almost decade's long economic depression, the expense of new construction and the inability of the Big Four associates to interest eastern and European investors in the purchase of their company's bonds. After 1880, economic conditions gradually improved allowing the Southern Pacific to contemplate improvements to their lines. It was during this period that the company completed the segment of the *Coast Line* that connected Ventura and Santa Barbara to Los Angeles.

In April of 1886, work resumed on extending the *Coast Line* south of Soledad and by November of that year the railroad had reached Templeton (Signor 1994: 11). After the completion of the Templeton segment the crews were moved south to Newhall to begin

work on the southern end of the *Coast Line*, where the rail line was planned to parallel the bed of the Santa Clara River from Saugus to the coast. By December of 1886 the line had reached Piru and a month later rails had been laid to Santa Paula. Contemporary newspaper accounts charted the progress of the line through Ventura County with several articles from a local newspaper noting:

It is said that rails sufficient to lay track into Ventura have arrived and that track laying will begin tomorrow. As we have been fooled so often about the matter we don't give this our entire confidence (Free Press: April 13, 1887). Forty carloads of rails reach Santa Paula: line expected in Ventura by the end of the week (Free Press: April 18, 1887). Rails laid to the brick kiln crossing (in Montalvo) (Free Press: April 19, 1887).

After reaching Ventura on April 27, the laying of track continued westwards towards Santa Barbara. Grading of the railroad bed proceeded despite being hampered by the steep cliff sides at Rincon (at the Ventura and Santa Barbara county line) and at Ortega Hill just west of the small community of Summerland. Temporary camps were set up during construction. One camp was located near Rincon beach. This camp consisted of at least fifty tents housing the railroad's work crews. Much of the backbreaking labor associated with the grading operations fell to advance crews of Chinese graders (Signor 1994: 11). Work on the rail lines was often dangerous, and at times, resulted in injury and even death. The cutting of a right-of-way through Ortega Hill, for example, resulted in the death of a railroad worker from a dynamite explosion (*Free Press*: May 4, 1887). Construction proceeded steadily and on July 1, 1887 the first passenger train reached Carpinteria; less than month later track had been laid to the site of the Santa Barbara Depot at the intersection of Victoria and Chapala Streets (Signor 1994: 11). The commencement of rail service to Santa Barbara, on August 19, 1887, was greeted with great celebration as many were convinced that the coming of the railroad would lead to great prosperity for the city. An article in the *San Francisco Journal* noted:

It was needed (the railroad) to place the city in the ranks of the prosperous and progressive cities in the State and to attain that end it was a necessity. We have before stated it was a great event in the history of the city. We should have said the "Greatest." Following in the lead of the iron horse are capital and population. The shrill whistle of the locomotive, the clang of its bell and the rumble of the cars are all music to the ears of the progressive and enterprising. The iron rails convey wealth and add population to every community, even to those localities where Nature seems to appear at her worst. But to Santa Barbara the future is certain, and will leave behind even the wildest dreams of the most enthusiastic. The celebration held in honor of the arrival of the first train was the greatest ever held in that City (San Francisco Journal 1887).

Following its arrival in Santa Barbara the Southern Pacific continued to extend the line westwards. From Santa Barbara the line continued north towards Goleta, pursuing a

more meandering route than the present rail track. This circuitous course not only was an engineering necessity, as the train engines could not handle the steep grades, but the winding route also was less costly and less labor intensive since it required less cutting and grading. In his book, *The Goleta Depot*, Gary Coombs recounts how:

The first track left the old Victoria Street station in Santa Barbara and entered the Goleta Valley by skirting the hills of Hope Ranch along a level grade, later to become Vieja Drive. The route then wound along the northern edge of More Mesa, just south of Atascadero Creek. From the confluence of Maria Ygnacia and Atascadero Creeks, the railroad ran northwestward over a trestle nearly a half-mile long to the site of the original Goleta station. From the Goleta Station the track ran westward, reaching another station on William's flat, near the intersection of La Patera Lane and Hollister Avenue. Continuing westward, the old tracks eventually reached the present right-of-way at the Coromar siding. In a dramatic arch, curving north and then south, along what was later to become Tuolumne Drive and Ellwood Station Road, the rails ended at Ellwood, where a turntable and another station building were situated (Coombs 1982: 3).

Work proceeded on the line and by December of 1887 the tracks had reached Ellwood, eleven miles west of Santa Barbara. At this point the north bound segment of the *Coast Line* was halted temporarily. Work on the track began again, but only on a sporadic basis. Much to the frustration of local boosters it would take another fourteen years before the northern segment, between Templeton and Ellwood, would be finished, finally linking Santa Barbara with San Francisco. The lack of a coastal connection to Central and Northern California was considered to be an economic disaster for Santa Barbara County, both in tourism, as well as the ability to easily and quickly transport the County's agricultural products. Largely as a result of this periodic stoppage the building of a large luxury hotel in Hope Ranch was abandoned. And it was not until 1902, a year after the last leg of the *Coast Line* was completed, that Santa Barbara finally was able to establish, with the building of the 600-room Potter Hotel, a significant presence as a tourist destination.

At the end of 1890 work began on bringing the *Coast Line* across the Santa Lucia Mountains to San Luis Obispo. Due to the mountainous terrain this leg of the railroad proved to be time-consuming and expensive to build and work was not completed until May of 1894 (Signor 1994: 15-16). By 1896, the line had been extended to Surf and the gap in the *Coast Line* had been narrowed to the 56 miles between Surf and Ellwood to the south (Signor 1994: 17). After reaching Surf work on the line was once again suspended. The stoppage of work was due to several factors, one of the most important being the low rate of financial return expected from the completion of the line to San Luis Obispo. In addition, the difficult terrain and the great number of arroyos that needed to be bridged necessitated a large outlay of capital that the partners could expect to see little return on.

These issues, coupled with the Southern Pacific's attempt to negotiate a settlement with the Federal government of a 58 million dollar bond debt incurred by the Central Pacific's building of the transcontinental railroad, gave caution to the continuance of the line. Finally, a worldwide depression, between 1891 and 1897, adversely affected many commercial and industrial firms in the United States, including the Southern Pacific Railroad (Daggett 1922: 363-64). The railroad suffered such financial reverses that it suspended dividend payments on its Central Pacific stock (Daggett 1922: 365-366). By 1898, the financial conditions in the United States had begun to improve. At this same time the Southern Pacific Company and the United States Government finally reached a settlement regarding the repayment of the 58 million dollar debt owed by the Central Pacific. With the improving economic conditions and the settlement of its obligation to the Federal government the Southern Pacific Company could once again contemplate the resumption of work on the *Coast Line*.

3.4.3 "Closing the Gap" of the *Coast Line* (1898-1912)

The completion of the rail line between Surf and Ellwood was the last remaining link that would finally complete the Southern Pacific Railroad's coastal route between San Francisco and Los Angeles. As had been the case for the past fourteen years, much of the difficulty regarding the completion of this relatively short gap was due to factors other than the mileage between Ellwood and Surf in northern Santa Barbara County. These included the time-consuming process of settling with the property owners whose properties would be crossed by the railroad and surveying the right-of-way for the new line. Significant challenges including constructing a railroad line across the numerous canyons and arroyos that extended through the coastal plain between Dos Pueblos and Santa Maria that required extensive cutting and filling and the construction of twelve large steel bridges with viaducts ranging in length between 421 to 811 feet. Materials were often in short supply. One contractor reported that he had made "an exhaustive search for rock suitable for piers" (Lawler 1981: 95). In one case the Southern Pacific Railroad was able to procure stone for the building of culverts and bridges on land owned by the Curletti family. In exchange for the sandstone quarried on the family's ranch, *Punta De Laguna*, the railroad agreed to construct a railroad siding on the property (Santa Barbara County Deed Book #30, pg.: 269-270).

In addition to such impediments as the procurement right-of-ways and acquisition of suitable construction material, the railroad had to contend with the region's acute labor shortage. McMurtie and Stone, the firm in charge of hiring the laborers was paying men at a rate of between \$1.75 and \$2.00 per day (Lawler 1981: 95). In contrast, agricultural employment was plentiful, far less dangerous and paid more money. Eventually, Southern Pacific set up a network of eighteen construction camps between Santa Barbara and Gaviota to house workers and store supplies needed to build the rail line. Because of the difficulty in bringing in mechanized equipment to the isolated Gaviota coast the contractors had to rely on manual labor, and what was euphemistically known as "Fresno Scrapers" (horse-drawn levelers), to grade much of the railroad bed. Once the bed was graded a gravel base was laid (usually about 15 feet wide) and the steel rails and wood

ties were installed. The crossing of the numerous arroyos located between Goleta and Gaviota required the construction of a number of bridges and culverts. The bridges ranged in complexity from small single-span structures, as in the case of the bridge that crosses Tecolote Creek, to large iron and sandstone bridges, such as the one that spans Dos Pueblos Canyon. Built of courses of cut ashlar, the majority of the stonework for these bridges was constructed by Italian stonemasons from Santa Barbara (Brantingham 1996: B3).

Despite these setbacks, by early 1899 the completion of the long awaited coastal line was in sight. The Santa Barbara *Morning Press* noted the economic advantage in the completion of the rail line and in an article observed that “the closing of the gap will certainly increase property values” (*Morning Press*, February 3, 1899). Though close to completion, it would take another two years before the rail line was finally finished. Several critical elements, including a labor shortage and heavy seasonal rains compounded to delay progress on the line’s construction. As if this were not enough, a problem developed at the last moment regarding the Southern Pacific Railroad’s survey of right-of-ways across a ranch owned by the Hollisters, one of the most influential families in Santa Barbara County. When an earthen embankment (carrying the tracks across the mouth of Santa Anita Canyon) threatened to block the Hollister family’s ranch headquarters from its access to the ocean the family threatened to block the railroad’s right-of-way through the property (Tompkins, *Santa Barbara News Press*: September 1, 1960). Ultimately, the dispute was settled when Edward Ivison, project manager in charge of the completion of the rail line between Ellwood and Surf, offered to pay, as a representative of Southern Pacific, part of the \$4,400 needed to build a bridge, enabling the Hollister’s to access the beach (Lawler 1981: 97).

By April, 1899, the Dos Pueblos viaduct, located on the outskirts of Santa Barbara, had been completed. Four months later construction trains began crossing the newly finished Canada Hondo Bridge, located between Gaviota and Goleta. A year later, by July, 1900, the unfinished track had been reduced to only a fifteen mile gap. Four months later, in November, the bridges at El Captain and Arroyo Hondo were in place. At the end of the year tentative plans for a gap-closing “jubilee” were being discussed. Finally, on December 31, 1900, the construction-train engine crossed the Cementerio viaduct (located north of Gaviota), signaling the completion of the *Coast Line*’s northern route (Lawler 1981: 98). A message purportedly sent by the railroad asked, “What news of the gap? It was answered simply, “There is no gap.”

Celebration in Santa Barbara proved to be relatively muted, considering the enthusiastic jubilation received when the first passenger train arrived from Los Angeles some fourteen years earlier. News of the rail line’s completion was neither announced by a banner news headline, nor by a celebratory town gathering, but in a simple congratulatory letter to the editor of the *Santa Barbara Morning Press* from Edward Ivison, in the newspaper’s January 1, 1901 edition (Lawler 1981: 100). This was followed the next day by a news article under the heading of “First Engine Goes Over the Completed Coast Line.” Three months later, on March 31, 1901, the *Coast Line*’s regular runs began. Launched in Los

Angeles, in 1876, and finished some twenty-five years later, the rail line, following a coastal route between Los Angeles and San Francisco, finally linked, with the completion of a viaduct north of Santa Barbara, the two largest and most important cities in California.

Ironically, none of the Big Four lived to witness the completion of the *Coast Line*. The last of the Big Four, Collis P. Huntington died on August 13, 1900, the other three, Mark Hopkins (died in 1878), Charles Crocker (died in 1888) and Leland Stanford (died in 1893) had preceded Huntington in death a number of years earlier. In the last years of his life Huntington had successfully fought off several attempts by the Union Pacific Company and its president, Edward H. Harriman, to acquire portions of the Southern Pacific's holdings. On March 31, 1901, less than a year after Huntington's death, however, Harriman was able to take control of the Southern Pacific Railroad with the help of Huntington's widow, Arabella and his nephew, Edward, who together controlled more than thirty percent of the company's stock (Arabella later married Edward in Paris, in 1913). After the appropriation, Harriman immediately implemented, between 1901 and 1905, a 242 million-dollar program, to expand and improve Southern Pacific Railroad's infrastructure and facilities. Included in these improvements, was the upgrading of the *Coast Line* track between Los Angeles and San Francisco, the construction of the Montalvo cut off in Ventura County and the building of a new train station and expanded rail yards in Santa Barbara (Hofsommer 1986:17 -21). It should be noted that the rail line's existing route through Ventura County and Santa Barbara County has essentially remained unaltered since its completion under Harriman's aegis.

Harriman was President of the Union Pacific Railroad for seven years. He died on September 9, 1908. In that time, under Harriman's skilled direction, the rail line expanded and grew even more powerful and prosperous. But there was a shadow on the horizon for the railroad in the guise of President Theodore Roosevelt and his reformist Administration. On February 1, 1908, the government brought suit under the Sherman Antitrust Act against the Union Pacific, claiming that their control of Southern Pacific was in violation of the antitrust legislation (Hofsommer 1986:51). Tied up in litigation for the next four years the suit was finally brought before the United States Supreme Court. On December 2, 1912, the Supreme Court handed down a decision that proved to have momentous implications for the economic viability of both the Union and Southern Pacific Railroads. In a court ruling it was determined that the two companies "were competitors for substantial traffic." Consequently, said the court, "the combination of the two was in contravention to the Sherman Act" (Hofsommer 1986: 52). Since the government would not allow the Union Pacific to implement a program of stock distribution between the two rail lines, Union Pacific was forced to divest itself of its Southern Pacific shares by redistributing them between several other companies, including the Baltimore & Ohio Railroad and the Central Trust Company of New York. The severing of the two rail lines meant for all intents and purposes "the Harriman era at Southern Pacific [had] ended" (Hofsommer 1986: 54).

3.4.4 The Southern Pacific Railroad (1912-2009)

Once again an independent company, the Union Pacific Railroad continued to prosper until the onset of the Great Depression in 1929. During the Depression, the railroad, like many other industrial and transportation companies, suffered a precipitous decline in business and a consequent loss of income. The Southern Pacific's financial situation was equally bleak. Its cash reserves were so low, that the company was forced to apply to the federal government for loans (Hofsommer 1986: 119-120). Compounding the problem was the gradual rise of modal competition, especially from the emerging trucking industry and passenger bus services, both of which, particularly in the postwar period, began to cut significantly into the railroad's freight and passenger business. A brief respite from the bleak economic picture of the 1930s came with the onset of World War II. During the war years the railroad's financial picture began to improve. Much of this was due to the expanding needs of defense-related industries and the government's transportation requirements, particularly for the movement of troops and supplies. After the war the Southern Pacific Company, like other railroads, encountered a profoundly different era, one that increasingly focused on a system in which people and goods were transported by automobile and truck, rather than rail. As a consequence, many railroad companies, including Southern Pacific, terminated their less profitable runs and, in 1970, transferred the remaining passenger service lines to Amtrak, a newly formed quasi-public company (Hoffsomer 1986: 309-311). Shortly after this transfer, many of the train stations considered redundant by Amtrak, including both the Goleta and Ventura Depots, were closed, moved to other locations, or demolished.

With the termination of passenger service the railroads' focused on freight hauling, the management of their vast property holdings and the development of new types of revenue. In the case of the Southern Pacific Railroad, these new financial sources included the acquisition of a trucking company and the development of industrial parks on its land holdings. By the early 1980s the railroad industry was undergoing a wave of consolidations and in 1983, the Southern Pacific Railroad and the Santa Fe Railroad proposed a merger of their operations. The Federal government, however, denied the merger, and for the next thirteen years the Southern Pacific Railroad continued as an independent operation. Finally, in a subsequent merger, begun 1996 and completed in 1997, it's sometime partner and onetime competitor, the Union Pacific Railroad Company merged the Southern Pacific Railroad Company and its assets with the Union Pacific Railroad Company and the Southern Pacific became an historical memory. Today the Coast Line remains a vital component of the Union Pacific Railroad Company's west national operations.

3.4.5 History of the Project Parcel

Between the late nineteenth and mid-twentieth century the project parcels were intermittently cultivated and remained like the surrounding area, largely rural in character. The first significant development in the area was the transformation of the state highway located north of the project area into a freeway. This along with the construction of residential subdivisions to the north began a gradual process of

suburbanization. By the 1980s nearby development included a commercial building at the southeast corner of the project area, a condominium complex and an electrical substation on the east side of South Glen Annie Road and small commercial buildings along Santa Felicia Drive complex. Development has occurred intermittently since the 1980s the most notable being the Camino Real Market place a large retail/commercial complex located on the south side of Hollister Avenue that opened in 2001.

4.0 SETTING AND SITE DESCRIPTION

4.1 Setting

The project area is located on the north side of Hollister Avenue in the City of Goleta (see Figures 1-3). A mix of commercial and residential development extends along the north side of Hollister Avenue between Storke Road and the intersection of Hollister Avenue and the 101 Freeway. The south side of Hollister is developed with a “big box” retail center, commercial buildings, apartments and single-family houses. At the west end of Hollister Avenue is the Sandpiper Golf Course and the Veneco processing plant. While a few undeveloped parcels exist on the north side of Hollister Avenue the overall development pattern can be characterized as suburban in character.

4.2 Site Description

The project parcels are delineated on their north side by the Union Pacific Railroad right-of-way and the 101 Freeway, on the south side by Hollister Avenue on the east side by South Glen Annie Road and on the west by Santa Felicia Drive. Development east of the project parcels consists of a multiple unit residential project and the Southern California Edison Isla Vista substation. Commercial buildings are located on the northwest and northeast corners of the intersection of South Glen Annie Road. The Camino Real Market Place, a large scale retail development, is located on the south side of Hollister Avenue. On its west side commercial buildings line either side of Santa Felicia Drive. The parcel is undeveloped. Its vegetation is primarily composed of introduced grasses with a few Eucalyptus trees located in the northeast corner of the parcel. The railroad line cut is located on APN 073-030-020 at the northeast corner of the parcel (see Figure 4). Approximately 12-feet deep by about 30 feet in width. Its east end exits onto South Glen Annie Road near the northeast corner of the parcel (Figures 8 -10). The cut follows a gentle curve to the northwest where it exits onto the Union Pacific Railroad’s existing Right-Of-Way (Figures 11-14). No remnants of the line’s gravel bed, iron rails or wood ties have survived.

5.0 EVALUATION AND ANALYSIS

5.1 Previous Designations

On November 2, 1988 the County of Santa Barbara Historical Landmark Advisory Committee adopted Resolution 11-2-88-1, which designated the railroad cut on APN 073-030-020 as a Santa Barbara County Place of Historical Merit (Appendix A). This designation was based on a nomination form prepared by Gary Coombs (Appendix A). The rationale for the designation

was enumerated in a letter dated September 22, 1988 to the then property owner, Teledyne Properties, Inc. (Appendix A). As noted in a letter from the Historical Landmark Advisory Committee to Teledyne Properties, Inc. the designation was considered honorary: *The Place of Historic Merit designation carries no ordinance restrictions on your property rights but is only honorary* (Letter from the Historic Landmark Advisory Committee (Robert W. Pike) to Teledyne Properties, Inc. September 22, 1988) (see Appendix A). It should also be noted that the designation of a property as a “Place of Historic Merit” required approval by HLAC, but not the Santa Barbara County Board of Supervisors.

After the incorporation of Goleta as a city, the rail line segment on APN 073-030-020 was listed as a “Locally Significant Historic Resource #45, Southern Pacific Railroad” on Table 5.2 of the *Goleta General Plan/Coastal Use Plan, September 2006*. Documentation for the designation can be found in the Santa Barbara County Planning and Development Department, Goleta Literary Background Binder for Historical Resources, October 2002 (copy on file with the City of Goleta).

5.2 City of Goleta Criteria for Evaluating the Significance of Potential Historic Resources

Criteria for evaluating if a property is a significant historic resource for CEQA review can be found in the City of Goleta Environmental Thresholds and Guidelines Manual 2002. It is also appropriate to determine if the resource is eligible for listing in the California Register of Historic Resources or the National Register of Historic Places. Finally, the City of Goleta uses a separate set of criteria to determine if a resource is eligible for listing as a locally significant historic resource (Goleta General Plan/Coastal Land Use Plan, September 2006, Section 6.0 Visual and Historic Resources Element Criteria: 6-19-6-20).

5.3 Application of CEQA Thresholds to Project

The criteria used to determine if a resource is significant for the purposes of CEQA are:

Any structure 50 years or older is considered potentially significant and shall be subjected to the following criteria (City of Goleta Environmental Thresholds and Guidelines Manual, 2002).

A significant resource a) possesses integrity of location, design, workmanship, material, and/or setting; b) is at least fifty years old; and c) demonstrates one or more of the following:

- 1) is associated with an event, movement, organization, or person that/who has made an important contribution to the community, state or nation;*
- 2) was designed or built by an architect, engineer, builder, artists, or other designer who has made an important contribution to the community, state, or nation;*
- 3) is associated with a particular architectural style or building type important to the community, state, or nation;*

- 4) *embodies elements demonstrating a) outstanding attention to design, detail, craftsmanship, or b) outstanding use of a particular structural material, surface material, or method of construction or technology;*
- 5) *is associated with a traditional way of life important to an ethnic, national, racial, or social group, or to the community-at-large;*
- 6) *illustrates broad patterns of cultural, social, political, economic, or industrial history;*
- 7) *is a feature or cluster of features which a sense of time and place that are important to the community, state, or nation;*
- 8) *is able to yield information important to the community or is relevant to the scholarly study of history, historical archaeology, ethnography, folklore, or cultural geography.*

The level of significance for these criteria are established by rating each significance attribute of the resource (detailed below) according to the following scale:

- E = exceptional*
- 3 = high; very good*
- 2 = good*
- 1 = little*

5.3.1 Application of Integrity Criteria

a) Integrity

- E = pristine integrity in all 5 categories*
- 3 = good integrity in at least 3 categories*
- 2 = good integrity in at least 1 category*
- 1 = fair to poor integrity in all categories*

Integrity means that the resource retains the essential qualities of its historic character. These guidelines recognize five components of integrity: location, design, setting, materials, and workmanship.

1) Integrity of Location

Integrity of location means that the resource remains at its original location.

