

FIELDWORK AND REPORTING GUIDELINES FOR CULTURAL RESOURCES

ARCHAEOLOGICAL, HISTORIC, AND TRIBAL CULTURAL RESOURCES

PURPOSE

These Cultural Resources Fieldwork and Reporting Guidelines for development review, fieldwork, and reporting provide direction for conducting cultural resource investigations and preparing reports for projects subject to CEQA being processed by lead agencies. These guidelines are designed to:

Make clear the requirements for conducting cultural resource investigations in the context of environmental review of development project applications pursuant to the California Environmental Quality Act (CEQA) and other applicable regulations and policies.

Ensure the quality, accuracy and completeness of cultural resource investigations and reports. Reporting structure is based on the State of California's Archaeological Resource Management Report format with modifications. Depending on the types of resources and impacts identified, the format may vary and all elements may not be required.

Aid in efficient and consistent review of maps and documents from different consultants.

Provide adequate information to make appropriate planning decisions and to make determinations regarding conformance with applicable regulations.

Increase the efficiency of the environmental review process and avoid unnecessary time delays.

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1.0 INTRODUCTION

This document guides planners and consultants conducting environmental review of cultural resources within lead agencies, and in the preparation of technical studies that are the result of the application of the Guidelines for Determining the Significance of and Impacts to Cultural Resources: Archaeological, Historic, and Tribal Cultural Resources (“Guidelines”). This document is also intended to help planners understand and review consultants’ documents. Requirements described herein apply to both archaeological and historic resources, both of which are considered to be *historical* resources in CEQA. Reporting requirements are based on the Archaeological Resource Management Report (ARMR) format and content guidelines developed by the California Office of Historic Preservation (1990), Historical Resources Guidelines developed by the City of San Diego (2001), the County of San Diego Report Format and Content Requirements (2007), and the County of Santa Barbara’s Fieldwork and Reporting Guidelines for Cultural Resources (2018), but has been modified to address the best practices currently in use in Santa Barbara County and elsewhere. The intent of these guidelines is to ensure consistency in the investigation, reporting, and management of cultural resources including identification, evaluation, and preservation and/or mitigation. Please note that evidence that a copy of all cultural resources technical reports have been submitted appropriate Information Center should be provided to the lead agency with jurisdiction over the project and preparation of the CEQA document.

2.0 DEVELOPMENT REVIEW

The following sections provide the nuts and bolts for lead agency staff conducting California Environmental Quality Act (CEQA) review of discretionary development project permit applications and other projects. It is important to note that projects that are usually exempt from CEQA review, are not exempt if the project for which the permit will be issued may have substantial adverse impacts to significant cultural resources. As noted in the Guidelines, historic resources are defined as the “built environment”, are non- archaeological in nature, and are generally at least 50 years old. Archaeological resources are defined as the surface and subsurface remains of sites no longer in use or maintained in which evidence of past activity is preserved, and may be either prehistoric or historic, or both (Native American and European).

2.1 CONSULTANTS

Consultants (Principal Investigator) should have the necessary professional qualifications to conduct the research. Many lead agencies have qualification standards or maintain an official list of qualified consultants.

2.2 NATIVE AMERICAN PARTICIPATION

Native American consultation is described in Section 1.4 of the Guidelines. In addition to the requirements of SB 18 and AB 52, Native American involvement in development projects is advisable or required when prehistoric and contact and/or historic period Native American cultural resources are known to be present, and may include consultation and / or monitoring. Monitoring may also be required in situations where significant resources are not present, but the possibility exists that undiscovered resources may be encountered.

2.3 PLANNER DEVELOPMENT REVIEW PROCESS

The development review process consists of identifying cultural resources within the boundaries of the project, including any off-site improvements associated with the project. This section provides guidance as to expectations regarding project design and how a typical cultural resource investigation is to be conducted. Cultural resource investigations are typically conducted in phases (1, 2, and 3), with Phase 1 associated with identification efforts, Phase 2 associated with evaluation of significance and assessment of effects, and Phase 3 with mitigation. Not all phases are necessary for every project, and in some cases phases can be modified or combined. For example, a Phase 1 study may be expanded to include subsurface exploration, which is called an Extended Phase 1. In rare cases, Phases 2 and 3 can be combined. Please refer to Section 1.3.3 of the *Guidelines for Determining the Significance of and Impacts to Cultural Resources: Archaeological, Historic, and Tribal Cultural Resources* and Section 3.1 of this document for additional discussion of these phases of investigation.

2.3.1 PROJECT DESIGN

CEQA statute Section 21083.2(b) and many agencies and local jurisdictions have policies that require that reasonable efforts be made to preserve important cultural resources in place; therefore, project design is essential to achieving this goal. The design of a project should avoid, or incorporate cultural resources into open space, whenever possible. If the project proponent, consultant, and agency or local jurisdiction staff agree to waive significance testing on cultural sites, those resources will be treated as significant and must be preserved through project design.

2.3.2 CULTURAL RESOURCE IDENTIFICATION

Lead agency staff will make a determination based on available information whether a survey of the property for cultural resources is necessary. Staff should use site visits, maps, aerial photos, cultural reports, record searches, and other available documents to make the necessary determination.

Historic Resources. For the built environment, it is often not necessary to do a formal survey to identify whether a potentially significant resource is present, as this information is often known at the time a project subject to CEQA is initiated. Potentially significant historic resources may be identified through previously completed neighborhood surveys or individual historic resource inventories, or based on of the structure's age. If the property contains built features over 50 years of age whose significance has not been assessed, the planner will request a Phase 1 Historic Resource Study at project scoping (also see Section 2.3.3, below).

Archaeological Resources. For archaeological resources, if no or insufficient information is available to determine the need for a survey, staff should make an initial request for property-specific information from the appropriate Information Center where the California Historical Resources Information System [CHRIS] database is maintained. Based on this and other information, lead agency staff will determine if a survey is needed. In cases where a cultural resources survey is required for a CEQA document being prepared for a discretionary land use permit for development, the applicant should be informed at project scoping. The applicant or agency will then retain a professional cultural resources consultant who will conduct a full record search at the information center prior to surveying the property for cultural resources. This record search is often optional for historic resources (i.e., the built environment) investigations. If an archaeological survey of the project property is required, it shall be conducted in such a manner as to determine whether cultural resources are absent or present within the project area. In some cases, such as alluvial depositional contexts or when surface visibility is inadequate, pedestrian survey may not be sufficient. In those cases, subsurface testing may be warranted despite the completion of a negative pedestrian survey. Staff will also contact the Native American Heritage Commission (NAHC) to identify potentially interested tribes, and the agency or local jurisdiction will notify those tribes of upcoming circulation of the environmental document for the project. If an archaeological survey has been completed, the resulting report will be provided to tribes or other NAHC-recognized Native Americans upon request.

No Prior Survey. Project properties that have not been previously completely surveyed for archaeological resources require a Phase 1 investigation as described above, unless conditions on the ground have been disturbed such that there is no possibility of the presence of cultural resources. Appropriate records, such as prior grading plans, will be required to demonstrate the extent of prior disturbance. Note that prior

agricultural uses such as vineyards or cultivation of other crops do not preclude the potential for significant resources to be present. For the built environment, previously unevaluated features greater than 50 years of age require completion of a Phase 1 study to assess whether or not the resource is potentially significant.

Prior Survey. Normally, projects with a prior archaeological survey that is 10 years old or less may use the previous study, if the methods used for that survey meet the current standards. Surveys older than 10 years often used lower standards and should be repeated. If a previous study was sufficient, an addendum to the prior report must be completed that (1) updates all graphics to match the current development project; (2) discusses any change in interpretation, impacts, or mitigation; and (3) identifies changes in circumstances or new information of substantial importance that cause one or more effects to cultural resources. In addition, the addendum should identify whether cultural material was collected as part of the previous survey, and if so identify the location of the collection. Projects should be conditioned with the requirement of curation for any collection associated with prior studies that have not been curated. Negative surveys of adjacent or nearby properties, or negative surveys of only a portion of the subject property, will not be accepted as evidence that no cultural resources are present and a survey will be required.

Negative Survey. Negative archaeological surveys do not require a full cultural resources report. Instead a negative archaeological letter report is acceptable. Section 4.2, below, provides a negative archaeological letter report outline and content requirements, and an example template is provided in Attachment 2. Negative reports must be submitted to both the lead agency (as a part of application processing) and the appropriate Information Center. It is highly recommended that evidence be provided that reports have been submitted to the Information Center prior to project approval..

