



## **Appendix D**

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*Cultural Resources: Archaeological Report Peer Review*



**Rincon Consultants, Inc.**

180 North Ashwood Avenue  
Ventura, California 93003

805 644 4455

FAX 644 4240

info@rinconconsultants.com  
www.rinconconsultants.com

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Stephanie Diaz/Scott Kolwitz  
City of Goleta  
130 Cremona Drive, Suite B  
Goleta, CA 93117

**Subject: Peer Review of an Archaeological Technical Report and Results of Background Research for the Cortona Apartments Project, City of Goleta, Santa Barbara County, California**

This letter summarizes the results of a peer review of the report entitled: *Results of a Limited Archaeological Subsurface Testing Program in Conjunction with Future Commercial Development of A.P.N. 73-140-16 on Cortona Drive, Goleta, California*, prepared by Wilcoxon Archaeological Consultants (Wilcoxon 1998) for the Cortona Apartments Project in Goleta. Prehistoric archaeological site CA-SBA-54 is recorded partially within the project site. This peer review was conducted as part of the environmental analysis being conducted in conformance with the California Environmental Quality Act (CEQA) by the City of Goleta. The purpose of the review is to determine whether the cultural resources analyses completed for the project site are adequate for the purposes of preparing an Environmental Impact Report (EIR). In addition to the peer review of the technical report, Rincon Consultants, Inc. (Rincon) conducted background research including searches of the California Historical Resources Information System (CHRIS) and the Native American Heritage Commission's Sacred Lands File.

## **Methods**

### ***Peer Review***

This peer review was conducted by Cultural Resources Principal Investigator Robert Ramirez, M.A., RPA, who meets the Secretary of the Interior's *Professional Qualification Standards* for historic and prehistoric archaeology (National Park Service 1983), and Cultural Resources Program Manager Kevin Hunt, B.A. Quality control for the peer review was provided by Vice President Duane Vander Pluym, D. Env.

The analysis entailed review of the Wilcoxon report with regard to methods, findings, and the potential for the project to impact significant archaeological resources as defined in CEQA and the *State CEQA Guidelines*. As part of the peer review, Robert Ramirez conducted a site visit to the project area on April 22, 2013.

### ***Cultural Resources Records Search***

Rincon requested a CHRIS records search at the Central Coast Information Center (CCIC) located at the University of California, Santa Barbara on April 25, 2013. The search was conducted to identify previous cultural resource studies as well as previously recorded cultural resources within a one-mile radius of the project site. The search included a review of the State Historic Property Data Files,



National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historical Landmarks, California Points of Historic Interest, and the California Office of Historic Preservation (OHP) Archaeological Determinations of Eligibility. The records search also included a review of all available historic USGS 7.5- and 15-minute quadrangle maps.

### ***Sacred Lands File Search***

Rincon contacted the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File (SLF) on April 25, 2013. The purpose of this search was to identify the presence of cultural resources important to Native Americans within the vicinity of the project site.

### **Findings**

#### ***Peer Review***

Wilcoxon's (1998) *Results of a Limited Archaeological Subsurface Testing Program in Conjunction with Future Commercial Development of A.P.N. 73-140-16 on Cortona Drive Goleta California* is formatted generally following the outline provided in the California Office of Historic Preservation's (1990) *Archaeological Resource Management Reports (ARMR) Guidelines: Recommended Contents and Format*, but relies on previous studies (primarily Wilcoxon, Haley, and Billman 1992) for background cultural and environmental setting and archival research. Wilcoxon 1998 does, however, provide a detailed discussion of the history of archaeological research at CA-SBA-54.

CA-SBA-54 was originally recorded in the 1920s (Rogers 1929) and was the subject of further archaeological research in the 1950s (Harrison and Harrison 1966). The majority of the site was destroyed in 1961 when the knoll where it was situated was removed. Subsequent research (Greenwood and Associates 1991, Wilcoxon et al. 1992) concentrated on identifying and evaluating the remaining portions of CA-SBA-54. This discussion is important as it provides a relevant context in which to evaluate the significance of the site and a basis from which to propose appropriate mitigation measures.

The fieldwork and laboratory methods used in the subsurface testing program were adequate for a study of this scope and in conformance with current professional standards. The results of fieldwork indicate that CA-SBA-54 is the only archaeological resource within the project site. A series of trenches were excavated throughout the project site and these identified intact deposits associated with CA-SBA-54. The study demonstrates that an intact layer of archaeological deposit is present below varying depths of disturbance within the northwestern portion of the project site. Though no formal CRHR eligibility assessment of CA-SBA-54 was conducted during Wilcoxon's (1998) study, these deposits were considered potentially significant (CRHR eligible) and a set of five subsequent mitigation measures were presented to address impacts to the resource in preference order. The primary recommended measure (Mitigation Measure 1) is avoidance. In the event that the intact deposits cannot be avoided, Wilcoxon 1998 recommended capping (Mitigation Measure 2), with limited data recovery collection in the event of such capping (Mitigation Measure 5). If capping and avoidance are not possible, then a full Phase II archaeological testing of the site and data recovery is recommended (Mitigation Measure 3). In any event, monitoring during any ground disturbance within 50 feet of the mapped intact resources (Mitigation Measure 4) is recommended.



No evidence of the site was observed during the site visit on April 22, 2013. However, as noted by Wilcoxon (1998), the intact portion of the site is covered by varying depths of fill dirt. In addition, ground visibility was poor to fair because of vegetation.