The 1887 railroad cut, located on the property at APN 073-030-020, remains in place. Other segments of the 1887 line located north and east of the project area have been removed by subsequent development. However, the railroad line segment on the project parcel has retained its historic configuration. Therefore, the segment of the rail cut on the subject properties receives a ranking of good for integrity of location.

2) Integrity of Design

Integrity of design means that the resource accurately reflects its original plan. However, it is rare to find structures that have not been modified in some manner. Therefore, the City guidelines recognize that building additions that accurately incorporate design elements found in the original structure do not compromise a building's integrity of design.

The segment of the railroad cut on the subject property has retained its historic dimensions; however, the loss of the original gravel bed, rails and ties has diminished the ability of the rail cut to convey its historic appearance and function. Therefore, because of these alterations the rail cut receives a ranking of fair to poor for integrity of design.

3) Integrity of Setting

Integrity of setting means those buildings, structures, or features associated with a later development period have not intruded upon the surrounding area to the extent that the original context is lost.

The property (APN 073-030-020) on which the segment of rail line is located has remained essentially undeveloped since the 1887 railroad route was constructed. The surrounding area remained devoted to agriculture and grazing until the late 1920s when oil was discovered at Ellwood and the area was developed with a number of oil processing facilities and wells. Notwithstanding the establishment of the oil industry, the west end of the Goleta Valley remained essentially agricultural and rural in character until the mid twentieth century when the area became a center for defense and aerospace related firms and the University of California relocated Isla Vista. It was in the early 1960s that the 101 Freeway, which is located north of the subject properties, replaced the original two lane highway. It was in the mid-1960s that the first suburban housing developments were built in Winchester Canyon, El Encanto Heights and Scull Ranch. Commercial development, mostly for research and development was built west of Storke Road along Hollister Avenue Road. Since the late 1970s the pace of growth accelerated and more recently commercial and housing development including a large "big-box" retail complex, as well as multiple-unit housing have been built along Hollister Avenue. Today the surrounding area can be characterized as suburban in character. Surrounding parcels no longer maintain their historic rural character. Therefore, the segment of rail line receives a ranking of fair to poor for integrity of setting.

4) Integrity of Materials

Integrity of materials means that the physical elements present are still present, or if materials have been replaced, the replacement(s) have been based on the original.

The 1887 railroad cut located on the property at APN 073-030-020, has lost several of its character-defining elements, including its iron rails, wood ties and gravel bed. Because of these losses, the 1887 railroad cut receives a ranking of poor for integrity of materials.

5) Integrity of Workmanship

Integrity of Workmanship means that the original character of construction details is present. These elements can not have deteriorated or been disturbed to the extent that their value as examples of craftsmanship have been lost.

The loss of the rail line's iron rails, wood ties, and gravel bed have significantly diminished the ability of this segment of the 1887 railroad to convey the original character of its construction and workmanship. Therefore, the 1887 railroad cut receives a ranking of poor for integrity of workmanship.

b) Age

E = 125 years old or older

3 = 100 years old or older

2 = 75 years old or older

1 = 50 years old or older

Comment: An "E" designation is based on the premise that any manmade feature which survives for 125 years or more is intrinsically exceptional and therefore subject to special consideration be virtue of its age, irrespective of other ratings.

Based on the City's criteria, the 1887 railroad cut, which is 122 years of age, receives a ranking of "3" for age.

c) Association

1) Association

Association with an event, movement, organization, or person important to the community, state or nation:

E = Resource has a central or continuous association with an event...

3 = Resource has a direct association with an event...

2 = Resource has an indirect association with...

1 = Resource has a distant association with...

Comment: The significance of the event, movement, organization, or person must be established before this criterion is applied.

A review of historic records and other documentation indicates that the 1887 railroad cut has a direct association with several notable historic themes including transportation and

the settlement of the Goleta Valley between 1887 and 1900. It is also associated with the Southern Pacific Railroad Company, which played a central and leading role in the economic and political life of California between 1866 through the post World War II period. Therefore, the rail cut, which has a direct association with an event and organization important to the community, state or nation receives a ranking of “3” for Association.

2) Designer

E = a designer that has made important contributions to the community and to the state or nation.

3 = a designer that has made important contributions to the community.

2 = an “attributed to” designer who made important contributions to the community.

1 = designer is unknown.

Comment: This significance attribute focuses on overall designer contributions rather than on the aesthetic merits of the design itself.

The 1887 railroad line was designed by engineers working for the Southern Pacific Railroad Company. It does not have an association with a significant designer, architect, or engineer. Therefore, the 1887 railroad cut, whose designer is unknown, receives a ranking of “1” for Designer.

3) Architectural Style or Building Type

E = retains all of the attributes associated with its style or type or is a good example of its style or type if few survive.

3 = retains most of the attributes associated with its style or type or is remodeled in a recognizable style that does not destroy the original style or type.

2 = retains few, but sufficient attributes associated with its style or type.

1 = undecipherable as a style or type or is one of many examples of its style or type.

Comment: Vernacular building types and industrial architecture are equal in research to well defined and studied architectural styles.

Several of the rail line’s character-defining features including its iron rails, wood ties and gravel bed have been removed. However, this segment of the 1887 railroad cut has retained its historic dimensions and configuration. Therefore, the 1887 railroad cut, which had retained few but sufficient attributes associated with its type receives a ranking of “2” for Building Type.

4.) Construction Materials

E = outstanding or very early example if few survive.

3 = outstanding or very early example if many survive; good example if few survive.

2 = good example if there are many examples of any material(s) and/or method(s) not generally in current use.

1 = common example of any method(s) and/or material(s).

Comment: examples of outstanding construction methods or structural materials include those which successfully address challenging structural problems, or which are treated as visible elements that contribute significantly to the resources overall design quality, or which exhibit fine craftsmanship.

Many of the rail line's original construction materials, including the iron rails, wood ties and gravel bed have been removed. The remaining "construction material" is the cut itself. When it was built in 1887 the segment of the railroad line in the Goleta Valley primarily employed common construction materials of the day such as wood, iron and gravel. The most notable construction material employed on the line was the local sandstone used for some of its bridges, abutments and culverts. No sandstone was employed in the construction of the segment through the project parcels. Therefore, the 1887 railroad cut, which was built using common construction materials of the day, receives a ranking of "1" for Construction Materials.

5.) Traditional Lifeways

E = resource has a central association with a tradition spanning three or more generations.

3 = resource has a direct association with a tradition spanning three or more generations

2 = resource has a direct association with a tradition spanning two generations or an indirect association with a tradition spanning two or more generations.

1 = resource has a distant association with a tradition spanning two or more generations.

Comment: traditional lifeways, as used here, pertain to cultural patterns that have attained antiquity commensurate with the age requirement to which tangible resources are held. A central association ("E" rating) implies a quality of uniqueness between the resource and the tradition.

The rail cut, located on the property at APN 073-030-020, is associated with the Goleta Valley's growth and settlement during the late nineteenth and early twentieth century. However, the ability of the rail cut to convey these associations has been severely compromised by its loss of physical integrity. Therefore, the property receives a ranking of "1" for its ability to convey a Traditional Lifeway.

6.) Association with Broad Themes or Local, State, or National History.

E = resource has a central association with theme(s)

3 = resource has a direct association with themes(s)

2 = resource has a direct association with theme(s)

1 = resource has an indirect association with theme(s)

Comment: The theme and its significance must be established before this criterion is applied. A helpful measure of this criterion is to consider how useful the resource would be for teaching or writing about cultural history.

The rail cut on the property at APN 073-030-020 had a direct association with the history of the development the railroad in the Goleta Valley between 1887 through the mid twentieth century. However, due to the loss of several of its physical components, including its iron rails, wood ties

and gravel bed, it can no longer effectively convey its association with these historic themes. Therefore, the resource receives a ranking of “2” because it has a direct association with themes important to the history of the Goleta Valley.

7.) Conveys (an) Important Sense of Time and Place

E = an individual resource or a unified urban or rural landscape which defines a period of 100 or more years ago.

3 = an individual resource or a unified urban or rural landscape which defines a period of 75 or more years ago.

2 = an individual resource or a unified urban or rural landscape which defines a period of 50 years or more.

1 = an individual resource or a unified urban or rural landscape which defines a period less than 50 years old.

Comment: A useful measure of this criterion is to consider the resource(s) has/have a prominence that contributes to a historic, visual, or environmental continuity. Would a typical resident notice the resource(s) and remember it/them?

If this segment of the 1887 rail line retained more integrity and the surrounding area had retained the rural/agricultural setting that characterized it during the late nineteenth or early twentieth century it could have been considered a resource that characterized a period of 100 more years ago. However, the ability of the segment rail line on the property at APN 073-030-020 to convey this period has been substantially impaired by the loss of several of its physical components, including the line’s iron rails, wood ties and gravel bed. Because of these losses the resource can no longer effectively convey its historic appearance or associations and can no longer convey an Important Sense of Time and Place.

8.) Ability to Yield Important Information

This attribute of significance is not quantifiable. Generally, when this criterion is invoked, it is an indication that the resource under study requires further examination by a professional from a related discipline. Nevertheless, it is incumbent upon the historical specialist to consider what qualities of the resource or the project area might enable it to yield information that is important to another scholarly discipline.

A review of available documentation about this section of the 1887 railroad line did not reveal any information indicating that study by a related discipline would generate significant new information regarding its history or significance.

5.3.2 Quantification of Historic Resource Criteria

In assessing the three major categories and the 13 subsets within the various categories in the City of Goleta’s significance for evaluation of historical resources it is the professional opinion of *Post/Hazeltine Associates* that the rail cut, located on the property at APN 073-030-020, achieves the following historic resource ranking:

Integrity (1.4)

<i>Integrity of location =</i>	2
<i>Integrity of design =</i>	1
<i>Integrity of setting =</i>	1
<i>Integrity of materials =</i>	1
<i>Integrity of workmanship =</i>	1

Age (3)

Association (1)

<i>Association with an event, movement, organization or person important to the community, state, or nation =</i>	3
<i>Designer =</i>	1
<i>Architectural style or building type =</i>	1
<i>Construction materials =</i>	1
<i>Traditional lifeways =</i>	1
<i>Association with broad themes or local, state, or national history =</i>	1
<i>Conveys an important sense of time and place =</i>	n.a.
<i>Is able to yield information important to the community or is relevant to the scholarly study of history, historical archaeology, ethnography, folklore, or cultural geography. (The application of this criterion, which usually applies to archaeological deposits, is beyond the purview of this report.</i>	

The segment of rail line located on the property at APN 073-030-020 receives an overall ranking of “2” for Integrity, “3” for Age and “1.1” for Association (City of Goleta, Environmental Thresholds and Guidelines Manual, 2002: 61 - 62). Properties with a ranking of 1 have a low potential for listing as a significant historic resource.

5.3.3 Application of the Significance Criteria to APN 073-030-020

1) is associated with an event, movement, organization, or person that/who has made an important contribution to the community, state or nation;

The segment of the railroad line on APN 073-030-020 was built by the Southern Pacific Railroad Company in 1887 as part of an effort to complete a coastal railroad line that would link Southern and Northern California. The Southern Pacific Railroad which owned the first transcontinental railroad as well as branch lines in California was the most powerful and influential political and economic player in Santa Barbara County and the state during the period between 1870 through the early twentieth century. Through its development of a network of railroad lines, property development and marketing the Southern Pacific Railroad played a pivotal role in the settlement of California, the development of its agricultural industry and the growth of the state’s economy. Locally,

the construction of the railroad, which provided the Goleta Valley with a reliable way of transporting its crops to Southern California and beyond, played an important role in establishing the area as a prosperous agricultural center. As noted in Section 5.3.1 of this report, the segment of rail line in the study area lacks sufficient integrity to convey its association with historic themes important to the Goleta Valley during the period between 1887 and 1900, primarily because the original tracks and gravel bed have been removed and the line represents a small fragment of a much larger route, which is no longer present. Therefore, the segment of rail line on APN 073-030-020 is not eligible for listing as a City of Goleta Significant Historic Resource under criterion 1.

2) was designed or built by an architect, engineer, builder, artists, or other designer who has made an important contribution to the community, state, or nation;

The segment of the rail line on APN 073-030-020 was built by the Southern Pacific Railroad Company in 1887. As noted in Section 3.4 of this report, the line was designed by engineers employed by the Southern Pacific Railroad Company and built of standard industrial construction materials of the day including gravel, wood and iron and did not represent an innovative example of engineering or design. Nor did the engineers associated with its construction make significant contributions to the architectural or engineering heritage of Goleta, Santa Barbara County, the state or nation. Therefore, the segment of rail line on APN 073-030-020 is not eligible for listing as a City of Goleta Significant Historic Resource under criterion 2.

3) is associated with a particular architectural style or building type important to the community, state, or nation;

The segment of the rail line on APN 073-030-020 was built by the Southern Pacific Railroad Company in 1887. As noted in Section 3.4 of this report, the rail line constructed in 1887 was the first railroad in coastal Santa Barbara County. However, as an isolated fragment of the original 1887 route that is missing its iron rails, wood ties and gravel bed the railroad cut can no longer convey the essential features of its historic appearance or function. Therefore, the segment of rail line on APN 073-030-020 is not eligible for listing as a City of Goleta Significant Historic Resource under criterion 3.

4) embodies elements demonstrating a) outstanding attention to design, detail, craftsmanship, or b) outstanding use of a particular structural material, surface material, or method of construction or technology;

The segment of the rail line on APN 073-030-020 was built by the Southern Pacific Railroad Company in 1887. As noted in Section 3.4 of this report, the line was designed by engineers employed by the Southern Pacific Railroad Company and built of standard industrial construction materials of the day including gravel, wood and iron and did not represent an innovative example of engineering or design. It was built by hired work crews primarily using hand labor and its construction did not represent the application of an innovative construction technique or technology. Therefore, the segment of rail line

on APN 073-030-020 is not eligible for listing as a City of Goleta Significant Historic Resource under criterion 4.

5) is associated with a traditional way of life important to an ethnic, national, racial, or social group, or to the community-at-large;

The segment of rail line on Therefore, the segment of rail line on APN 073-030-020 does not have a significant association with a traditional life way. Therefore, the segment of rail line on APN 073-030-020 is not eligible for listing as a City of Goleta Significant Historic Resource under criterion 5.

6) illustrates broad patterns of cultural, social, political, economic, or industrial history;

As noted in Section 3.0 of this report, the rail line cut on APN 073-030-020, which was part of the 1887 railroad line does have an association with the history of settlement and agriculture in Goleta Valley between 1887 and 1900. While this association exists, the ability of the rail line segment on APN 073-030-020 to convey this association has been significantly diminished by the loss of the original tracks and rail bed and the conversion of most of the surrounding area from agricultural land to retail, commercial and residential development. Moreover, as noted in Section 5.2.1 of the report (c. Association, #6, Association with Broad Themes or Local, State, or National History), the resource has lost its physical integrity and can no longer convey its historic associations. Therefore, the segment of rail line on APN 073-030-020 is not eligible for listing as a City of Goleta Significant Historic Resource under criterion 6.

7) is a feature or cluster of features which a sense of time and place that are important to the community, state, or nation;

As noted in Section 5.1.2 of this report, the setting of the rail line cut on APN 073-030-020 has been significantly diminished by the conversion of most of the surrounding area from agricultural land to retail, commercial and residential development. Moreover, the segment of rail line on APN 073-030-020 no longer maintains its physical integrity. Consequently, the segment of rail line can no longer convey its historic appearance or setting for its period of significance (1887-1900). Therefore, the segment of rail line on APN 073-030-020, which had not maintained its physical integrity or ability to convey a sense of time and place, is not eligible for listing as a City of Goleta Significant Historic Resource under criterion 7.

8) is able to yield information important to the community or is relevant to the scholarly study of history, historical archaeology, ethnography, folklore, or cultural geography.

The application of this criterion to archaeological deposits is beyond the purview of this report.

Summary Statement of Significance Pursuant to CEQA

The former railroad cut on APN 073-030-020 is not eligible for listing as a significant historic resource for the purposes of CEQA review.

5.4 Eligibility for Listing in the California Register of Historical Resources

The following criteria are used to determine if a resource is eligible for listing in the California Register of Historical Resources:

For purposes of this section, the term “historical resources” shall include the following:

1.) *A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.).*

2.) *A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, 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.*

3.) *Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architecturally, 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 (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852) including the following:*

3a Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;

3b Is associated with the lives of persons important in our past;

3c 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;

3d Has yielded, or may be likely to yield, information important in prehistory or history.

Application of the California Register Criteria

Criterion 1: *A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.).*

The segment of rail line on APN 073-030-020 is not listed in the California Register of Historical Resources, nor has it been determined to be eligible for such a designation by a previous study. Therefore, the resource is not eligible for listing in the California Register of Historical Resources under Criterion 1.

Criterion 2: *A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, 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.*

The rail line segment on APN 073-030-020 is listed as a “Locally Significant Historic Resource #45, Southern Pacific Railroad” on Table 5.2 of the *Goleta General Plan/Coastal Use Plan, September 2006*. It should be noted that the designation of the rail road cut as a Significant Historic Resource does not appear to have been based on a through application of the integrity or significance criteria set forth in the City of Goleta Environmental Review Guidelines; instead it was based on information collected by the Santa Barbara County Planning and Development Department in its Goleta Literary Background Binder for Historical Resources, October 2002. The information regarding the railroad cut in the scrapbook would not appear to meet the guidelines for historic property studies as detailed in PRC §5024.1. Therefore, the rail line segment is not potentially eligible for listing in the California Register of Historical Resources under Criterion 2.

Criterion 3a: *Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;*

The segment of the railroad line on the study parcels was built by the Southern Pacific Railroad Company between 1886 and 1887 as part of an effort to complete a coastal railroad line that would link Southern and Northern California. The Southern Pacific Railroad which owned the transcontinental railroad as well as branch lines in California was the most powerful and influential political and economic player in California during the period between 1870 through the early twentieth century. Through its development of a network of railroad lines, property development and marketing the Southern Pacific Railroad played a pivotal role in the settlement of California, the development of its agricultural industry and the growth of the state’s economy. Locally, the construction of the railroad, which provided the Goleta Valley with a reliable way of transporting its crops to Southern California and beyond, played an important role in establishing the area

as a prosperous agricultural center. While the 1887 railroad line has a direct association with historic themes important to the Goleta Valley and California, it lacks sufficient integrity to convey this association, primarily because the original tracks and gravel bed have been removed. Therefore, the resource is not eligible for listing in the California Register of Historical Resources under Criterion 3a.

Criterion 3b: Is associated with the lives of persons important in our past;

A review of historic documents and previous reports and published histories of the Southern Pacific Railroad line in the Goleta Valley did not reveal any information linking this section of rail line to person or persons who made significant contributions to the culture and development of the State. Therefore, the segment of rail line in APN 073-030-020 is not eligible for listing in the California Register of Historical Resources under Criterion 3b.

Criterion 3c: 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;

The segment of abandoned rail line on APN 073-030-020 is composed of a below grade cut, no other elements of the original railroad line remain in place. Graded through in 1887 the railroad cut does not embody in its construction or design the distinctive characteristics of a type, period or method of construction. Constructed using standard techniques of the day, primarily hand labor, this engineering work does not represent the work of an important creative individual nor does it possess high artistic values. Therefore, the segment of abandoned rail line on APN 073-030-020 is not eligible for listing in the California Register of Historical Resources under Criterion 3c.

Criterion 3d: Has yielded, or may be likely to yield, information important in prehistory or history.

As noted in Section 4.3 of this report, the history of the Southern Pacific Railroad line in the Goleta Valley and its related features has been well documented by previous studies and in published documentation. The potential of this segment of the 1887 rail line to contain further information important to the community is considered to be minimal. Therefore, the segment of abandoned rail line on APN 073-030-020 is not eligible for listing in the California Register of Historical Resources under Criterion 3d. The application of this criterion to potential archaeological deposits is beyond the purview of this report.

Summary Statement of Eligibility for Listing in the California Register of Historical Resources

As delineated above in Section 5.3 of this report, the segment of the 1887 railroad cut is not eligible for listing in the California Register of Historical Resources.

5.5 Eligibility for Listing in the National Register of Historic Places

Also to be considered are the criteria for the National Register of Historic Places. (MEA Technical Appendix 1 VGB-10):

The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of State and local importance that possess integrity of location, design, setting, materials, workmanship, feeling and association, and:

- (a) That are associated with events that have made a significant contribution to the broad patterns of our history; or*
- (b) That are associated with the lives of persons significant in our past; or*
- (c) That 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*
- (d) That has yielded, or may be likely to yield, information important in prehistory or history.*

Application of the Criteria

- (a) That is associated with events that have made a significant contribution to the broad patterns of our history*

The segment of the railroad on the study parcels was built by the Southern Pacific Railroad Company between 1886 and 1887 as part of an effort to complete a coastal railroad line that would link Southern and Northern California. The Southern Pacific Railroad which owned the transcontinental railroad as well as branch lines in California was the most powerful and influential political and economic player in California during the period between 1870 through the early twentieth century. Through its development of a network of railroad lines, extending from Louisiana to California the Southern Pacific Railroad Company and its associated companies played a pivotal role in the settlement of California, the development of its agricultural industry and the growth of the nation's economy. Locally, the construction of the railroad, which provided the Goleta Valley with a reliable way of transporting its crops to Southern California and beyond, played an important role in establishing the area as a prosperous agricultural center. While the 1887 railroad line has a direct association with historic themes important to the Goleta Valley and California, it lacks sufficient integrity to convey this association, primarily because the original tracks and gravel bed have been removed. Therefore, the segment of rail line on APN 073-030-020 is not eligible for listing in the National Register of Historic Places under Criterion a.

(b) That is associated with the lives of persons significant in our past

A review of historic documents and previous reports and published histories of the Southern Pacific Railroad line in the Goleta Valley did not reveal any information linking this section of rail line to person or persons who made significant contributions to the culture and development of the State. Therefore, the segment of rail line on APN 073-030-020 is not eligible for listing in the National Register of Historic Places under Criterion b

(c) That 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;

The segment of abandoned rail line on APN 073-030-020 is composed of a below grade cut, no other elements of the original railroad line remain in place. Graded through in 1887 the railroad cut does not embody in its construction or design the distinctive characteristics of a type, period or method of construction. Constructed using standard techniques of the day, primarily hand labor, this engineering work does not represent the work of an important creative individual nor does it possess high artistic values. Therefore, the segment of abandoned rail line on APN 073-030-020 is not eligible for listing in the National Register of Historic Places under Criterion c.