Positive Survey. Positive surveys (i.e., those that identify significant or potentially significant cultural resources within the project area) require a “full” cultural resources survey report as detailed below in Sections 4.1 (Archaeological Technical Report) and 4.3 (Historic Resources Technical Report).

2.3.3 CULTURAL RESOURCE EVALUATION AND ASSESSMENT OF PROJECT IMPACTS

If cultural resources cannot be avoided through project design or incorporation into open space, evaluation of resource significance will be required. For archaeological resources, significance evaluation and assessment of project impacts occurs as part of Phase 2. Evaluating resource significance and assessing impacts are detailed in the Guidelines. Note that significance evaluations are not required for resources that have been evaluated for CEQA significance in the past 10 years and there has been no change in the conditions which contributed to the determination of resource importance. Significance evaluation is also not required when significance is assumed in the absence of testing and the resources are placed in open space. However, archaeological resources that are placed in open space and will be capped should have subsurface index samples collected, since future research access will likely be precluded. In addition, site boundaries for these resources must be defined to determine whether they extend beyond the area designated for open space. Boundary definition will require subsurface probing unless the site is wholly contained on an exposed surface such as bedrock or a deflated surface. Resources should be re-evaluated if their condition or setting has improved or deteriorated, if new information is available, or if the resource is

becoming increasingly rare due to the loss of other similar resources. Resource evaluation includes determining resource importance, assessing project impacts, identifying appropriate mitigation measures, and identifying the significance of impacts after implementation of mitigation. The following sections outline and provide guidance for these topics.

For historic resources (i.e., the built environment), the evaluation of resource significance takes place in Phase 1. If the resource is determined not to be significant, the report simply presents that conclusion supported by substantial evidence and no further research is necessary. If the historic resource is assessed as significant, the report may be expanded into a Phase 2 report that evaluates project impacts and proposes appropriate mitigation. It is also acceptable to create a stand-alone Phase 2 historic resources report and include the Phase 1 report as an appendix.

2.3.4 CULTURAL RESOURCE MITIGATION MEASURES

Section 3 of the Guidelines discusses mitigation and design considerations. Mitigation must be proposed for any project that has the potential to impact important cultural resources. The determination of mitigation measures is based on resource significance and the type (direct, indirect, cumulative) and severity of the impact. The focus of mitigation is the preservation, data recovery, and curation of the information that these resources contain that would otherwise be destroyed or lost due to construction and development activities. Avoidance and preservation in place is always the preferred mitigation approach.

For archaeological resources, mitigation may include data recovery excavations, often referred to as a Phase 3 investigation. A report of the results of such excavations, including any specialized studies, is prepared and all artifacts and project records are curated at an appropriate local curation facility at the applicant's expense. Projects may also be conditioned to include measures when archaeological resources are not identified but their presence is possible. For example, grading monitoring may be required when cultural resources are possibly present on a project site, or areas of a project site, but were not identified during fieldwork. Mitigation may also include measures to protect off-site resources even though the project does not propose development in that area. For example, a project proposes development adjacent to a known archaeological site (no development within the site boundaries). To mitigate for potential impacts to this resource, grading monitoring and temporary fencing may be made conditions of project approval. Grading monitoring in and of itself does not constitute an adequate mitigation measure for known or newly discovered cultural resources. If grading monitoring does result in the discovery of previously undiscovered cultural resources, all grading work should cease and County Planning and Development staff should be immediately contacted in order to determine the appropriate next steps.

For historic resources, avoidance and preservation in place, including restoration or rehabilitation of the structure, is always the preferred mitigation. Adaptive reuse and or relocation of a historic structure may also be an appropriate mitigation measure, but the appropriateness of such mitigation must be evaluated on a case-by-case basis. CEQA (CEQA Guidelines Section 15064.5(b)(3)) recognizes that a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Building or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer, 1995) shall be considered as mitigated to a level of less than a significant impact on the

historical resource. In addition, Historic American Buildings Survey /Historic American Engineering Record (HABS/HAER) documentation, or documentation similar to HABS/HAER may also be appropriate mitigation.

Normally, HABS/HAER documentation alone may not be adequate mitigation for the destruction of significant historic resources (structures). In the case of *Architectural Heritage Association v. County of Monterey*, 122 Cal.App.4th 1095 (2004), it was found that “archival documentation cannot normally reduce destruction of an historic resource to an insignificant level.” Also in the case of *League For Protection of Oakland*, 52 Cal.App.4th 896 (1997), the Court of Appeal held that the historic resources of the building to be demolished “normally cannot be adequately replaced by reports and commemorative markers.” Therefore, documentation alone may not be an adequate mitigation measure to reduce the impact to less than significant. In such cases, where the historic resource is not being preserved, it may be necessary to identify the impact as Class I.

3.0 ARCHAEOLOGY FIELDWORK GUIDELINES¹

This section provides guidance for consultants conducting cultural resources investigations supporting CEQA environmental review, and simultaneously provides benchmarks for planners that are reviewing the resulting reports to ensure that the efforts were sufficient. This section considers all three phases of cultural resources studies. Most of these guidelines are based on a cultural resources management plan prepared for Vandenberg Air Force Base².

3.1 RESOURCE IDENTIFICATION (PHASE 1)

Identification efforts must begin with background research to determine what efforts have previously been completed in and near the project, and to determine whether cultural resources have previously been recorded in and near the project. As part of that effort for archaeological research, consultants will request the Native American Heritage Commission (NAHC) to conduct a Sacred Lands search as part of the background research effort. Local Native American groups identified by the NAHC should be contacted to determine whether they have any information regarding sensitive cultural resources in or near the project. The resulting technical report should contain evidence of the NAHC consultation and evidence that local groups were contacted and consulted. In some instances, formal consultation with tribes by local jurisdictions and agencies is required pursuant to SB 18 and AB52. SB 18 consultation is required for projects that include a General Plan amendment. See also the discussion of AB 52 consultation in Section 1.4.2 of the *Guidelines for Determining the Significance of and Impacts to Cultural Resources: Archaeological, Historic, and Tribal Cultural Resources*.

A record search is also required at the appropriate Information Center, which is part of the California Historical Resources Information System (CHRIS). The record search should include not only the project

¹ Fieldwork guidelines are not provided for built environment resources.

² Lebow, Clayton G., and Michael J. Moratto, 2005, *Management of Prehistoric Archaeological Resources*. Vandenberg Air Force Base Integrated Cultural Resources Management Plan, Vol. 5, edited by Michael J. Moratto and Barry A. Price. Applied EarthWorks, Inc., Fresno, California. Submitted to U.S. Air Force, 30 CES/CEVPC, Vandenberg Air Force Base, California.

area, but also the surrounding radius within half a mile of the project. Proof that this research was completed must be contained in the Phase 1 report. In areas of very high site densities, the half mile radius may be reduced to one quarter mile. For historic resources and historical archaeological resource identification, background research should include review of historic maps and aerial images; historic museums, local assessor's offices; the National Register of Historic Places; the California Register of Historical Resources; the California Inventory of Historic Resources; and California Historical Landmarks.

Fieldwork for a Phase 1 archaeological investigation will minimally include a pedestrian survey of the ground surface. A survey should encompass the entire project area although impenetrable brush and/or steep slopes (greater than 30 percent) can result in less than complete survey coverage. If survey coverage is less than 100 percent, a map in the survey report should show the survey coverage and explain why certain areas were not covered. Surface survey should use parallel transects spaced no more than 15 meters apart. For small project area of less than an acre, survey transects should be narrower. Project parameters can also dictate transect intervals. For example, a narrow linear project such as a fiber-optic cable installation, may warrant narrower transect spacing. Transect intervals should be noted in the survey report. The type of vegetation or ground cover (structures, pavement etc.) should be described throughout the project site and the resulting ground surface visibility estimated in percentage of ground surface visible. If ground visibility is poor, surveyors should take advantage of soil exposures during the survey, even if it means departing from the transect. Surveyors should also examine road cuts, creek banks, rodent burrows, previously excavated soils, and other exposures that would inform on potential buried site deposits. Photographs should be taken during the survey to document the setting, and daily notes should be taken to describe factors that may affect the survey outcome such as the weather, the terrain, surface visibility, and vegetation.