#### ***CHRIS Records Search***

The CHRIS records search conducted for this peer review provides additional data to support the significance of CA-SBA-54. The 1955 site form indicates human remains had been recorded at the site prior to its destruction by grading. In addition, a 1992 report documenting the results of subsurface tests at the site after it had been destroyed by grading identified human bone fragments in a test trench (Wilcoxon et al. 1992:13). This suggests that human remains could still be encountered in intact portions of the site.

#### ***Sacred Lands File Search***

The NAHC faxed a response on April 26, 2013, which stated that the search of the Sacred Lands File “failed to indicate the presence of Native American traditional cultural places in the project site location submitted...” but recommended that a provided list of Native Americans be contacted as they may have knowledge of cultural resources in or near the project area. This response indicates that CA-SBA-54 has not been recorded by NAHC within the Sacred Lands File, but does not mean the site is not important to local Native Americans and follow-up with local contacts is recommended.

#### **Conclusions**

The report: *Results of a Limited Archaeological Subsurface Testing Program in Conjunction with Future Commercial Development of A.P.N. 73-140-16 on Cortona Drive Goleta California* (Wilcoxon 1998) was conducted consistent with current professional standards and provides an adequate level of analysis to demonstrate that an intact subsurface component of CA-SBA-54 is present within the project site. Though Wilcoxon did not formally evaluate CA-SBA-54 for California Register of Historical Resources eligibility, Rincon recommends the site be presumed CRHR eligible. The demonstrated presence of an intact deposit combined with the recorded presence of human remains indicate that the site likely contains significant data potential that could contribute to our understanding of prehistory and would thereby be eligible for listing on the CRHR. In addition, the site may have Native American heritage value, which can be ascertained during meetings with local Native American representatives.

Rincon concurs with Wilcoxon’s (1998) findings regarding potential site significance. Wilcoxon 1998 basically proposes three alternative strategies for mitigation, which are by order of preference 1) full avoidance, 2) capping with limited data retrieval, and 3) Phase II subsurface testing program for CRHR eligibility, likely to be followed by Phase III data recovery excavation if the site is determined CRHR eligible. Under any of these three alternatives, monitoring of ground disturbance within 50 feet of the mapped resources locations is recommended. Rincon agrees that with respect to the scientific value of CA-SBA-54, the three alternatives delineated above would be adequate to reduce potential project impacts to less than significant in accordance with *State CEQA Guidelines*. However, the possible ethnocultural effects are not necessarily fully mitigated, or fully mitigable. Rincon recommends that follow-up with the local Native Americans be conducted to determine the heritage value of the site and its potential to be a traditional cultural property.



As noted above, Rincon recommends that Wilcoxon's (1998) subsurface testing adequately demonstrated that the site retains significant data potential and therefore should be considered CRHR eligible. If impacts to CA-SBA-54 cannot be avoided by the proposed project (i.e., Wilcoxon's proposed Mitigation Measures 1 or 2 cannot be employed) and the site is presumed CRHR eligible, Rincon recommends that Phase III data recovery excavation be conducted instead of Phase II testing. Phase III data recovery would include preparation of a work plan/research design, fieldwork, laboratory analysis of recovered artifacts and ecofacts, special studies if appropriate, preparation of a technical report, and curation of recovered materials in consultation with Native American representatives. This data recovery program can be outlined as mitigation in the EIR and should be completed prior to issuance of a grading permit (but does not need to be completed in conjunction with the EIR analysis).

In addition to the impact mitigation alternatives proposed by Wilcoxon (1998:24-25), Rincon recommends the following measure:

State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the Santa Barbara County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Sincerely,  
**RINCON CONSULTANTS, INC.**

Robert Ramirez, M.A., RPA  
Principal Investigator,  
Cultural Resources

Kevin Hunt, B.A.  
Cultural Resources Program Manager



## References

California Office of Historic Preservation

1990 *Archaeological Resource Management Reports (ARMR) Guidelines: Recommended Contents and Format*. Electronic document accessed March 15, 2013. Online at: <http://ohp.parks.ca.gov/pages/1054/files/armr.pdf>

Harrison, William M. and Edith S. Harrison

1966 An Archaeological Sequence for the Hunting People of Santa Barbara, California. In *Archaeological Survey Annual Report 1966*. Donald S. Miller, ed, pp 1-90. Department of Anthropology, University of California, Los Angeles.

National Park Service

1983 Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines. Electronic document accessed May 21, 2013. Online at [http://www.nps.gov/history/local-law/Arch\\_Standards.htm](http://www.nps.gov/history/local-law/Arch_Standards.htm).

Rogers, David B.

1929 *Prehistoric Man of the Santa Barbara Coast*. Santa Barbara Museum of Natural History, Santa Barbara, California.

Greenwood and Associates

1991 *Archaeological Survey Report for the Proposed Storke/Glen Annie Road Interchange Alternatives on Highway 101*. Greenwood and Associates. Report on file at Central Coast Information Center, Santa Barbara, California.

Wilcoxon, Larry R.

1998 *Results of a Limited Archaeological Subsurface Testing Program in Conjunction with Future Commercial Development of A.P.N. 73-140-16 on Cortona Drive, Goleta California*. Wilcoxon Archaeological Consultants. Report on file at Central Coast Information Center, Santa Barbara, California.

Wilcoxon, Larry R, Brian D. Haley, and Brian Billman

1992 *A Supplemental Archaeological Survey and Subsurface Testing Report for the Storke/Glen Annie Road Interchange Project on U.S. Highway 101 in Goleta California*. Larry R. Wilcoxon Archaeological Consultants. Report on file at Central Coast Information Center, Santa Barbara, California.