(d) That has yielded, or may be likely to yield, information important in prehistory or history.

As noted in Section 4.3 of this report, the history of the Southern Pacific Railroad line in the Goleta Valley and its related features has been well documented by previous studies and in published documentation. The potential of this segment of the 1887 rail line to contain further information important to the community is considered to be minimal. Therefore, the segment of abandoned rail line on APN 073-030-020 is not eligible for listing in the National Register of Historic Places under Criterion d. The application of this criterion to potential archaeological deposits is beyond the purview of this report.

Summary Statement of Eligibility for Listing in the National Register of Historic Places

As delineated above in Section 5.4 of this report, the segment of the 1887 railroad cut is not eligible for listing in the National Register of Historic Places.

5.6 Eligibility for Listing as a Locally Significant Resource

The abandoned railroad cut on APN 073-030-020 is identified in the City of Goleta General Plan/Coastal Plan as Locally Significant Resource #45. The City of Goleta uses the following criteria to determine if a resource is eligible for listing as a locally significant historic resource

(Goleta General Plan/Coastal Land Use Plan, September 2006, Section 6.0 Visual and Historic Resources Element Criteria: 6-19-6-20):

- a. It exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, architectural, landscape architectural or natural history.*
- b. It is identified with persons or events of local, state or national history.*
- c. It embodies distinctive characteristics of a style, type period, or method of construction or is an example of the use of indigenous materials or craftsmanship.*
- d. It represents works of a notable builder, designer, architect, or landscape architect.*
- e. It includes a geographically definable area possessing a concentration of historic, prehistoric, or scenic properties that are unified aesthetically.*
- f. It has a location with unique physical characteristics, including, landscaping, or is a view or vista representing a significant structural, architectural, or landscape, architectural achievement.*
- g. It embodies elements of design, detail, materials, or craftsmanship representing a significant structural, architectural, or landscape architectural achievement.*
- h. It reflects significant geographical patterns associated with different eras of settlement and growth.*
- i. It is one of a few remaining examples possessing distinguishing characteristics of an architectural, landscape architectural, or historical type.*
- j. It includes rare or specimen plant materials associated with a particular period or style of landscape history.*

Application of the Criteria

a. It exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, architectural, landscape architectural or natural history

While the segment of abandoned rail line on APN 073-030-020 has a demonstrable association with an important historical event, namely the arrival of the railroad in the Goleta Valley in 1887, its ability to convey this association has been significantly compromised by the destruction of almost all of the original 1887 line; moreover, the remaining fragment of the line on APN 073-030-020 no longer retains sufficient integrity to effectively convey its original function or association with this historic event. Therefore, the abandoned railroad cut on APN 073-030-020 is not eligible for listing as a locally significant resource under Criterion *h*.

b. It is identified with persons or events of local, state or national history.

The segment of rail line on APN 073-030-020 is associated with the construction of the first railroad line built in the Goleta Valley. Constructed in 1887 the line provided the region with its first reliable transportation link to Southern California and the rest of the nation. While APN 073-030-020 has a demonstrable association with an important historical event, its ability to convey this association has been significantly compromised by the destruction of almost all of the original 1887 line; moreover, the remaining fragment of the line on APN 073-030-020 no longer retains sufficient integrity to effectively convey its original function or association with

this historic event. Therefore, the abandoned railroad cut on APN 073-030-020 is not eligible for listing as a locally significant resource under Criterion *h*.

c. It embodies distinctive characteristics of a style, type, period, or method of construction or is an example of the use of indigenous materials or craftsmanship.

Constructed in 1887 the railroad line on APN 073-030-020 originally featured a railroad cut with a rail line consisting of a gravel bed supporting wood ties and steel rails. At the time of its abandonment in 1887, the rail line's metal rails, gravel bed and wood ties were removed. Because the abandoned railroad cut on APN 073-030-020 can no longer convey its historic appearance or function, it does not possess the distinguishing characteristics of its type. Therefore, the abandoned railroad cut on APN 073-030-020 is not eligible for listing as locally significant resource under Criterion *c*.

d. It represents works of a notable builder, designer, architect, or landscape architect.

As noted in Section 3.4.3, the railroad cut, which was part of a railroad line built in 1887 by the Southern Pacific Railroad, was not designed by notable builder, designer, architect, or landscape architect. Therefore, the abandoned railroad cut on APN 073-030-020 is not eligible for listing as a locally significant resource under Criterion *d*.

e. It includes a geographically definable area possessing a concentration of historic, prehistoric, or scenic properties that are unified aesthetically.

The railroad cut is an isolated fragment of a railroad line built in 1887 that once extended from Los Angeles to Elwood, north of Goleta. This portion of the line was abandoned in 1899 when a new line was constructed through the Goleta Valley to San Luis Obispo County. With exception of another isolated section of the original railroad line located near Kellogg Way, the original line has been destroyed. The isolated fragment of the original line on APN 073-030-020 is not part of a larger concentration of historic features. Therefore, the abandoned railroad cut on APN 073-030-020 is not eligible for listing as a locally significant resource under Criterion *e*.

f. It has a location with unique physical characteristics, including, landscaping, or is a view or vista representing a significant structural, architectural, or landscape, architectural achievement.

Located on an undeveloped lot in a semi-urbanized area of Goleta the segment of abandoned railroad line on APN 073-030-020 no longer retains its ability to convey its historic appearance, nor does it embody unique physical characteristics that would make it eligible for listing as a locally significant resource under Criterion *f*.

g. It embodies elements of design, detail, materials, or craftsmanship representing a significant structural, architectural, or landscape architectural achievement.

The segment of the 1887 railroad built in the Goleta Valley was constructed using standard construction techniques and construction materials of the day including primarily hand labor and pre-cut wood ties and steel rails. The most notable feature of this part of the railroad line was the use of local sandstone for culverts and bridges. However, this material was not used on the segment of the rail line on APN 073-030-020. Because the segment of rail line on APN 073-030-020 did not embody a significant structural achievement in terms of its design or construction it is not eligible for listing as a locally significant resource under Criterion g.

h. It reflects significant geographical patterns associated with different eras of settlement and growth.

This portion of the line was abandoned in 1899 when a new line was constructed through the Goleta Valley to San Luis Obispo County. Construction of the 1887 rail line which linked southern Santa Barbara County to the rest of Southern California provided the Goleta Valley with its first reliable transportation link with the rest of the nation. It engendered the development of the Goleta Valley's agricultural industry and spurred settlement and development of the area. Subsequently in 1899, this segment of line was abandoned and replaced by the current line abutting the north side of the project parcel. The new line which was completed in 1900 provided coastal Santa Barbara County with its first railroad link to Northern California. While APN 073-030-020 has an association with history of settlement and growth of the Goleta Valley between 1887 and 1900, its ability to convey this association has been significantly compromised by the destruction of almost all of the original 1887 line; moreover, the remaining segment on APN 073-030-020 no longer retains sufficient integrity to effectively convey its original function or association with Goleta Valley history. Therefore, the abandoned railroad cut on APN 073-030-020 is not eligible for listing as a locally significant resource under Criterion h.

i. It is one of a few remaining examples possessing distinguishing characteristics of an architectural, landscape architectural, or historical type.

When it was constructed in 1887 the segment of rail line on APN 073-030-020 featured a railroad cut with a rail line consisting of a gravel bed supporting a rail line with wood ties and steel rails. At the time of its abandonment in 1887, the rail line's metal rails, gravel bed and wood ties were removed. Subsequently, most of the abandoned rail line in the Goleta Valley was removed by development leaving the segment of line on the project parcel and another section located south of Kellogg Way in old town Goleta. While the rail cut at APN 073-030-020 is one of the few surviving segments of the 1887 railroad line in the Goleta Valley, it can no longer convey its historic appearance or function and no longer possesses the distinguishing characteristics of its type. Therefore, the abandoned railroad cut on APN 073-030-020 is not eligible for listing as locally significant resource under Criterion i.

j. It includes rare or specimen plant materials associated with a particular period or style of landscape history.

Currently, the parcel on which the railroad cut is located is a field with isolated planting of Eucalyptus trees located near its northeast corner. These plantings are not composed of rare or

specimen plant material. Therefore, the abandoned railroad cut on APN 073-030-020 is not eligible for listing as a locally significant resource under Criterion j.

Summary Statement regarding Eligibility for Listing as a Locally Significant Resource

The abandoned segment of the 1887 Southern Pacific Railroad line on APN 073-030-020 does not retain sufficient integrity to convey its historic associations or significance. Therefore, it does not qualify for its current listing as a Locally Significant Historic Resource.

5.7 Summary Statement of Significance under All Tests

After the incorporation of Goleta as a city, the abandoned rail line segment on APN 073-030-020 was listed as a “Locally Significant Historic Resource #45, Southern Pacific Railroad” on Table 5.2 of the *Goleta General Plan/Coastal Use Plan, September 2006*.

The criteria for evaluating if a property is a significant historic resource for CEQA review are found in the City of Goleta Environmental Thresholds and Guidelines Manual 2002. CEQA significance thresholds were applied to the abandoned railroad cut on APN 073-030-020. Post/Hazeltine Associates has concluded that the potential resource does not retain sufficient integrity to convey its historic associations or significance. Therefore, the abandoned railroad cut is not considered to be a potentially significant resource for the purposes of CEQA review.

Post-Hazeltine Associates has evaluated the resource for eligibility for listing in the California Register of Historic Resources and the National Register of Historic Places, and has concluded that the resource is not eligible for listing under either Register.

The criteria set forth in Section 6.0, Visual and Historic Resources Element Criteria, of Goleta General Plan/Coastal Land Use Plan (September 2006) were applied to the resource to determine if the abandoned railroad cut meets any of the criteria necessary for listing as a locally significant historic resource. Post/Hazeltine Associates has concluded that the resource does not retain sufficient integrity to convey its historic associations or significance. Therefore, the abandoned railroad cut, which is listed as a locally significant resource, does not meet any of the criteria necessary for such a designation.

6.0 ASSESSMENT OF PROJECT IMPACTS AND CONCLUSIONS

As noted in the original designation in 1988 of APN 073-030-020 as a Place of Historic Merit by the Santa Barbara Historical Landmark Advisory Committee the original designation was intended to be commemorative in nature. The designation of the property as a Locally Significant Historic Resource by the City of Goleta was based on this earlier designation and did not include an assessment of the resource’s potential eligibility for listing using the criteria set forth by the City of Goleta for evaluating potentially historic resources. After applying the city’s historic resource significance criteria to the rail cut at APN 073-030-020, Post/Hazeltine Associates has concluded that it does not meet any of the necessary eligibility criteria for listing

as a City of Goleta Locally Significant Historic Resource or for listing in the California Register of Historical Resources or the National Register of Historic Places. Because the rail cut does not meet the criteria necessary for listing as a City of Goleta Locally Significant Historic Resource its removal will not result in significant impact to historic resources. However, Post/Hazeltine Associates recommends that the rail cut be photo-documented following the requirements outlined by the City of Goleta for documenting historic resources prior to its removal. Copies of the photo-documentation shall be archived with the Goleta Valley Railroad Museum and the Goleta Valley Historical Society. In addition, a plaque memorializing the history of the rail cut should be incorporated into the design of the new project. Residual impacts to historic resources from the implementation of the proposed project are considered to be adverse but not significant.

7.0 SOURCES CONSULTED IN THE PREPARATION OF THIS STUDY

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The following archives were used in the preparation of this report:
County of Santa Barbara, Hall of Records

County of Santa Barbara Tax Assessor's Office

Goleta Valley Historical Society

Santa Barbara Historical Society, Gledhill Library

University of California, Santa Barbara, Map and Imagery Room

University of California, Santa Barbara, Special Collections

Ventura County Museum of History and Art

Additional Sources:

U. S. Land Commission Map, 1855.

U. S. Geodetic Survey Maps, 1870, 1878.

W. W. Burton Map, January 1900

U.S.G.S. Map of Goleta, Quad, 1903.

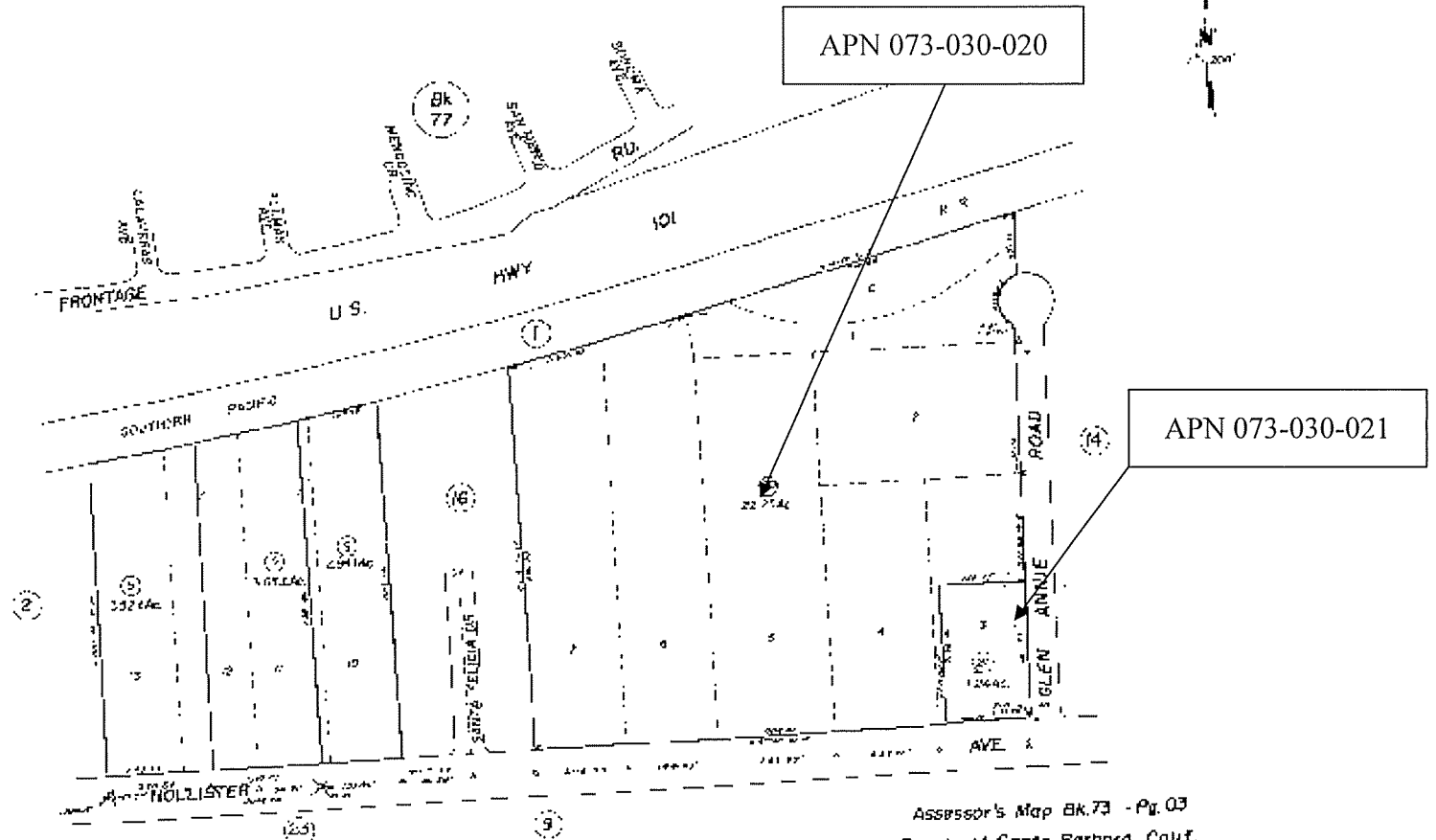
Maps & Photographs



Figure 1
 Location Map for APN 073-030-020, Goleta, California

73-03

RANCHO LOS DOS PUEBLOS



R.S. Bk. 22 Pg. 26 - Gilbert Watkins Tract

NOTE: Assessor's Block Numbers Shown in Circles
Assessor's Parcel Numbers Shown in Boxes

Assessor's Map Bk. 73 - Pg. 03
County of Santa Barbara, Calif.

Figure 2
Assessor Parcel Map
APN 073-030-020 and APN 073-030-021

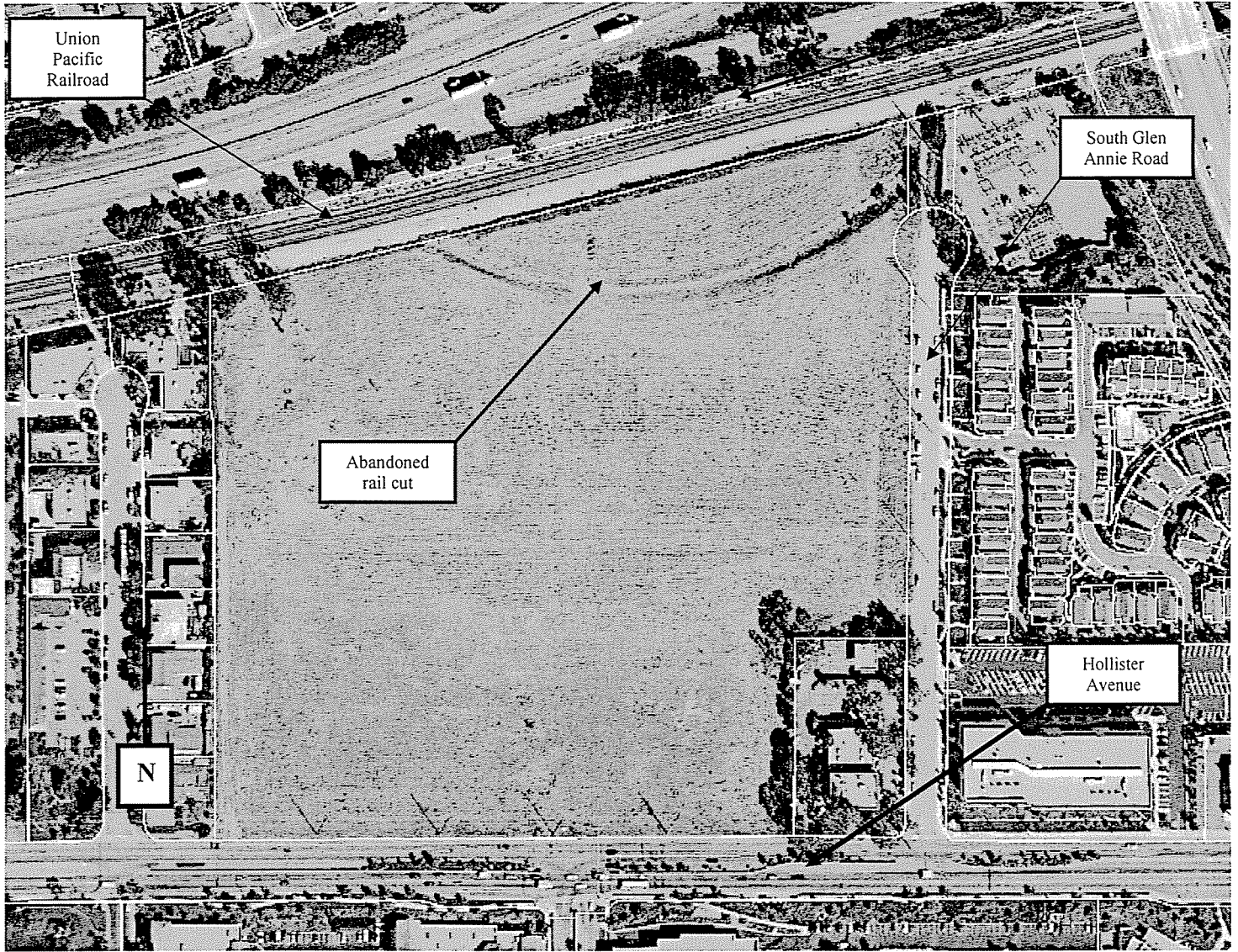
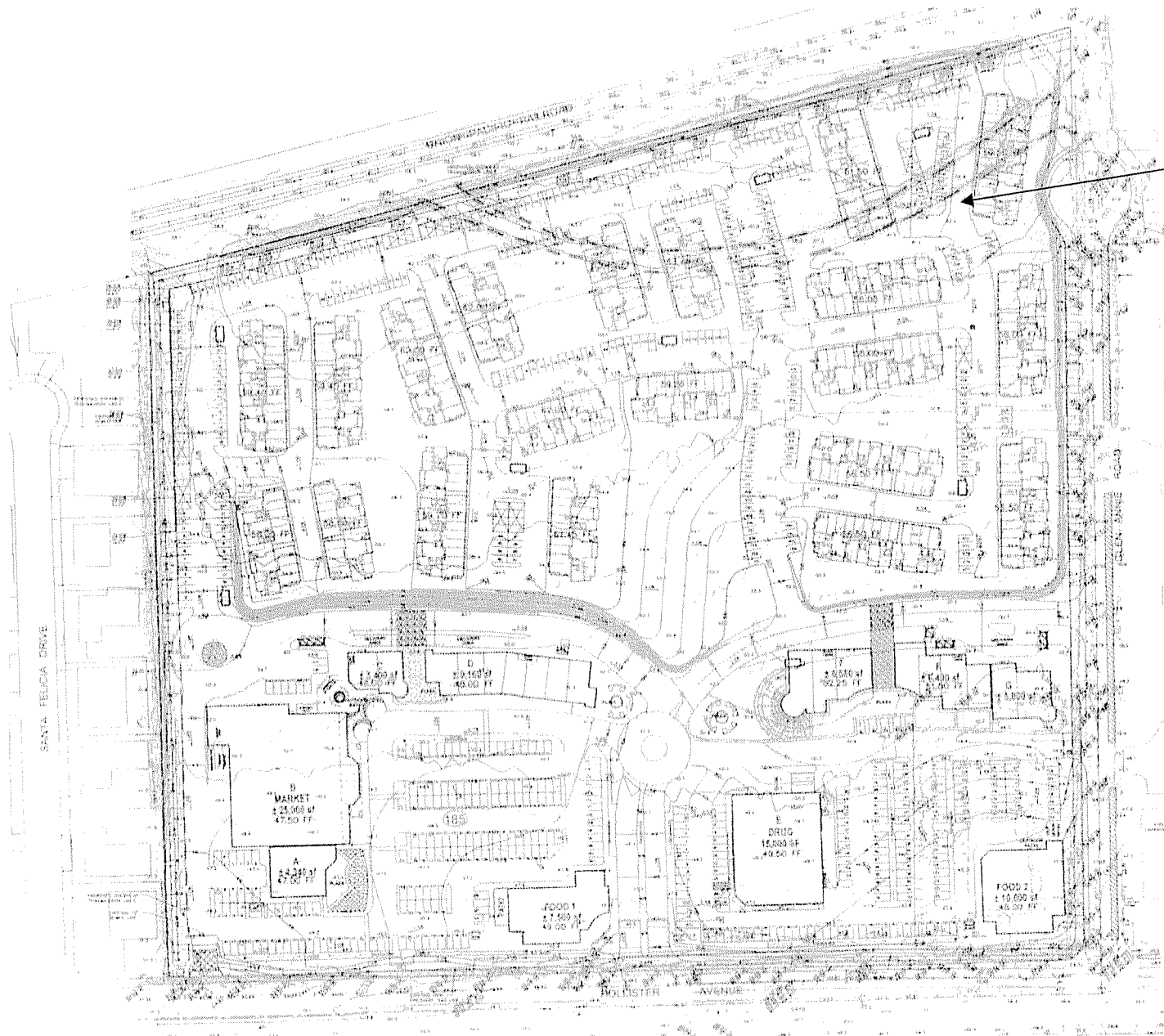