As defined in the Vandenberg Integrated Cultural Resources Management Plan, a prehistoric site is a place with three or more associated artifacts. Associated artifacts should be no more than 30 meters from other artifacts. A site is also defined by the presence of one or more features, with or without artifacts. All observed archaeological sites will be documented on California Department of Parks and Recreation 523 forms, minimally including a Primary Record (523A) and an Archaeological Record (523C). Of course, some cultural resources, such as cultural landscapes or sacred places, may not have any artifacts present. If the artifacts are greater than 30 meters from each other, they should be recorded as artifact isolates on California Department of Parks and Recreation 523 forms

Surface survey may be insufficient in some instances, and the pedestrian survey should be augmented with subsurface probing, which is called an Extended Phase 1 survey. Three circumstances typically call for an Extended Phase 1 study. One is insufficient exposures of the native surface due to dense vegetative cover or other obstructions such as pavement or imported fill. Second is where natural depositional processes may have buried archaeological deposits, such as in alluvial contexts. The third is to define the boundary of a known site(s) to aid in project design and development of avoidance measures. If known archaeological sites are within 100 meters of proposed project ground disturbance, whether the known site is on the project property or on an adjacent property, an extended Phase 1 should be conducted on the project property to ensure that there are no related subsurface deposits in the project area. If the Extended Phase 1 work is within or near (within 100 meters) a known prehistoric and/or Native American contact/historic archaeological site, a Native American monitor must be retained to observe the effort.

Extended Phase 1 surveys can be completed with manually excavated shovel test pits, geo-probes, or backhoe trenching. Manually excavated shovel test pits are preferable but cannot reach deeper than 80–100 centimeters and thus are insufficient for deeper exploration. Shovel test pits should be at least 30 centimeters in diameter and excavated in 20-centimeter levels. Excavation in each pit should continue until two consecutive sterile levels have been encountered, or until bedrock is reached. If an Extended Phase I survey uses backhoe trenching, the backhoe should proceed only under the direct supervision of a qualified archaeologist. Excavation should proceed in lifts no thicker than 30 centimeters (1 foot). For each lift, the equivalent of one 5-gallon bucket of sediments should be screened unless the deposit is known to be clearly sterile.

For both shovel test pits and backhoe trenching, the excavated sediments should be screened through 1/8-inch mesh at prehistoric sites and through 1/4-inch mesh at historical archaeological sites. Any recovered archaeological materials should be recorded and characterized and then returned to the unit during backfilling. Each unit should be documented on a form that describes the soils, non-cultural constituents, and archaeological materials by level. All shovel test pit/backhoe trench locations should be recorded with a global positioning system (GPS) with sub-meter accuracy, and the locations should be plotted in a map included in the survey report (ideally a figure that also depicts project plans, if available).

3.2 RESOURCE EVALUATION AND ASSESSMENT OF PROJECT IMPACTS (PHASE 2)

Evaluations of archaeological resource significance require that the consultant prepare and submit a proposal to the lead agency for review prior to beginning the work, unless the lead agency is doing the fieldwork itself. Fieldwork cannot begin until the proposal has been approved. The consultant must describe the project and the site (or sites), and particularly the relationship to project components; provide a research design; discuss the proposed level of effort; describe the methods that will be used during fieldwork, laboratory processing, and technical analyses; and propose a report structure.

If background research was completed within one year as part of the Phase 1 study, it need not be repeated for the Phase 2 work. If not, background research and Native American consultation/coordination must be completed prior to Phase 2 fieldwork. Subsurface testing to evaluate the significance of prehistoric and/or contact/historic Native American archaeological sites requires monitoring by a Native American observer.

Typically, an evaluation of the significance of an archaeological site encompasses the entire site. It is possible, however, particularly at large sites that will only be partially impacted, to assume the site is significant and to focus the evaluation on the area of impact. In that case, the purpose of the evaluation is to determine whether the site deposit within the impact area contributes to the site's assumed significance and whether the project will adversely affect the site's significance. Levels of effort during a Phase 2 study will vary widely but must be sufficient to accurately define the site boundary and to collect data for evaluating site significance and assessing project impacts.

Field methods used to evaluate archaeological site significance vary but should have two primary components: defining the site extent and spatial variability (both vertical and horizontal), and collecting

data for evaluating data potentials. Fieldwork should begin by defining site extent and spatial variability, which depending on the site might be completed with surface inspection (for sites with little or no possibility of a subsurface component, such as on bedrock or a deflated surface); manual excavation of shovel test pits, and or backhoe trenching. Methods used for shovel test pits and backhoe trenching will follow those described above for Extended Phase 1 studies. Geological and geomorphological studies may also be important in understanding the depositional history and integrity of archaeological deposits.

Gathering data for significance evaluation might include surface collection and subsurface excavation. For sites with the potential for subsurface components as demonstrated through shovel test pits and/or backhoe trenching, data collection should not be limited to just the surface. To sample subsurface deposits, relatively large manually excavated units should be strategically placed to recover a sample of material from the archaeological deposits and to expose stratigraphy and depositional contexts. These larger units should be square or rectangle and can be as small as 50 by 50 centimeters but should be no larger than 100 by 100 centimeters. Excavations should proceed in arbitrary 10-centimeter levels or smaller, stratigraphically distinct levels. Excavated sediments should be screened through 1/8-inch mesh although in some situations, such as dense clayey soils, it may be sufficient to screen a sample (minimally 25 percent of the volume) through 1/8-inch mesh and the remainder through 1/4-inch mesh. Archaeological screen residues must be retained for analysis, by level. Each excavation unit level must be recorded on a standard form that documents the depth, the level volume, the sediments, the non-archaeological constituents, and the archaeological constituents. At least one wall of each unit must be illustrated and the sediments/stratigraphy described. All units and surface collections used to collect spatial data and data for evaluation must be recorded with a global positioning system (GPS) with submeter accuracy, and the locations should be plotted in a map included in the technical report.

Materials collected during a Phase 2 study must be processed in an archaeological laboratory. Processing should include sorting into gross categories and cataloging. Specialists should analyze the catalogued remains; sampling may suffice depending on the quantities of materials. Many types of analyses might be completed depending on the recovered materials, with the goal of assessing data potentials relative to the project research design. Results of the analyses must be presented in a technical report as described in Section 4.0. Recovered archaeological materials must be curated in perpetuity at an accredited curatorial facility, at the project proponent's expense. If the Phase 2 study determines that a Phase 3 investigation is necessary, it may be acceptable to retain the Phase 2 collection until the Phase 3 work is complete and the two collections curated together. In some cases, a bond is required to cover the costs of the work. If there will be no data collection beyond the Phase 2 study, acceptance of the Phase 2 collection by the curation facility must be demonstrated to the agency or jurisdiction before the bond will be released, if applicable, or prior to final Building Inspection Clearance if the project is a land use permit, to allow the project to move forward.

3.3 MITIGATION OF IMPACTS (PHASE 3)

If impacts to a significant archaeological site cannot be avoided, data recovery excavation is one type of possible mitigation as discussed in the Guidelines. Prior to fieldwork, the consultant must prepare a data recovery plan for review and approval by the lead agency. The approach and methods used during data recovery must be sufficiently thorough to help mitigate the damage to the site. The plan must include a

research design that is more focused and refined than the Phase 2 research design because it will incorporate the results of the Phase 2 study. Targets for recovery must be established and field and analytic methods must be detailed in the plan. For prehistoric and/or Native American contact/historic sites, monitoring by a Native American observer is required.

Methods used during a Phase 3 study are much the same as those used during the data collection part of a Phase 2 investigation, but more intensive. Excavations should focus on the area that will be impacted. The recovered sample should be large enough to address the research questions that were identified during Phase 2 significance assessment and refined in the Phase 3 data recovery research design. Excavation units may be configured to create block exposures (e.g., four 100 by 100 centimeter units or eight 50 by 50 centimeter units could form a 200 by 200 centimeter square), but the basic provenience unit must remain as the 100 by 100 centimeter unit. Generally, excavated sediments are screened through 1/8-inch mesh (and in some cases even 1/16-inch mesh) although a sampling strategy that includes a combination of 1/8- and 1/4-inch meshes might be justifiable. Water screening of samples passed through 1/8-inch mesh may be necessary to ensure better recovery of small constituents and limit damage to fragile remains. If warranted by the data potentials, column samples might be excavated in unit walls and the sediments from samples processed using flotation techniques to recover small constituents such as beads, fish bones, and carbonized seeds. Flotation techniques should be used to process at least a portion of deposits where carbonized remains are present or suspected, and not just limited to column samples. All of these considerations must be discussed in the proposal for lead agency review.