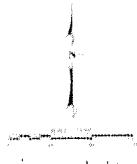
Figure 3
Abandoned Southern Pacific Railroad rail cut located on the property at APN 073-030-020 in
the City of Goleta, Santa Barbara County, California



1887 railroad cut
(dashed line)

Figure 4
Conceptual Grading/Site Plan

GOLETA MIXED USE VILLAGE
CONCEPTUAL GRADING PLAN
HOLLISTER AVENUE, GOLETA, CA



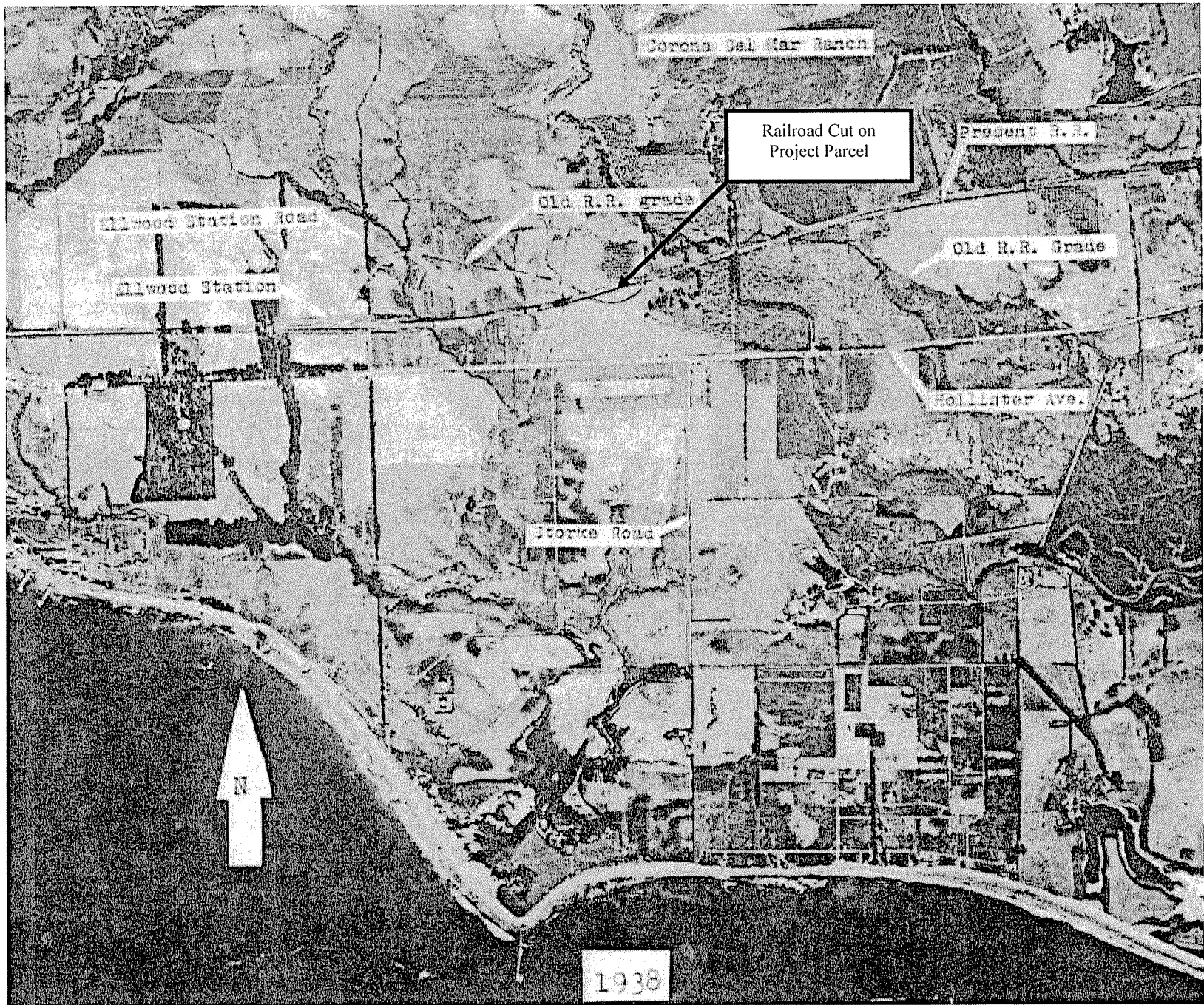


Figure 5
1938 Aerial Photograph Depicting the 1887 line of the Southern Pacific Railroad
(Goleta Valley Historical Notes: Volume 2, No. 1 Spring, 1987, Goleta Valley Historical Society)

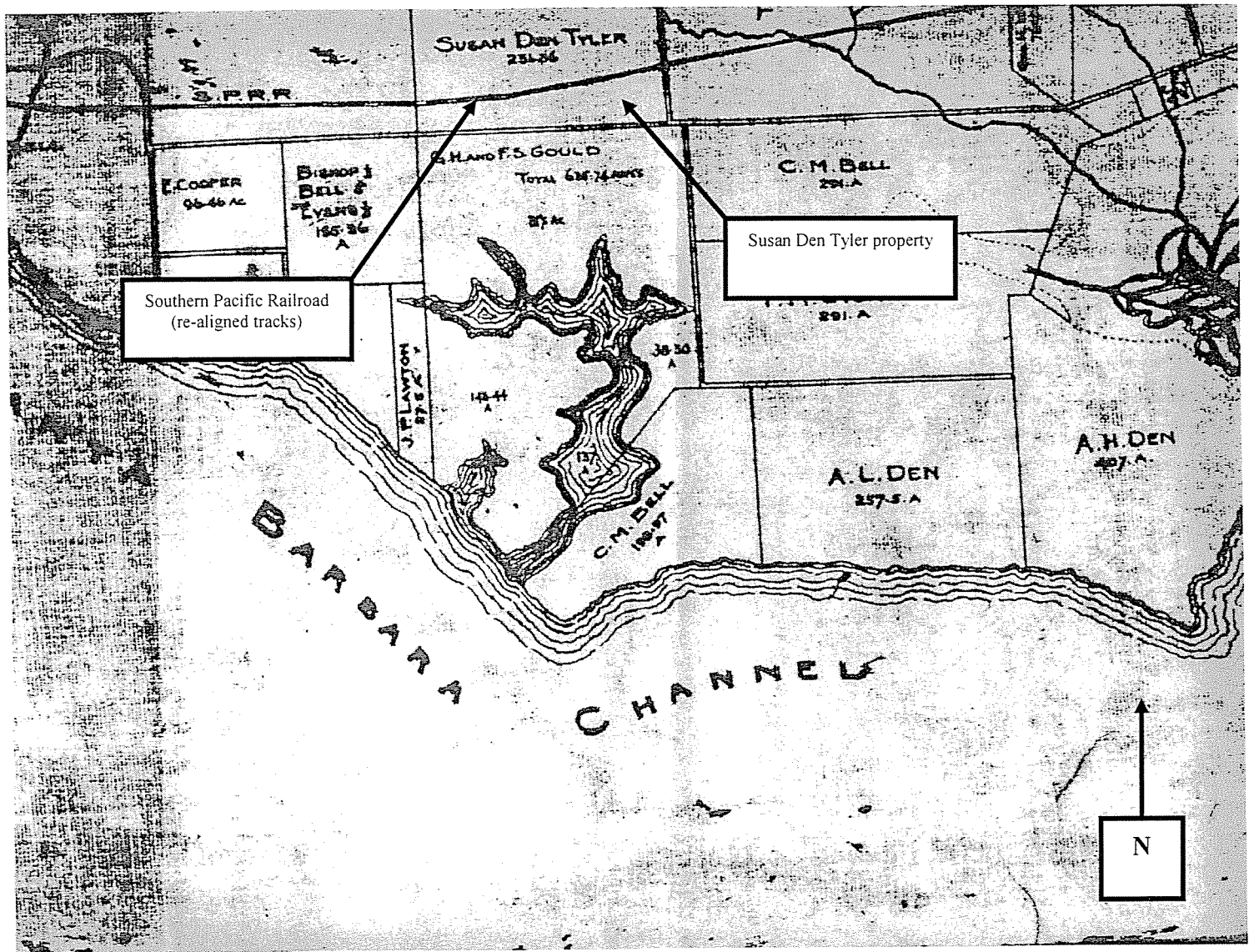


Figure 6
 Susan Den Tyler Property and the rerouted line of the Southern Pacific Railroad
 (W. W. Burton Map, January 1900)

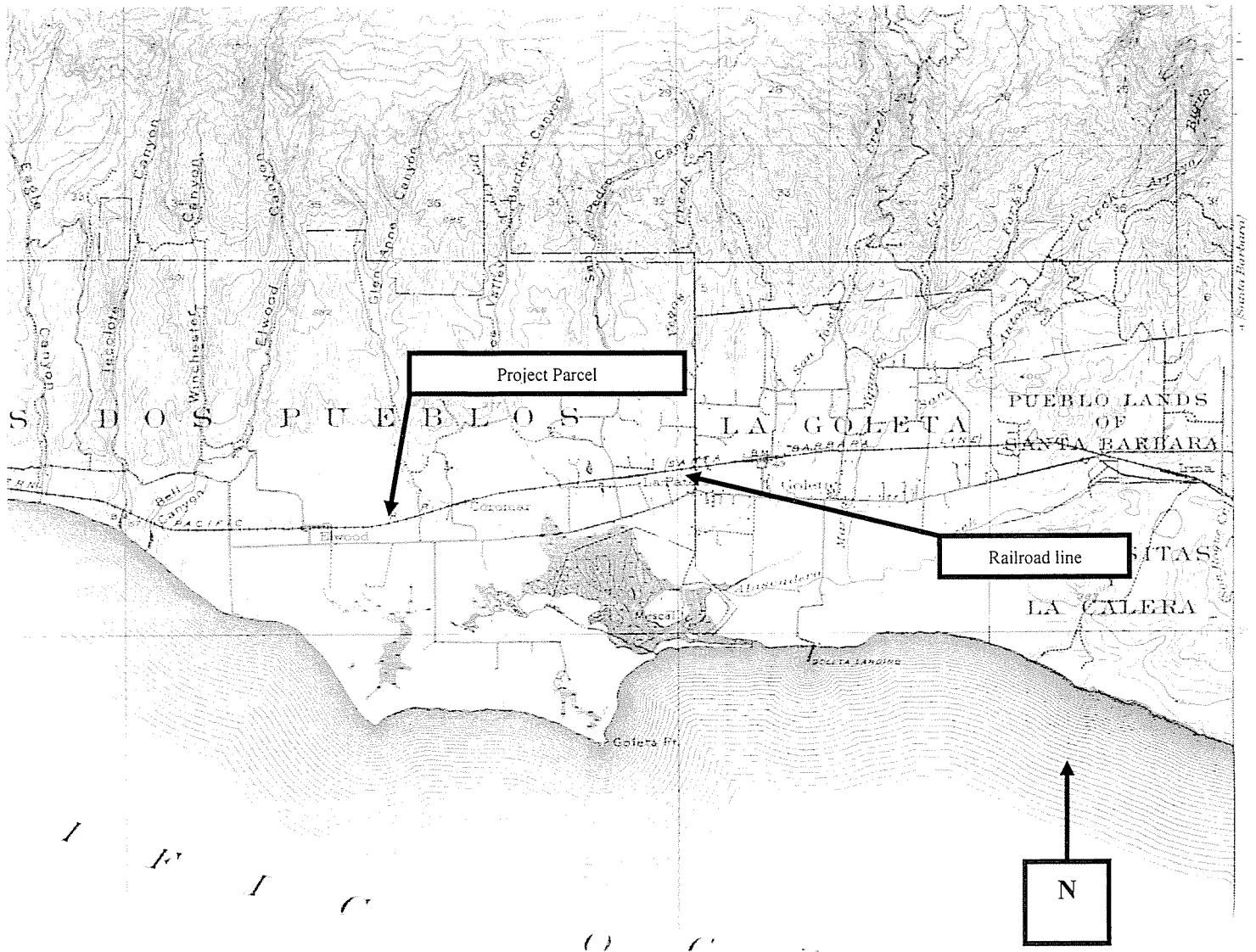


Figure 7
1903 USGS Map of Goleta Depicting the 1900 line of the Southern Pacific Railroad
(Santa Barbara Historical Museum, Gledhill Library)

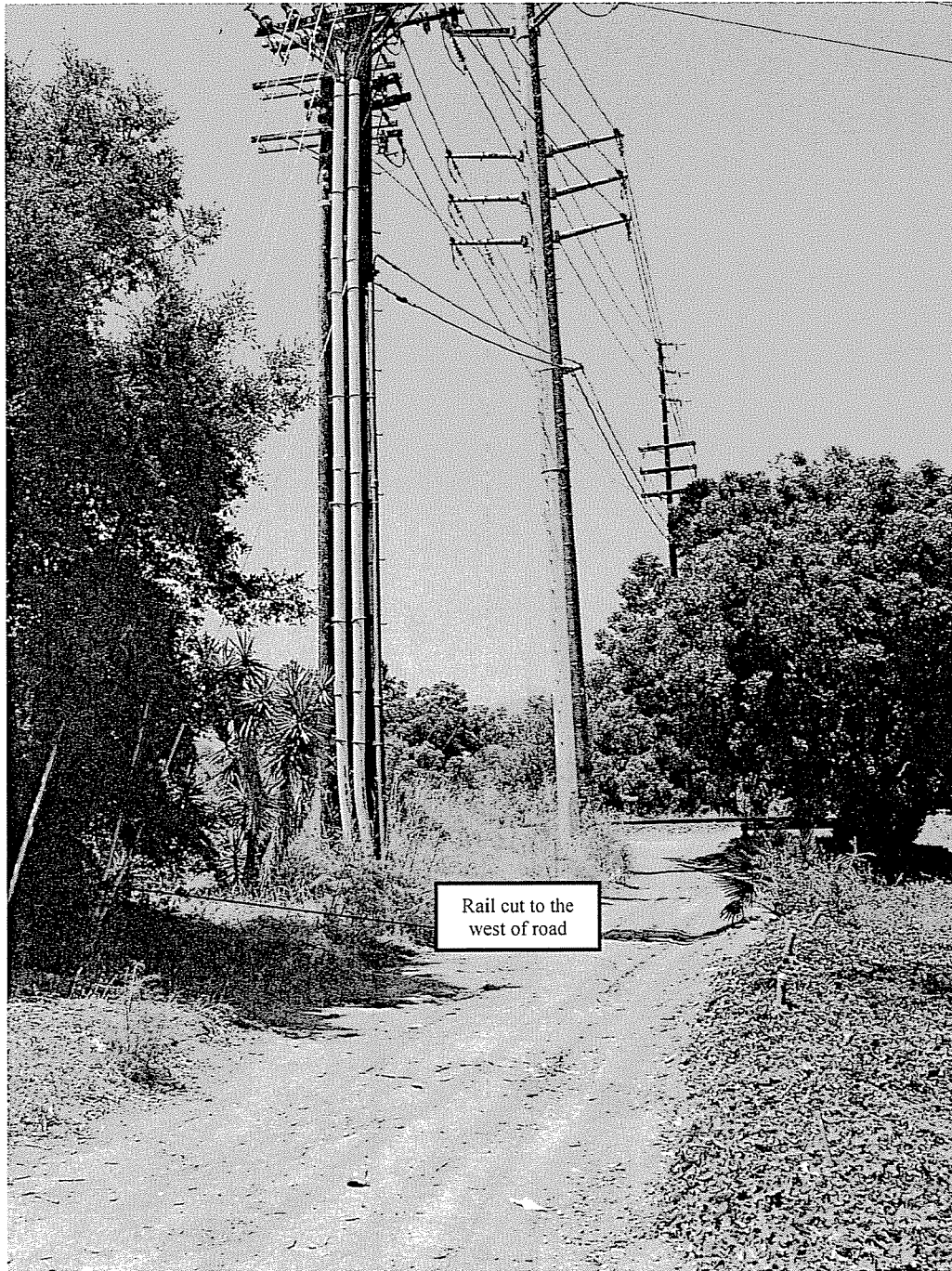


Figure 8

Beginning of rail cut west of South Glenn Annie Road
(Looking north along a dirt pathway at end of road)
(Post/Hazeltine Associates)



Figure 9
View of abandoned rail cut
(looking west from South Glen Annie Road)
(Post/Hazeltine Associates 2009)



Figure 10
View of abandoned rail cut
(looking west)
(Post/Hazeltine Associates 2009)



Figure 11
View of abandoned rail cut
(looking west toward Santa Felicia Drive)
(Post/Hazeltine Associates 2009)



Figure 12
View of abandoned rail cut
(looking east toward South Glen Annie Road)
(Post/Hazeltine Associates 2009)



Figure 13
View abandoned rail cut
(looking southeast towards Hollister Avenue)
(Post/Hazeltine Associates 2009)

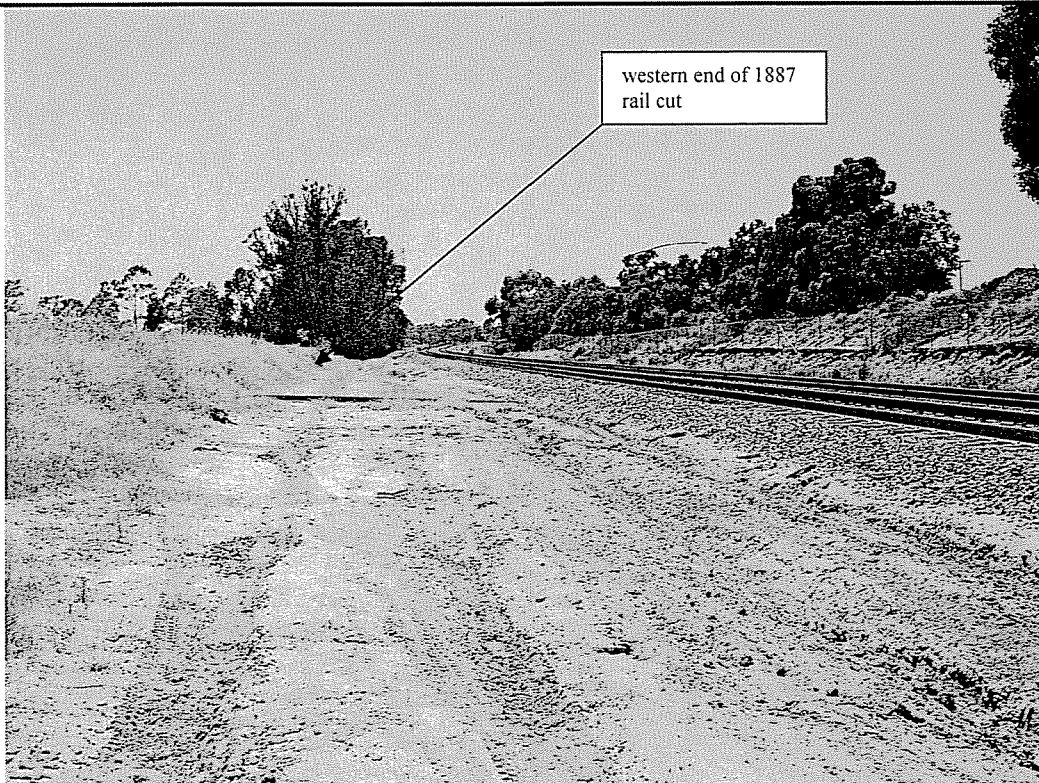


Figure 14
View of existing Union Pacific Railroad tracks and Right-Of-Way
(looking west)
(Post/Hazeltine Associates 2009)

APPENDIX

A

**DOCUMENTS ASSOCIATED WITH
THE 1988 DESIGNATION OF THE PROPERTY
BY
SANTA BARBARA COUNTY**

105 LAET ANAPAMUS-3127
SANTA BARBARA
CALIFORNIA 93101
805-663-4488
EX-2011



SANTA BARBARA COUNTY
HISTORICAL LANDMARK ADVISORY COMMITTEE

September 22, 1988

Melodyne Properties, Inc.
250 Middlefield Road
Menlo Park, California 94025

Re: Santa Barbara County Assessor's
Parcel No. 73 330 20, Glen Annie Rd.
Goleta, California

I am pleased to inform you that a historical feature on your property located in Santa Barbara County near the conjunction of Glen Annie Rd. and the Southern Pacific Railway right of way, in Goleta, has been determined to be eligible to become a Santa Barbara County "Place of Historical Merit."

The feature in question is an old railroad cut, from the original 1887 Southern Pacific right of way. It is located near the Northeastern corner of the property described above.


The purpose of the county historical landmarks program is to remind the citizens of Santa Barbara County and its visitors of the historical background of the county and to encourage the preservation of places, sites, buildings, structures, works of art and other objects having special historical or aesthetic significance, for the use, education and view of the general public.

Recognition of a property as a historic place is a unique honor and we hope that you will be pleased to participate in the program.

The Place of Historical Merit designation carries no ordinance restrictions on your property rights but is only honorary.

The Santa Barbara County Historical Landmarks Advisory Committee has set a meeting for November 2, 1988 at 1:30 at the County Administration Building, Santa Barbara, to consider approving the designation. You are welcome to attend. Please contact me at (805) 566-2966, or the Chairman, Robert Johnson, at (805) 906-2539 if you have any questions or concerns prior to this meeting.