Again, like a Phase 2 study, the recovered archaeological materials must be processed in an archaeological laboratory and at least a sample of the recovered remains must be analyzed by technical specialists. Specialist studies may include faunal analysis, various types of lithic analysis, radiocarbon dating, analysis of flotation samples, and others. Analyses must be sufficient to address the research questions that were identified during the Phase 2 significance assessment and refined in the Phase 3 data recovery research design. Following technical analyses, the recovered archaeological materials must be curated in perpetuity at a local accredited curation facility, at the project proponent's expense. Curation must be demonstrated to the lead agency prior to project completion, or prior to final Building Inspection Clearance if the project is a development permit.

4.0 REPORTING GUIDELINES

This section describes guidelines for reporting cultural resources investigations. All cultural resources technical reports should follow the formats and guidance in this document, although depending on the types of resources and impacts identified, the format may vary and all elements may not be required. Depending on the results of the study (absence/presence of cultural resources), the lead agency or may require that one of the following be submitted:

Full Archaeological Resources Technical Report. A full report is required for projects where cultural resources are present on site, including Phase 1 studies where cultural resources are present. The full report shall include maps of the regional location of the project, the location of cultural sites, and site-specific maps that include the location of cultural deposits and features, with a current, legible overlay of the proposed project development plans. See Section 4. 1 for an outline and content requirements for a full

Archaeological Resources Technical Report.

Negative Archaeological Resources Letter Report. This type of report is required for projects where no resources are present on site. See Section 4.2 for an outline and content requirements for a Negative Archaeological Resources Letter Report. See Attachment 2 for an example of a Negative Archaeological Resources Letter Report.

Historic Resources (i.e., built environment) Technical Report. This type of report is required for any evaluation of the built environment such as buildings and structures. In a Phase 1 historic resources study, the significance of the resource is evaluated. If the resource is assessed as not a potentially significant historical resource, then the report need go no further than Phase 1 and a relatively brief discussion may suffice. If the resource is assessed as significant, a Phase 2 report is prepared that evaluates potential project impacts to the resource and proposes appropriate mitigation. The Phase 1 report may simply be expanded to include Phase 2 or it may be appended to the Phase 2 report. See Section 4.3 for an outline and content requirements for Historic Resources Technical Reports.

Cultural resources reports will be reviewed for technical accuracy and completeness by a staff archaeologist, historian, peer reviewer, or planner. Reports are considered draft until staff determines the report to be complete. Each submittal and review of a draft cultural resources report is considered an “iteration”. During each iteration, staff will either determine the report to be complete or respond with comments for necessary changes.

4.1 FULL ARCHAEOLOGICAL RESOURCES TECHNICAL REPORT

The following sections provide an outline and the criteria for the required elements of a “full” technical report. The structure of the report is based on the ARMR format with modifications. Depending on the types of resources and impacts identified, the format may vary and all elements may not be required. For example, a Phase 1 report would include all of the information through Section 1.3, below, as well as Sections 4.1.1, 4.1.2 (if presence/absence testing was performed), 4.1.5, and 4.2. Similarly, a Phase 3 report would likely not include Sections 5 and 6, unless combined with a Phase 2 report.

4.1.1 OUTLINE

A full archaeological technical report should include the following elements:

TITLE PAGE

PROJECT INFORMATION PAGE

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	Previous Studies
	Previously Recorded Sites Adjacent to Study Area
1.3	Applicable Regulations
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3.0	METHODS
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3.3	Laboratory and Cataloging Procedures
3.4	Curation
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4.0	RESULTS
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5.1	Resource Significance
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6.0	MANAGEMENT SUMMARY – MITIGATION MEASURES AND DESIGN CONSIDERATIONS
6.1	Unmitigated Impacts (Class I)
6.1.1	Mitigation Measures and Design Considerations
6.2	Mitigated Impacts (Class II)
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6.3	Effects Found Not to be Significant (Class III)
7.0	REFERENCES

APPENDICES

4.1.2 CONTENT

The following sections discuss the criteria for the required elements that are to be used when preparing an archaeological technical study. The elements described below are not exclusive and it is expected that the consultant will expand beyond these elements when necessary.

TITLE PAGE

The title page is the front exterior of the report and should contain the consultant's information, client's information, and the title of the report.

PROJECT INFORMATION PAGE

No slogans or company logos should appear. The cover should include only the following information:

- Report Type (e.g. Survey, Testing Program);

- Project common name;
- APN and address of property
- Permit number(s) (if applicable);
- Environmental document number, (if applicable);
- Lead agencycontact's name, address and phone number;
- Date (must be revised during each edition of the draft Technical Study);
- Cultural Resource Technical Report preparer's name, firm name and address;
- Signature of Approved consultant;
- Project proponent's name and firm name (if applicable);
- List USGS quadrangle(s)
- List any site(s) located within the project area

Refer to Attachment 1 for an example of an acceptable, standard project information page.

TABLE OF CONTENTS

The Table of Contents is a mandatory section of every technical study except for a negative letter report. The Table of Contents must also contain a list of figures, tables, and appendices.

LIST OF ACRONYMS

The List of Acronyms should appear on the page directly following the Table of Contents and contain all acronyms used throughout the technical report, including technical, legal and industry related terms. The list must be alphabetical and clearly arranged.

The first time an abbreviation or acronym is utilized, provide the full name and then indicate the form of abbreviation that will be used throughout the document to represent that name, e.g.: "The project complies with the California Environmental Quality Act (CEQA) ..." If an acronym is only used once or twice in a document, the acronym should be eliminated and it should be spelled out.

EXECUTIVE SUMMARY/ABSTRACT

The Executive Summary/Abstract should be as concise as possible, using clear simple language, not exceed 5 pages, and should provide an abstract of the scope and findings of the report. No new information should be provided in this section that is not further explained elsewhere in the document. This section should be written so that non-archaeological professionals can understand it. The purpose is to provide a quick reference. The Summary must be fully consistent with the text of the technical report. Make sure that the Executive Summary/Abstract accurately summarizes the issues discussed in the technical report text. For example, ensure that the issues identified for discussion in Chapters 4.0, 5.0, and 6.0, and the conclusions as to significance stated there, match the issues and conclusions stated in the Executive Summary/Abstract. Failure to ensure consistency may lead to the document being found inadequate by staff. The Executive Summary/Abstract must include the following information:

Describe the purpose and scope of the archaeological investigation. Specify the type of study that was conducted (e.g., literature search, inventory, evaluation, data recovery).

List the date(s) of the investigation.

Summarize the major findings of the investigation. For example, if the document reports an archaeological survey, list the number and types of resources identified during the survey.

If resources have been evaluated, summarize their significance as determined pursuant to the California Environmental Quality Act (CEQA) or other regulations and standards as appropriate.

The status of human remains (absence or presence) should be stated.

Briefly indicate what types of features and artifacts were encountered.

Discuss how the proposed project affects resources.

Describe constraints on the investigation (e.g., time, finances, logistics, vegetation, weather, landowner permission, vicious dogs).

Offer a summary of recommendations (e.g., test excavation, federal, state, or local register or list eligibility recommendations, and treatment recommendations).

Describe the disposition of field notes, collections, and reports.

1.0 INTRODUCTION

The objective of this section is to provide clarity for the reader. Specifically, background information as detailed below should be included to provide an understanding of the what, why, when, and where.

1.1 Project Description

This section provides a detailed description of the proposed project. The project description is the land- or resource-disturbing activity for which a cultural resources study is required. The project description must include all potential permanent and temporary impact areas, including access; staging, lay-down, and washout; and placement of utilities, including features such as on-site septic systems. The discussion must identify not only changes to the project site as it currently exists, but also include any off-site improvements that will be a part of the project. The project description provides information needed to determine how archaeological resources may be affected. How much information is appropriate for a given report may depend on what was included in previous reports for the project, and on the scope and size of the project. It is clear that the project description is fluid and evolves over the permitting process cycle. The intent of this section is to make the description as accurate as possible. If major changes occur (e.g. new off- site impacts) staff will request an update to the study.