Sincerely yours,


Robert W. Fike

SANTA BARBARA COUNTY
HISTORICAL LANDMARK ADVISORY COMMITTEE
November 2, 1988

- MINUTES -

Present: Mr. Robert Johnson, Chair; Mrs. Dale Rossi, Vice-Chair;
Mr. Robert Rivers; Dr. Gary Coombs; Mrs. Catherine
McNahan; Mrs. Lucille Christie; Ms. Phyllis Olsen;
Mr. Guy Koop; Robert Pika, Deputy County Counsel

Absent: None

GENERAL BUSINESS

A. APPROVAL OF MINUTES OF NOVEMBER 2, 1988

Mr. Rivers moved that the Minutes be approved as amended.
Dr. Coombs seconded the motion and it was passed.

B. PUBLIC COMMENT

None.

C. ANNOUNCEMENTS

Mr. Rivers repeated his announcement regarding the open
house of the Marshallia Guest House or Vandenberg Air Force
Base.

OLD BUSINESS

A. Item A was dropped from the Agenda.

B. Upon motion of Dr. Coombs, seconded by Mr. Rivers,
Resolution 11-2-88-1 was adopted, following amendment of a
typographical error in the heading.

C. Dr. Coombs presented additional information regarding the
Local Government Certification/Survey Program. It appears
that only one County, Santa Cruz County, is certified.
Several cities are also certified. All applied for grants
for the survey process and all but one of the grants was
approved. Dr. Coombs described the program in the inventory
process.

D. Upon motion by Ms. Olsen, seconded by Mrs. Rossi, it was
resolved that the staff prepare and submit to the Chair,
and upon satisfaction by the Chair, submit to the Board of

Nomination Form

(next page)

NOMINATION FORM (cont'd.)

11. Describe any physical alterations or changes to the nominated property:

Rails, ties, and all other evidence of the old railroad are gone. The cut itself appears to be relatively intact.

12. Historical sketch of the nominated property:

See continuation sheet

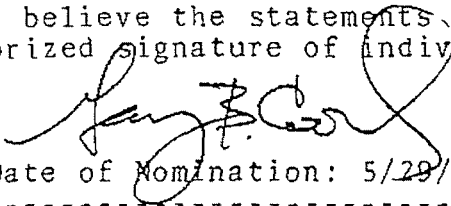
13. Description of the physical setting today:

The immediate vicinity remains undeveloped. Glen Annie Road lies to the east and the modern railroad tracks are to the north.

14. Explain why you feel the nominated property should be designated a County Historical Landmark or Place of Historical Merit:

See continuation sheet.

15. I believe the statements made here to be true and complete. Authorized signature of individual or group representative:



16. Date of Nomination: 5/29/88

FOR OFFICE USE ONLY:

Signature: Owner's name: Parcel No.:
References: Photos enclosed:

Ready for committee action:
By (staff or member signature):

CONTINUATION SHEET -- Southern Pacific Railroad 1007 Right of Way

- Item 10. An engineered cut in the ground surface, about 15 feet in depth at its center and about 40 feet in width. The feature extends several hundred yards west from South Glen Annie Road, curving gently to the north until it joins the current SP railroad alignment.
- Item 12. The Southern Pacific Railroad reached Santa Barbara from the south in 1887. The end of track was in the Goleta Valley at Ellwood station, less than one mile west of the nominated feature.
It wasn't until 1901 that the railroad finally completed its Coast Line between Los Angeles and San Francisco. At that time, the tracks were realigned, establishing the modern-day route.
- Item 14. The Coming of the Railroad was a monumental event in the history of Santa Barbara and southern Santa Barbara County (See, for example, Tompkins 1975). It gave the area a transportation link with the outside world that previously relied on slow and inconvenient steamships and stagecoaches. The railroad stimulated a population and building boom that transformed Santa Barbara from a quiet and remote village into a bustling resort city.
The nominated property is one of only a handful of surviving features that remind us of the original railroad line.

REFERENCES:

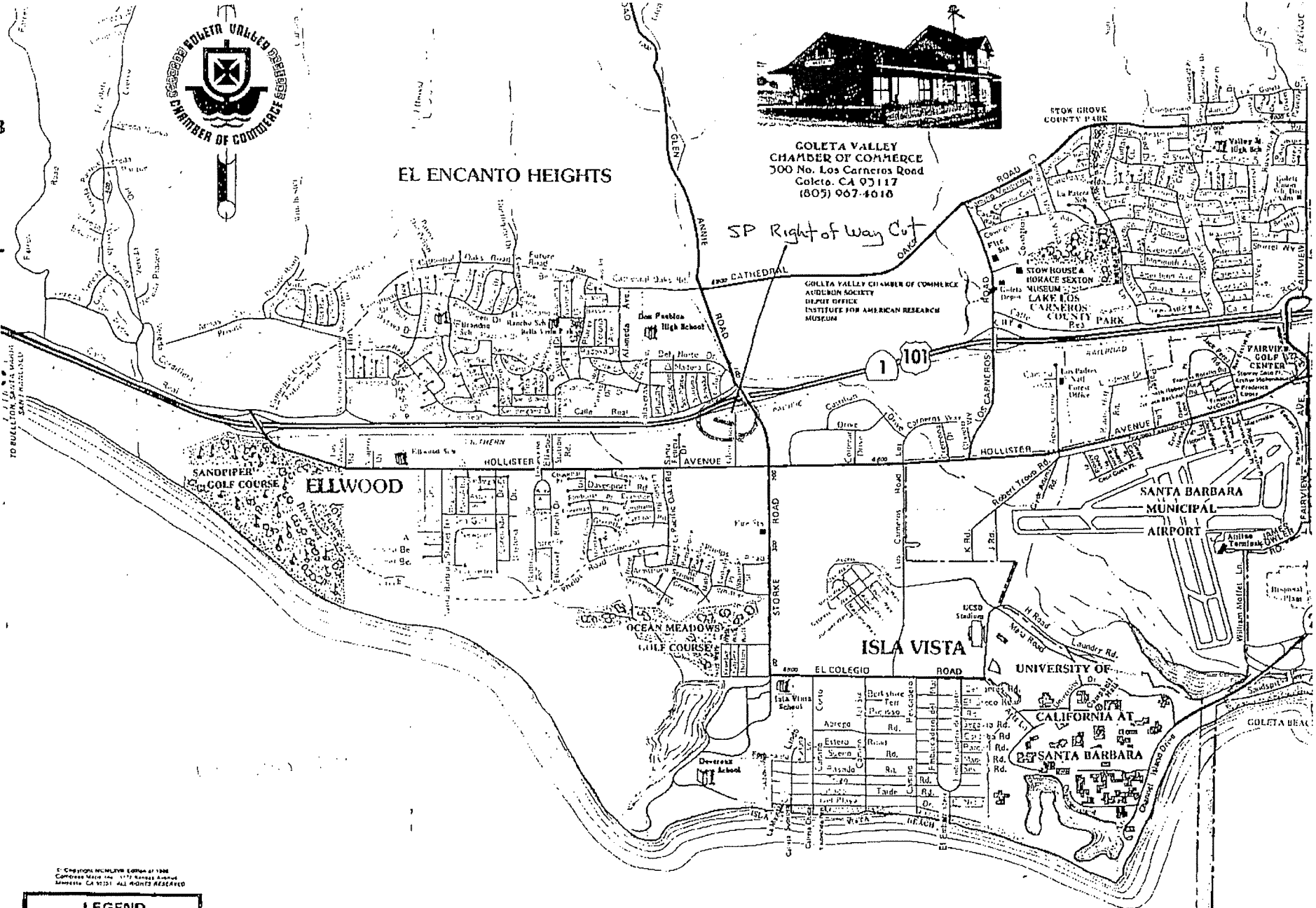
- Coombs, Gary B.
1982 Goleta Depot: The History of a Rural Railroad Station, pp. 3-8.
- Myrick, David F.
1987 "Santa Barbara County Railroads: A Centennial History." Noticias 33: 21-71.
- Tompkins, Walker A.
1966 Goleta: The Good Land. Pp. 189-202.
1975 Santa Barbara Past and Present. Pp. 74-75.



GOLETA VALLEY
CHAMBER OF COMMERCE
300 No. Los Carneros Road
Goleta, CA 93117
(805) 967-4618

EL ENCANTO HEIGHTS

SP Right of Way Cut



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Mapmakers, CA 93201. ALL RIGHTS RESERVED

LEGEND

- INTERNATIONAL HIGHWAY 101
- STATE HIGHWAY 1
- MAJOR THROUGH HIGHWAY
- MAJOR LOCAL STREET
- LOCAL STREET
- STREET
- RAILROAD
- WATERWAY
- UNDEVELOPED LAND
- WOODLAND
- WATER
- BEACH

A PEER REVIEW AND ASSESSMENT OF
PREVIOUSLY COMPLETED CULTURAL RESOURCE
INVESTIGATIONS ADDRESSING THE WESTAR MIXED-USE
PROJECT AREA, GOLETA, SANTA
BARBARA CO., CALIFORNIA

by,

Jeanette A. McKenna, Principal
McKenna et al., Whittier, CA

INTRODUCTION

McKenna et al. prepared this peer review and assessment of the previous studies for the Westar Mixed-Use project area at the request of Envicom Corporation, Agoura Hills, California. The proposed development area has been subjected to various levels of investigation for cultural resources. This peer review and assessment includes a review of the reports on-file at the University of California, Santa Barbara, Central Coast Information Center, and miscellaneous documents obtained through the County of Santa Barbara, City of Goleta, Envicom Corporation, and other societies and/or individuals.

DOCUMENTS REVIEWED

A full listing of reviewed documentation pertaining to the cultural resources investigations directly and/or indirectly associated with the Westar Mixed-Use project area is presented in Table 1. All documents listed in Table 1 are on file at McKenna et al. Additional documents referenced at the end of this review can be found at the repository noted (see "References"). It is possible that additional documents exist, but were not known or unavailable at the time of this review.

LOCATION AND SETTING

The Westar Mixed-Use project area is located in the City of Goleta, Santa Barbara, California. Specifically, the property consists of approximately 23.55 acres and is located on the north side of Hollister Avenue and between Glen Annie Road and Santa Felicia Drive (Figure 1). This property is cross-referenced as Assessor Parcel Nos. 073-030-

Table 1. Summary of Documents Reviewed During this Undertaking.

Report	Citation	Title	Status	Sites
Book	Coombs (1982)	Goleta Depot: The History of a Rural Railroad Station.	Property Specific	SPRR Alignment
Book	Coomb et al. (1986)	Those Were the Days: Landmarks of Old Goleta.	General Overview	Historic
Form	Coombs (1988)	Santa Barbara County Historical Landmarks NOMINATION FORM: Historical Landmarks for Places of Historical Merit: Southern Pacific Railroad Right-of-Way (1987)	Property Specific	SPRR Alignment
Minutes	Pike (1988)	Santa Barbara County Historical Landmark Advisory Committee, Minutes, November 2, 1988	HLAC Minutes	SPRR Alignment
Minutes	Pike (1988)	Santa Barbara County Historical Landmark Advisory Committee, September 22, 1988	HLAC Minutes	SPRR Alignment
Minutes	Johnson (1988)	Resolution of the Santa Barbara County Historical Landmark Advisory Committee; Resolution No. 11-2-88-1: Resolution Declaring a Portion of the Southern Pacific Railroad Right of Way, Goleta, to be a Place of Historical Merit	HLAC Minutes	SPRR Alignment
G. Plan	Goleta (n.d.)	General Community Plan (pp. 216-218)	General Overview	SPRR Alignment
E-1193	Foster, Romani, and Romani (1991)	Archaeological Survey Report for the Proposed Storke/Glen Annie Road Interchange Alternatives on Highway 01 (05-SB-101-24.8/24.9)	p/o Project Area	54 142 143 1745
E-1568	Levulett and Casen (1992)	Historic Property Survey Report for Storke/Glen Annie Road Interchange Improvements, Goleta, Santa Barbara County (05-SB-101; P.M. 24.8/24.9; 05202-079810)	p/o Project Area	54 142 1745 2433 2434
E-2473	Carbone (2000)	Phase I Archaeological Study for Proposed Construction of Railroad Siding, Ellwood Station to Los Carneros Area, Goleta, Santa Barbara County, California	p/o Project Area	54 142 2586
E-4582	Stone and Victorino (2009)	Phase I/Extended Phase I Archaeological Investigation – Westar Goleta Mixed Use Village, Goleta, California	Property Specific	54 142 1745
Report	Post and Hazeltine (2009)	Phase I Historical Resources Management Report for a Portion of the Westar Property, 7000 Hollister Avenue (APN -73-030-020)	Property Specific	SPRR Alignment
Form	City of Goleta (2010)	Environmental Checklist Form and Revised Initial Study – Westar Mixed-Use Project: Cultural Resources	Property Specific	All

Report	Citation	Title	Status	Sites
Letter	Sanchez (2010)	NAHC Response: SCH#2010071060 – Westar Mixed-Use Project: 08-143-GPA, -RZ, -OA et al., Santa Barbara County	Property Specific	NAHC
Letter	Sanchez (2010)	SB-18 Tribal Consultation, Westar Mixed-Use Project, Santa Barbara County	Property Specific	NAHC
email	Romero (2010)	Response (Concerned Chumash)	General Overview	Prehistory
Letter	Arredondo (2010)	Response (Concerned Chumash MLD)	Property Specific	Prehistory

020 and 073-030-21. The property is made up of Parcel B, which is 22.32 acres of vacant (undeveloped) land covered with low grasses and weeds, and Parcel A, 1.23 acres of land containing two structures totaling 9,546 square feet and associated landscaping. Both parcels are relatively flat and bounded to the east and west by commercial and/or residential developments; the south by Hollister Avenue; and the north by the Union Pacific Railroad alignment (Figures 2 and 3). The property elevation is approximately 60 feet above mean sea level, but actually rises very slightly from south to north (Figure 4). Citing Stone and Victorino (2009:3):

The project area is undeveloped and vegetation is non-native grasses and forbs. Soils in the proposed project area are characterized as Milpitas-Positas fine sandy loam (USDA 1981). The surface layer or A Horizon of the Milpitas series is brown and light brownish gray fine sandy loam and loam between 24-25 inches thick. The underlying B Horizon subsurface layer is dark yellow brown or brown clay loam that is nearly 30 inches thick and extends to 54 inches below surface. The basal C Horizon is alluvial and can be cobbly, stony, gravelly ...

The relative depths of the soils described by Stone and Victorino (2009:3) were derived from subsurface testing (via backhoe trenches). The shallow (first two feet) also yielded evidence of modern refuse mulched into the field.

Based on the information presented by Stone and Victorino (2009), it is suggested the current surface of the property is not the original surface, but one subjected to disking, weed abatement, etc. Modern refuse deposited on the property (legally or otherwise)

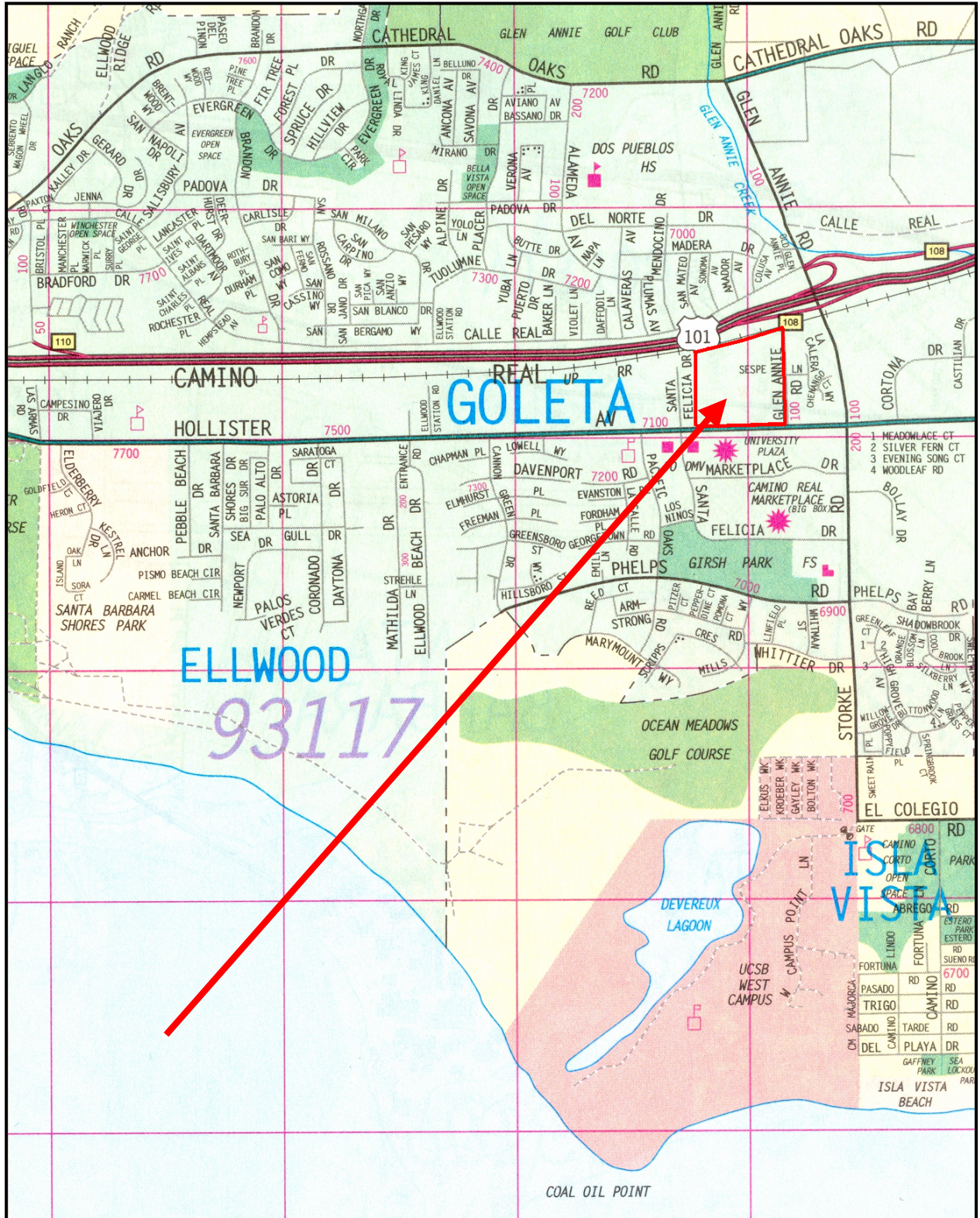


Figure 1. General Location of the Project Area.

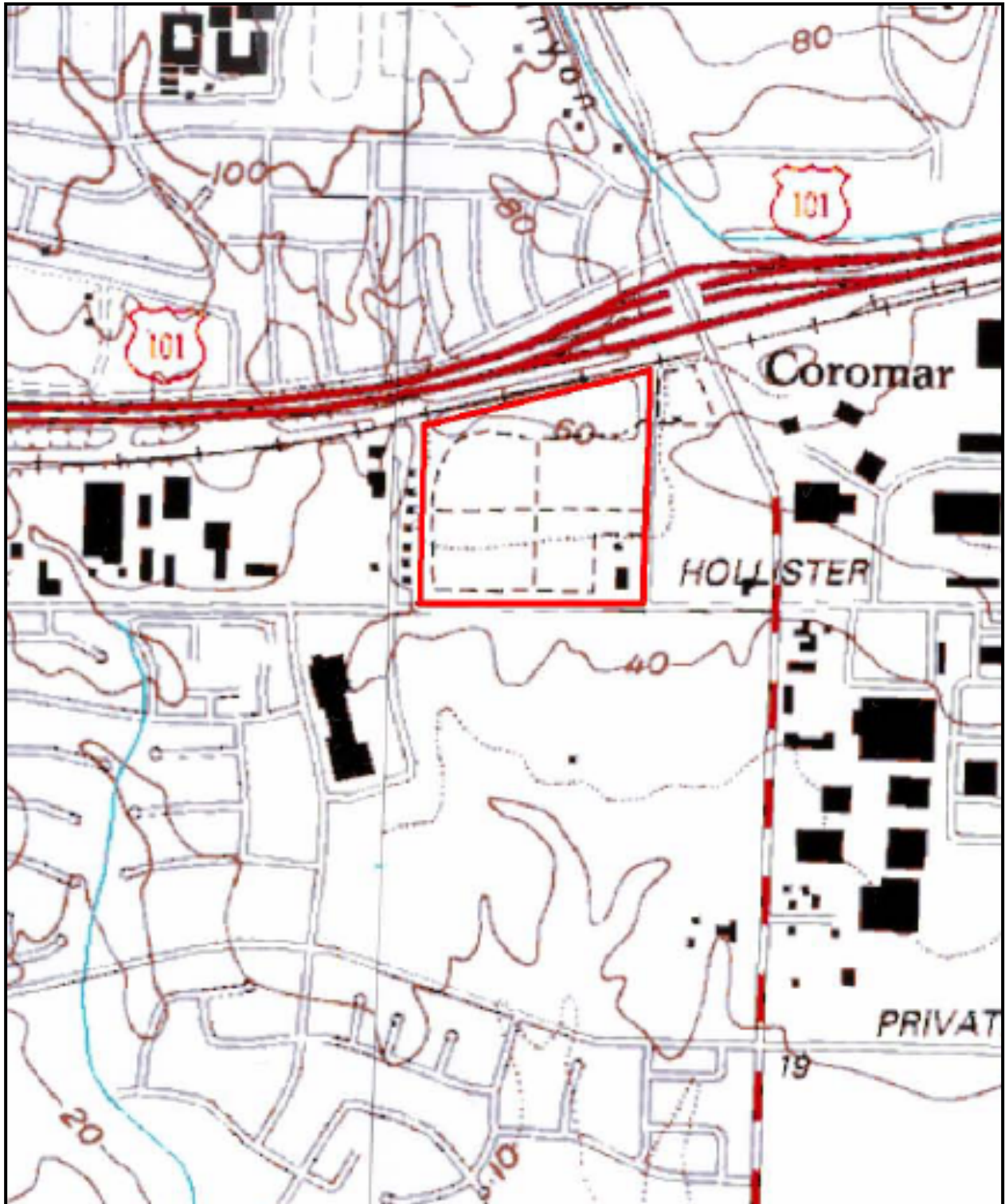


Figure 2. Specific Location of the Project Area (USGS Goleta Quadrangle, rev. 1995).

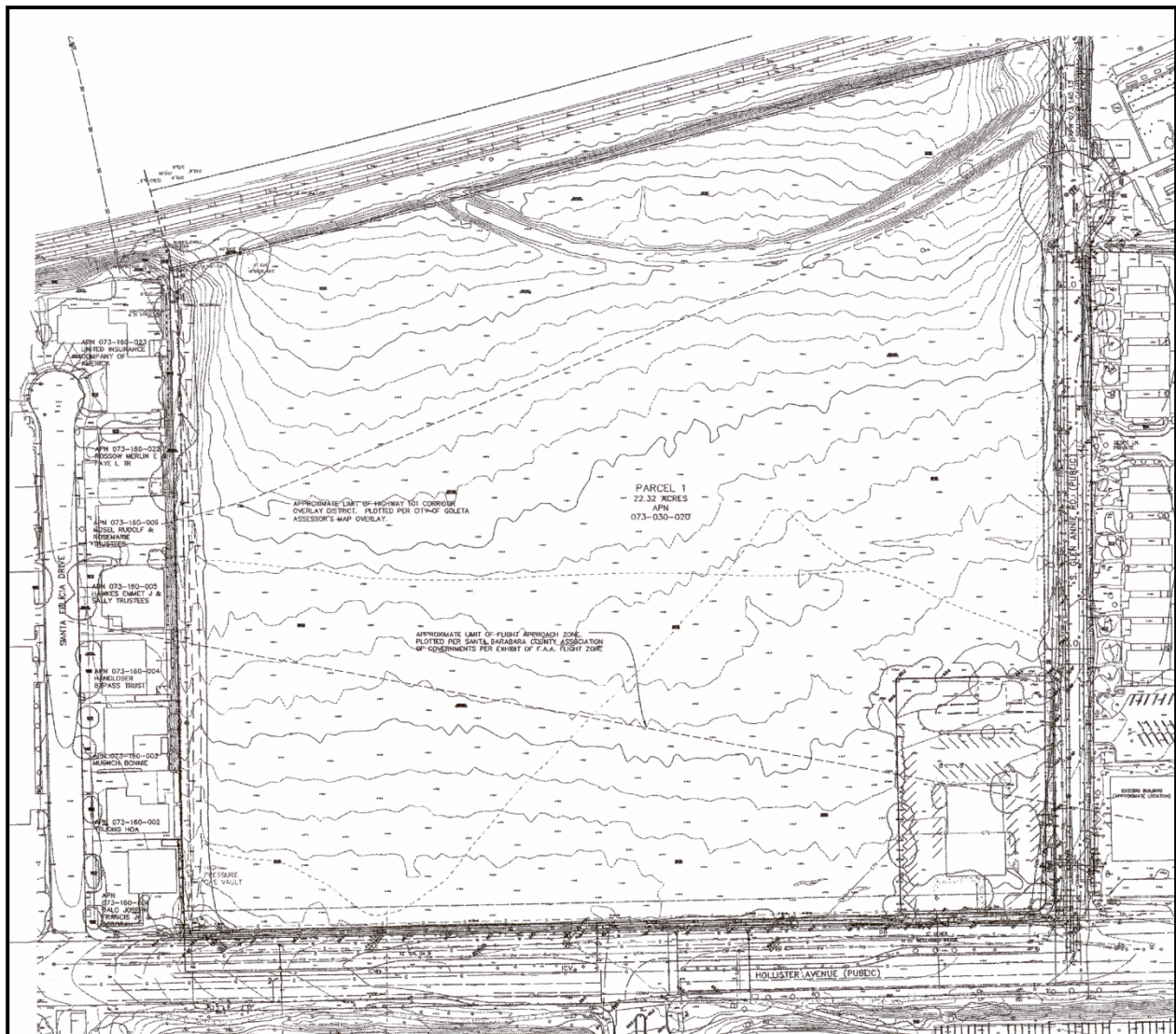


Figure 3. Schematic Plan View of Project Area.

was reported by Stone and Victorino, but was either removed or mulched into the ground prior to a recent field visit by McKenna et al. on January 7, 2011. At the time of this recent field survey, there was no surface evidence of modern refuse and very little evidence of the testing completed in 2009.

Grasses averaged 6" to 12" in height and the ground is relatively soft. Rodent activity is evident throughout the property, resulting in back dirt mounds around rodent holes (both wet and dry; Figure 5).



Figure 4. Overview of the Project Area (from SW Corner; facing NW).



Figure 5. An Example of Recent Rodent Activities within the Property.

METHODOLOGY

To complete the peer review of the studies completed for the Westar Mixed-Use project area, McKenna et al. completed the following tasks:

1. **Supplemental Records Search:** completed through the University of California, Santa Barbara, Central Coast information Center. McKenna reviewed the information presented in the respective reports and obtained the pertinent reports and site records.
2. **Consultation:** McKenna et al. consulted with the University of California, Santa Barbara, Central Coast Information Center (Kristina Gill, 1/7/11); the Goleta Valley Historical Society (Robin Cederlof, 1/7/11); the South Coast Railroad Museum (Dr. Gary Coombs, 1/7/11); and the City of Goleta.

Through the City of Goleta, McKenna et al. assisted with the Native American consultation for compliance with SB-18 and general discussions relating to the sensitivity of the area to yield cultural resources.

3. **Peer Review:** McKenna et al. (Jeanette A., McKenna, Principal Investigator) read through the numerous reports addressing the Westar Mixed-Use project area to assess the completeness of the reports and the level of compliance and/or deficiencies. This report presents those findings. In addition, Ms. McKenna conducted a field reconnaissance visit on January 7, 2011, to assess the current condition of the property. Photographs of the property were taken and are attached to this report.
4. **Assessment and Recommendations:** After completing the review of the various documents and the site visit, McKenna et al. formulated an assessment of the studies and prepared a list of recommendations considered necessary to improve upon the cultural studies.

Post/Hazeltine Report (2009):

In 2009, the company of Post/Hazeltine Associates (Pamela Post and Timothy Hazeltine) prepared a document addressing “a portion” of the Westar Mixed-Use project area property. This report was designed to address the SP/UPRR alignment crossing the property’s northeastern quarter. In their introduction, Post and Hazeltine specify the document was designed to address the 1887 railroad line segment and “... document

the history of the property, re-evaluate its [the RR alignment] eligibility for listing as a significant historic resources at the City of Goleta level and determine its potential eligibility for listing as a significant historic resource at the State and National level” (2009: 1).

Under heading 2.0 (PROJECT DESCRIPTION), Post and Hazeltine identify the 1887 SPRR alignment as a City of Goleta “Significant Historic Resource.” This reference is a little misleading (but accurate), as the City defines the resource as a “Place of Historic Merit,” which is, as defined by the City, a “significant historic site.” Both “Landmarks” and “Place of Historic Merit” are referred to as “significant historic sites” and, as presented, appear to carry the same weight with respect to local recognition.

The remnant of the Southern Pacific Railroad alignment within the project area was not evaluated by the City of Goleta, but was based on the previous designation by Santa Barbara County as a “Place of Historical Merit.” This resource was never (prior to Post/Hazeltine) re-evaluated in accordance with local (ca. 2002) guidelines and not previously evaluated for State or National recognition. The application to the County was based solely on the information provided by Coombs (1988) and the local historical society supporters and in accordance with the requirements as applicable in 1988.

In preparing the Phase I Historic Resources Management Report (2009), Post and Hazeltine followed the standard report format, including headings, needed to place the project area in a setting for evaluation. In this case, the area of concern was limited to the railroad alignment, not the entire project area. A relatively detailed history (Historical Context) was presented, beginning with the arrival of the Spanish and English explorers and the eventual establishment of the Mission Santa Barbara.

Property specific history includes the ownership histories, including land disputes, and the development of the Southern Pacific Railroad through the Goleta area of Santa Barbara County. Despite problems with construction and the general economy, Post and Hazeltine (2009:3) state the original railroad alignment between Ellwood and Santa Barbara (including the current project area) “... **did allow Goleta Valley farmers to efficiently move their crops south to Los Angeles and points further east. With a reliable transportation link to the rest of California and the nation Goleta Valley’s farms and orchards became an increasingly important part of the local economy.**”

In documenting the history of the Southern Pacific/Union Pacific Railroad, Post and Hazeltine present a detailed discussion of the “Big Four” railroad tycoons responsible for the development of the nation’s major rail lines. In this case, the “Big Four” (Collis Huntington, Mark Hopkins, Leland Stanford, and Charles Crocker) were all Californians

and partners in the development of the Central Pacific Railroad Company. These four built fortunes and reputations in California, but also had national recognition and influence, also being involved in the development of the transcontinental railroad system(s).

The Central Pacific Railroad received funding and land grants from the U.S. government to develop the railroad system connecting the transcontinental railroad to a developing California rail system. The “Big Four” acquired control of the Southern Pacific Railroad system in 1868 and continued the expansion of the national and regional.

The Pacific Improvement Company, est. 1878, a subsidiary of the Southern Pacific railroad, was responsible for the development of the specific branch line extending from the San Fernando Valley to Ellwood (including the alignment within the project area). Although there were numerous legal battles throughout the late 1800s with respect to railroad development, the “Big Four” retained their control of the Southern Pacific Railroad and were in control of the Pacific Improvement Company in 1887, when the alignment was established through Goleta. This alignment, eventually connecting Los Angeles to

San Francisco, would be known as the “Coast Line.” The alignment to Ellwood was completed in December, 1887, but the linking of the Ellwood terminus with San Francisco was not completed until 1901-1902.

In ca. 1901-02, the Southern Pacific Railroad merged with the Union Pacific Railroad (under Edward H. Harriman). The current alignment of the SP/UPRR alignment bounding the northern boundary of the current project area dates to ca. 1901-1905, with Union Pacific improvements along the Coast Line (Post and Hazeltine state the original line was abandoned in 1899). As such, the original alignment was in use between ca. 1887 and 1905 – with some references suggesting use of the original line halted service in ca. 1900 (Coombs 1982:6-7), culminating in approximately 13 years of active service.

By Post and Hazeltine’s own documentation, the Southern Pacific Railroad alignment crossing the project area was in use for approximately 13 years, was built under the direction of the “Big Four” and the Southern Pacific Railroad/Pacific Improvement Company, and provided an essential connection for transportation of persons and products throughout California and the nation during its early years of operation (similar connections continued with the Union Pacific acquisition of the railroad).

Re-Evaluation of the Southern Pacific Railroad Alignment (1887-1901)

In re-evaluating the 1887 SPRR alignment, Post and Hazeltine (Section 5.0) address the existing designation, the CEQA criteria (State), National criteria (Federal), and, again, the local criteria. The discussions range from simple statement to extended texts.

Goleta (Local) Evaluation:

Existing Designation: The property (SPRR alignment) was nominated as a County Landmark in 1988 and eventually recognized as a “Place of Historical Merit,” an honorary designation with “... no ordinance restrictions ...” (Pike 1988). With the incorporation of the City of Goleta in 2002, the designation as a “Place of Historic Merit” was adopted without any additional evaluations.

Post/Hazeltine (2009:29-30) applied the Goleta General Plan/Coastal Land Use Plan (September 2006, Section 6.0 Visual and Historic Resource Element Criteria:6-19-6-20) to re-evaluate the local significance of the SPRR alignment. These criteria are:

- a. It exemplifies or reflects special elements of the city’s cultural, social, economic, political, aesthetic, architectural, landscape architectural, or natural history. **(Post Hazeltine conclusion – No)**
- b. It is identified with persons or events of local, state, or national history. **(Post Hazeltine conclusion – No)**
- c. It exemplifies distinctive characteristics of a style, type, period, or method of construction or is an example of the use of indigenous materials or craftsmanship. **(Post Hazeltine conclusion – No)**
- d. It represents works of a notable builder, designer, architect, or landscape architect. **(Post Hazeltine conclusion – No)**
- e. It includes a geographically definable area possessing a concentration of historic, prehistoric, or scenic properties that are united aesthetically. **(Post Hazeltine conclusion – No)**
- f. It has a location with unique physical characteristics, including landscaping, or is a view or vista representing an established visual feature of a neighborhood or community. **(Post Hazeltine conclusion – No)**

- g. It embodies elements of design, detail, materials, or craftsmanship representing a significant structural, architectural, or landscape architectural achievement. **(Post Hazeltine conclusion – No)**
- h. It reflects significant geographical patterns associated with different eras of settlement and growth. **(Post Hazeltine conclusion – No)**
- i. It is one of the few remaining examples possessing distinguishing characteristics of an architectural, landscape architectural, or historical type. **(Post Hazeltine conclusion – No)**
- j. It includes rare or specimen plant materials associated with a particular period or style of landscape history. **(Post Hazeltine conclusion – No)**

In reviewing the conclusions presented by Post and Hazeltine, McKenna et al. presents the following responses:

- a. It exemplifies or reflects special elements of the city’s cultural, social, economic, political, aesthetic, architectural, landscape architectural, or natural history.

Post and Hazeltine concluded Criterion “a” did not apply because the railroad alignment lacked integrity, despite stating its “... demonstrable association with an important historical event, namely the arrival of the railroad in the Goleta Valley in 1887 ...” They also state that almost all of the original has been destroyed. In fact, while much of the original 1887 alignment has been lost to redevelopment, the current SPRR/UPRR route is also historic (over 50 years of age) and would qualify as a locally historic resource. The short segment of the RR alignment within the current project area is one, if not the last, remnant of the 1887 alignment, resulting in it being the only recognizable portion of the historic railroad. Despite its lack of “integrity,” as interpreted by Post and Hazeltine, this alignment still “exemplifies” the successful progress and economic advancements within the Goleta Valley between 1887 and 1901. The physical remains representing this alignment are noticeable and recognizable as a railroad alignment (to those who are interested and familiar with these features) and is a physical element of the City’s (Valley’s) history. **McKenna et al. would conclude that Criterion “a” is applicable.**

- b. It is identified with persons or events of local, state, or national history.

Post and Hazeltine (2009:30-31) state the railroad alignment is associated with the first rail line built through the Goleta Valley and the development as it is associated with the “Big Four” and/or subsequent association with the Union Pacific Railroad and/or E.H. Harriman. McKenna et al. would argue that the intent of Criterion “b” is not based on the physical integrity of the feature, but the non-tangible associations with persons and events. As such, this feature would certainly be eligible under Criterion “b,” as it is directly associated with the “Big Four” and Harriman, each significant in local, regional, state, and national circles, and the development of the California rail systems. **McKenna et al. would conclude that Criterion “b” is applicable.**

- c. It exemplifies distinctive characteristics of a style, type, period, or method of construction or is an example of the use of indigenous materials or craftsmanship.

McKenna et al. agrees with the Post and Hazeltine conclusion that there is no visible rail bed. However, there is not data to confirm buried components are not present. McKenna et al. would argue there is an element of recognition in the development of the “bends and twists” to the alignment to accommodate the inclines (and engine capacities to move the trains) and this is representative of the period of development. With advances in technology, engine and power designs, and construction equipment that permitted the realignment of the tracks, these advances eventually lead to the abandonment of the 1887-1900+ alignment. Although it would be more advantageous to have additional physical evidence, **McKenna et al. would conclude that it is premature to exclude Criterion “c” from applicability.**

- d. It represents works of a notable builder, designer, architect, or landscape architect.

There is no evidence readily available (mainly via the Post/Hazeltine report) to suggest the 1887 railroad alignment reflects the works of a notable builder, designer, architect, or landscape architect. However, one could attempt to argue that the larger SPRR infrastructure meets this requirement. Post and Hazeltine (2009:10-11) also reference the difficulty in acquiring building materials and labor, acquiring right-of-way, and main-

taining local access to other venues (e.g. shoreline), all aspects requiring the “strength” and “power” of the railroad empire. At this time, **McKenna et al. concurs that data needed to apply Criterion “d” has not been documented and may not be available or applicable.**

- e. It includes a geographically definable area possessing a concentration of historic, prehistoric, or scenic properties that are united aesthetically.

Post and Hazeltine (2009:31) rely, again, on the lack of integrity of the alignment through the project area as a means of eliminating Criterion “e.” They note that this alignment is one of only two small segments of the original alignment remaining. McKenna et al. agrees that this alignment is not part of a concentration of properties united aesthetically and, therefore, **McKenna et al. tentatively concurs with the findings of Post and Hazeltine that Criterion “e” is not applicable.**

- f. It has a location with unique physical characteristics, including landscaping, or is a view or vista representing an established visual feature of a neighborhood or community.

The location of the alignment is relatively unique, as the terrain dictated the loop of the alignment to meet the technical needs of the railroad. The terrain, therefore, can be interpreted as a “unique physical characteristic” as meant under Criterion “f.” The landscaping along the alignment also includes eucalyptus trees, as standard application for wind protection and route identification. There is no “vista” and no association with a neighborhood or community – other than the Goleta Valley in general. **At this time, McKenna et al. is not convinced Criterion “f” does not apply.**

- g. It embodies elements of design, detail, materials, or craftsmanship representing a significant structural, architectural, or landscape architectural achievement.

As noted by Post and Hazeltine (2009:32), there is no evidence that any design, materials, detail, or craftsmanship were used in the development of the alignment within the project area, although this is not necessarily the case for the entire Goleta Valley alignment. Therefore, **McKenna et al. concurs with the conclusion that Criterion “g” does not apply** to this particular portion of the SPRR 1887 alignment. If, however, physical

elements of the alignment are identified in a buried context, this conclusion may change.

- h. It reflects significant geographical patterns associated with different eras of settlement and growth.

Post and Hazeltine (2009:32) state that the 1887 SPRR alignment "... linked southern Santa Barbara County to the rest of Southern California ... provided the Goleta Valley with its first reliable transportation line with the rest of the nation. It engendered the development of the Goleta Valley's agricultural industry and spurred settlement and development in the area." By 1900, the new alignment connected the Valley to Northern California, as well. McKenna et al. would argue that the intent of Criterion "h" is an intangible association – an association with "geographical patterns" and not one based on the integrity or lack of integrity of the physical resource. In this case, it was the presence of the railroad that allowed local farmers to successfully transport their produce to market and to bring tourists of settlers to an area that was previously not accessible to the majority of people. The discussion of the "geographical patterns" has not been fully developed and, therefore, **McKenna et al. has tentatively concluded Criterion "h" can be applied to this resource.**

- i. It is one of the few remaining examples possessing distinguishing characteristics of an architectural, landscape architectural, or historical type.

This segment of the SPRR/UPRR 1887 alignment is one of only two examples of the original alignment remaining and still reflects the original location of the alignment and the preparation of the property to accommodate the alignment. It is a "distinguished" characteristic, as railroad alignments have a unique structure to their development. **McKenna et al. would argue that the development of the landscape to accommodate the rail alignment is consistent with the intent of Criterion "I" and, therefore, Criterion "I" would apply, although the case for application is not as strong as other arguments for recognition.**

- j. It includes rare or specimen plant materials associated with a particular period or style of landscape history.

The property in question is located within an open field with intrusive grasses and weeds (and eucalyptus trees) that are not indicative of the

natural vegetation. The intrusive flora is not unique, rare, or indicative of any particular period, although one could argue the grasses and trees are associated with a specific period in history (American Period). However, at this time, **McKenna et al. concurs that Criterion “j” does not apply in this instance.**

Summarizing the local assessment for significance or recognition, Post and Hazeltine found that none of the City’s criteria were met. In contrast, McKenna et al. found the following:

- | | | |
|-----------------|-----------------|--------|
| a. Yes | e. No | i. Yes |
| b. Yes | f. Undetermined | j. No |
| c. Undetermined | g. No | |
| d. No | h. Yes | |

Based on this re-evaluation, McKenna et al. concluded four of ten criteria requirements were met; two were undetermined, and the remaining four did not apply. Overall, the re-evaluation was weighted towards retaining the local designation as a “Place of Historic Merit” in the City of Goleta.

Goleta (CEQA) Evaluation:

Post and Hazeltine’s report (2009:22) also included a reassessed the resource with respect to the City’s current guidelines (the City adopted the County of Santa Barbara Environmental Thresholds and Guidelines, rev. 2002). In summarizing the Post/Hazeltine re-evaluation of the SPRR under local guidelines, they found the following:

Integrity:	
Integrity of Location	= 2
Integrity of Design	= 1
Integrity of Setting	= 1
Integrity of Materials	= 1
Integrity of Workmanship	= 1
Overall Assessment	= 2 (Post and Hazeltine 2009:22)
Age:	
	= 3
Overall Assessment	= 3 (Post Hazeltine 2009:22)

Association:

Event, Person, etc.	= 3
Designer	= 1
Architectural Style	= 1
Construction Materials	= 1
Traditional Lifeways	= 1
Broad Themes in History	= 1
Time and Place	= n.a.
Potential to yield ...	= n.a.

Overall Assessment = 1 (Post and Hazeltine 2009:22)

In interpreting the value system presented above, the rankings are:

E = exceptional
3 = high-very good
2 = good
1 = little

The re-evaluation by Post and Hazeltine (2009:33) concluded that the SPRR had relatively assessments of 2, 3, and 1. While assessments with a value of 1 have a low potential for listing as a historic resource, values above 1 have a greater potential. McKenna et al. would conclude that, even in applying the Post/Hazeltine assessment, this resource meets the minimum criteria for recognition. In applying the same data, McKenna et al. would re-evaluate the property as follows

Integrity:

Integrity of Location	= 2
Integrity of Design	= 1
Integrity of Setting	= 1
Integrity of Materials	= 1
Integrity of Workmanship	= 1

Overall Assessment = 2 (McKenna 2011)

Age: = 3

Overall Assessment = 3 (McKenna 2011)

Association:

Event, Person, etc.	= 4
Designer	= 1
Architectural Style	= 2
Construction Materials	= 1
Traditional Lifeways	= 1
Broad Themes in History	= 3
Time and Place	= 2
Potential to yield ...	= 1.

Overall Assessment = 2.5 (McKenna 2011)

Based on the McKenna et al. re-evaluation, this resource has an assessment evaluation of 2, 3, and 2.5, respectively, resulting in a “good” to “very-good” ranking and qualifying for local recognition.

CEQA Evaluation:

To be considered a historic resource under the California Environmental Quality Act (CEQA), as amended, a resource must be listed in or determined eligible to be listed in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4850 et seq.); included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code; or identified as significant in a historic resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code. The criteria for identifying a cultural resource as a historical resource and eligible for listing to the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4852) are as following

- A) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- B) Is associated with the lives of persons importation in our past;
- C) Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a creative individual, or possesses high artistic values; or

- D) Has yielded, or has the potential to yield, information important to pre-history or history.