The precise location and boundaries of the project site must be described. Both regional and vicinity (preferably topographic) location maps must be included to show the project's location. The project description should be as detailed as possible and may include but is not limited to the following:

- Size of project and area of proposed development.
- Purpose and scale of proposed uses associated with the project, such as residential development or recreational camping.
- Nature and extent of disturbance anticipated.
- Project phasing.
- Proposed structures (size, location, purpose etc.).
- Location of easements (existing and proposed) such as those for biological open space and roads.
- Proposed or potential uses within the open space (e.g. passive recreation such as hiking or horse trails).
- Off-site improvements (e.g. roads, utilities, facilities).
- U.S.G.S. Quadrangle map delineating the study boundaries (allows the CCIC to plot the location of the study).
- General location map showing the location of the project.
- Project plot plan/map (minimally 8.5”X11”).

1.2 Existing Conditions

1.2.1 Environmental Setting

Natural Setting

This section generally includes a discussion of the natural setting of and in the vicinity of the project. Describe any preserved lands (open space easements, Pre- Approved Mitigation Areas, Park Land) adjacent to or contiguous with the site. The description of the physical environment shall be based on the existing condition of the property. If prior unauthorized activities (e.g. grading, clearing) or actions taken in preparation for the project, such as septic testing or geotechnical investigations have altered the environmental setting, these should be described. The physical environment should include but is not limited to the following:

- Identify the natural physiographic region and biotic communities.
- Describe the current natural environment of the general area including landforms, hydrology, geology, soils, climate, vegetation, and animal life, as appropriate.
- The location of culturally important resources such as outcrops of cryptocrystalline rock, reservoirs, town sites, etc., should be discussed, as appropriate.
- Describe the natural environment as it is believed to have existed during the temporal periods of occupation under investigation, if such information is available.
- Describe the current land use (e.g., agriculture, mining, recreation, residential).
- Assess the current condition of the land within the project area (e.g., relatively unmodified,

partially disturbed by construction or improvements).

Cultural Setting

This section provides the context for the evaluation of cultural resources. This section should provide an overview of the prehistory and history (including built environment) of the study area. Settlement patterns, subsistence practices, geographic boundaries, and environment should be incorporated into the discussion of each period. The following is an example of how this section should be broken into the different temporal periods. This is an example only and will vary from region to region. This example is presented here for report formatting and organization.

1.2.1 *Environmental Setting*

Natural Setting Cultural Setting

Prehistoric

Early Holocene

Early Period

Middle Period

Late Period

Ethnohistoric Period

Historic

Mission Period

Rancho Period

American Period

No single classification is agreed upon for the different periods of prehistory and history. Various researchers have used different terms for these distinct periods. The cultural background of California continues to evolve as new information is accumulated as a result of current research efforts. The above outline is provided as a guideline and it is recommended that each archaeologist provide their interpretation of the prehistory and history of the region in California where they are working.

1.2.2 *Record Search Results*

Previous Studies

Previously Recorded Sites Within and Adjacent to Study Area

Identification of previous investigations is the focus of this subsection. Previous work conducted on the project site and within a ½-mile radius of the project boundaries should be discussed. In areas of very high site densities, the ½-mile radius may be reduced to ¼-mile. The repository(ies) where the documents are held must be identified. The type of study (e.g. survey, Phase I evaluation) must be described for each investigation (tabular form). Note in the text and table whether or not the survey(s) partially or completely covered the project area, if applicable. Resources identified should be discussed and include information about site type, location of and topographical setting of sites to the project site, diagnostic artifacts if

present, and provide a regional perspective. The following information should be included:

Evidence of a record search conducted at the appropriate information center of the California Archaeological Inventory for known cultural resources and previous reports shall be included. Either a copy of the record search report performed by Information Center staff or the results of a records search performed by a professional consultant should be provided. Hard copies of DPR forms obtained for record searches are required to be attached to the report. Include the results of review of aerial photos and historic maps, and interviews, if conducted. Identify the location of cultural material that was collected as part of a previous study for any recorded sites within the project footprint.

List of site numbers and associated report references.

A map of the location of the cultural resources shall be included. Note that all archaeological reports that disclose site locations will remain confidential (not distributed to the public).

1.3 Applicable Regulations

This section should identify the regulations that are applicable to a project. Typical regulations that apply to projects include CEQA and other sections of the Public Resources Code (as it applies to the discovery of human remains). Lead agency regulations may also apply, including but not limited to such regulations as Community Plan policies or development standards, zoning ordinances, policies of a Local Coastal Plan or other regulations

2.0 RESEARCH DESIGN

A research design is required for any project that proposes to evaluate site significance (Phase 2) or mitigation through data recovery (Phase 3). A research design provides the theoretical basis for an archaeological study. Research designs vary in nature and level of detail depending on the project components and investigation type. Research designs are explicit statements of the theoretical and methodological approaches to be followed in an archaeological study. In some cases, research designs have been developed for specific geographic regions, types of investigations, or types of resources.

Research designs link theory, known information, research goals, and methods. The use of previously formulated research designs is acceptable if these designs are current and relate directly to the area and type of study under consideration.

When a research design is required, the following should be included:

- Discuss the theoretical basis of the proposed research. Cite or discuss the research paradigms under which the investigators are operating.
- Summarize previous research. A summary of important research questions pertinent to the study area or to the identified resources should be presented, with particular emphasis on the identification of

relevant data gaps. Statements appealing to generally recognized goals of archaeology or anthropology by themselves usually lack the detail necessary for an adequate research design.

- Present testable hypotheses or research questions, or state the goals of the research. Any useful theoretical approach should be capable of generating testable hypotheses. A research design should present important research questions recognized for the region and relevant to the study, based on previous research.
- Identify the test implications of the hypotheses or research questions. Describe expected archaeological resource types, archaeological patterns, and data categories anticipated, as they relate to test implications or research questions. Discuss operational definitions for archaeological resource types (and rationales for their use), if different from OHP definitions of archaeological sites, historic resources, and isolated artifacts or resources.

3.0 METHODS

3.1 Survey Methods

3.2 Excavation Methods

3.3 Laboratory and Cataloging Procedures

3.4 Native American Participation

(Include all subsections that apply).

Methods of investigation must always be included in a full Archaeological Resources Technical Report. Methods should include all the tools (e.g. survey, indexing, testing, lab analysis, etc.) used by the project archaeologist/historian to identify archaeological resources, evaluate their significance, and to determine the appropriate mitigation for project impacts. The discussion of methodology can be organized for each site, or for similar sites. A brief discussion of the survey results can be included to clarify the methods used. The following outline provides the components that should be incorporated into this subsection if appropriate.

Describe how personnel conducting the work were organized and list the active participants and their duties. Identify the persons participating in the study such as Native American observers, monitors, and consultants, interested parties with special knowledge or expertise, and technical specialists.

Describe the data gathering methods employed (e.g., remote sensing data; surface survey; surface chemical analysis; sub-surface methods such as probing road and stream cuts or analyzing core probes, archival research). The methods description should provide details such as deployment of survey personnel, site recordation techniques, chemical analyses, index sampling, sub-surface test locations and methods, and remote sensing techniques.

Describe specific research and sampling strategies employed, the rationale for their use, and a description of how they were implemented.

Using actual project plans, show area(s) subject to investigation in relation to the Area of Potential Effect (APE) and project boundaries. For survey reports, depict areas surveyed, not surveyed, or surveyed using various strategies. Such maps can be included in an appendix. A USGS 7.5 minute map showing the outline of the survey area must also be included.

Provide a descriptive summary of the areas examined, noting areas that were not inspected in relationship to the sampling strategies employed, and why. Note the percentage of ground visibility for the areas inspected. Describe whether or not visibility was adequate for the purposes of the survey, and why or why not.

Describe the types and methods of excavation. Number each excavation location on a map of the site sufficiently detailed to depict the relationship between natural and archaeological features within the site. Include an explanation of the rationale for the placement of units.

Describe cultural materials collected (if any), including methods of documentation and removal.

Describe measures undertaken or needed to restore archaeologically disturbed site areas when archaeological field studies are completed.

Indicate where collected materials, photographs, and other documents are or will be curated. Curatorial agreements and reburial agreements should be provided in an appendix in the final draft of the report.

Discuss problems or constraints in conducting the research.

Identify what measures were taken to consult with the Native American Heritage Commission (NAHC) and/or local Native American groups, organizations, or individuals.