Post and Hazeltine concluded this resource is not eligible for recognition under any of the four criteria presented above. In contrast, McKenna et al. has concluded the 1887-1900+ railroad alignment meets the intent and requirements of Criteria “A” and “B”, as presented above. The alignment can be associated with the development of the extensive California rail system developed by the “Big Four” in and resulting in connecting regional areas throughout California and the nation. This alignment represents the first rail system in the Goleta Valley and was instrumental in the success of the agribusiness in Santa Barbara County and the immediate area. It also facilitated the growth in settlement in the Goleta Valley and was instrumental in the development of tourism in this area. These are intangible associations and not related to the physical integrity of the property.

The resource does not appear to qualify under Criterion “C.” However, with additional research, the property may still qualify under Criterion “additional C” if physical evidence is uncovered in a buried context and/or research an associate the construction with specific individuals or designs. This assertion can pertain to Criterion “D”, as well.

A resource need only meet one of the four criteria presented above to identify a cultural resource as a historical resource. McKenna et al. has concluded this resource meets the requirements for recognition under Criteria “A” and “B.” Therefore, this resource is a significant historical resource.

National Register of Historic Places (NHRP) Evaluation

Criteria for eligibility for listing in the National Register of Historic Places are similar to those for CEQA eligibility. A resource is eligible if it:

- A. Is associated with events that have made a significant contribution to the broad patterns of our history;
- B. Is associated with the lives of persons significant in our past;

- C. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction;
- D. Has yielded, or may be likely to yield, information important to the prehistory.

As discussed with respect to CEQA, the 1887 railroad alignment can be associated with both events and persons important in history (see earlier discussion). On a grander level, this resource connected the coastal California area with the rest of the nation through the connections with the Southern Pacific railroad and Union Pacific Railroad systems.

The historic Goleta railroad station, originally built along the historic SPRR alignment (1901) and relocated to the South Coast Railroad Museum on Los Carneros Road, is listed in the National Register of Historic Places and is recognized for its association with the “Big Four,” the events associated with its construction and events within the local, regional, state, and national commercial and transportation improvements. McKenna et al. has confirmed the Depot is listed as a Santa Barbara County Historical Landmark (No. 22); the California Register of Historical Resources; as well as the National Register. At the time of its listing, the depot was in a state of disrepair, in need of serious and costly renovations, and fully abandoned.

The railroad alignment located within the project area is also in a state of disrepair and/or abandonment. Nonetheless, it shares the history of association with persons and events that led to the recognition of the depot. Based on these factors and the data presented above under the local and CEQA evaluation, this resource would also qualify.

General Discussion on Evaluation:

The Post/Hazeltine Associates report of 2009 concludes the 1887 Southern Pacific Railroad alignment crossing the Westar Mixed-Use project area is not a significant resource, mainly based on its lack of integrity. The McKenna et al. review of their data and a reassessment of the findings disagrees within this conclusion. The resource is already designated as a locally significant resource, a Resource of Historic Merit.

For the purposes of the currently proposed project development, McKenna et al. has concluded that the SPRR alignment within the project area is eligible [under CEQA] for listing in the California Register of Historical Resources. The applicable criteria involve the associations of the resource with major events and persons important in history (Criteria “A” and “B”).

Because the resource meets the minimum criteria for recognition, impacts to this resource would be considered adverse. To lessen adverse impacts to a level of insignificance, McKenna et al. makes the following recommendations (others may be added and/or some of these may be deemed infeasible):

1. Insure the resource is adequately recorded (obtain a state trinomial for reference);
2. Conduct subsurface testing in the area of the resource to determine whether or not additional components are present and to assist in making decisions on proposed use of the property;
3. Avoid impacts to the resource by designing the proposed development to avoid direct and/or indirect impacts;
4. Design the proposed project to incorporate the alignment into the design (e.g. a bike path, walking trail, road alignment, etc.);
5. Consider using the alignment as a transportation corridor with supporting facilities (e.g. a park and ride location; use for access to the existing rail line);
6. Insure recognition of the alignment by placing markers or a plaque to commemorate the significance of the alignment;
7. Consider a “trade-off” with the Goleta Valley Historical Society and/or Central Coast Railroad Museum in the form of donations or gifts to off-set the loss of the physical resource;
8. Insure monitoring of activities in the area of the alignment to insure adequate identification and recordation of buried components and to assist in the identification of potentially significant remains in the same area;

9. Complete additional research and documentation of the alignment prior to any alteration or demolition. In this case, the preparation of an Historic American Engineering Record (HAER) would be appropriate;
10. Prepare a technical report on the findings/research and supplement the technical report with an abbreviated report that can be distributed through the Historical Society and Railroad Museum.
11. Prepare a technical document to supplement the 2009 Post/Hazeltine report and file both reports with the UCSB-CCIC.

As noted, additional recommendations may be added to this discussion and/or some of the recommendations presented above may be amended or removed, pending consultation with the City.

Any comments or questions regarding this review should be directed to the author, Jeanette A. McKenna, Whittier, California.

Jeanette A. McKenna, Principal, McKenna et al.

_____ Date

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Additional Research

Santa Barbara County Tax Assessor's Office
Goleta Valley Historical Society
Santa Barbara Historical Society, Gledhill Library
University of California, Santa Barbara, Map and Imagery Room
University of California, Santa Barbara, Special Collections
Ventura County Museum of History and Art
U.S. Land Commission Map (1855)
U.S. Geodetic Survey Maps (1870 and 1878)

W.W. Burton Map (1900)
U.S.G.S. Goleta Quadrangle (1903)
Aerial Photograph (ca. 1938; on file, GVHS)

March 4, 2011

Mr. Kenneth E. Marshall, AICP
Principal, Regional Office Manager
Dudek
621 Chapala Street
Santa Barbara, CA 93010

**Re: Response to the Peer Review and Assessment
Phase I Historical Resources Management Report
Westar Mixed-Use Project, City of Goleta, California**

Dear Ken:

This letter is a response to comments made by Jeanette McKenna, Principal, McKenna et al., in a peer review (McKenna 2011) of a Phase I Historical Resources Management Report prepared by Post/Hazeltine Associates (Post/Hazeltine 2009) in support of the Westar Mixed-Use Project. The letter focuses on issues raised in the peer review relative to our conclusions. Each main issue is numbered, followed by the peer review comment, and our response, incorporating specific citations from the Phase I Historical Resources Management Report supporting its conclusions.

1. City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Criteria: 6-19-6-20, Local Significance Criteria

- A. Comment:** The peer review states that the Southern Pacific Railroad (SPRR) corridor segment within the project site is over 50 years of age, and “is one of, if not the last, remnant of the 1887 alignment, resulting in it being the only recognizable portion of the historic railroad” (pg. 19). This alignment is considered to “exemplify the successful progress and economic advancements within the Goleta Valley between 1887 and 1901. The physical remains representing this alignment are noticeable and recognizable as a railroad alignment (to those who are interested and familiar with these features) and is a physical element of the City’s (Valley’s) history” (pg. 19). The peer review considers

that the SPRR spur onsite exemplifies or reflects special elements of the “city’s cultural, social, economic, political, aesthetic, architectural, landscape architectural, or natural history” satisfying City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion a.

Response: The Historical Resources Management Report has presented substantial evidence supporting a conclusion that the integrity of the SPRR corridor segment onsite has been compromised to a point of impairing its significance. It does not retain its integrity of Design, Setting, Materials and Workmanship. By its very nature, this type of resource (essentially a cut below natural grade) would, if any element survived, maintain its integrity of location. However, the fact that the SPRR corridor segment soil cut onsite survives in place does not necessarily mean the resource has retained sufficient integrity to convey its historic appearance, function or associations, attributes that are necessary to qualify it for listing as a significant historic resource at the local level. Moreover, while the railroad cut may be associated with the late nineteenth century of the Goleta Valley, its ability to exemplify this association has been substantially diminished by the loss of its integrity of Design, Setting, Materials and Workmanship.

The setting of the spur remains as an excavated swale; however, the relationship of this small segment of the 19th century railroad to the corridor extending outside the project site is absent, eliminating its historical context. The design of the swale is not unique to the SPRR route. No materials associated with the SPRR railroad, including ballast, wooden ties, or iron rail, exist to suggest its historical context. Evidence of significant historical materials would be, for example, a trestle or bridge that illustrated the engineering technologies of the late 19th century. Examples of this are the large steel bridges with viaducts ranging in length between 421 to 811 feet that were constructed between Dos Pueblos and Santa Maria associated with the completion of the Coast Line during the years 1898-1912, the materials for which were often in short supply (Post-Hazeltine 2009, pg. 10). No such historic materials exist onsite. There is no particular evidence of the workmanship associated with the railroad spur, as no railroad materials remain. Given the absence of characteristics related to the feature’s historical design, setting, materials and workmanship, the integrity of the former SPRR spur on the project site is not “good” or above. Without these historical characteristics and associations, the presence of the spur does not exemplify or reflect special elements of the “city’s cultural, social, economic, political, aesthetic, architectural, landscape architectural, or natural history,” and does not satisfy City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion a.

- B. Comment:** The peer review states that the SPRR spur within the project site is identified with “persons or events of local, state or national history, and therefore satisfies City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion b. In particular, the peer review suggests that the railroad alignment is associated with the first rail line built through the Goleta Valley, and is associated with the railroad’s “Big Four” owners, and/or subsequent association with the Union Pacific Railroad and/or E.H. Harriman.

Response: The Historical Resources Management Report (pgs. 5-12) does recognize that the railroad line has a direct association with historic figures, namely the principals of the SPRR Company (the “Big Four,” Collis Huntington, Mark Hopkins, Leland Stanford, and Charles Crocker), and Union Pacific Railroad (UPRR) president Edward H. Harriman, who are important in the past. The railroad cut onsite represents only an isolated fragment of the much longer rail line dating to the late nineteenth and early twentieth century. The SPRR railroad corridor segment on the Westar property is not substantially identified with these “persons or events of local, state or national history,” primarily because it lacks sufficient integrity to convey its historic design, setting, materials and workmanship, and because this isolated fragment of the original line cannot convey its association with important historic figures or events. The SPRR’s principals including the “Big Four,” and successors including Harriman, are associated with the entire surviving Coastal Route between Los Angeles and Northern California. Given the degree to which the original railroad infrastructure has been improved and upgraded over the past 100 years resulting in the removal of original historic materials, it is unlikely that the entire line would be eligible for listing as a significant historic resource based on this association. It is possible that specific sites along the Coastal Route exhibit sufficient integrity to clearly convey this historic association with the Big Four or later operators of the line; these might include places where important historic events associated with the history of the Southern Pacific Railroad took place; however, the on-site remnant is not one of them. Examples of these might be the location where “the construction-train engine crossed the Cementario viaduct (located north of Gaviota), signaling the completion of the Coast Line’s northern route between Los Angeles and San Francisco” (Post-Hazeltine 2009, pg. 11). No such particular historic event is associated with the isolated SPRR railroad corridor segment on the project site. Therefore the railroad cut onsite is not substantially associated with “persons or events of local, state or national history,” and therefore does not satisfy City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion b.

- C. Comment:** The peer review states that the SPRR spur within the project site “exemplifies distinctive characteristics of a style, type, period, or method of construction or is an example of the use of indigenous materials or craftsmanship,” and therefore satisfies City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion c. There is not sufficient data to confirm the absence of buried historical materials within the railroad corridor. The circular alignment of the railroad corridor onsite is characteristic of the “bends and twists” used to accommodate the inclines and engine capacities to move the trains that is representative of the late nineteenth century period of development.

Response: The Historical Resources Management Report and the Archaeological Resources Report prepared by Dudek incorporated intensive, systematic means to identify any remain historic materials including gravel ballast, wood ties, or iron rails associated with the late nineteenth/early twentieth century segment of the railroad

corridor within the project site. The railroad cut has not been subject to substantial erosion and alluviation that would result from a drainage or creek flowing during peak flooding events. Therefore, the natural burial of any unknown historic materials located beneath flooding alluvium in the railroad corridor is considered highly unlikely.

The Historical Resources Management Report identifies (pg. 9) that the curving alignment of the railroad cut on the project site was a component of the Coast Line's looped terminus at the Elwood Station. The Coast Line extended from the William's Flat Station near the La Patera Lane/Hollister Avenue intersection, and continued through the project site northward to what is now Tuolumne Road and Elwood Station Road, north of US 101, before heading south to the Elwood Station. This circuitous route did reflect the need to reduce grading that otherwise might have been necessary to direct the Coast Line route in a more easterly-westerly direction. This railroad corridor segment on the project site, however, is too fragmentary by itself to substantially exemplify a distinctive characteristic or method of construction whereby grading was minimized. An appropriate example of such evidence would be "the extensive cutting and filling and construction of twelve large steel bridges with viaducts ranging in length between 421 to 811 constructed through the coastal plan between Dos Pueblos and Santa Maria" (Post-Hazeltine 2009, pg. 10) that were required to complete the connection of the Coast Line from Surf to Elwood. The railroad cut onsite, however, does not "exemplify distinctive characteristics of a style, type, period, or method of construction or is an example of the use of indigenous materials or craftsmanship," and therefore does not satisfy City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion c.

D. Comment: The peer review states that the SPRR corridor segment within the project site "has a location with unique physical characteristics, including landscaping, or is a view or vista representing an established feature of a neighborhood community," and therefore satisfies City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion f. The location of the alignment is relatively unique, as the terrain dictated the loop of the alignment to meet the technical needs of the railroad. The terrain, therefore, can be interpreted as a "unique physical characteristic" as meant under Criterion "f." The landscaping along the alignment also includes eucalyptus trees, as standard application for wind protection and route identification.

Response: While the segment of curved railroad corridor within the project site does represent the technical needs of maintaining a certain grade along the line, the terrain does not embody unique characteristics such as noteworthy topographical features that would make it eligible for listing under Criterion f. In addition, there is no data present that document the association between the eucalyptus trees onsite to the construction of the 1887 Southern Pacific Railroad Company line. The peer review may be assuming that the eucalyptus trees were planted to provide material for railroad ties. This historical association, if it could be documented, would not date to the early Coast Line route

constructed in the late nineteenth century; rather, it would date to the later improvements associated with when the corridor segment onsite was abandoned later in the 20th century. Instead, it is most likely that the eucalyptus trees onsite are associated with the former use of the surrounding land for agriculture, as the trees provided wind breaks to protect crops. Therefore, the railroad cut onsite is not “a location with unique physical characteristics, including landscaping, or is a view or vista representing an established feature of a neighborhood community,” and therefore does not satisfy City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion f.

- E. Comment:** The peer review states that the Southern Pacific Railroad (SPRR) spur within the project site “reflects significant geographical patterns associated with different eras of settlement and growth,” and therefore satisfies City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion h. The peer review considers that the railroad corridor segment onsite illustrates the development of the Goleta Valley’s agricultural industry, spurred settlement and development in the area, allowed local farmers to successfully transport their produce to market, and transported tourists and settlers to an area that was previously not readily accessible to the out-of-towners.

Response: The Historic Resources Management Report concurs that the 1887 Coast Line railroad line through the Goleta Valley is associated with significant geographical patterns important to the economic, social and demographic development of the Goleta Valley. Although demonstrating the evidence necessary for fulfilling this criterion does involve the application of intangible attributes, it is still necessary for a significant resource to be able to convey this association by retaining those characteristics that link it to significant geographical patterns important to the history of Goleta. As discussed above in Response to Comment 1.A, the isolated fragment of the railroad line onsite lacks its integrity of Design, Setting and Materials, does not effectively convey the historic association with the development of Goleta Valley’s agricultural industry, and therefore does not satisfy City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion h.

- F. Comment:** The peer review states that the SPRR spur within the project site “is one of the few remaining examples possessing distinguishing characteristics of an architectural, landscape architectural, or historical type,” and therefore satisfies City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion i. The alignment is one of only two examples of the original alignment remaining and still reflects the original location of the alignment and the preparation of the property to accommodate the alignment. It is a “distinguished” characteristic, as railroad alignments have a unique structure to their development.

Response: The fragment of the 1887 Coast Line railroad line within the project site does not meet the definition of an “architectural type,” as its construction did not require the

construction of buildings, engineering structures and features such as berms, culverts, retaining walls, bridges, or buildings. Such “architectural type” examples would be the “twelve large steel bridges with viaducts ranging in length between 421 to 811 constructed through the coastal plan between Dos Pueblos and Santa Maria, built with local sandstone procured from local ranch quarries (Post-Hazeltine 2009, pg. 10), or even the “small single-span structure crossing Tecolote Creek and constructed by Italian stonemasons from Santa Barbara (Post-Hazeltine 2009, pg. 11). No such evidence of an architectural type is present within the simple excavated railroad cut onsite. The excavated railroad corridor segment onsite can be classified as an example of late nineteenth century engineering, but as it represents only a very small section of the original line that is no longer associated with other features dating to the 1887 to circa 1900 railroad, the feature does not retain its distinguishing historical characteristics. Therefore the railroad corridor segment on the project site does not satisfy City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criterion i.

The substantial evidence presented above supports the conclusion in the Historical Resources Management Report that the isolated railroad corridor segment related to the Coast Line dating from 1887 to circa 1900 does not qualify as a Place of Historic Merit pursuant to City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance criteria.

2. City of Goleta Historical Resources Guidelines Significance Criteria

- A. **Comment:** The peer review considers that the railroad corridor segment located on the project site generates an Overall Assessment of “good” score to “very good” score of “3,” suggesting that the railroad corridor segment onsite qualifies as a historic resource under local significance criteria.

Response: As discussed in Responses in Section A, the Historical Resources Management Report concludes that the isolated railroad corridor segment on the project site does not retain integrity of Design, Setting, Materials, or Workmanship. When compared to other examples of engineering, technology, and historical events that are still reflected at other locations along the Coastal Route within Southern Santa Barbara County, the railroad corridor cut does not exhibit sufficient context or historic materials to be rated any higher than having little historic value. The major differences in assessing significance ratings between the peer review and the Historical Resources Management Report are related to: 1) association with an event or person; and 2) association with broad themes in history.

The Response to Section 1, Comment B. above explains that the railroad cut onsite represents only an isolated fragment of the much longer rail line dating to the late nineteenth and early twentieth century. It is not substantially identified with “persons or events of local, state or national history,” primarily because it lacks sufficient integrity to

convey its historic design, setting, materials and workmanship, and because this isolated fragment of the original line cannot convey its association with important historic figures or events.

The Response to Section Comment 1, Comment E. above explains that the isolated fragment of the railroad line onsite lacks its integrity of Design, Setting and Materials, and does not effectively convey the historic association with the development of Goleta Valley's agricultural industry.

3. **California Environmental Quality Act Guidelines Section 15064.5 Significance Criteria**

A. Comment: As discussed in Section A, the peer review considers that the isolated railroad corridor segment on site satisfies California Environmental Quality Act Guidelines Section 15064.5 Significance Criteria Criterion A. (is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage); and Criterion B. (is associated with the lives of persons importation in our past) for inclusion of the resource on the California Register of Historic Resources (CRHR). The alignment is considered to be associated with the development of the extensive California rail system developed by the "Big Four" that connected regional areas throughout California and the nation. This corridor segment is associated with the first rail system in the Goleta Valley that was instrumental in the success of the agribusiness, settlement, and development of tourism in Santa Barbara County and the immediate area. These intangible associations are not related to the physical integrity of the property. It is potentially significant under Criterion C (embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a creative individual, or possesses high artistic values), and Criterion D (has yielded, or has the potential to yield, information important to prehistory or history) if unknown artifacts were to be located within the railroad swale.

Response: As discussed in Responses in Section A. above, the Historical Resources Report concludes that the isolated railroad corridor segment on the project site does not retain integrity of Design, Setting, Materials, or Workmanship. Insufficient evidence of the historic railroad route exists to illustrate a substantial association with significant historic events and/or with significant persons or persons involved with developing the railroad.

As discussed in Response to Section A. Comment C. above, the railroad cut is not subject to substantial erosion and alluviation that would result from a drainage or creek flowing during peak flooding events. Therefore, the natural burial of any unknown historic materials located beneath flooding alluvium in the railroad corridor segment cut bank is considered highly unlikely. Even in the unlikely event that original construction materials were found, gravel ballast, wooden ties, and iron spikes that would have been used on the 1887 railroad line in the Goleta Valley do not reflect distinctive characteristics of a type, period, region or method of railroad construction, do not

represent the work of a creative individual, do not possess high artistic values, and because they were common for this period, would not yield information important to history. Examples of resources that might satisfy significance criteria C. and D. are the twelve large steel bridges with viaducts ranging in length between 421 to 811 constructed through the coastal plan between Dos Pueblos and Santa Maria” (Post Hazeltine 2009, pg. 10), that were required to complete the connection of the Coast Line from Surf to Elwood, or even the “small single-span structure crossing Tecolote Creek and constructed by Italian stonemasons from Santa Barbara” (pg. 11). No evidence of distinctive historical characteristics or remains such as stone abutments would be expected within the railroad cut onsite.

4. National Register of Historic Places (NRHP) Eligibility Listing Criteria

- A. **Comment:** The peer review considers that the isolated railroad corridor segment on site satisfies NRHP eligibility Criterion A. (is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage); and B. (is associated with the lives of persons important in our past). The peer review considers that the feature onsite is associated with the railroad that connected coastal California with states to the east and north through SPRR and UPRR systems.

Response: The peer review omits important components associated with determining a resource eligible for NRHP listing. As defined in the Historical Resources Management Report (pg. 28):

“The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of State and local importance *that possess integrity of location, design, setting, materials, workmanship, feeling and association, and (italics added for emphasis):*

- (a) That are associated with events that have made a significant contribution to the broad patterns of our history; or
- (b) Is associated with the lives of persons important in our past; or
- (c) That 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
- (d) Has yielded, or may be likely to yield, information important in history.

Determining a resource’s NRHP listing eligibility requires first the determination of its integrity. Without this integrity present, the resource cannot be determined eligible for NRHP listing.

As discussed in Responses to Section C, Comment A. above, the Historical Resources Report concludes that the isolated railroad corridor segment on the project site does not

retain integrity of Design, Setting, Materials, or Workmanship. Insufficient evidence of the historic railroad route exists to illustrate a substantial association with significant historic events and/or with significant persons or persons involved with developing the railroad. Therefore, the isolated railroad corridor segment on the project site is not eligible for NRHP listing under any criteria.

- B. Comment:** The historic Goleta Railroad Station, though relocated to the South Coast Railroad Museum on Los Carneros Road, is listed on the NRHP, the CRHR, and is Santa Barbara County Historical Landmark No. 22. When listed as a historic resource, it was in a state of disrepair and fully abandoned. The railroad alignment located within the project area “also is in a state of disrepair and/or abandonment” but also is eligible for listing as a historic resource on the CRHR and as a City Landmark.