4.0 RESULTS

This section presents the information collected during the study. A thorough description of collected data is essential for the construction of meaningful and well-supported interpretations. When interpretations of data are mixed with or substituted for basic data presentations, the reader is left with no basis for independently assessing conclusions and inferences. It is therefore critical to explicitly separate data presentation from interpretation of those results whenever possible. In most cases, data should be presented in tabular format in addition to a summary discussion.

Use the following guidance when discussing results.

Archaeological Resources Survey Report

If no archaeological resources were located, their absence should be explicitly noted and a letter report is acceptable. See Attachment 2 for a sample archaeological negative letter report.

If resources were previously reported or anticipated but were not located, discuss the possible environmental and cultural factors that may have hidden or destroyed the resources.

If cultural resources were identified:

Provide information regarding the cultural resources that were observed and recorded, including prehistoric archaeological sites, historic sites, and isolated artifacts.

Recent or contemporary resources (e.g., modern roads, power lines, structures) noted but not formally recorded might also be discussed and include on a map, although such information may not be appropriate or necessary, and is usually not confidential.

If applicable, provide a synthesis of previous research as it relates to the project.

The following maps should generally be included in a report on the results of inventory:

- If not already presented, area(s) subject to investigation in relation to the Area of Potential Effects (APE) and project boundaries on an appropriate U.S.G.S. quadrangle (7.5 minute series) sufficient to allow CCIC mapping.
- For survey reports, depict areas surveyed, not surveyed, or surveyed using various strategies. Larger scale maps may also be appropriate to convey information regarding the nature of the investigation.
- U.S.G.S. quadrangle maps showing prehistoric resource locations recorded during survey.
- Archaeological resource sketch maps consistent in content and quality with the standards established in the California Archaeological Inventory Handbook for Completing an Archaeological Site Record distributed by the California OHP.
- Archaeological site contour maps depicting topographic and archaeological details, and surface and sub-surface study locations should be provided, if available, although such maps often are not prepared for survey reports.

Describe all resources.

The description should at a minimum include site type, chronological placement, size, and if there is any disturbance (e.g. grading, pot hunting etc.).

For each resource (historic, prehistoric, isolates), complete all appropriate DPR forms. The DPR forms may be placed in a confidential appendix or may be submitted electronically in pdf format. The submitted report must provide evidence that the DPR forms have been submitted to the Central Coast Information Center (CCIC). Once site numbers (trinomial, primary, isolate) are assigned they must be incorporated into

the study and replace any temporary numbers. The report will not be considered final without the primary numbers and trinomials from the appropriate Information Center.

Provide a master map (photocopy of appropriate USGS quadrangle) depicting the locations of all resources.

Archaeological Excavation Reports

Excavation can occur during any phase of a cultural resource investigation. The description of excavation during these various phases should be scaled to the size of the excavation, the importance of information to the objectives of the study, and the abundance and quality of information resulting from the excavation. In terms of data presentation, no distinction is made here between excavation conducted for evaluative purposes and excavation performed as a data recovery or mitigation phase. Data and interpretation should be presented separately when possible. Summarize the results of lengthy, appended special studies.

Describe the physical context of the archaeological deposit, including:

Site topography and geomorphology (if not addressed in Physical Environment).

Soil type (midden/non-midden), structure, stratigraphy and relationship to surrounding soils. Summarize results of special studies such as particle size analysis and soil chemistry, and include a copy of special studies reports in an appendix.

Non-cultural soil constituents (floral, faunal). Include a summary of special studies and insert reports in an appendix;

Anthropic soils and stratigraphic relationships.

Profiles of excavation units, trenches, or auger borings, as appropriate.

Describe archaeological features. Functional ascriptions/interpretations, such as hearth, oven, or house pit, may be unavoidable at this level of data presentation. It may be appropriate to discuss the relationship between feature and non-feature archaeological material distributions (e.g., the relationship between midden deposits and ovens or house pits).

Describe physical evidence including location dimensions, attributes, and associations.

Provide or reference illustrations and photographs of features.

Either present in full or summarize the results of special studies related to features (e.g., radiocarbon, flotation, micro-constituent analysis, chemical analysis).

Enumerate and describe artifacts by material type and artifact class (e.g., flaked- stone). Avoid typological ascriptions that impose or imply function or chronological association in the initial description. For example, biface, uniface, or modified flake is preferable to knife, scraper, or used flake. Such interpretations can follow in separate sections, as described below.

Discuss typological consideration of artifacts such as stone tools, beads, bone and groundstone tools, and historic materials.

Include illustrations/photographs of formal artifacts. These can be included in an appendix.

Present the results of analyses of artifact manufacture and use (e.g., flaked-stone manufacturing technology, use-wear studies, pottery analysis, basketry identification). Extensive and detailed analyses may be included in appendices. A summary of the results of these studies should be presented in the body of the report. Such studies should define analytic methods and distinguishing traits of analytic categories. For example, if a flaked-stone analysis involved the identification of different types of flakes, then the attributes that define such flake types should be reported. References to previous analyses should not supplant basic descriptions of methods and analytic categories.

Present the results of analyses such as radiocarbon dating, obsidian source and hydration studies, thermoluminescence dating, geomagnetic studies, pollen analysis, blood protein analysis, and others.

Describe non-artifactual archaeological material that reflects past human activities (e.g., burned seeds, charred animal bone), and materials that provide information on past environments or exploited resources (e.g., pollen).

Include identification studies for floral and faunal remains, with interpretations regarding the kinds and amounts of resources used, consumed, etc.

Present the results of physical analyses such as pollen, microconstituent analysis (flotation, coprolite studies).

Avoidance of impacts to human remains is often a requirement. However, accidental discoveries sometimes occur in the process of site testing or data recovery and during construction grading and excavation, and sometimes even during analysis of recovered archaeological materials in a laboratory. The treatment of human remains is discussed in detail in Section 3.4 of the *Guidelines for Determining the Significance of and Impacts to Cultural Resources: Archaeological, Historic, and Tribal Cultural Resources*. In such cases, the procedures implemented or the information of discovery shall be provided. Information shall include the context of discovery, examination, and disposition of human remains, if any and presence of associated burial artifacts. Given the highly sensitive nature of human remains, examination and treatment of such remains will depend on the outcome of consultation with Most Likely Descendants (MLD) identified by the NAHC and land owners regarding the treatment of human remains. Therefore, whether and how human remains and associated grave goods are examined may vary greatly. Similarly, the nature and extent of reporting on the treatment of human remains may vary with the determination of the MLD. In general however, the following information is desirable from an archaeological and management standpoint.

Describe the context of the discovery of human remains. For example, describe if a human burial discovered during excavation was expected, based on consultant information or archaeological indicators.

Describe measures taken pursuant to state law, local ordinance, agreement, and/or agency policy regarding human remains.

Describe efforts to consult with the County Coroner, Native American Heritage Commission, MLDs, and land owner.

Describe outcome of discussions regarding the treatment of human remains.

Describe actions taken with regard to the study of human remains (i.e., exposure, exhumation, analysis, reburial in-situ, reburial after exhumation).

Describe the location, physical position, orientation, and nature of the remains (e.g., primary inhumation, cremation). Include a description of grave associations and the physical/contextual relationships between human remains and associated artifacts. For example, describe if artifacts were overlying or underlying the human remains in a patterned arrangement, or were found within burial pit fill.

Report the results of analyses, including specialists' reports in a appendix.

Include photographs and illustrations.

Record/report the reburial location on a New Deposit/Redeposit Record (DPR 422I).

Describe the spatial distribution and patterning of cultural material by class (e.g., flaked-stone, bone). Present data on the intrasite distribution of cultural materials (i.e., vertical and horizontal stratigraphy, assisted by data tables).

5.0 DISCUSSION OF RESOURCE SIGNIFICANCE AND IMPACT ANALYSIS

5.1 Resource Significance

The descriptive data presented in subsection 4.2 above should be discussed and interpreted with explicit reference to the research design or study objectives defined in the report. In addition, unanticipated data recovered during the study may warrant discussion of additional research topics not included in the research design.

Discuss the results of the investigation as they relate to (1) specific topics and questions presented in the research design, and (2) the applicable elements of the Guidelines for Determining the Significance of and Impacts to Cultural Resources: Archaeological, Historic, and Tribal Cultural Resources.