Response: The peer review does not identify critical differences in the integrity of the Goleta Railroad Station and the railroad corridor segment on the project site that clearly make this analogy incorrect.

- a. When nominated to the NRHP, the Goleta Railroad Depot was located in its original location adjacent to the railroad tracks responsible for bringing passengers and freight to the facility. Therefore, the overall context of the station was intact relative to its historical setting. In contrast, the railroad corridor segment on the project site has been completely isolated from the SPRR route extending to the east and north, removing its historical context. As a result, this section of line in isolation does not convey its historical association with the history of the Goleta Valley or the SPRR.
- b. The Depot, even in its pre-restoration state, retained most of its historic materials that were considered distinctive characteristics of a type, period or method of construction including: wood framing; wood siding; wood sash windows; and wood doors. These historic-period materials effectively conveyed its historic appearance and associations with the Coast Line, SPRR, and UPRR. In contrast, the railroad cut on the Westar property does not retain any physical materials including its gravel bed, rails, and ties that are associated with the period of its use in the late nineteenth and early twentieth century. This is not the case with the Goleta depot, which maintained these qualities even in its deteriorated state.
- c. The Depot can be associated with particular historic events and activities that when reconstructed, can provide information important in history. These activities have been effectively restored at the Goleta Railroad Museum, and provide for a center of civic pride and local heritage. The isolated railroad segment, particularly without any associated historic material dating to its use (i.e., gravel ballast, wooden ties, and rails), does not provide the same information or association important in history.

Therefore, the comparison of the Goleta Railroad Depot's NRHP listing to the potential eligibility of the isolated railroad corridor segment on the project site does not consider the swale's lack of integrity, historic material, or inability to yield information in history.

5. Recommendations

- A. **Comment:** The peer review identifies eleven recommendations considered necessary to reduce impacts on historic resources, given that the isolated railroad corridor segment is considered a historic resource and eligible for listing on the CRHR.

Response: As discussed in responses above, the isolated railroad corridor segment on the project site does not satisfy criteria for listing as a Place of Historic Merit pursuant to City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance Criteria, an historic resource listed on the CRHR, or an historic property listed on the NRHP. The Historic Resources Management Report (pg. 34) recommends, however, that the resource be photo-documented pursuant to City of Goleta Historic Resources Guidelines, and that a plaque memorializing the history of the railroad through the site be incorporated into the proposed project design. Comments on each of the recommended measures provided in the peer review follow:

1. **Insure the resource is adequately recorded (obtain a state trinomial for reference);**

This measure is consistent with the Historical Resources Management Report recommendation described above.

2. **Conduct subsurface testing in the area of the resource to determine whether or not additional components are present and to assist in making decisions on proposed use of the property;**

This measure's action would not identify any original historic materials associated with the railroad, including ballast, ties, or rails, as there is no potential for these artifacts to be buried by alluviation onsite. There is no nexus for this measure, and it should not be considered further.

3. **Avoid impacts to the resource by designing the proposed development to avoid direct and/or indirect impacts;**

The isolated railroad corridor segment on the project site does not satisfy criteria for listing as a Place of Historic Merit pursuant to City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance criteria, an historic resource on the CRHR, or an historic property on the NRHP. As it is not a significant

historic resource, there is no nexus for requiring avoidance of direct or indirect impacts resulting from project construction, and it should not be considered further.

4. Design the proposed project to incorporate the alignment into the design (e.g. a bike path, walking trail, road alignment, etc.);

The isolated railroad corridor segment on the project site does not satisfy criteria for listing as a Place of Historic Merit pursuant to City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element criteria, an historic resource on the CRHR, or an historic property on the NRHP. As it is not a significant historic resource, there is no nexus for requiring redesign of the project to incorporate the feature as a bike path, walking trail, or road alignment, and it should not be considered further.

5. Consider using the alignment as a transportation corridor with supporting facilities (e.g. a park and ride location; use for access to the existing rail line);

The isolated railroad corridor segment on the project site does not satisfy criteria for listing as a Place of Historic Merit pursuant to City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element criteria, an historic resource on the CRHR, or an historic property on the NRHP. As it is not a significant historic resource, there is no nexus for requiring redesign of the project to incorporate the feature as a transportation corridor with supporting facilities, and it should not be considered further.

6. Insure recognition of the alignment by placing markers or a plaque to commemorate the significance of the alignment;

This measure is consistent with the Historical Resources Management Report recommendation described above.

7. Consider a “trade-off” with the Goleta Valley Historical Society and/or Central Coast Railroad Museum in the form of donations or gifts to off-set the loss of the physical resource;

The isolated railroad corridor segment on the project site does not satisfy criteria for listing as a Place of Historic Merit pursuant to City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element criteria, an historic resource on the CRHR, or an historic property on the NRHP. As it is not a significant historic resource, there is no nexus for requiring compensatory mitigation, and it should not be considered further.

8. Insure monitoring of activities in the area of the alignment to insure adequate identification and recordation of buried components and to assist in the identification of potentially significant remains in the same area;

The isolated railroad corridor segment on the project site does not satisfy criteria for listing as a Place of Historic Merit pursuant to City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element criteria, an historic resource on the CRHR, or an historic property on the NRHP. As it is not a significant historic resource, there is no nexus for requiring monitoring during construction by an archaeologist or historian, and it should not be considered further. In addition, this measure's action would not identify any original historic materials associated with the railroad, including ballast, ties, or rails, as there is no potential for these artifacts to be buried by alluviation onsite.

9. Complete additional research and documentation of the alignment prior to any alteration or demolition. In this case, the preparation of an Historic American Engineering Record (HAER) would be appropriate;

The Historic Resources Management Report provides extensive archival background relative to the isolated railroad corridor segment onsite. The Historic Resources Management Report recommended recordation of the site, as well as the peer review Recommendation No. 1, will provide sufficient documentation of the resource.

10. Prepare a technical report on the findings/research and supplement the technical report with an abbreviated report that can be distributed through the Historical Society and Railroad Museum.

The isolated railroad corridor segment on the project site does not satisfy criteria for listing as a Place of Historic Merit pursuant to City of Goleta General Plan/Coastal Land Use Plan Visual and Historic Resource Element Local Significance criteria, an historic resource on the CRHR, or an historic property on the NRHP. The Historic Resources Management Report provides extensive archival background relative to the isolated railroad corridor segment onsite, and recordation is recommended. Ensuring that the recordation is provided to the Goleta Historical Society and the Goleta Depot Railroad Museum will provide adequate dissemination of this documentation. Support for an exhibit that illustrates the location of the railroad corridor segment as part of an exhibit commemorating and interpreting the history of the Southern Pacific and Union Pacific Railroad through text, maps, photographs and other displays could also be beneficial.

11. Prepare a technical document to supplement the 2009 Post/Hazeltine report and file both reports with the UCSB-CCIC

The Historic Resources Report provides extensive archival background relative to the isolated railroad corridor segment onsite, and recordation of the feature is recommended prior to construction. Together, these documents will provide substantial background on

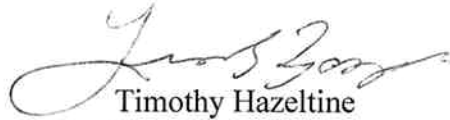
the isolated railroad corridor segment. No additional technical documentation will be necessary, nor is the scope of such an effort defined by the peer reviewer.

Please let us know if you have any further questions.

Sincerely



Pamela Post Ph.D.
Senior Partner



Timothy Hazeltine
Partner

References

Post/Hazeltine Associates

2009 Phase I Historical Resources Management Report for a Portion of the Westar Property, 7000 Hollister Avenue (APN 073-030-020).

McKenna, Jeanette A.

2011 A Peer Review and Assessment of Previously Completed Cultural Resource Investigations Addressing the Westar Mixed-Use Project Area, Goleta, Santa Barbara Co., California.

Stone, David and Ken Victorino

2009 Phase I/Extended Phase I Archaeological Investigation, Westar Goleta Mixed Use Village, Goleta, California

McKenna et al.

History/Archaeology/Architectural History/Ethnography/Paleontology

Jeanette A. McKenna, MA
Registered Prof. Archaeologist
Owner and Principal Investigator

March 9, 2011

ENVICOM CORPORATION
Attn: Brian McCarthy
28328 Agoura Road
Agoura Hills, California 91301

RE: Westar Mixed-Use Project, Post/Hazeltine Responses of March 4, 2011.

Mr. McCarthy:

In response to the comments presented by Post/Hazeltine (March 4, 2011), McKenna et al. has prepared the following responses. Please take into consideration the comments presented here reflect the findings of McKenna et al. as they pertain to the technical document prepared by Post/Hazeltine for the SPRR/UPRR alignment within the Westar Mixed-Use project area, only, as Post/Hazeltine was not contracted to address the entire project area.

Item 1: Local Significance.

Comment A. Post/Hazeltine, in their response to the McKenna et al. review, do not question the association of the response the “special elements of the City’s cultural, social, economic, political, aesthetic, architectural, landscape architectural, or natural history,” but base their argument on the “lack of integrity” of the resource. Cultural, social, economic, and political elements are non-tangible and, therefore, are not directly related to the physical remains identified within the property. As such, McKenna et al. interprets the guidelines as including both tangible and non-tangible elements ... the non-tangible elements not necessarily requiring physical integrity of the resource.

Local guidelines (revised 2002), adopted from the County guidelines, list “Integrity” as one of three categories for assessing significance. The three categories include integrity, age, and association. Simply put, even if one accepts a lack of integrity, a resource may also qualify under age and/or association. Further, qualifying under “integrity” requires meeting only one of five sub-categories (location, design, setting, materials, and workmanship).

McKenna et al. maintains this resource meets the minimum local requirements for integrity, fulfills the age requirement, and can be associated with notable individuals and events. McKenna et al. maintains the local designation should remain and some level of mitigation is needed if this resource is to be impacted.

Comment B. Again, Post/Hazeltine state the associations with noted individuals or events do not apply because the resource lacks integrity. As discussed above, integrity is only one of three categories for consideration. McKenna et al. would also argue that a lack of local recognition for this resource is not because the resource lacks significance, but the local population has not been educated to understand the history and significance of the resource. The local museum and historical society are actively working to publicize this significance.

Post/Hazeltine state “[N]o particular historic event is associate with the isolated SPRR railroad corridor ...”. McKenna et al. would argue that **the development and use** of the railroad for the various local and regional activities fulfill this requirement. If this “segment” did not exist, the significant central coast alignment would not exist. The “segment” must to considered in a more holistic manner and acknowledged as part of a larger and greater element of the central coast infrastructure.

Comment C. Post/Hazeltine state (page 3) the Dudek archaeological study involved “intensive, systematic means to identify any remain [sic] historic materials including gravel ballast, wood ties, or iron nails ...”. This statement is erroneous. Dudek did conduct a surface survey, but never tested to determine the presence or absence of buried materials. Further, there was no evidence to definitively conclude the alignment was not subjected to erosion or alluviation. Although unlikely, the removal of the materials may result in the presence of evidence of other historic activities. Post/Hazeltine and presenting an archaeological argument that Dudek, itself, does not address. Without subsurface testing or compilation of other archaeological data, the Post/Hazeltine conclusion is not justified.

Comment D. No, McKenna et al. is not suggesting the eucalyptus trees were planted to provide materials for the railroad ties. ***The reviewer (McKenna et al.) is not aware of ANY instance where trees were planted along an alignment in anticipation of maturation and harvesting for use as railroad ties and would never suggest such an interpretation.*** Eucalyptus trees, in introduced tree, were fast growing trees used primarily for windbreaks and soil stabilization. They were used on farms and ranches to identify property boundaries and also serve as windbreaks. In California, eucalyptus trees were also planted along roadways and railroad alignments (e.g. along Highway 1 in Ventura county and, currently, along Interstate 10 in San Bernardino and Riverside Counties). The trees on the project site are mature.

It is highly likely the trees can be associated with the development of the railroad alignment and provided multiple services – windbreaks, location of the alignment from a distance, property boundary, etc. It is also possible the trees are associated with agriculture. In either case, they represent a historic landscape.

The purpose of mentioning the trees was to emphasize the lack of recordation of all elements associated with the railroad development, including the construction of the later alignment. It also served to emphasize the lack of acknowledgment that this resource is part of a greater whole.

Post/Hazeltine discount the possibility of a railroad association and emphasize the use of the property for agriculture pre-dating the railroad construction. Additionally, the Post/Hazeltine conclusion contradicts data presented by Stone and Victorino, who state the property reflects its original contours. The archaeological report also fails to address the presence of the mature eucalyptus trees. The fact that there is more than one possibility for the presence of the trees and no alternative interpretations have been adequately addressed in either technical report, McKenna et al. concluded additional studies are warranted.

Comment E. Again, Post/Hazeltine falls back on the lack of integrity for the alignment and, therefore, interprets the guidelines to negate significance under Criterion “h.”. As noted above, McKenna et al. is emphasizing that integrity is only one of three categories to be considered and, regardless of integrity arguments, the resource fulfills the requirements under “age” and “association.”

Comment F. Post/Hazeltine state the railroad alignment is not an example of an “architectural type.” McKenna et al. would argue that the alignment is an “engineering structure” that required specific planning and placement to meet the needs of the railroad grade and load requirements. Although the laying of bed and rails may be standard, the “landform” required for a functioning railroad alignment does meet the definition. This alignment may not be representative of the “best example” of its type, but it is representative of the remaining example of its type and, as noted earlier, the presence or absence of related elements had not been adequately investigated.

Item 2. City of Goleta Significance.

Post/Hazeltine repeat their arguments that emphasize the lack of integrity for the resource. McKenna et al. repeats the conclusion that “integrity” is not the only defining category to be considered and, even if the resource is proven to lack integrity (McKenna et al. does not consider the current level of analysis proof of a lack of integrity), the “age” and “association” categories would qualify

the resource for consideration and listing as a locally recognized resource (Place of Historic Merit).

3. CEQA Guidelines/Evaluations.

Comment A. Post/Hazeltine again argue that the lack of integrity justifies a conclusion that this resource is not eligible for listing in the California Register of Historical Resources. Post/Hazeltine contradicts their own document by (now) stating the resource is not associated with significant persons or events. Their own discussion on the history of the railroad presents these associations. For arguments-sake, if this railroad was a local development and not connected to the larger, regional and national rail system, it would still represent and be associated with significant social and economic events for the central coastal area, thereby qualifying under CEQA Criterion A. Because no subsurface testing has been completed, the potential for qualifying under Criterion D cannot be ignored.

4. National Register Evaluation.

Comment A. Post/Hazeltine cite NRHP eligibility criteria and requirements for integrity. However, Post/Hazeltine emphasize integrity must be established prior to evaluating eligibility. McKenna et al. interprets the guidelines differently. Citing the National Register Bulletin on “How to Apply the National Register Criteria for Evaluation,” to be listed in the National Register of Historic Places, “... a property must not only be shown to be significant under the National Register criteria, but it also must have integrity.” McKenna et al. interprets this statement as requiring evaluation under the four main criteria first and, subsequently, assess the integrity. In doing so, the analysis is completed with all data available at the time of assessment and avoiding preliminary dismissal of significance based solely on a presumed level of “integrity.” The guidelines (nps.gov/history/nr/.../nrb15_8.htm) also state:

“The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of the property’s physical features and how they relate to its significance ... Within the concept of integrity, the National Register criteria recognizes seven aspects or qualities that, in various combinations, define integrity. To retain historic integrity a property will always possess several, and usually most, of the aspects .. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant.”

Post/Hazeltine states (page 9) the resource does not retain integrity of "... Design, Setting, Materials, or Workmanship ...". By omission, they suggest the remaining three elements of integrity do apply – meaning location, feeling, and association. As noted above (under CEQA evaluation), Post/Hazeltine contradict their own technical document and statements made with respect to the events and associations with significant persons. McKenna et al. concluded these associations are documented and can be applied to the National Register eligibility. This resource is also directly associated with the historic railroad depot, a National Register of Historic Places property that has been relocated.

Comment B. McKenna et al. responses as follows ...

- a. The depot has since been relocated and still listed in the Register. Ordinarily, relocation would result in a loss of recognition. However, in this case, the depot was considered significant enough to maintain the listing. The alignment within the project area is directly associated with the railroad represented by the depot, hence a level of association worth consideration.
- b. The depot is a different type of resource and McKenna et al. reviewed photos of the depot before and after restoration. Yes, much of the original material was present (although in poor condition). Restoration was a large effort and required a considerable amount of time and expertise. In the case of the railroad alignment, subsurface testing has not be completed, there is no definitive information to show whether or not additional components are present, and the current condition still does not negate the significance under Criteria A and B.
- c. The depot is a point of interest and certainly worthy of the efforts for restoration. McKenna et al. is not insisting the railroad alignment needs to be maintained or restored, but is should be recognized for its contributions to the historic context for the area and its association with a railroad alignment that preceded the current alignment. If any buried components of this early alignment are identified in a buried context, they will represent a significant addition to the understanding of the original alignment.

Recommendations.

As noted in the various comments presented above, McKenna et al. has a professional difference of opinion with respect to the significance of the SPRR/UPRR alignment within the project area. Post/Hazeltine concluded the resource was not significant under CEQA and based that conclusion primarily on the "lack of integrity." McKenna et al. has concluded that there is insufficient data to conclude a lack of integrity significant enough to preclude eligibility and that Criterion A and B can be applied to confirming eligibility. Whether evaluated for local, state, or federal eligibility, the resource is still associated with significant for its association with historic events, economic and political activities,

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and significant persons in history. Therefore, McKenna et al. also believes there will be adverse impacts to this resource until or unless mitigation measures are implemented.

Despite concluding the resource is not eligible for listing, Post/Hazeltine also made recommendations (mitigation measures) to be completed prior to any impacts to the resource, including photography and the mounting of a plaque. In making these recommendations, Post/Hazeltine is contradicting their own findings – that there is no significant resource and there will be no adverse impacts. In addition, consistently referring to the resource as an “isolated railroad corridor segment” does not negate the fact that this segment is essentially the last remnant still visible and accessible to the general public, resulting in an acknowledgment of its rarity.

With respect to the mitigation measures proposed as a result of the McKenna et al. review, the following is noted:

1. The Post/Hazeltine report does not cite a state trinomial and does not recommend recordation for a trinomial. This is still a necessary step for compliance with the CHRIS reporting requirements and the Office of Historic Preservation. McKenna et al. is recommending Post/Hazeltine and/or Dudek Engineering complete the required forms.
2. To argue there is “no potential” for railroad related artifact is a misrepresentation of the facts. There is always a potential for buried artifacts and/or features. Post/Hazeltine provided no definitive data to conclude all remnants of the alignment have been removed. Only surface examination was completed and there is no data to eliminate the potential. This resource is, by definition, an archaeological resource (a ruin or remnant with the potential for buried components) and, therefore, should be addressed via archaeological methods, not a strictly historic research approach.
3. Redesign of the project is a recommendation to be considered, not a requirement. If the project cannot avoid direct or indirect impacts, additional alternatives for mitigation of impacts have been presented.
4. Again, if impacts cannot be avoided, it has been recommended – not required – that the project consider incorporating the alignment into the design in a manner that can commemorate the presence of the resource.
5. The local historical society has voiced a concern for the alignment and has considered recommending re-establishment of the alignment as a siding for a transportation hub. This recommendation would require a transfer of a portion of the property for the defined purpose and, although not a strong alternative, has been recommended for consideration, as the historical society and Railroad Museum have an overt interest in this resource.

6. Placing a marker within the property is consistent with one of the recommendations presented by Post/Hazeltine. Regardless of the final project design, the placement of a commemorative plaque is strongly recommended.
7. Because the historical society and Railroad Museum have a vested interest in this alignment and its current level of recognition (and have voiced this interest), McKenna et al. has recommended that, in anticipation of the loss of the alignment, the project proponent consider an additional level of compensation to the societies to off-set the loss. In this case, the compensation may be in the form of a monetary donation to each society and/or provide for some additional research and/or restoration at the societies' facilities.
8. Again, Post/Hazeltine argues that there is "no potential" for buried resources or artifacts. This conclusion is premature. The entire project area is considered sensitive for buried prehistoric archaeological resources and will be monitored during pre-construction activities. Conducting monitoring in the vicinity of the railroad alignment will be conducted as part of this overall monitoring program and, therefore, having a monitor to oversee the potential for historic period resources should not add any undo requirement on the project proponent.
9. Post/Hazeltine recommended photo-documentation of the railroad alignment prior to any disturbances or destruction. McKenna et al. is recommending, based on the re-assessment of the significance of the resource, be completed in accordance with HABS requirements. The majority of the historic research has been completed. With some additional research, the completion of archaeological testing, and the required large format photography, this level of recordation could also suffice as part of the compensation for the loss of the resource.
10. In addition to completing additional documentation and recordation (regardless of the level deemed acceptable), the documentation should also be submitted to the UC Santa Barbara Central Coast Information center for permanent reference. If a HABS document is prepared, this document must also be submitted to the Office of Historic Preservation for compliance with the NPS data requirements.
11. Any and all data currently prepared for this project should be submitted to the UC Santa Barbara Central Coast Information Center, including the required archaeological records (Dudek) and Historic Property records (Building/Structure/Object Record; Post/Hazeltine). There is a considerable amount of flexibility in the data requirements for the resource forms, but they must be filed and permanent trinomials assigned. The trinomial assignment is not dependent upon significance, but a recognition that the resource exists (or existed).

The responses presented above reflect the professional opinion of Jeanette A. McKenna, Owner and Principal Investigator of McKenna et al., Whittier, California.

There is a professional difference of opinion between Post/Hazeltine and McKenna et al. McKenna et al. has concluded the SPRR/UPRR alignment is a significant cultural resource and worthy of protection, preservation, and/or mitigation of adverse impacts. The recommendations presented as a result of this review are based on the significance of the resource as defined by McKenna et al. The final determination of significance and the extent of mitigation measures should be made by the Lead Agency in consultation with the City's environmental consultants and identified stakeholders.

Although the extent of mitigation may vary, depending on the final project description and the accepted mitigation measures, the site forms must be filed and trinomials assigned. Further, submittal of the technical studies to the UCSB Central Coast Information Center is also required (not optional). Any further discussion regarding these issues can be directed to the reviewer.

Jeanette A. McKenna

9, 2011

Jeanette A. McKenna, Principal

March

Date