It is preferable to organize the discussion according to the structure of the research questions, hypotheses, and test implications presented in the research design, and the structure of the guidelines for determining significance. Discuss the results of the study in terms of the general research objectives of the study (e.g.,

settlement patterns, subsistence, and change through time). This discussion should place the investigation in a regional context, noting its role or contribution to an understanding of local, regional, state, or national history or prehistory. Finally, the individual guidelines (criteria) used should be listed and discussed as they relate to the resource, as applicable. See Section 1.0 of the Guidelines for more information on these criteria.

Note: If a resource has not been evaluated for significance and a decision is made to place it in open space in lieu of significance testing, significance is assumed.

5.2 *Impact Analysis*

Relying on the existing conditions and guideline(s) for the determination of significance, this discussion must detail each of the significant effects associated with the project for the resource being evaluated. Each guideline should be analyzed separately and a determination as to impact significance (significant and not avoidable, significant and mitigable to below a level of significance, not significant) must be made. The technical study should identify how effects would occur and how severe they would be. Impacts must be identified as direct, indirect or cumulative. The following guidance should be followed when preparing the analysis of project effects.

Identify impacts and mitigation measures for the *whole project*, including any remainder parcel which is not proposed to be developed currently or off-site improvements.

Be sensitive to the *age* of technical studies which are the basis for the analyses. Cultural studies older than 10 years may be unreliable.

Resources placed in open space must be assessed for indirect impacts.

6.0 *MANAGEMENT SUMMARY – MITIGATION MEASURES AND DESIGN CONSIDERATIONS*

6.1 *Significant Unavoidable Impacts*

6.1.1 *Mitigation Measures and Design Considerations*

6.2 *Mitigable Impacts*

6.2.1 *Mitigation Measures and Design Considerations*

6.3 *Less Than Significant Adverse Effects*

This section must discuss the feasible mitigation scenarios that could avoid, minimize, rectify, and/or reduce each of the significant environmental effects to the maximum extent feasible. There must be a clear connection between the proposed mitigation measure and the identified significant effect. In addition,

resources that were determined not to have a significant adverse effect must be discussed. Resources should be categorized as having impacts that are unavoidable, feasibly mitigated, or that have no adverse effects.

If mitigation is proposed, it should be identified and discussed. If a project is phased, the mitigation must be detailed and identify which phase of the project mitigation will be implemented.

Design considerations that were relied upon in determination of significance of impacts, while not considered mitigation, must be listed in the mitigation measures to ensure that they are included in the conditions of approval for the project (e.g. open space).

After the application of mitigation measures, state clearly whether the impact remains significant or is mitigated to a level below significance. In addition, identify whether the implementation of a mitigation measure will cause impacts to a resource.

Rather than providing the *exact wording* of proposed project approval conditions which will be used to implement mitigation measures, describe the *specific concept* of the proposed mitigation and specify how it must *function* to be effective. Lead agency staff will draft the exact wording to implement the requirement at later stages in project processing. For example, do not set forth the entire terms of a required open space easement, but rather state that an open space easement will be required over ... [state the area]...which will prohibit...[specify prohibited uses and activities]...but may permit ...[state any exceptions].

A research design and data recovery plan must be submitted to the County for any project that proposes data recovery as mitigation.

7.0 REFERENCES

This list must provide adequate references to documents cited in the technical study. References that were relied upon and which have a limited circulation must include a location where the public can readily access and review the document.

APPENDICES

Appendices must be identified by letter and may include but are not limited to the following:

- Record Search Results
- Specialized Studies and Analyses
- Artifact Catalog
- Native American Consultation
- Curatorial Agreements
- DPR Forms (New and Updated)

4.2 NEGATIVE ARCHAEOLOGICAL RESOURCES SURVEY LETTER REPORT

The following sections provide an outline and the criteria for the required elements of a letter report. Letter reports are only to be used for negative surveys or in cases where only isolates are present.

4.2.1 OUTLINE

An archaeological letter report should include, at a minimum, the following elements:

NEGATIVE ARCHAEOLOGICAL SURVEY REPORT OUTLINE

TITLE PAGE

PROJECT INFORMATION PAGE

INTRODUCTION /PROJECT LOCATION

County or City

USGS 7.5" Quad & date

Section, Township, and Range, or Land Grant

Physical address & other locational data

Assessor's Parcel Number

OWNER'S (OR LEAD AGENCY'S) CONTACT INFORMATION

SURVEY

Type

Date of Survey

Field Crew

DESCRIPTION

Description of survey technique

Assessment of adequacy of visibility for purposes of the survey

Detailed explanation of why an extended Phase 1 was or was not performed

Description of extended Phase 1 testing, if applicable

Confirmation of negative results

Project description with recommended conditions, if applicable

RECORDS SEARCH

SACRED LANDS SEARCH

Figure 1: USGS Map with survey area clearly marked

Figure 2: Regional Location Map

Figure 3: Project plans with surveyed areas clearly marked

4.2.2 CONTENT

The following sections discuss the criteria for the required elements that are to be used when preparing a negative archaeological letter report. A sample of a project information page and a letter report sample template are provided in Attachments 1 and 2, respectively.

TITLE PAGE

See subsection 4.1.2.

PROJECT INFORMATION PAGE

See subsection 4.1.2.

INTRODUCTION / PROJECT LOCATION

The following elements should be included in the project location:

- County or City
- USGS Quad Map and Date of Map
- Section, Township, and Range or Land Grant
- Physical Address (if no physical address is available, provide the street name and nearest cross streets.)
- Other Locational Data (include directions to the project site, which is especially important if there is no physical address.)

Assessor's Parcel Number (APN)

The Assessor's Parcel Number should be included in the report. If unavailable, contact County staff for assistance.

OWNER (OR LEAD AGENCY) AND ADDRESS

SURVEY

Type. Identify the survey type. Negative surveys are typically "Intensive Pedestrian". Identify if extended Phase 1 testing was performed.

Date of Survey. Provide the date or dates of the survey.

Field Crew. Identify the members of the field crew and the absence or presence of a Native American monitor.

Description of Work. The description should briefly discuss the field methods (e.g. survey transects, etc.), areas surveyed, areas not inspected and why, site conditions (e.g. ground visibility, presence of trails, etc.), natural landforms, topography, and the proposed project (e.g. 24-lot subdivision). Identify whether or not an extended Phase 1 was conducted, and why or why not. If so, describe the testing program (i.e. shovel probes, backhoe trenches, depths of excavation, screening; also provide a figure showing where testing occurred overlain on project plans. Confirm negative results. Include a description of the proposed project any conditions (e.g. grading monitoring) that should be implemented and why.

Record Search. Provide evidence that a records search was conducted. DPR forms are not required. Include DPR forms for any isolates identified.

Sacred Lands Check. If a Sacred Lands Check was conducted, provide documentation.

FIGURE 1: USGS MAP

Identify the project site on a USGS map and attach it to the report. Enlarge the map if necessary in order to allow the CCIC to map the survey area.

FIGURE 2: REGIONAL LOCATION MAP

Identify the project site on a Regional Location map and attach it to the report.

FIGURE 3: SURVEY LOCATION(S)

Show the surveyed areas overlain on project plans. Enlarge for legibility if necessary.

4.3 HISTORIC RESOURCES TECHNICAL REPORT

The following subsections provide an outline and the criteria for the required elements of a “full” historic resources technical report. Depending on the types of resources and impacts identified, the format may vary and all elements may not be required. For example, a Phase 1 study would not include Section 6. Deviations may be allowable from the standard format outlined below, subject to staff approval, as long as all of the relevant information is presented.

4.3.1 OUTLINE

HISTORIC RESOURCES TECHNICAL REPORT OUTLINE

TITLE PAGE

PROJECT INFORMATION PAGE

TABLE OF CONTENTS

LIST OF ACRONYMS

EXECUTIVE SUMMARY/ABSTRACT

1.0 PROJECT DESCRIPTION

2.0 SITE HISTORY/HISTORICAL CONTEXT

3.0 NEIGHBORHOOD CONTEXT

4.0 SITE DESCRIPTION

5.0 PHASE 1 ASSESSMENT

5.1 Evaluation and Analysis

- Age
- Integrity (Location, Design, Setting, Materials, Workmanship, Feeling, and Association)

5.2 Application of Resource Eligibility Criteria

- California Register of Historical Resources (CRHR)
- Other applicable significance criteria, if appropriate.

6.0 PHASE 2 IMPACT ASSESSMENT AND MITIGATION

6.1 Potential Impacts to Historical Resource(s)

6.2 Mitigation Measures (if applicable)

7.0 SUMMARY AND CONCLUSIONS

8.0 BIBLIOGRAPHY AND SOURCES USED IN PREPARATION OF REPORT

MAPS AND FIGURES

4.3.2 CONTENT

TABLE OF CONTENTS

See Section 4.1.2.

LIST OF ACRONYMS

See Section 4.1.2.

EXECUTIVE SUMMARY (MANAGEMENT SUMMARY/ABSTRACT)

See Section 4.1.2.

1.0 PROJECT DESCRIPTION

Provide a summary of the proposed project including proposed alterations to existing resources, landscaping or setting. Identify the architect, designer, contractor or engineer responsible for the design. If the project is complex, list the total new square footage and/or number of units or scope of the project (i.e. replace an existing bridge with a new span, etc.)

2.0 SITE HISTORY/HISTORICAL CONTEXT

Prepare a historic context for the project parcel(s). Any existing applicable historic contexts should be consulted as well as National Park Service guidance for evaluating historic properties:

<https://www.nps.gov/nr/publications/policy.htm>.

3.0 NEIGHBORHOOD CONTEXT

Include a historic context statement for the neighborhood that characterize the study parcel's setting and development pattern (i.e. is it a suburban neighborhood, rural area, urban, beachfront or residential estate property).

4.0 SITE DESCRIPTION

Provide a description of the study parcel(s) built improvements such as buildings, structures and features including designed or vernacular landscapes. Guidance prepared by the National Park Service for evaluating landscapes can be found at:

https://www.nps.gov/oclp/CLI%20PPG_January2009_small.pdf.

5.0 PHASE 1 SIGNIFICANCE ASSESSMENT

Provide the rationale for completing the significance assessment, such as identification of potentially significant architectural resources, historic/cultural associations, landscape components, etc.

5.1 Evaluation and Analysis

Age. Provide an absolute or estimated age for the resource(s) based on onsite survey or a review of historic records such as permits, assessor's records, maps or other records, including pertinent grantor-grantee land ownership title record data for the period of historical significance.

- **Integrity.** Evaluate the seven aspects of integrity of the resource(s) using the guidance set forth in: https://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_8.htm.

5.2 Application of Resource Eligibility Criteria

- **CRHR.** Apply the CRHR significance criteria to the resource [CEQA Section 15064.5(a)].
- **Other applicable significance criteria,** if appropriate.

6.0 PHASE 2 IMPACT ASSESSMENT AND MITIGATION

6.1 Potential Impacts to Historic Resource(s)

- Apply the criteria set forth in CEQA Guidelines Section 15064.5(b).
- Apply the standards set forth in: *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (2017) <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

6.2 Mitigation Measures (if applicable)

- Mitigation measures shall be based on the guidance set forth under CEQA as well as *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (2017). Additional discussion of mitigation measures can be found in Section 3 of the Guidelines.

7.0 SUMMARY AND CONCLUSIONS

Summarize the findings of the report including the presence or absence of significant historic resources. If significant historic resources are identified, characterize project impacts to historic resources and their level of impact [less than significant (Class III), less than significant with mitigation (Class II), or significant and unavoidable (Class I)]. Also if the study parcel is within an area governed by a plan, such as a specific Community Plan or other regional plan, the conclusions should state whether or not the proposed project is consistent with the applicable policies and development standards for historic resources set forth in those planning documents.

8.0 BIBLIOGRAPHY AND SOURCES USED IN PREPARATION OF REPORT

Include a list of resources, archives and interviews used/accessed in the preparation of report

MAPS AND FIGURES

Include a regional location map (preferably a USGS map) and a parcel map. Include proposed project site plans if they exist for the property (an aerial photograph can serve in lieu of or in addition to a site plan). Photographs of each building, structure and feature as well as the setting and landscape should be included. Simple structures such as sheds, outbuildings, garages, water towers etc. often require only one photograph. More complex buildings should include images of all four sides of the building. Include sufficient images of the setting and property to characterize this aspect of the resource.

4.4 CULTURAL RESOURCES MAPPING GUIDELINES

Extent of Mapping Required:

Project Parcel (Property) Boundary

Off-site Improvement Areas – Any required off-site improvements (e.g., road improvements, utility extensions, etc.) must be mapped in accordance with these requirements. Mapping should include maximum area necessary to complete the improvement.

Base Map – The cultural resource map must be completed using a base map that includes:

- The most recent project plot plan and all existing and proposed utility and road easements;
- The proposed maximum limits of disturbance for the project (on and off site); including grading, septic systems, wells, construction staging areas, washout areas, road improvements, drainage improvements, etc.;
- Open Space/Conservation Easements;
- Topography (USGS topographic data is sufficient if project plans do not show it; however most project grading plans include topography);
- Major roads and major road names;
- Both proposed (solid lines) and existing (dashed lines) parcel/lot lines;
- Assessor Parcel Numbers;
- North arrow (specify magnetic or true);
- Bar or Graphic Scale;
- The location of archaeological and historic resources;
- Any applicable buffers for archaeological or historic resources.

ATTACHMENT 1

PROJECT INFORMATION PAGE TEMPLATE

REPORT TITLE

Project Common Name

Permit Numbers/ Environmental Document No. (If Available)

Lead Agency: e.g. County of Santa Barbara Planning and Development Department

Contact

e.g. County of Santa Barbara P&D, 123 East Anapamu Street, Santa Barbara, CA 93013-2058

Phone Number

Preparer:

Name

Firm Name Address

Phone Number

Signature _____

Project Proponent:

Name

Firm Name

Address

Date

USGS Quad(s)

Site Number(s)

**ATTACHMENT 2
NEGATIVE ARCHAEOLOGICAL RESOURCES SURVEY REPORT
TEMPLATE AND REQUIRED CONTENTS**

Project Common Name

Permit Numbers/ Environmental Document No. (If Available)

Lead Agency: e.g. County of Santa Barbara Planning and Development Department

Contact: _____

**e.g. 123 East Anapamu Street
Santa Barbara, CA 93013-2058**

Phone Number _____

Preparer:

Name

Firm Name Address

Phone Number

Signature _____

Project Proponent:

Name

Firm Name

Address

Date

Quadrangle

RE: Project Name; Project Numbers Cultural Resources - Negative Findings

To Whom It May Concern:

Please be advised that a survey has been conducted on the above referenced project. It has been determined that there are no cultural resources present on this property. The project has been plotted on the attached USGS 7.5 minute topographical map for your information.

County: Santa Barbara

USGS 7.5' Quad: Date: Township: Range:

Address:

Other Locational Data:

Assessor Parcel Number(s):

Owner and Address:

Survey Type: Intensive Pedestrian Date of Survey:

Field Crew:

Description: The field survey was conducted using standard archaeological procedures and techniques.

Continuous parallel transects (meters) were walked in a __/__ direction. Survey conditions in these areas were good to fair, with some areas partially obscured by ground cover in the form of . In areas possessing dense vegetation, the survey methodology was adjusted to accommodate surface examination of trails and clearings and to facilitate the inspection of bedrock outcrops and stream beds. Identify if shovel scrapes, or extended Phase 1 testing was conducted. Explain why or why not. If extended Phase 1 was done, describe methods and results. No artifacts or features were identified during this survey. This project proposes to _____. (Optionally add any conditions [not mitigation] that may be required such as grading monitoring due to the presence of heavy vegetation etc.).

Record Search: Staff conducted a records search of the surrounding area using the California Historic Resources Inventory System (CHRIS). _____ studies () have been conducted within a ____-mile radius and ____ site(s) was/were identified (_____). The site(s) is/are approximately _____ mile from the subject property. It (They) was/were recorded by _____ and is/are described as _____ (use tabular format if there are more than three).

Native American Consultation: No Sacred Lands were identified by the Native American Heritage Commission (NAHC). Staff contacted the Native American groups and individuals provided by the NAHC to further investigate whether they have knowledge of Sacred Lands occurring on the subject parcels. (No) response was received.

Sincerely,

Author/Principal Investigator Firm or Agency

Attachments

1. 7.5" USGS Topographical Map with Survey Area Identified
2. General Location Map
3. Project Plans with Survey Area Identified